## JERUSALEM PAPERS

## THE PERILS OF CONTAINMENT\RESTRAINT IN ISRAEL'S NATIONAL SECURITY BEHAVIOR

**EFRAIM INBAR & MENACHEM BACHARACH** 





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#### **INTRODUCTION\***

In recent decades, Israel has often displayed containment\restraint in its national security behavior, preferring to restrain its reactions to provocations rather than escalating the conflict. As such, it refrained from mounting preemptive/preventive strikes. Foreign policy and domestic considerations, reluctance to rule over hostile populations, casualty aversion, changes within the IDF military brass, and misperceptions of modern warfare are at the core of this phenomenon. Both access to missile production and the development of technologies for intercepting high-trajectory fire contributed to the proclivity for restraint. Yet containment erodes deterrence, allows the adversary time for a military build-up and routinizes its use of force; allows incremental increases in acceptable doses of violence against Israel, undermining international legtimacy for strong military reactions.

Israel's security doctrine has always been based on three pillars: deterrence, early warning, and decisive victory. These were intended primarily to deal with an existential threat posed by neighboring Arab countries. For Israel, a decisive victory means the destruction of the enemy's forces and/or the degradation of its capabilities to harm Israel for an extended period. Decisive victories and periodical displays of military force are required to strengthen cumulative deterrence, the goal of which is the postponement of the next round of violence. Israel realized it could not do what the Americans did at the end of World War II when the political systems of Germany and Japan were reengineered after those countries were defeated and surrendered. Forcing its neighbors to accept peace was beyond Israel's power.

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After the Second Lebanon War (2006), a fourth component was added: defense, mainly from high-trajectory fire. A fifth emerged as the Begin Doctrine: the prevention of existential threats such as the development of a nuclear weapons infrastructure.<sup>1</sup> Additional elements such as the reliance on the (informal) alliance with the US and Israel's technological superiority were noted in the 2018 document entitled "IDF Strategy."<sup>2</sup>

Based on its national security doctrine, Israel has traditionally not hesitated to escalate military confrontation in order to restore deterrence and delay further hostilities as much as possible. It has responded to attacks on its territory and civilians with reprisals across the border, even embarking on full-blown wars—the Sinai Campaign (1956) and the Six-Day War (1967). In recent years, the Israel Defense Forces (IDF) has conducted its "Campaign between the Wars" in Syria, which leans primarily on air strikes aimed at preventing Iranian entrenchment in Syria and the transfer of game-changing technologies to Hezbollah. In the wake of the Hamas massacre in southern Israel on October 7, 2023, Israel went to war in Gaza.

Yet despite becoming the supreme regional power in recent decades, Israel has often behaved with restraint and opted to contain provocations against it rather than pursuing strategies with the potential for escalation and for attaining decisive victory. Containment/restraint [*hachala* in Hebrew] became part of the Israeli defense repertoire.

We will begin with several examples of containment by Israel followed by an analysis of the logic behind the choice of that strategy, which could have a detrimental effect primarily on deterrence. The most recent example of the erosion of Israeli deterrence is the Hamas assault on October 7. Hezbollah's decision to join the war, albeit in a limited way, also reflects a reduction in Israel's deterrence capacity. The present war in Gaza perhaps represents the beginning of a return to the original foundations of Israel's security doctrine.



#### **PAST CONTAINMENT EVENTS**

A striking example of Israeli containment/restraint is the lack of response to the missile fire from Iraq during the First Gulf War in 1991. Despite the loss of life and damage to property, Israel, under pressure from the US, demonstrated restraint. Contrary to other voices in the Israel Defense Forces (IDF), Chief of Staff Lt. Gen. Dan Shomron suggested tha a policy of containment be adopted, and the Prime Minister Yitzhak Shamir took his advice. Shamir later admitted that this decision was one of the most difficult he had ever made.<sup>3</sup>

The two Lebanon wars (1982 and 2006) also erupted only after repeated attacks against civilians, the abductions of soldiers, and rocket fire from Lebanon into Israel. On June 6, 1982, Israel mounted a large-scale invasion of Lebanon to push back the sources of fire. Additional considerations included weakening the PLO and an attempt to change Lebanon's political reality.

Indeed, the Lebanese arena has provided numerous examples of Israeli containment. For example, in 2000, as a result of Katyusha rocket fire on Israel, Foreign Minister David Levy threatened that "the land of Lebanon [would] burn in flames..."<sup>4</sup> As Prime Minister and Defense Minister Ehud Barak famously said immediately after the unilateral withdrawal from Lebanon in May 2000, "If a hair falls from the heads of any of our soldiers, Lebanon will burn." Yet in October of that year, Hezbollah kidnapped and killed three Israeli soldiers and the IDF nevertheless responded with a pin-point attack to prevent escalation. At a cabinet meeting on October 9, Barak said: "[We] reserve the right to respond at the time we see fit...."<sup>5</sup>

This formula, along with threats by leaders, became a typical Israeli response to Hezbollah's provocations. After an attempted abduction of soldiers in November 2005, Prime Minister Ariel Sharon and Defense Minister Shaul Mofaz consulted with IDF Chief of Staff Lt. Gen. Dan Halutz, who recommended that they "contain the event."<sup>6</sup>



The Winograd Commission, established to investigate and draw lessons from the Second Lebanon War, determined: "Despite explicit and unequivocal threats, since the withdrawal in 2000, Israel has responded to Hezbollah's attacks in a limited and measured manner, to contain every incident and bring it to an end as quickly as possible....<sup>"7</sup> The Commision found that despite criticism of the containment policy levied by IDF commanders, there was no real attempt by senior military brass to challenge the political echelon on this issue. Moreover, the military did not initiate a systematic analysis of the advantages and disadvantages of the containment policy and did not advise the government to conduct thorough deliberations on the issue.<sup>8</sup> Containment/restraint has become the main preference of the political echelon, and the IDF senior command has readily adapted to that mindset.

On July 12, 2006, dozens of Hezbollah terrorists launched a coordinated attack under the cover of a heavy artillery barrage on the northern Galilee, during which three soldiers were killed, three were seriously wounded, and two were abducted. It was only after this blow that the IDF embarked on the operation that would become known as the Second Lebanon War.

Even when Hezbollah launched drones at the Karish gas drilling rig (July 2022) and toward northern Israel, the IDF contained these attacks. In 2023, Hezbollah fired anti-tank missiles at the border fence and succeeded in dismantling some of the equipment attached to it; fired missiles at Israel; dispatched a terrorist who placed a powerful improvised explosive device (IED) on a civilian traffic route; and patrolled along the border in violation of UN Security Council Resolution 1701 of 2006. None of this led to an Israeli response.

The best-known statement in favor of containment was made by Sharon on June 3, 2001: "Restraint is also an element of strength."<sup>9</sup> He then addressed criticism of Israel's response to the Palestinian terror campaign that began in the fall of 2000 known as the Second Intifada. From the end of September 2000 until the beginning of 2002, there were almost seven thousand attacks in which two hundred forty-four Israelis were killed and many hundreds were wounded.



Israel exercised great restraint because it saw the Palestinian Authority (PA) as a partner for peace, and because of the Pavlovian response of the international community, which routinely called for restraint. It was difficult to move from a state of cooperation with the PA to the recognition that a violent confrontation with the Palestinians was underway.

The catalyst that led for a shift away from the policy of containment and the launch of Operation Defensive Shield was the suicide bombing at the Park Hotel in Netanya on March 27, 2002, in which thirty Israelis were killed and 140 were wounded. The IDF invaded most of the major cities controlled by the PA and cleared the area of terrorists. This operation, and subsequently the work of the IDF and Shin Bet, created a new, more tolerable security reality. Israel was successful in foiling the attempts of over 90 percent of would be suicide bombers and in destroying almost all terrorist cells

Gaza is another arena in which Israel has shown restraint for protracted periods of time. The firing of rockets and mortar shells; the launching of explosive balloons, incendiary kites, and drones; and the constant digging of attack tunnels from the Gaza Strip toward Israel did not elicit immediate or wide-ranging responses. This was the case despite Sharon's solemn declaration of August 31, 2003, after mortar shells were fired at Sderot that "[nearby] Ashkelon will not become a front line."<sup>10</sup>

Only after extensive rocket fire, harm to civilians, and interruptions of daily life in Israel did the IDF launch several ground operations—but not an all-out war—to reconquer Gaza and put an end to Hamas rule. Over time, Hamas increased its missile range, putting even more Israelis in danger. Yet Israel employed a strategy of containment even in situations in which hundreds of thousands of its civilians were compelled to seek shelter from attacks. This was clearly a deterrence failure.

Only in extreme cases in which Israel could no longer contain such attacks did it go on the offensive. On July 17, 2006, during the Second Lebanon War,



Prime Minister Ehud Olmert explained to the Knesset: "There are moments in the life of a nation when it must ...say: Enough is enough."<sup>11</sup> The same happened after the October 7 massacre. The Hamas assault on communities near the border with Gaza, which resulted in some 1,200 dead and the abduction of 240 individuals - men, women, elderly, and children - left Israel with no choice but to embark on a war to destroying the military infrastructure of that organization.

#### THE REASONS FOR CONTAINMENT/RESTRAINT

An examination of domestic, regional, and geopolitical considerations could shed light on Jerusalem's predilection for containment/restraint. Like other small states, Israel does not always have the freedom to act with all its military might. Of particular importance is the support of the Americans. Israel did not go to war in 1967 until it concluded that the US would not object. In 1973, Israel decided against a preemptive air strike because of perceived American opposition. The decision to launch the First Lebanon War in 1982 was made after Jerusalem understood that Washington had given it a "yellow light."

American opposition also prevented a past attempt at a large-scale military operation in Gaza in April 2001. At that time, Sharon informed Washington that rocket fire on Sderot had crossed all red lines. He ordered the IDF to invade the Gaza Strip with the declared aim of putting a stop to the mortar fire and compelling enemy to redeploy the rockets to a place from which they could no longer reach Israel. Yet after the commander of the Gaza division announced that the IDF would remain there for months if necessary, American pressure led to the withdrawal of Israeli forces within twenty-four hours. Even the conduct of the current war on Hamas has been influenced by Washington. For example, the Americans insisted that Israel allow the transfer of food and fuel into Gaza. As a result, Hamas has been strengthened and the war prolonged.

Jerusalem has long believed that a policy of containment, which essentially means absorbing attacks and casualties, is a tool for building legitimacy overseas. Domestically, it can be used to justify military action at a later stage.



Because images of war are universally accessible in real time, the dimension of legitimacy has become more important.<sup>12</sup> Unfortunately, there is often a correlation between the Israeli blood spilled, the extent of the destruction within the country, and the understanding abroad of subsequent Israeli military responses.

Another reason for Israel's inclination toward containment is that the decision to launch a war or a large-scale military operation is always a gamble, and the possibility of failure hovers over decision-makers. No leader wants to be identified with an unsuccessful war—something that can bring down a government. Golda Meir was forced to resign in 1974. Olmert faced a steep decline in popular support after significant shortcomings were revealed in the conduct of the war in 2006. These risks increase the chances that politicians will adopt a policy of containment. The long-serving Prime Minister Benyamin Netanyahu is well known for his risk aversion and caution regarding the use of force.

Garnering legitimacy for the use of force is necessary to justify the costs even if the war or military operation ends successfully. Here, too, the period of restraint preceding such action is used to build domestic support for a military response.

The perceived "Lebanese quagmire" following the Israeli invasion in 1982 was one of the reasons for the policy of containment vis-à-vis Lebanon after Israel's unilateral withdrawal n May 2000.<sup>13</sup> Moreover, casualty aversion has a restraining effect. The Winograd Commission noted that the government also feared exposing the civilian population in the north to rocket fire because of the protective shelters were in poor shape and the civilian emergency services were not fully prepared. In addition, the government valued the economic prosperity in the north -- particularly the tourist industry, which was vulnerable to vacillations in the security situation.<sup>14</sup> It is also difficult to justify losses in a preemptive or preventive war the goals of which are not broadly supported and/or do not appear achievable. This is true both in Israel and elsewhere.<sup>15</sup>



The belief that Israeli society is very sensitive to casualties guided the behavior of the political and military leadership. Apprehension regarding loss of life grew stronger during the First Lebanon War as it dragged on with no discernible purpose and with mounting fatalities (about 500). In 1983, protest movements emerged to urge Israel to pull the IDF out of Lebanon.<sup>16</sup> The Parents Against Silence and Four Mothers movements gained popularity and significantly influenced the May 2000 decision to withdraw the IDF from the security zone in Lebanon.

Since then, the national security establishment has introduced casualty aversion into its calculus regarding ground operations. Lt. Gen. (res.) Moshe "Bogie" Ya'alon recalled that ahead of Operation Defensive Shield (April 2002) to retake Palestinian cities, the IDF hesitated due to fears of heavy losses.<sup>17</sup> After the 2006 Lebanon War, Maj. Gen. (res.) Elazar Stern complained of excessive sensitivity to loss of life and revealed that the IDF had stopped fighting in one battle after suffering several casualties.<sup>18</sup> Israel's restrained responses to rocket attacks from Gaza after the strip was taken over by Hamas were similarly affected by this consideration.

Of course, Israeli society is less casualty averse than the leadership realizes, as its response during the current war war amply demonstrates. Reservists reported in great numbers and with tremendous fighting spirit, while civil society displayed enormous social resilience and ingenuity. A cursory review of the eulogies for the fallen soldiers reveals a striking degree of patriotism.

Paradoxically, peace treaties with the Arab states—achieved in large measure because of Israel's military superiority—have resulted in the restriction of Israel's freedom of action. In the past, when Egypt was an enemy, "What will Cairo say?" was not of high priority. Nowadays, however, Israel needs to give greater consideration to Egyptian concerns. Indeed, in the current war, it made known to the Egyptians its intentions to seize the Philadelphi Corridor along the Gaza–Egypt border. Similarly, it takes into consideration Amman's sensitivities to Israeli moves in the West Bank and Jerusalem. Relations with



Jordan—the country with which it shares its longest border and which serves as a buffer zone in the east—are of great importance.

The initial restraint demonstrated by the IDF in the face of Palestinian terror in the aftermath of the 1993 Oslo Accords and the 1995 transfer to the PA of the cities designated in the agreement stemmed mainly from the expectation that the peace process would succeed. Yasser Arafat was seen as a peace partner rather than an enemy scheming to use the peace process to eliminate Israel.

Another reason for opting for containment/restraint was the significant decline in threat perception. Following the peace treaties with Egypt and Jordan, and, later, the so-called Arab Spring, existential threats of a conventional nature seemed to evaporate. Indeed, the IDF has shrunk in size, in part because of economic constraints, but also because of the belief that no Arab army could invade the country and defeat it. The fear that security incidents would lead to an escalation and a subsequent military invasion has disappeared. Conspicuous military superiority enables containment, the price of which is an erosion of deterrence.

In the twenty-first century, the power of Hezbollah or Hamas to threaten the territorial integrity of the state was considered limited. The events of October 7 were unforeseen, and the fear of a Hezbollah invasion of northern communities is very new. Although the chances that high-trajectory fire could be aimed at Israes have greatly increased, and that such an attack would exact a heavy toll on the country, neither Hezbollah nor Hamas was seen as posing existential threats. Therefore, there was little perceived need for an immediate, harsh response is reduced. Waiting for a convenient time to teach the enemy a lesson seemed to be a reasonable alternative.

The IDF believed that Hamas could be dealt with by employing a "mowing the grass" strategy,<sup>19</sup> which is implemented under the assumption that restraint garners legitimacy. The inevitable military response to serious provocations was only intended to degrade the enemy's military capabilities until such time



as Israel was again required to act. It also compelled the enemy to make the investment in time and treasure for defense and to rebuild lost capabilities. However, defining Hezbollah and Hamas as terrorist organizations does not adequately reflect the threat they pose, as they have highly motivated armies equipped with more missiles than most militaries in the world.

Those missiles had a deterrent effect on Israel. The economic cost of being subject to missile attacks during periods of escalation and the fear of civilian losses restrained Israel's military reactions. At the same time, the development of anti-missile weapon systems such as the Iron Dome and David's Sling has to some extent allayed Israeli fears of the threats posed by missile arsenals beyond the country's borders. The ability to minimize the damage and especially the loss of life provided the political echelon with breathing space and reduces public pressure to retaliate. Containment thus became a politically acceptable option.

In recent years, there has been reluctance to initiate a large-scale ground incursion because the political leadership was skeptical of the IDF's readiness for such an operation.<sup>20</sup> As a result of the reduction in threat perception and the belief that large-scale wars were a thing of the past, the IDF cut back on its order of battle, particularly in the ground forces and the training of its reserves.

Former IDF Chief of Staff Aviv Kochavi's effort to formulate a "concept for victory" attests to the attempt to deal with the doubts regarding the IDF's ability to attain a decisive victory on the battlefield.<sup>21</sup> Since, in the assessment of the chief of staff and other senior commanders, the IDF had not yet prepared for an extensive ground operation, it preferred to adopt a strategy of containment.<sup>22</sup> Whenever there was a need to respond militarily, Israel carried out surgical air strikes, which minimized the use of ground forces. This preference prevailed until October 7. It then became evident that the IDF had not prepared for such a war, as the shortages of personnel and ammunition in 2024 indicate.

Yet another reason for restraint has been the concern that a ground incursion would entail complex combat scenarios involving friction with a hostile local



population and responsibility for its welfare. Israel's withdrawal from Lebanon and Gaza, and its willingness to withdraw from territories in the West Bank, stem from its reluctance to rule over foreign populations. Indeed, Israel announced at the outset of the current war that after eliminating the Hamas military infrastructure, it had no plans to remain in Gaza.

To be sure, friction with local Gazans could lead to casualties among IDF soldiers, which were likely to be problematic at home. Moreover, fatalities among noncombatants caught in the crossfire could elicit international criticism. One instructive example was in Operation Grapes of Wrath on April 18, 1996, when four artillery shells deviated from their targets, hitting a concentration of refugees and a UN force stationed in the Kafr Qana area in southern Lebanon, and several civilians were killed by Israeli fire elsewhere. This sparked global outrage, leading to a UN Security Council resolution on April 25 demanding an immediate end to the operation. Israel complied within two days. Media manipulation by Hezbollah and Hamas drives international criticism of Israel and leads to the loss of legitimacy. Currently, such criticism has mounted in the face of the destruction in Gaza and the misfortunes of its people, images of which have been disseminated all over the world in real time. Containment exempts Israel from the risks inherent in military action aimed at eradicating Hezbollah or Hamas.

A policy of containment in the Lebanese and Palestinian arenas also arises out of Israel's strategic priorities. Preventing Iran from going nuclear—an existential threat—is among Israel's vital interests. Jerusalem does not want to be distracted by engaging other arenas in which complications could arise that divert resources from its primary focus. Containment in the Lebanese arena after the withdrawal in 2000 was inter alia a result of the need to focus on the Palestinian one.<sup>23</sup> After Operation Guardian of the Walls (May 2021) during which tsegments of the Israeli Arab population rioted, concern grew over the possibility of a further front—the internal one—for which the country was unprepared. The potential for hostilities in other theaters, as a result of a Gaza encounter reinforced Israel's tendency to contain Hamas.



The separation of Gaza from the PA in the West Bank after the June 2007 Hamas coup weakened the hostile Palestinian national movement, a situation that successive Israeli governments wished to preserve. Israel preferred a weak Hamas, and containment was believed to serve this purpose. In parallel, Israel continued to supply water and electricity to Gaza and facilitated the flow of goods to and from the strip (under security scrutiny). Moreover, Israel approved the transfer of millions of dollars to Hamas from Qatar to prop up the Islamist group's hold on Gaza.

In line with its "mowing the grass" strategy, Israel initiated only two ground operations: Cast Lead in December 2008–January 2009; and Protective Edge from July 17–August 4, 2014. The main objectives of these actions were to cripple the military capabilities of Hama and deter it from perpetrating further attacks. Neither toppling Hamas in Gaza nor retaking the entire Gaza Strip was an objective of these missions. These incursions did not prevent subsequent rearmament and buildup, which necessitated the continued implementation of the "mowing the grass" policy. Yet the goal of keeping Hamas weak was not attained. In the aftermath of October 7, the deterrence failure as well as the immense underground infrastructure built under Israel's nose is mindboggling. Apparently Israel did not "mow the grass" short enough.

It seems that changes within the cadre of IDF officers further led to hesitation in launching campaigns aimed at decisive victory. At first, as a young army with roots as a militia, the organizational culture in the IDF was informal, emphasizing initiative, deception, and offensive operations. Moshe Dayan famously remarked upon his preference for galloping horses over lazy mules. After the Yom Kippur War (October 1973), the IDF grew considerably in the wake of the lessons learned and the accelerated military build-up in the neighboring Arab countries.<sup>24</sup>

Parallel to its expansion, the IDF underwent processes of bureaucratization and professionalization like other large armies. As technology has become more important, different kinds of officers were promoted. The introduction of



greater legal oversight of IDF operations has also acted as a brake on offensive initiatives. The military leaders produced by such an army are no longer the "fighting heroes" who welcome action and are willing to take risks and sacrifice their life, but rather the "managers" who operate large frameworks and succeed in integrating various components of military might.<sup>25</sup> All modern armies face the challenge of preserving valor and a fighting spirit. After the Second Lebanon War (2006), there was much criticism of IDF commanders who conducted the war from behind their plasma screens instead of leading their forces into battle. The changing nature of the cadre of the IDF officers and their interactions with a cautious political echelon made containment a more attractive option.

#### CONCLUSION

For some three decades, Israel has tended to implement a strategy of containment while minimizing the importance of decisive victory. Containment/restraint has become a component of Israel's security behavior. Each of the reasons listed above for the country's preference for containment curbed thinking oriented toward offense, but the weight of those considerations in the decision-making system changes from time to time. Foreign policy and domestic considerations, and the desire to avoid prolonged rule over hostile populations—as well as the development on the one hand of technological capabilities to produce missiles, and the technological progress to intercept them, on the other —have all worked in favor of the preference for containment over decisive victory. Changes within the IDF and in the perception of war have also influenced the preference for containment. That strategy is a logical alternative that serves political and strategic interests.

The problem is that over time, exercising containment/restraint conveys weakness and aversion to military confrontationin a region with a political culture that values the use of force. Indeed, it is part and parcel of the rules of the game in the Middle East, which is something that is not well understood



in the West. The greatest disadvantage of containment is the damage to Israel's capacity for deterrence. After all, fear is the best political currency in the Middle East. Moreover, an erosion of deterrence brings the next round of violence closer.

The public's casualty aversion, which has been internalized by IDF commanders and which increases the inclination to avoid offensive initiatives, is also perceived by Israel's opponents as weakness, something that further erodes Israel's deterrence.

Additionally, containment/restraint allows the enemy time for force buildup and thus creates a greater future risk to Israel. Over the years, Jerusalem has allowed Hezbollah to acquire a huge missile arsenal that has deterred Israel from acting against it in Lebanon. Hezbollah's missiles did not "rust," as former Chief of Staff Yaalon predicted at the turn of the millennium, and they caused enormous damage in the 2006 Second Lebanon War.

Similarly, Israel was satisfied with the formula of "quiet for quiet" in Gaza, which spared the Israeli population from missile attacks, but gave Hamas time to buttress its regime and build up its forces without interference. The Hamas attack of October 7 indicates that over time, containment and a reticence to take action in order to preserve quiet along the borders lead to much higher costs than taking initiative.

Moreover, the policy of restraint normalizes the use of force by Israel's adversaries. The world got used to missiles raining down on Israel's population, and Israel's success in intercepting them undermined its legitimacy to respond. Moreover, restraint allows the "acceptable" doses of violence against Israel to increase incrementally. Hamas gradually extended the range of its missiles, putting an increasing number of Israelis on alert and making their lives miserable. The payload of its warheads also increased.



Containment that seems successful over time also causes complacency and failures in deterrence. In Gaza, it produced conditions that led to a calamitous strategic surprise.

The Israeli political leadership went along with the policy of containment despite the frustration among the Israeli public which expected the IDF to deliver a strong riposte. Instead, what they saw was a strong IDF that is used sparingly. This undermines trust and even creates an uncomfortable feeling that the lives of soldiers are more important than the lives of civilians on the home front. Citizens expect the state to fulfill its social contract with them, at the core of which is the ideat that the state is obliged to protect them.

Israel does not have the luxury of dispensing with the use of preemptive strikes, which were a core element of its original doctrine. In certain situations, there is considerable strategic sense to such operations, despite the inherent risks involved. Of course, whatever the merits of the strategy of containment, it, too, is not without risk. Today Israel is paying a staggering price for its delay in mounting a strong military response to previous provocations, which would have instilled fear in its enemies. Determining to what extent force should be used is not easy. In the wake of the events of October 7, it appears that Israel demonstrated an overreliance on containment and that a better balance between that option and the use of force must be reestablished. Kicking the can down the road is rarely a prudent course of action.



## NOTES

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