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MEMORANDUM SUBMITTED BY MR. EDWARD N. BEROUTI,
SECRETARY, JAFFA AND DISTRICT INHABITANTS
COMMITTEE

We have appeared before you in Beirut and have submitted two memoranda. The main and basic demand has been and still is the return of the refugees as a whole and in particular those of our District. Upon this principle we cannot compromise.

We base our demand upon four grounds:

1. The natural right of every Palestinian citizen to return to his country and home. To this right there can be no substitute. We have heard that some sources have been toying with the idea of a transfer of population. This may have happened before in history but we strongly reject the idea and deny that there can be any analogy with our present case. Any past transfer of population was from a foreign country to the mother country and not vice versa as in the present case.
2. The humanitarian ground
The Commission has visited the refugee camps and seen for itself the appalling moral and material conditions under which they live.
3. A right arising by agreement.
The agreement of 13th May 1948 between the Commander of Haganah and the Jaffa Emergency Committee. The general tenor of the agreement shows that the Jewish occupation of Jaffa was to be of a temporary nature. We refer in particular to clauses 8 and 12 of instructions attached to agreement.
4. Finally we demand the application of paragraph 11 of the resolution of 11th December 1948.

We regret that too much emphasis has been laid upon the compensation provision of this resolution and submit that the main part is the return of the refugees to their homes. We cannot accept the principle of compensation as an alternative. To the right and return of refugees there can be no substitute. These are our views whatever may be the views of the authorities

or some or all of the Arab states, though we doubt not they adopt the same opinion.

We do not believe in compensation for what is in fact proposed is to pay compensation for a whole country which is impossible. The Jews own less than 10% of the area of Palestine. The compensation principle is to apply only where a refugee on his own free choice decides not to return.

Here we ask that:

compensation to be paid to the individual and not from state to state as the latter method will cause prejudice to the individual right.

We have also in Beirut and in our memoranda referred to some conservatory or urgent measures which we requested the Commission to take namely:

- a) The return of grove owners and of a sufficient number of labourers. This is a matter of days as the irrigation season began and the preparatives for the return involves delay
- b) Frozen assets in banks.

We request the release of these assets and submit that to keep them blocked is a vexatious measure as the currency involved is held outside Palestine.

These two measures have become most urgent and necessary since as we have heard unofficially the question of the return of the refugees has been linked on the agenda with other political matters, thus causing delay.

May we take the liberty to ask the Commission what steps have been taken in this regard?

- c) To stop the Jews from continuing to create conditions designed to prevent the return of the refugees and to call for the immediate evacuation of the premises.

There are two alternatives before you. Either the refugees return or some 850.000 people will perish. Jews have shown no conciliation but have obtained sofar all their demands.

I refer to the last paragraph of our memorandum dated the 9th instant and confirm our desire to be heard in connection with any proposed political solution affecting the area we represent.

PARTICULARS SHOWING THE AREA OF CITRUS UNDER CULTIVATION BEING OWNED BY PALESTINIAN ARABS AND THE NUMBER OF LABOURERS REQUIRED FOR THE CULTIVATION, UPKEEP AND IRRIGATION OF SAME.

1. There are about seven thousand registered Palestinian Arab owners of citrus groves.
2. The area owned by the above mentioned owners totals approximately 137.000 dunums.
3. In general, there are about 60 trees par dunum of citrus in Palestinian Arab groves.
4. Apart from irrigation, the ground cultivation, trimming and upkeep of the groves should be done and finished within the coming 100 days.
5. The general return of one labourer for all the necessary cultivation is six dunums per season.
We therefore submit that the number of persons whose entry into Palestine is demanded is as follows:

	<u>Number of persons</u>
Individual owners	7.000
Labourers for cultivation, irrigation and upkeep	23.000
Specialists for motors, pipes and other repairs	3.000
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	33.000
An average of 4 dependents for each of above mentioned	132.000
The total number of persons required	<hr/>
	165.000