

**Submission
No 137**

MEASURES TO PROHIBIT SLOGANS THAT INCITE HATRED

Organisation: Institute for the Study of Global Antisemitism and Policy (ISGAP)

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Legislative Assembly Committee on Law and Safety
Inquiry into Measures to Prohibit Slogans that Incite Hatred

Institute for the Study of Global Antisemitism and Policy (ISGAP)

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Executive Summary

This submission argues that effective regulation of hateful slogans requires a comprehensive understanding of the organisational and ideological infrastructure that facilitates their proliferation. Drawing on ISGAP’s extensive research into Islamist¹ organisational strategy and antisemitic discourse, we demonstrate that individual slogans represent specific manifestations of a broader, acceleratory process of ideological entrenchment known as *tamkeen*, in Arabic term meaning “settlement.” In Islamist political thought, it refers to the concept of Muslims gaining sufficient power, authority, or control to impose Islamic governance and law on society through a process of institutional entrenchment. Policy responses that address only enumerated phrases without accounting for this underlying dynamic will prove inadequate, as adaptive strategies will readily emerge to circumvent proscriptions.

We provide a detailed taxonomy of hateful slogans organised by type, including those with explicit historical violence as their referent, those employing coded or dog whistle meanings accessible primarily to Arabic speakers, and those constituting direct antisemitic abuse. We contextualise these slogans within recent Australian incidents demonstrating their real-world deployment and impact on community cohesion. Our recommendations address organisational infrastructure, linguistic expertise requirements, community engagement, and enforcement frameworks.

1. Introduction

The Institute for the Study of Global Antisemitism and Policy (ISGAP) welcomes the opportunity to contribute to this inquiry. ISGAP is the world’s foremost antisemitism research and policy institute, conducting rigorous academic research and policy analysis on matters relating to antisemitism, radical Islamist ideology, and their manifestations in the international context. Our work informs governments, universities, and civil society organisations across five continents.

¹ Here we are referring to Islamism the Political ideology and not Islam the religion/faith

This submission addresses terms of reference (a) through (d), focusing on our institutional expertise: the organisational and ideological infrastructure that facilitates the proliferation and normalisation of hateful rhetoric in Australia. While other submissions before this Committee may address legal and constitutional frameworks in detail, ISGAP offers a distinct analytical perspective grounded in our research on Islamist organisational strategy and the linguistics of antisemitic discourse.

We submit that policy makers must recognise two features essential to formulating effective responses: first, the acceleratory nature of hateful rhetoric, which follows predictable escalation patterns; and second, the role of external organisational entities in weaponising activism to undermine social cohesion. Without accounting for these dynamics, regulatory interventions will prove insufficient.

2. The Threat to Community Cohesion and Safety

2.1 The Acceleratory Nature of Hateful Rhetoric

Policy makers need to understand the gradual, contagious, domino-effect, snowball nature of rhetoric utilised by radical elements within activist networks internationally. Academic research demonstrates that such rhetoric follows a specific trajectory, becoming increasingly radical, aggressive, and overtly antisemitic as previous positions become normalised.² This pattern establishes a new “floor” of commonly accepted hateful speech after each escalation, rendering yesterday’s extreme rhetoric today’s mainstream discourse.

It is therefore insufficient to place specifically enumerated guardrails via penalties alone (which may prove difficult to enforce in practice) for particular speech acts. More pre-emptive measures are required to ensure safe, respectful discourse is encouraged while inflammatory antisemitic rhetoric is forcefully combatted. Effective policy must address the hostile and aggressive contextual environment, and the pernicious forces therein, in which those speech acts occur.

2.2 External Organisational Influence: The Role of Islamist Networks

The efficacy of policy interventions will depend significantly on the extent to which they account for the role that external organisational entities (including Islamist networks and nation states) play in weaponising activism and speech within the Palestinian rights movement to undermine social cohesion due to ideological or realpolitik considerations.

Simply prohibiting specific phraseology without accounting for these larger mechanisms will mean that new adaptive, chameleonic strategies will be readily adopted to circumvent proscriptions. Consider, for example, the use of “Zionists” or “Zios” as dog whistling

²Cary Nelson, *Hate Speech and Academic Freedom: The Antisemitic Assault on Basic Principles* (Boston: Academic Studies Press, 2024), 47–89.

substitutes for “Jews,” the deployment of Arabic-language slogans whose violent implications are opaque to non-Arabic speakers, or the use of puns and wordplay to evade detection while communicating the same hateful message to intended audiences.

2.3 The Concept of Tamkeen and Strategic Entryism

ISGAP’s November 2025 report on “The Muslim Brotherhood’s Strategic Entryism into Western Society: A Systematic Analysis” highlights the concept of **tamkeen** (Arabic: تمكين, lit. “enablement, empowerment”).³ Tamkeen refers to a deliberate process of institutional entrenchment of Islamist ideology designed to facilitate a “honeycombing”-style revolution from within the institutions of civil society, including within Muslim communities, protest movements, and the broader public arena.⁴

This strategy operates by shifting the Overton Window (the range of ideas found acceptable at a given time)⁵, thereby normalising radical Islamist discourse in public settings. It describes a camouflaged hostile takeover process by which Islamist organisations position themselves to shape their environment until they are sufficiently entrenched to advance wider ideological objectives.

Organisations such as Hizb ut-Tahrir (حزب التحرير, “Party of Liberation”) and Muslim Brotherhood aligned entities and individuals; the latter being notorious for concealed, resilient, long-term investment in soft power and under-the-radar radical Islamist influence - are central actors in this process.⁶ Hamas, which started as the Palestinian chapter of the Muslim Brotherhood, is a direct manifestation of this strategy. The specifically problematic phraseology identified in the Committee’s terms of reference is merely a specific manifestation of this larger, acceleratory process of tamkeen, which has been centrally facilitated via the coopting of the mass protest movement attending outrage over perceived injustices in the Israel/Palestine conflict.

3. A Taxonomy of Hateful Slogans and Their Linguistic Analysis

Effective policy requires a comprehensive understanding of the range of slogans employed, their historical referents, and their coded meanings. ISGAP offers the following taxonomy, drawing on our expertise in Arabic linguistics and Islamist discourse analysis:

³Institute for the Study of Global Antisemitism and Policy, “The Muslim Brotherhood’s Strategic Entryism into Western Society: A Systematic Analysis” (New York: ISGAP, November 2025), 12–34.

⁴Lorenzo Vidino, *The New Muslim Brotherhood in the West* (New York: Columbia University Press, 2010), 1–25.

⁵Joseph S. Overton, “The Overton Window of Political Possibilities,” Mackinac Center for Public Policy, accessed January 2026, <https://www.mackinac.org/OvertonWindow>.

⁶Matthew Levitt, *Hamas: Politics, Charity, and Terrorism in*

the Service of Jihad (New Haven: Yale University Press, 2006), 30–56.

3.1 Slogans with Explicit Historical Violence as Referent

- **“Khaybar, Khaybar, ya yahud! Jaish Muhammad soufa ya’oud!”** (خيبر خيبر يا يهود، جيش محمد سوف يعود, “Khaybar, Khaybar, oh Jews! The army of Muhammad will return!”)

This chant was recorded at the infamous protest at the Sydney Opera House forecourt on 9 October 2023, alongside explicitly antisemitic abuse including **“Fuck the Jews.”**⁷ It was coined by ██████████, founder of Hamas, in the 1980s. It references the Battle of Khaybar of 628 CE, when Muhammad besieged a pre-existent, established Jewish community in Khaybar in the Arabian Peninsula, resulting in the mass slaughter, and subjugation of some Jews.⁸ This chant amounts to an antisemitic, terroristic slogan that, on its face, potentially constitutes incitement to religious violence of the type enacted by the ISIS-aligned perpetrators of the Bondi Beach Hanukkah massacre, Sajid Akram and his son Naveed Akram, on 14 December 2025.⁹

Though such chants are relatively less common in the mass protest movement, they must come under severe penalty when they occur. It is also incumbent on stakeholders within the community, especially the Muslim community, who have theological legitimacy, to address the sources of perverse and warped religious ideology that radical-doctrinally justified antisemitism from which this reference originates.

- **“Globalise the Intifada” and any mention of “intifada”:** While proponents claim this term merely denotes “uprising,” its dominant meaning in contemporary political discourse is inseparable from the First and Second Intifadas (1987–1993; 2000–2005), which were characterised by sustained campaigns of suicide bombings, stabbings, and attacks deliberately targeting civilians, carried out by organisations including Hamas and Palestinian Islamic Jihad.¹⁰ In contemporary Australian contexts, particularly where the slogan is deployed alongside expressions that celebrate or legitimise terrorist violence, its meaning cannot reasonably be treated as abstract or indeterminate.
- **“There’s only one solution, intifada revolution”:** This phrase, used on the streets of Sydney and Melbourne, is not linguistically neutral. Its structure closely mirrors the language of the “Final Solution” (*Endlösung*)—a formulation utilised by Nazi Germany that is inseparable from the historical reality of genocide.¹¹ When combined with a term overwhelmingly associated with political violence, the slogan operates as a

⁷Gina Coote, “Pro-Palestinian Rally at Lakemba in Sydney Criticised for ‘Celebration’ of Attacks on Israel,” ABC News, October 9, 2023, <https://www.abc.net.au/news/2023-10-09/nsw-palestinian-rally-lakemba-sydney-israel-wong/102950238>.

⁸W. Montgomery Watt, *Muhammad at Medina* (Oxford: Clarendon Press, 1956), 209–216.

⁹Australian Federal Police, “Statement on Bondi Beach Incident,” Media Release, December 15, 2025.

¹⁰Benny Morris, *Righteous Victims: A History of the Zionist-Arab Conflict, 1881–2001* (New York: Vintage Books, 2001), 561–652.

¹¹Robert S. Wistrich, *A Lethal Obsession: Anti-Semitism from Antiquity to the Global Jihad* (New York: Random House, 2010), 761–812.

compressed reference to annihilationist outcomes, regardless of whether individual speakers articulate that intent explicitly.

- **“Birruh Biddam Nafdika, Ya Aqsa”** (بالروح بالدم نفديك يا أقصى, “With the soul, with the blood, we shall redeem/defend Al-Aqsa”): This pledge to sacrifice one’s life and blood explicitly glorifies violence and martyrdom, invoking the religious obligation to “defend” the Al-Aqsa Mosque through any means necessary, including self-sacrifice and martyrdom.

3.2 Slogans with Coded or Dog whistle Meanings

“From the River to the Sea (Palestine will be free)”: This phrase is often claimed to support the end of oppression and establishment of a Palestinian state. However, by specifically delineating the entire territory of the region, from the Jordan River to the Mediterranean Sea, it effectively calls for ethnic cleansing of Jews at minimum, and their genocide at maximum.¹²

This connotation is confirmed by common Arabic variants of the chant, which reveal meanings inaccessible to non-Arabic speakers:

- *min an-nahr ila l-bahr / Filastin sa-tatahharrar* (من النهر إلى البحر / فلسطين ستتحرر) — “from the river to the sea / Palestine will be free”
- *min il-mayye la-l-mayye / Falastin arabiyye* (من المية للمية / فلسطين عربية) — “from the water to the water / Palestine is Arab”
- *min il-mayye la-l-mayye / Falastin islamiyye* (من المية للمية / فلسطين إسلامية) — “from the water to the water / Palestine is Islamic”

The latter two variants represent clear dog whistles invoking Arabist ethnic cleansing or Islamist-motivated genocide of the type perpetrated against Sudanese Christians, or against Israelis at the Nova Festival site on 7 October 2023.¹³ Needless to say, well-wishing, charitable Australians who do not know Arabic are eviscerated of any basic understanding of such shrewdly and subtly aimed political messages that are intended for, and can only be understood by, Arabic speakers.

“Resistance by any means necessary”: This framing provides rhetorical cover for terrorism by treating all forms of violence, including the deliberate targeting of civilians, as legitimate “resistance.” It exploits ambiguity to legitimise actions that would otherwise be universally condemned as terrorism.

¹²David Patterson, *Anti-Semitism and Its Metaphysical Origins* (Cambridge: Cambridge University Press, 2015), 156–178.

¹³Meir Litvak and Esther Webman, *From Empathy to Denial: Arab Responses to the Holocaust* (London: Hurst & Company, 2009), 201–245.

3.3 Explicitly Antisemitic Slogans

- **“Where are the Jews?”** This phrase, echoing the hunt for Jewish victims during historical pogroms and the Holocaust, constitutes a direct threat implying violent intent toward Jewish individuals.
- **“Fuck the Jews” / “Screw the Jews”:** These constitute direct antisemitic abuse targeting Jewish people as a collective, documented at protests including the Sydney Opera House forecourt on 9 October 2023.

3.4 Religious/Ideological Terms Requiring Contextual Assessment

“Jihad”: While this term has multiple meanings in Islamic theology, including spiritual struggle, - in the context of pro-Palestinian protests glorifying violence, it functions as an invocation of a war against perceived enemies of Islam.

“Shahid” / “Martyr”: When used to glorify terrorists or those who have committed violence against civilians, these terms function to legitimise and encourage terrorism. The glorification of “martyrs” normalises the view that killing and dying while attacking civilians is not only acceptable, but is praiseworthy.

4. The Need to Protect Communities: Recent Australian Case Studies

The slogans catalogued above do not exist in isolation. They form part of a broader ecosystem of events, media operations, and education campaigns that propagate Islamist ideals, glorify terrorism, and promote charismatic figures who advance ideologies that are antithetical to liberal democratic principles. The following case studies demonstrate this dynamic:

4.1 The Bankstown “Glory to Our Martyrs” Event (8 October 2025)

On 8 October 2025, Hizb ut-Tahrir organised an event in Bankstown titled “Glory to Our Martyrs.” The promotional materials framed it as a celebration “honouring two years of *resistance*” on the anniversary of the 7 October 2023 terror attacks, clearly attempting to show support for those massacres and the overarching jihadist ideology of Hamas that motivated them.¹⁴

One of the main speakers, [REDACTED], was previously recorded in the hours following the 7 October attack stating: *“I’m smiling and I’m happy... I’m elated, it’s a day of*

¹⁴News Centre Australia, “Bankstown Pro-Hamas Rally Must Be Investigated for Advocating Terrorism,” October 9, 2025, <https://www.newscentre.com.au/releases.html?id=1034941>.

courage, it's a day of pride, it's a day of victory. This is the day we've been waiting for."¹⁵ At the Bankstown event, he made a passionate speech admiring "our Martyrs" as "thorns in the throat of Zionist sympathisers."

Another speaker, named ██████ referred to "taking back control of Muslim armies" in the Middle East and blasted US President Donald Trump's peace proposal. An utterance such as "Our Muslim armies, do you not see, do you not feel what is happening on the ground in Palestine?" could, to an ear trained in Islamist theology, sound like an oblique reference to the aforementioned Khaybar Khaybar ya yahud chant, especially when made at an event glorifying Hamas fighters (Hamas being the Palestinian chapter of the Muslim Brotherhood). As we have already noted, the founder of Hamas is the one who created that chant.

Such speeches and slogans propagated at an event featuring other signs and symbols glorifying Islamist violence, including placards with the Hamas inverted red triangle symbol (▼), which has been used in Hamas propaganda to denote the identification and targeting of individuals or locations and has since been banned by Meta (Facebook)¹⁶, and signs on children's clothes emblazoned with "Death to the IDF," represents a particularly egregious case of the climate of ideologically motivated and normalised hatred, demonization, and dehumanization that has begun to infuse some pro-Palestine events.

4.2 The Proliferation of Islamist Symbols at Mainstream Protests

Such symbols and slogans have also become increasingly prevalent in the larger protest events. Examples include the well-documented presence of Islamist flags and posters of the Iranian Supreme Leader ██████ (Iran being a main funder of Islamist terror worldwide, including Hamas, Hezbollah, and Palestinian Islamic Jihad)¹⁷ clearly visible adjacent to prominent members of the Palestinian activist movement, including sitting members of NSW State Parliament and former Premier and Foreign Minister Bob Carr, and the Lord Mayor of Sydney during the Sydney Harbour Bridge March on 3 August 2025, and reproduced in subsequent media coverage.¹⁸

4.3 Implications for Community Safety

The cumulative effect of this climate of hatred, demonization, and dehumanization is a degradation of civic trust. Religious institutions operate under heightened security, individuals conceal markers of identity, and self-censorship becomes a rational response

¹⁵Coote, "Pro-Palestinian Rally at Lakemba."

¹⁶Meta Platforms Inc., "Updates to Our Policies on Violence and Incitement," Transparency Center, November 2024, <https://transparency.fb.com/policies/>.

¹⁷ US Treasury Department, "Iran's Support for Terrorism Worldwide," Office of Foreign Assets Control, 2024.

¹⁸ Australian Associated Press, "Thousands March Across Sydney Harbour Bridge in Pro-Palestine Protest," *The Guardian Australia*, August 3, 2025.

to perceived risk.¹⁹ The Bondi Beach Hanukkah massacre, which targeted Jewish civilians did not emerge in a vacuum. It occurred within an environment in which extremist narratives and violent rhetoric were allowed to circulate with limited challenge.²⁰

5. Policy Recommendations

Drawing on ISGAP’s research into Islamist organisational strategy and the dynamics of antisemitic discourse, we offer the following recommendations structured around four key areas:²¹

5.1 Addressing Organisational Infrastructure

1. Intelligence and security agencies should adopt better national strategies that address nonviolent extremist influence operations within legal constraints, with particular attention to the tamkeen strategy of institutional entrenchment.
2. Security agencies must restore and expand their capacity to analyse the ideological dimensions of extremist movements, including the role of foreign state and non-state actors in facilitating domestic radicalisation.
3. Clearer and more appropriate definitions of violent and nonviolent extremism should be developed, with analytical frameworks that distinguish ideological movements hostile to democracy from legitimate political dissent.

5.2 Linguistic and Cultural Expertise

1. Clear operational guidance should be issued to police, prosecutors, and courts on identifying historically violent, coded, or dog whistling rhetoric, with specific reference to Arabic-language slogans and their meanings.
2. Specialist Arabic-language expertise, particularly in Islamist rhetoric and terminology, should be made available to law enforcement and prosecutors to ensure that coded messaging in non-English languages does not evade regulatory frameworks.
3. Legal thresholds should be clarified to permit consideration of cumulative factors, including historical meaning, context of use, proximity to violence, and impact on targeted communities, rather than relying solely on dictionary definitions.

¹⁹ISGAP, “Muslim Brotherhood’s Strategic Entryism,” 45–67.

²⁰Gabriel Weimann, *Terror on the Internet: The New Arena, the New Challenges* (Washington, DC: United States Institute of Peace Press, 2006), 45–78.

²¹Executive Council of Australian Jewry, *Report on Antisemitism in Australia 2024* (Sydney: ECAJ, 2024), 34–56.

5.3 Community Engagement and Education

1. Stakeholders within Muslim communities who have theological legitimacy and are not aligned with Islamist ideology should be identified, supported, and empowered to address the sources of perverse and warped religious ideology from which radical-doctrinally justified antisemitism and many of these slogans originate. Current consultation frameworks should be reviewed to ensure that voices representing non-Islamist mainstream Islam are prioritised over those with Islamist sympathies.
2. Regular consultation, weekly or monthly, with affected communities should inform policy refinement, ensuring that regulatory approaches reflect lived experience and empirically grounded harms.
3. Institutions, both governmental and civil society, need to strengthen their resilience against systematic influence operations designed to shift the Overton Window toward acceptance of extremist discourse.

5.4 Legislative and Enforcement Framework

1. Legislatures should reform anti-discrimination laws to prevent exploitation while maintaining protections for individuals, ensuring that regulatory frameworks cannot be weaponised to silence legitimate criticism while remaining effective against genuine incitement.
2. Proportionate civil or administrative responses, such as protest conditions or targeted penalties, should be available where slogans with violent referents are repeatedly used, without criminalising protest as a whole.
3. Independent oversight mechanisms should monitor enforcement to ensure consistency, proportionality, and insulation from political pressure.

6. Conclusion

ISGAP welcomes the NSW Government's intention to recognise the harms that specific language and rhetoric concerning the Israel/Palestine conflict can play in undermining Jewish safety and social cohesion in Australia more generally. However, we urge policy makers to recognise that individual slogans are manifestations of a larger, acceleratory process of ideological entrenchment and strategies to promote this.

Effective policy must address not only the specific utterances but also the organisational infrastructure and strategic dynamics that facilitate their proliferation and normalisation. Without accounting for these deeper mechanisms, new adaptive strategies will readily emerge to circumvent whatever specific prescriptions are enacted.

The slogans and symbols catalogued in this submission are not merely offensive language. They are functional components of a broader strategy designed to normalise violent

ideology, intimidate targeted communities, and erode the foundations of a shared civic environment grounded in mutual security and respect. The Committee's work in addressing these challenges is vital to protecting Australian communities and democratic values.

ISGAP stands ready to provide further expertise and research to assist the Committee in its deliberations.

For further information, please contact:

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