



وصول
معاً من أجل الحقوق



FEARS OF CIVIL SOCIETY ORGANIZATIONS AMID GOVERNMENT RESTRICTIONS

THE PRESSURE OF THE LEBANESE GOVERNMENT
ON THE CIVIL SOCIETY ORGANIZATIONS WORKING WITH SYRIANS REFUGEES



FEARS OF CIVIL SOCIETY ORGANIZATIONS **AMID GOVERNMENT RESTRICTIONS**

THE PRESSURE OF THE LEBANESE GOVERNMENT
ON THE CIVIL SOCIETY ORGANIZATIONS WORKING WITH SYRIANS REFUGEES

Researchers: Marielle Hayek - Mohammad Hasan - Nabila Al Hamwi
Contributors: Eid El khodor - Layan Al Dani
Review and Editor: Marielle Hayek
Legal review: The team at the Syrian Legal Development Programme
Translation: Catherine Akkoul
Designer: Ahmad Laila

The ACHR team does its utmost to respect the standards of impartiality, objectivity, accuracy and validity of the information included in its publications and its releases, despite the serious challenges that the team could face while finalizing the reports and research papers, at the very least, the researchers and the team who participated in the completion of the work having their safety threatened or undergoing harassment or arbitrary prosecutions by the Lebanese security services. However, ACHR chooses legal terms accurately, as it has been customary of the Lebanese security services to harass and prosecute human rights activists residing in Lebanon whether they are Lebanese or Syrians or of other nationality, who are publicly challenging the ongoing systematic official violations committed against Syrians refugees in Lebanon. This harassment ranges from arbitrary summons to investigation centers without any respect for the applicable legal procedures (without basing these summons on a decision issued by the Public Prosecution or any other Judicial authority) where they are deprived of legal rights guaranteed to them by Article 47 of the Lebanese Code of Criminal Procedure (the right to contact their relatives and a lawyer) and depriving Syrians and foreign activists from obtaining or renewing legal residency permit in Lebanon. Noting that the General Directorate of the Lebanese Public Security officially showed this policy of permit residence deprivation in a statement published on its official website on 17 June 2019 threatening the organizations that have condemned the procedures of deporting Syrian refugees stating that it is "taking all legal actions and reviewing the competent judiciary to stop the workers and employees of this or that organization." The Ministry of Social Affairs recently issued a plan for the return of refugees, approved by the Council of Ministers on 14 July 2020, containing a large number of contradictions and human rights violations, in addition to decisions and procedures that would restrict civil society organizations actively working with refugees.



EXECUTIVE SUMMARY	5
RESEARCH METHODOLOGY	9
INTRODUCTION	11
THE ROLE OF CIVIL SOCIETY AND NON-GOVERNMENTAL ORGANIZATIONS	14
REFUGEES' CONDITIONS AND THE CIVIL SOCIETY ACTIVISM IN THE EARLY DAYS OF THE REFUGEE CRISIS	15
THE EMERGENCE OF ORGANIZATIONS AND THE EXPANSION OF CIVIL SOCIETY INITIATIVES	17
INTERNATIONAL GRANTS, AID AND DONATIONS PROVIDED TO LEBANON	20
PLEDGES, AIDS, DONATIONS AND GRANTS IN THE INTERNATIONAL CONFERENCES	22
GRANTS PROVIDED BY THE EUROPEAN UNION	23
LEBANON SYRIAN CRISIS TRUST FUND	24
THE LEBANON HUMANITARIAN FUND	24
THE POLICIES OF THE LEBANESE GOVERNMENT IN THE MANAGEMENT OF THE REFUGEE FILE	26
CHALLENGES FACED BY CIVIL SOCIETY ORGANIZATIONS SINCE THEIR ESTABLISHMENT	32
CHALLENGES IN ACCESSING FUNDING	33
THE CHALLENGES IN PROJECT IMPLEMENTATION	34
PROSECUTION AND HARASSMENT OF CIVIL SOCIETY WORKERS	35
LOCAL AND INTERNATIONAL LAWS PROTECTING ASSEMBLIES	37
THE INTERNATIONAL CONVENTIONS PRESERVING THE FREEDOM OF ASSOCIATIONS	38
THE LOCAL LAWS PROTECTING THE FREEDOM OF ASSOCIATIONS IN LEBANON	41
CONCLUSION AND RECOMMENDATIONS	47
COPIES OF THIS RESEARCH PAPER SENT TO	51
REFERENCES	52

EXECUTIVE SUMMARY





This research paper was issued by Access Center for Human Rights on the pressures exerted by the Lebanese Government on civil society organizations working with Syrian refugees in Lebanon. The research paper outlines the main role played by NGOs in responding to the refugee crisis in Lebanon which began to worsen in 2012, and changes that civil society has witnessed as a result of this crisis. It also explains the grants offered to Lebanon, and the Lebanese Government's management of the Syrian refugee file and its policies since 2011 until today.

The paper documents the most prominent challenges and difficulties that local civil society organizations face, starting from the establishment and registration, then the funding and project implementation stages, reaching the harassment and security prosecutions of workers in these organizations. The paper also presents an analysis of local and international laws that preserve the freedom of peaceful assemblies and associations, as it focuses on their application and respect in Lebanon.

Lebanon is characterized by an economic and political system based on sectarian quotas and a government incapable of meeting its citizens needs in various sectors including public services. The inability of the Government was and remains widely criticized, especially given its inability to solve the crisis that has worsened in the last months leading to a significant deterioration in the local economy impacting all residents of the country. Additionally, the government did not put forward any coherent and comprehensive national plan to regulate the presence of refugees and protect them, due to divided political opinions within the government between those supporting and protecting refugees and those supporting the Syrian Government by pressuring refugees to return to Syria, until the Ministry of Social Affairs adopted an initial plan to regulate the return of refugees on 14 July 2020, containing many inconsistencies that will be discussed successively.

The burden caused by the presence of Syrian refugees in Lebanon could have significantly benefited the Lebanese Government had it adopted a coherent and comprehensive national plan to regulate their presence on its territories since the start of the refugee crisis. However, the Government was and continues to indirectly pressure them, through codifying the violations under the pretext of protecting the security and the Lebanese economy, (discussed in our previous reports and research papers) and has still not found a solution to protect rights of refugees except by breaching laws and international treaties.

Local non-governmental organizations responded to refugees needs and the local host communities with support from United Nations agencies and international organizations who prefer working with local NGOs due to their lack of trust in the Lebanese Government. Their response contributed to the Lebanese economy and in establishing voluntary groups and several initiatives to implement new projects. During the early years of the refugee crisis, civil society initiatives focused on direct relief aid and health services given the urgency at the time. Meanwhile, its initiatives today are concentrated on



education, vocational training, and protection. Since the beginning of the refugee crisis, Lebanon has received great amounts of grants and aid in support of hosting refugees.

Since the beginning of the year 2013, several international conferences were held in support of the Syrian people and the neighboring host countries, most notably, the Brussels Conference on Supporting the future of Syria and the region, as Lebanon holds the largest quota of the States' and the European Union's support. Additionally, funds were established to meet refugee needs, and grants reached their peak in 2015. However, they began slowly shrinking since that year, especially the aid given to the Lebanese Government, which is criticized in several regards over the mismanagement of the refugee file and its lack of financial transparency in expenditures.

As of 2014, the Lebanese Government began demanding refugee returns at international conferences. Despite renouncing its demands of establishing "safe areas" in Syria in preparation for their return, the Lebanese Government still stresses the need to repatriation and considers it the "only solution" for the refugee crisis. Additionally, it has increased pressures on refugees through forced deportation which is considered one of the most prominent violations practiced by the Lebanese Government in the last year, in addition to arbitrary detention, night curfews and the reoccurring crackdown of foreign labor especially against Syrian labor and Syrian commercial stores, in accordance with the decisions of the Ministry of Labor.

Moreover, security agencies place pressure on civil society organizations working with Syrian refugees in Lebanon, especially following the repercussions of Aarsal in August 2014. Syrian refugees have since been subjected to security prosecutions and arbitrary detention, some of which based on fabricated or unfounded charges. On the other hand, Syrian organizations and local organizations working with Syrian refugees face difficulty in the registration and establishment process or in obtaining official permits, as well as, with money transfer operations and opening bank accounts. Most of the associations that we interviewed were unregistered, or face many difficulties in registration. Funding remains the main challenge they face, considering the complexity of grants requests to Lebanon, and the observed preference of the United Nations agencies and the European Union in contracting with international organizations or with civil society organization networks with international expertise in the humanitarian field instead of supporting the small local organizations and associations, and those who have the required field expertise to implement projects of international networks and organizations and even those of United Nations agencies.

The Lebanese authorities are putting pressure on projects that target Syrian refugees especially in the fields of vocational training and medical services, by preventing or blocking them. The organizations witness an increase in security inspections to their offices and confiscation of official documents for Syrian employees, in addition to, interrogating and summoning them to the investigation offices for



the General Security and the State security. Criminal laws are also implemented and administrative decisions and decrees are issued to restrict the freedom of associations in Lebanon in contradiction with international treaties and charters in which Lebanon must abide by, and contrary to the local laws, most notably the Lebanese Constitution which enshrines the principle of the freedom of associations. Article 13 of the Constitution states: "The freedom to express one's opinion orally or in writing, the freedom of the press, the freedom of assembly, and the freedom of association shall be guaranteed within the limits established by law."⁽¹⁾

Therefore, the Lebanese Government must respect the local and international laws that it has ratified, and thus secure the necessary freedom and protection to ensure the work of civil society organizations and refrain from placing pressure and conducting recurrent security inspections and visits. In addition, we call for facilitating the legal procedures related to associations and their employees, such as opening bank accounts, receiving and transferring direct funds and registering organizations and associations. We stress the need to facilitate the procedures to encourage organizations/associations to transparently deal with the Government within the legal frameworks.

Furthermore, we suggest that the International community, donors and supporting States adopt a monitoring mechanism, in cooperation with civil society organizations, to evaluate Lebanon's response to the crisis, and the distribution of the funding in support of the Lebanese community and refugees. We affirm the need of public inclusion of all stakeholders in regards to the grants of the European Union and the funding countries, including civil society organizations, and supporting them in their field of work in order to expand their response activities in refugee communities. In addition to, supporting them in their advocacy work and pressuring Lebanon to abide by the International Bill of Human Rights and to include civil society organizations in monitoring processes. We also recommend the Special Rapporteurs to strengthen observation of Lebanon's violations of international conventions, treaties, and agreements, and increase effective communication with concerned civil society organizations.

(1) UNDP, The Parliament, "The National Human Rights Plan: Freedom of Association", 20 November 2008.
<https://tinyurl.com/yyea2wot>

RESEARCH METHODOLOGY





ACHR relies on multiple research methods to issue reports and related data, most importantly the descriptive and historical approach. The center conducts a special analysis of the data which is collected from multiple sources through research mechanisms that include foremost, interviews with the victims directly or with their parents and/or their first degree relatives, surveys, as well as, reliable electronic references such as previous reports and research. Interviews are conducted with victims directly or with their parents or their relatives, by way of field interviews and communications through secure, encrypted and open source programs, each separately, in a manner that guarantees independence in their statements. ACHR team analyzes media reports and official data after verifying their validity and accuracy. For this report, from 31 May 2020 to 09 June 2020, the team conducted 17 interviews with local and international organizations and associations working with Syrian refugees, as well as, donors supporting the refugees file and activists within the Syrian civil society.

Those organizations/associations work in the following sectors: relief, education, psychological support, protection, vocational training and empowerment workshops, health studies and research and defending human rights and public freedoms. To ensure the safety of the workers in those institutions, any information that refers to the intended party directly and/or indirectly has been removed.

Interviews were focused on workers in Al Beqaa region which includes the largest number of civil society organizations due to the percentage of refugees in the region. (approximately one-third of the refugee population in Lebanon.) The team relied on ACHR database which includes violations against some organizations working with refugees, recorded since ACHR's establishment.

ACHR ensures the concealment of the identity of the individual potentially at risk, while interviews rely on a consistent list of questions regarding the facts to ensure the validity of the information provided, in the original language of the interviewees, without any financial compensation. ACHR prioritizes international standards for monitoring and documentation including "accuracy", "objectivity" and "impartiality" in its outputs.

INTRODUCTION





The conflict in Syria entered its tenth year in March 2020 and with the escalation of violence against civilians in the early years causing the displacement of more than half of the Syrian people, the humanitarian crisis in Syria is still at a very dangerous juncture amid unprecedented demographic change. This will certainly lead to a tear in the Syrian society and a loss of refugee rights outside the country and the displaced people inside Syria.

Since 2011, neighboring countries have been inadequate in managing the refugee file, especially Lebanon, which hosts a large number of refugees compared to its population. Following many years of the Lebanese Government's unwillingness to develop a plan to manage the Syrian refugee file in the country, nor to implement a coherent national strategy to prevent human rights violations, On 14 July 2020, the Ministry of Social Affairs in Lebanon published a refugee return plan. This plan explains the Lebanese Government's policy in returning refugees and the mechanism of pressure on them and on civil society organizations.

The political elite positions were overlapping, differing in opinions and not discouraging of integrating refugees for their fear of re-living their experience with the Palestinian refugees, it should be noted that the first plan adopted by the Lebanese Government on 23 October 2014 is still far from a comprehensive national strategic plan.

The Government of Lebanon remains focused on securing international funding and aid mainly due to hosting refugees, rather than developing a serious plan or strategy in response to refugee needs amid the exacerbation of the crisis and/or to improve their living and security conditions. Contrary to the United Nation General Assembly Resolution 46/182, which places on the State the responsibility to respond to the humanitarian crisis and to initiate, organize, coordinate, and implement the humanitarian assistance on its lands.⁽²⁾

The response of the Lebanese Government in 2014 was overdue, and instead of being a plan in response to the refugee crisis, it appeared to be a plan organizing the return of refugees to their country that was still unsafe. The priorities of the government seemed to shift towards an approach to systematically pressure refugees in order to reduce their numbers in the country and the government claimed to adopt this policy of indirect pressure to solve its "security fears." Meanwhile, the government used the refugee file as an investment to share its economic burden through expanding the humanitarian response to include the development of the Lebanese infrastructure and public institutions.⁽³⁾

The existence of a diverse civil society in Lebanon dates back to the years following the civil war that lasted between 1975 and 1990, when non-governmental organizations played an important role in reconstructing Lebanon as a result of the government's evasion of its responsibilities. It is a result of the government's inability to respond to the crises the country witnessed at the time, the weakness of governmental institutions and the absence of a plan for its sustainability in various sectors and basic services, including electricity, health care, education and waste and water management.⁽⁴⁾

What is particularly important in the Lebanese context and what distinguishes Lebanon from other host

(2) OCHA. "OCHA in a message" what is the General Assembly Resolution No.46/182?" December 2011. <https://tinyurl.com/y2pw89v5>
(3) Megaphone, "The secrets of the Central Bank of Lebanon", YouTube, Video, 31 July 2020. <https://tinyurl.com/y3w8hf5w>
(4) Laura El Chmali, "The Impact of the Syrian Refugee Crisis on the Civil Society Sector in Lebanon", Border Crossing, Transnational Press London, 2017, Vol. 7(2), pages 361-394. <https://tinyurl.com/yxuenkn2>



countries is that its government is based on sectarian divisions and political quotas that are dividing the government amid a political social system built on sectarianism. These divisions have historically affected civil society, the latter played an important role in supporting the adaptability of public institutions, most importantly, the Ministry of Health, the Ministry of Higher Education and the Ministry of Social Affairs. The long history of the humanitarian response in Lebanon is closely related to conflict and civil war, which resulted in dire humanitarian and economic consequences, including: the civil war from 1975 and 1990, the Israeli military operations in southern Lebanon in both 1993 and 1996 and the Israeli war in 2006, which represented another invitation for humanitarian work. The power of civil society increased during the war as a result of familial, regional, and sectarian relations and links which primarily affects the organization of the relationship between individuals and authority.⁽⁵⁾

(5) Marie-Noëlle AbiYaghi, Léa Yammine, Amreesha Jagarnathsingh, "Civil Society in Lebanon: the Implementation Trap", Civil Society Knowledge Centre, Lebanon Support, 1 January 2019 <https://tinyurl.com/yypq64e4>

THE ROLE OF CIVIL SOCIETY AND NON-GOVERNMENTAL ORGANIZATIONS





Civil society organizations play various roles; they are an important source of information for citizens and government. They also have a monitoring role or what is known as “watchdog”, they monitor the policies and government procedures, work on holding the government accountable, provide alternative policies to the latter, and participate in advocacy. They also defend citizen rights and work on changing social standards and behaviors. In a peaceful and stable country, civil society fills the space untouched by the government. In a fragile and conflict-ripped country, it plays a more important role in providing services that are usually the responsibility of the State and businesses and can even lay the foundation for reconciliation.⁽⁶⁾

REFUGEES’ CONDITIONS AND THE CIVIL SOCIETY ACTIVISM IN THE EARLY DAYS OF THE REFUGEE CRISIS

PROJECTIONS WERE THAT THE NUMBER OF REFUGEES WOULD REACH 300,000 IN MID-2013

**BUT THE NUMBER EXCEEDED
500 THOUSAND
REFUGEES**

month and was even expected to increase to approximately 300 thousand by mid-2013. However, in reality, it exceeded 500 thousand registered refugees by June of the same year, with the registration of 65,000 new persons per month.⁽⁷⁾

With the flow of Syrian citizens to Lebanon in 2011, the United Nation High Commissioner for Refugees (UNHCR) had expected that the number of refugees to Lebanon would reach 7,000 by the beginning of 2012. No one expected that the exacerbation and development of events in Syria would lead to the asylum of about 57,000 refugees from Syria. Their number was increasing to approximately 10,000 new refugees per

In the early years of Syrian asylum to Lebanon, many faced several challenges while registering with the UNHCR in Lebanon, an essential step for collecting aid from it (Note that the percentage of refugees who receive food and cash assistance from UNHCR does not exceed 25 percent.)⁽⁸⁾

The procedures were difficult and complicated which hampered their significant needs upon their arrival to Lebanon. In addition, the Lebanese Government had prevented the UNHCR from registering more refugees as of 2015, making the number of refugees unclear. As of 31 July 2020, the registered numbers with UNHCR are estimated at 880,414,⁽⁹⁾ while the Lebanese government has been estimating the number of refugees to be at 1,5 million for the past five years.⁽¹⁰⁾

-
- (6) George Ingram, “Civil Society: An essential ingredient of development,” Brookings, 6 April 2020. <https://tinyurl.com/yvhtrxcq>
(7) Ninette Kelley, “Responding to a Refugee Influx: Lessons from Lebanon,” Journal on Migration and Human Security, 2017, Vol. 5, No 1, page 82-104. <https://tinyurl.com/yvtlxslc>
(8) Doctors without Borders, “Aid lags as Syrian refugee numbers increase”, 7 February 2013. <https://tinyurl.com/y6jx3yor>
(9) UNHCR, “The Operational Portal: Refugee Situations,” Lebanon, Latest Update: 31 July 2020. <https://data2.unhcr.org/en/situations/syria/location/71>
(10) UNHCR, where we work, Lebanon. Access Date: 27 July 2020. <https://tinyurl.com/y2hatsag>



CIVIL SOCIETY ORGANIZATIONS WERE NOT CAPABLE

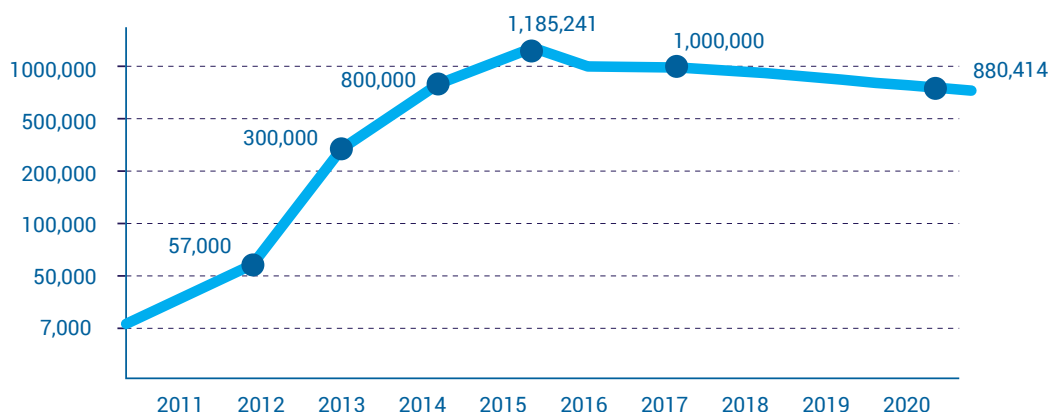
TO DEAL WITH SURPRISINGLY
LARGE NUMBERS OF REFUGEES

A study conducted by Doctors without Borders in late 2012, revealed that more than 75 percent of Syrian refugees live in inappropriate shelters, such as collective shelters, farms, garages, unfinished buildings or old schools. It was also noted that a large number of families who arrived to Lebanon early on, heavily depended on their

resources shortly following their arrival, however the currency difference between Syria and Lebanon is significant and insufficient to secure the basic needs of refugees, such as food and shelter, for more than a few months.⁽¹¹⁾

The rapid and large influx of refugees in Lebanon has been a challenge for local NGOs, in terms of expanding the services required to meet the needs of refugees coming from war conditions and ensuring they meet the necessary financial controls and accountability requirements for cooperation with the United Nations agencies, especially that the conditions required by the latter produce a heavy burden.⁽¹²⁾ Given the acceleration of events at the time, Lebanese and Syrian youth started spontaneous volunteer initiatives to welcome refugees. First with welcoming those wounded by the war and providing them with urgent treatment by contracting with several hospitals. Then with food distribution and securing temporary housing for refugee families. The greatest burden at that time fell on the United Nations agencies and civil society organizations that were not qualified to deal with the surprisingly large numbers of refugees, in addition to their huge needs at all levels. Meanwhile, the volunteer teams strengthened and expanded their work and response by establishing legal associations and organizations in order to address refugee needs.

NUMBERS OF REGISTERED SYRIAN REFUGEES IN LEBANON ACCORDING TO THE UNHCR



(11) Aid lags as Syrian refugee numbers increase. <https://tinyurl.com/y6jx3yor>

(12) Civil Society Facility South, Mapping Civil Society Organizations in Lebanon." 16 April 2015. <https://tinyurl.com/y3ossu7o>



THE EMERGENCE OF ORGANIZATIONS AND THE EXPANSION OF CIVIL SOCIETY INITIATIVES

Civil society in Lebanon has witnessed rapid and severe changes in dealing with the Syrian refugee file since the beginning of the refugee crisis. A large number of humanitarian organizations and associations and various programs and projects have emerged in all sectors of relief, education, development, health, rights, etc., in response to the crisis, in addition to, the presence of religious associations that had previously adopted a “civil non-governmental characteristic” for assistance.⁽¹³⁾

A study conducted by the Civil Society Empowerment Program in the Southern Mediterranean in 2015, regarding the mapping of civil society organizations in Lebanon, found that there are 1.3 associations per 1000 inhabitants in Lebanon.⁽¹⁴⁾

In 2019, the Civil Society Directory, a program by Lebanon Support, received around 50 monthly registration requests for the establishing of new associations.⁽¹⁵⁾

NGOS ARE FILLING THE SPACE LEFT BY

THE LEBANESE GOVERNMENT

Most of these organizations started by adopting programs and projects targeting refugees to provide aid and to improve their living conditions, as well as companies, forums and groups that aimed to improve coordination between them and local civil society organizations and international organizations with United Nations agencies.⁽¹⁶⁾

In previous years, local civil society actors have received support from international donors at the United Nations, the European Union, and other international programs. It has become obvious that NGOs are filling a space left by the Lebanese Government – which abandoned its responsibilities – in their response to the Syrian refugee crisis in Lebanon.

Despite this dynamic, the general impact of NGOs on the government and its policies is very limited due to the direct and indirect pressure imposed by the Lebanese Government on the activity of assemblies and civil society organizations working mainly with refugees, and the reduction of funding opportunities which allow for the continuity of work and activity of organizations, especially in 2018.

(13) Al Kantar Bassam, “NGOs’ are prospering in the time of the Syrian crisis.” Al Akhbar, 23 April 2013. <https://al-akhbar.com/Arab/49833>

(14) Mapping civil society organizations in Lebanon, 16 April 2015. <https://tinyurl.com/y3ossu7o>

(15) Abi Yagi. Yammine. Jagarnathsingh. Civil Society in Lebanon. <https://tinyurl.com/yypq64e4>.

(16) El Chmali, The impact of the Syrian refugee crisis, pages 361-394. <https://tinyurl.com/yxuenkn2>



Due to the political divisions, sectarian quotas, and political favoritism entrenched in the Lebanese government, in addition to political, social, and economic tensions in Lebanon and the absence of an effective government in recent years, certainly all of these factors have affected civil society that has historically supported and continues to support state institutions which are semi-absent and unable to fully assume their responsibilities.

Both, the European Union and United Nations agencies played a major role in the response to the Syrian refugee crisis in Lebanon by cooperating with local and international civil society organizations working with refugees. Moreover, the volunteer teams and the emerging organizations and associations were unable to invest the time in building the capacities of their teams on the methods of intervention and setting up broad strategies to limit the aggravation of the crisis, due to the great acceleration of the large refugee numbers as of mid-2012. Thus, international non-governmental organizations led the response and held the responsibility in the early years. In 2015, the UNHCR adopted a directive system in cooperation with its international organizations partners aiming to build the capacity of local organizations to replace international organizations in the future, after strengthening the monitoring and financial accountability of these local organizations.⁽¹⁷⁾

Soon after, the situation changed and local organizations began playing an important role in managing the humanitarian crisis of refugees in Lebanon. Local NGOs remain the effective managers of the Syrian refugee crisis file in the country with the support of international organizations, governmental agencies, various United Nations agencies, European Union programs and independent donors which have preferred to place their trust in NGOs over the Lebanese Government and its ministries, given that organizations have proven to manage funds more efficiently than governmental agencies.⁽¹⁸⁾

Therefore, NGOs focused their efforts on development and social services, particularly in the fields of education, providing health services and job opportunities to fill the gaps left by state institutions. In addition, the pledges have targeted these organizations to provide the necessary services, this has contributed to expanding the scope of civil society work and increasing projects and the fields in which they operate.⁽¹⁹⁾

An “operational portal” on refugee situations was established as an effective mechanism for coordination between United Nations agencies and the concerned international and local bodies on all matters related to the management of the Syrian refugee file in Lebanon and neighboring countries.⁽²⁰⁾

The influx of refugees in the first four years of the refugee crisis caused the majority of refugees to settle in the poorest areas lacking in basic services, particularly in areas bordering Syria; such as: Aarsal,

(17) Ninette Kelley. Responding to a refugee influx. <https://tinyurl.com/yvtlxslc>

(18) Mapping civil society organizations. <https://tinyurl.com/y3ossu7o>

(19) Ibid.

(20) UNHCR, “The Operational Portal: Refugee Situations,” Lebanon. Latest Update: 31 May 2020. <https://tinyurl.com/y2y87xeg>



Al Beqaa region, Baalbak-Hermel, and Northern Lebanon as these areas need major interventions in terms of health care, providing nutrition, basic aid and shelter.

In 2014, the total population of Arsal was estimated at 35,000, but it exceeded 83,000 in just one week. There was no longer available space in the centers, mosques and other places that were used as collective shelters at the time.⁽²¹⁾

Given the absence of the Lebanese Government's role in responding to these pressing needs at the time, international and local organizations took initiative by providing immediate initial support. Several Syrian youth initiatives established what is known as "Syrian Civil Society." During the first few years of the Syrian crisis, the focus of civil society organizations was on rapid and direct delivery of humanitarian aid as several initiatives were actively receiving war-wounded in northern Lebanon and central Al Beqaa region. Lebanese authorities allowed this through the Red Cross response which had an important role in transporting the war-wounded from Syria to Lebanon.

However, in 2015, Lebanese authorities restricted the activists in this field and closed many health care centers affiliated with Syrian-led organizations.⁽²²⁾ Meanwhile their intervention today is primarily focused on education and vocational training projects.⁽²³⁾

In the early days of the refugee crisis, voluntary initiatives were launched through social media and played a major role in intervening and responding to secure the urgent needs of refugees. These voluntary initiatives continue to rely on donations for their activities by publishing cases or refugees' needs on social media. Some initiatives had and still have an important role in supporting refugees and intervening in collective and individual cases. However, many of them ceased their activities after approximately a year, at the beginning of the crisis, due to their inability to obtain long-term grants/funding, as most donors do not provide support to unregistered voluntary teams, meanwhile, their unregistered status is due to the difficulties they encountered in the registration process.⁽²⁴⁾

IN 2015 LEBANESE AUTHORITIES RESTRICTED ACTIVISTS

AND CLOSED MANY HEALTH CARE CENTERS AFFILIATED WITH SYRIAN-LED ORGANIZATIONS

(21) UNHCR, "Syrian refugees flee to Lebanon", 19 February 2014. <https://tinyurl.com/y5bggd7c>

(22) Private source for Access Center for Human Rights.

(23) El Chmali, The impact of the Syrian refugee crisis. <https://tinyurl.com/yxuenkn2>

(24) Luz Saavedra, "We know our wounds: National and local organizations involved in the humanitarian response in Lebanon," ALNAP Country Study, 2016. <https://tinyurl.com/y2awumjt>

INTERNATIONAL GRANTS, AID AND DONATIONS PPROVIDED TO LEBANON





Lebanon was inevitably affected by the Syrian crisis considering its geographical location and the nature of the two countries' commercial and industrial cooperation and exchange. In recent years, Lebanon hosted the largest number of Syrian refugees worldwide compared to its population.⁽²⁵⁾ Thus, Lebanon played an essential role in the international community's response to this crisis. Since 2011, Lebanon has received large amounts of grants and aid in support of this response, which reached its peak in 2015, but slowly began decreasing.

THE LEBANESE GOVERNMENT WAS REPEATEDLY CRITICIZED

FOR THE MISMANAGEMENT OF THE SYRIAN
REFUGEE FILE IN LEBANON AND ITS LACK OF
FINANCIAL TRANSPARENCY IN EXPENDITURE

Since 2013, funding has covered less than 50 percent of the funding required for the Lebanon Crisis Response Plan (LCRP), except for the years 2013 and 2015 where funding covered 51 percent and 54 percent of the required funding, respectively.⁽²⁶⁾

Several international conferences were held in support of the Syrian people and the neighboring host countries – particularly Lebanon – such as the Brussels conferences on “Supporting the Future of Syria and the Region”, the London conference and the Kuwait conferences for humanitarian pledges. Funds were also established in response to this crisis, including the Lebanese Syrian Crisis Trust Fund, the Lebanon Humanitarian Fund, as well as, the EU Regional Trust Fund in Response to the Syrian Crisis. Funding was also provided by the European Union and various countries through United Nations agencies and local and international non-governmental organizations. Meanwhile, a small amount of aid was provided directly to the Lebanese Government, as the latter was repeatedly criticized for the mismanagement of the Syrian refugee file in Lebanon and its lack of financial transparency in expenditure.⁽²⁷⁾

Perhaps the support of the international community was insufficient in meeting the required needs at the beginning of the Syrian refugee crisis to Lebanon, but by the end of 2013, funding had significantly increased with the number of registered Syrian refugees in Lebanon exceeding one million people. Most

(25) UNHCR, “Lebanon at a Glance”, June 2020.

(26) Government of Lebanon and the United Nations, Lebanon Crisis Response plan, 2017-2020, January 2020 update. <https://tinyurl.com/yyuo64gn>

(27) El Chmali, The impact of the Syrian refugee crisis, pages 361-394. <https://tinyurl.com/yxuenkn2>



MORE THAN 8 BILLION AND 875 MILLION USD

The total value of the grants and aid that Lebanon received from 2011 until 27 July 2020

donor countries provided aid and pledges to Lebanon through United Nations agencies, international or local non-governmental organizations or through direct support. However, some countries still provide grants directly to the Lebanese Government.⁽²⁸⁾

Between the years 2015 and 2018, Lebanon received USD 5.64 billion to support the Lebanon Crisis Response Plan.⁽²⁹⁾ In addition to USD 421.07 million in 2020 and USD 917.2 million in 2019.⁽³⁰⁾ The total value of the grants and aid that Lebanon received from 2011 until 27 July 2020 registered through the Financial Tracking Service (FTS), amounted to USD 8,875,149,403.⁽³¹⁾ As for the aid received during 2020 until 27 July of that year amounts to USD 609,312,146.⁽³²⁾ Of this amount, USD 8,593 billion were allocated to the UNHCR between 2011 and the end of 2019.⁽³³⁾ Meanwhile, the total funding received by the UNHCR from the beginning of 2020 until 29 April of the same year was USD 98,593,080.⁽³⁴⁾

PLEDGES, AIDS, DONATIONS AND GRANTS IN THE INTERNATIONAL CONFERENCES

Several international conferences were held to support Lebanon in its response to the refugee crisis. On 16 February 2016, the London international conference was hosted by the United Nations and the governments of the United Kingdom, Kuwait, Germany, and Norway. During the conference, pledges were made to provide USD 10 billion in support of the Syrian people and neighboring host countries.⁽³⁵⁾ Conferences for humanitarian pledges for Syria were held in Kuwait, where more than USD 1.54 billion was pledged on 15 January 2013.⁽³⁶⁾ Meanwhile, the second conference on 14 January 2014 and resulted in pledges worth USD 2.4 billion. At the third conference, on 13 March 2015, the participants pledged USD 3.8 billion in support of the Syrian people and the neighboring host countries, a part of which contributed in supporting Lebanon through the LCRP.⁽³⁷⁾

The first conference on "Supporting the Future of Syria and the Region", known as the Brussels Conference,

(28) A private interview for the team with UNHCR.

The Australian Embassy in Lebanon, "Direct Aid Program 2019-2020," Last Access: 26 June 2020. <https://tinyurl.com/y5u9uke4>

(29) Lebanon Crisis Response plan, January 2020 update. <https://tinyurl.com/y58uwavs>

(30) UNHCR, Financial Tracking Service, Lebanon, Country Snapshot for 2019. <https://tinyurl.com/y2b48zch>. Inter-Agency Coordination Group. End Year Funding Update for the Crisis Response Plan. 31 December 2019. <https://tinyurl.com/y2zwhvqz>

(31) UNHCR, Financial Tracking Service, Lebanon, Country Snapshot for 2020, Last Update: 27 July 2020. <https://tinyurl.com/y6b4n7sp>

(32) Ibid.

(33) Lebanon Crisis Response plan, 2020 Update. <https://tinyurl.com/yyuo64gn>

(34) UNHCR, funding update 2020, Lebanon, as of 29 April 2020. <https://tinyurl.com/yccmhgpo>

(35) UN News, "Record \$10 billion pledged in humanitarian aid for Syria at UN co-hosted conference in London", 4 February 2016. <https://tinyurl.com/y7ykn6j>

(36) OCHA, "Syria: Five things you need to know about the Kuwait Pledging Conference", 13 January 2014. <https://tinyurl.com/yc7fobah>

(37) UN News, "Donors pledge \$3.8 billion in aid to people affected by Syria crisis at UN-backed conference", 31 March 2015. <https://tinyurl.com/yct45a4x>



was hosted by the European Union in 2017. It has been hosted every year since by the European Union with the participation of the United Nations. The aim of these conferences is to strengthen the political, humanitarian and financial commitment of the international community to support the Syrian people and the neighboring host countries, to alleviate the burdens on them and the conflict-affected communities. On 5 April 2017, The first conference took place on 5 April 2017 with the participation of 70 States, international and civil society organizations.⁽³⁸⁾ The second conference, held on 24 and 25 April 2018, witnessed a significant increase in attendees, as 86 delegations participated. This included 57 states and 10 representatives of regional organizations and international financial institutions, in addition to, 19 United Nations agencies, while over 250 non-governmental organizations participated in preparing for the Conference.⁽³⁹⁾ However, the number of attendees slightly decreased in the third conference which was held from 12 to 14 March 2019. It was attended by 78 delegations, including 56 states, 11 regional organizations and international financial institutions and the United Nations agencies. This conference noticed unprecedented initiation to involve civil society and Syrian, regional and international non-governmental organizations throughout the preparation phase and dialogue days, including side events.⁽⁴⁰⁾ Recently, the fourth conference was held on 30 June 2020 and was attended by 84 delegations including 57 states, 10 regional organizations and international commercial institutions and 17 United Nations agencies.⁽⁴¹⁾

On the other hand, an increase in the value of the pledges, aid and grants provided by the participating countries and the European Union can be noticed following every conference. In 2017, the participants pledged USD 6 billion for the year 2017.⁽⁴²⁾ In the second conference in 2018, they pledged USD 4.4 billion in addition to multi-year pledges worth USD 3.4 billion for the years 2019 and 2020.⁽⁴³⁾ At the third conference in 2019, the participants pledged USD 7 billion for the year 2019 and USD 2.4 billion in multi-year pledges for 2020 and beyond.⁽⁴⁴⁾ However, the fourth conference witnessed a decrease in the value of pledges compared to previous years, as the participating countries pledged USD 5.5 billion for 2020 and USD 2.2 billion in multi-year pledges for 2021 and beyond.⁽⁴⁵⁾

GRANTS PROVIDED BY THE EUROPEAN UNION

Between 2011 and June 2020, the European Union provided EUR 2.3 billion to Lebanon in support of Syrian refugees and the host community. This aid is divided as follows: ⁽⁴⁶⁾

-
- (38) European Council, Supporting the future of Syria and the region - Brussels conference, 4-5 April 2017. <https://tinyurl.com/y47zo6rq>
- (39) European Council, Brussels II Conference on 'Supporting the future of Syria and the region': co-chairs declaration, 25 April 2018. <https://tinyurl.com/y83rtsej>
- (40) European Council, Brussels III Conference on 'Supporting the future of Syria and the region': co-chairs declaration, 14 March 2019. <https://tinyurl.com/y7s8pz46>
- (41) European Council, Brussels IV Conference on 'Supporting the future of Syria and the region': co-chairs declaration, 30 June 2020. <https://tinyurl.com/ybt8czlt>
- (42) European Council, Brussels conference. <https://tinyurl.com/y47zo6rq>
- (43) European Council, Brussels II Conference. <https://tinyurl.com/y83rtsej>
- (44) European Council, Brussels III Conference. <https://tinyurl.com/y7s8pz46>
- (45) European Council, Brussels IV Conference. <https://tinyurl.com/ybt8czlt>
- (46) European Commission, "Responding to the Syrian crisis: EU Support in Lebanon." Brussels IV Conference, June 2020. <https://tinyurl.com/y3h86v2d>



- EUR 411 million in bilateral assistance for Lebanon within the frame of the European neighborhood policy, with a focus on economic and social development projects, investment in infrastructure, increasing the efficiency of state institutions and the rule of law, supporting civil society and assisting Lebanon in facing the Covid-19 pandemic impact.
- EUR 634 million as humanitarian assistance to secure the basic humanitarian needs of refugees, access to health care, as well as, to provide water, shelter, sanitation services and legal assistance.
- EUR 1.3 billion to support the needs of Syrians and Lebanese for long-term resilience by promoting job opportunities, growth, and social cohesion. In addition to supporting Lebanon in providing access to social protection, education, health care and water services. A portion of these grants were allocated to the EU Regional Trust Fund in response to the Syrian crisis.

Between 2015 and June 2020, a significant portion of the non-humanitarian aid targeting Lebanon's response to the Syrian refugee crisis was allocated through the European Union's Regional Trust Fund. These allocations have reached EUR 1.8 billion, of which EUR 955 million were allocated to Lebanon.⁽⁴⁷⁾ This Fund supports 39 projects in the education sector in Lebanon, in addition to, the livelihood, local development, health sector, protection and sanitation services.⁽⁴⁸⁾

The humanitarian aid provided by the European Union is directed through the United Nations, international organizations, and international partners of non-governmental organizations. This aid was allocated in response of the life-threatening needs in the sectors of food assistance, health, water, sanitation, hygiene, as well as, shelter and protection.⁽⁴⁹⁾

LEBANON SYRIAN CRISIS TRUST FUND

The Lebanon Syrian Crisis Trust Fund (LSCTF) is a multi-donor trust fund established in December 2013, managed by the Lebanese Government and the World Bank. It aims to help reduce the impact of the Syrian conflict on the Lebanese people and host communities by funding activities that are identified in the Roadmap of Priority Interventions for Stabilization from the Syrian Conflict.⁽⁵⁰⁾ This fund has contributed to projects targeting essential services in specific municipalities, supporting the stability of the public education sector, and providing primary health care. As of June 2016, the total amount of grants provided to this fund amounted to USD 75 million.⁽⁵¹⁾ In 2017, the World Bank pledged an extra USD 100 million for this fund. Many countries contribute to this trust fund, most notably: Norway, Finland, and France.⁽⁵²⁾

(47) European Commission, «European Neighbourhood Policy and Enlargement Negotiations», Lebanon. Last Access: 10 July 2020. <https://tinyurl.com/y5jznva6>

(48) European Commission, "Managing the Refugee Crisis: EU Support to Lebanon and Jordan Since the Onset of Syria Crisis." Last accessed: 26 June 2020 <https://tinyurl.com/ybfhx9rh>

(49) European Commission, the European Neighborhood policy and Enlargement negotiations. <https://tinyurl.com/y5jznva6>

(50) United Nations, funding channels. Last accessed: 26 June 2020 <https://www.un.org.lb/english/funding-channels>

(51) World Bank, "Lebanon: Country partnership framework for FY17-FY22." 22 June 2016. <https://tinyurl.com/y3ragmbn>

(52) United Nations, funding channels. <https://www.un.org.lb/english/funding-channels>



THE LEBANON HUMANITARIAN FUND

Due to the Syrian crisis developments and the increase in needs in neighboring countries, the Syria Emergency Response Fund was divided into four independent funds in 2014, for each of: Syria, Lebanon, Turkey, and Jordan. As a result, the Lebanon Humanitarian Fund was established. It aims to well manage the allocation and distribution of funding for the emergency humanitarian needs identified in the Lebanon Crisis Response Plan.⁽⁵³⁾

It has been funded with more than USD 76 million. In 2019, 21 humanitarian projects were financed with USD 11 million from this fund in support of refugees and host countries. These projects fall primarily in the sectors of education, health, shelter and protection.⁽⁵⁴⁾

This fund witnessed a decrease in grants in 2017, whereas, the years 2018 and 2019 experienced an increase, as grants amounted to USD 13.2 million in 2019 alone. This is the highest amount provided to Lebanon since 2015. While, nine different funders contributed to the fund that year, making it the highest number of donors since the establishment of the fund.⁽⁵⁵⁾

These grants are awarded to the partners who provide services in the aforementioned sectors based on the agreed upon priorities, strategy, and principles. Accordingly, international organizations received the largest funding in 2019, followed by the United Nations and lastly by the local non-governmental organizations, while the Lebanese government did not directly receive grants from this fund.⁽⁵⁶⁾

(53) Lebanon Humanitarian Fund, "Principles Guiding 2019 Allocations." <https://tinyurl.com/ya7z2gsf>

(54) OCHA, Lebanon Humanitarian Fund Annual Report 2019, 28 May 2020. <https://tinyurl.com/yaxmjt2e>

(55) Ibid.

(56) Ibid.

THE POLICIES OF THE LEBANESE GOVERNMENT IN THE MANAGEMENT OF THE REFUGEE FILE





The Lebanese Government's plans and policies tend to be merely proposals often in violation of international laws and conventions that Lebanon is committed to. The international and local civil society organizations have played a pivotal role in assisting Syrian refugees, despite all the pressures they are subjected to in Lebanon, and they still play an important role in raising the voices of refugees to the international community and pressuring Lebanon to prevent it from committing further violations. Subsequently, Lebanon views these organizations as a tool to obstruct its plans and policies, the majority of which lacks minimum human rights standards. It found the indirect mechanisms of pressure on civil society organizations as the only means to control the funding and to implement the policies that violate international conventions.

INDIRECT PRESSURE

ON CIVIL SOCIETY ORGANIZATIONS AS THE ONLY MEANS TO CONTROL THE FUNDING AND TO IMPLEMENT THE POLICIES THAT VIOLATE INTERNATIONAL CONVENTIONS

We summarize the most notable plans and policies adopted by the Lebanese Government and the impact of civil society on them:

Since the beginning of the Syrian refugee crisis in Lebanon, events in Syria have evolved, as well as, the political and social pressures and tensions in Lebanon and the policy governing the refugee file in Lebanon was subsequently affected. The Lebanese government went from an "open-door policy" in dealing with Syrian refugees to "limiting entry to Lebanon, or even closing the borders." Moreover, the government stopped applying the ordinary laws related to foreigners on Syrian nationals and instead adopted special decrees in 2015 that complicate the entry and stay in Lebanon, further exacerbating the challenges amid lack of funding.

In the period between 2011 and 2014, the Lebanese government refrained from adopting any policy regarding Syrian refugees and kept the borders open and considering it is not a party to the 1951 Refugee Convention, it continued to use the term "displaced" or "guests" instead of "refugees/asylum seeker" despite the legality of the term. This position led to the policy of banning the establishment of official camps for Syrian refugees in 2012, in addition to, the mismanagement by the Ministry of Interior and the decisions of municipalities. Several municipalities applied alternative discriminatory decisions under the pretext of managing the refugee crisis, such as collective forced eviction and curfews.⁽⁵⁷⁾ With no objection from the Ministry of Interior, despite being the authorized ministry and the one responsible for the decisions issued by municipalities, which should be issued by the ministry before they are

(57) Ibid.



announced by the municipality.

Since 2014, the Lebanese Government started taking incapacitating decisions to “mitigate the number” of refugees. The council of ministers issued decision no. 72 on 23 May 2014 which established a ministerial cell tasked with following up on the Syrian displacement file in Lebanon, headed by the Prime Minister, and consisting of the Ministers of Foreign Affairs and Emigrants, Interior and Municipalities and Social Affairs. Their main task is providing the necessary recommendations to mitigate displacement, in coordination with the relevant departments. Each ministry had a different role in the cell: The Ministry of Interior and Municipalities was responsible for managing the conditions of refugees locally with respect to the international standards. Whereas the Ministry of Foreign Affairs and Emigrants is tasked with researching the possibility of establishing “safe areas” in Syria to transfer refugees. As for the Ministry of Social Affairs, it was responsible for coordinating relations with international organizations and local administrations.⁽⁵⁸⁾

The fundamental change in the Lebanese Government’s policy in the management of the Syrian refugee file was on 23 October 2014 when the Council of Ministers unanimously approved the policy paper proposed by the ministerial cell on Syrian asylum in Lebanon. The amendments to the Lebanese government’s policy, adopted in 2015, are based on this same paper which considered that the government exceeded what can be “reasonably expected” of it in its response to this crisis, and for this reason, it stated three objectives for the policy:⁽⁵⁹⁾

First: Reducing the number of refugees by halting “displacements” (a legally inaccurate term used by Lebanon for fear of any obligation from the 1951 Refugee Convention, which it has not signed) on the border excluding exceptional humanitarian cases and ceasing Syrian refugee registrations with the UNHCR. It also suggested the encouragement of returns to Syria or the immigration to third countries, the strict application of Lebanese laws on refugees, as well as, other measures that would inevitably restrict refugees and force them to return, such as, denying them of the right to obtain legal residency papers.

Second: Providing security by tasking the municipalities with conducting periodic statistical surveys for refugees and increasing municipal police officers for security.

Third: Mitigating burdens through several measures, including the enforcement of Lebanese laws on Syrian refugees to protect national labor and to balance the aid between refugees and the host community.

(58) F. Dionigi, “The Syrian Refugee Crisis in Lebanon: State Fragility and Social Resilience”, LSE Middle East Centre, February 2016. <https://tinyurl.com/y97mzyu9>

The ministerial decree no.72 dated 23 March 2014.

(59) The Syrian refugees crisis in Lebanon. <https://tinyurl.com/y97mzyu9>



In fact, the measures set out in that paper were adopted starting from 14 December 2014 and currently remain in place. On 5 January 2014, the Lebanese government adopted new measures to limit the entry of Syrians into Lebanon, and these measures made their presence in the country even more difficult, further marginalizing them and increasing the challenges and violations they face.⁽⁶⁰⁾

For instance, the Minister of Labor, Sajaan Azzi, adopted a decision based on this policy on 16 December 2014. This decision redefined the occupations confined to the Lebanese, as a move to increase restrictions on foreigners in Lebanon, particularly Syrians. This comes after the former Minister of Labor, Salim Jreissati, had exceptionally allowed Syrian workers, in February 2013, to practice some of these professions for humanitarian reasons and limited them to agriculture, cleaning and construction sectors. Refugees registered with the UNHCR were also prohibited from practicing any professional activity under the pretext of “receiving humanitarian aid”,⁽⁶¹⁾ noting that cash assistance for these individuals does not exceed LBP 263,000 per person based on the minimum model of spending, established in 2014.⁽⁶²⁾

On the other hand, on 5 January 2015, a circular was issued by the General Directorate of General Security regulating the entry and exit of Syrians, it issued a decision that complicates obtaining legal residency permits for Syrians that entered Lebanon after 2015. After having followed an “open door” policy, it now adopted extremely harsh conditions and imposed a visa system at the border. Meanwhile, international organizations rejected the ministry’s proposal evaluating the possibility of establishing refugee camps in “safe areas” in Syria, citing ineffectiveness of the proposal amid ongoing political and military developments in Syria, that would inevitably endanger refugees.⁽⁶³⁾

The policy of the Lebanese Government was further clarified in 2016 when former Minister of Foreign Affairs and Emigrants, Gebran Bassil, announced that the 2014 policy paper needs to be updated and implemented with “actual measures,” claiming that this policy did not halt asylum, but only stopped registration of refugees. He then called for the return of refugees to Syria, considering this “the only sustainable solution for the crisis.”⁽⁶⁴⁾

In 2016, the Prime Minister formed a ministerial committee consisting of the concerned ministers: The Ministry of Social Affairs, the Ministry of Health, the Ministry of Education, the Ministry of Public Works, the Ministry of State for Displaced Affairs and the Ministry of Interior. This committee was tasked with drafting a general policy on managing the Syrian refugee file in all aspects, whether social, economic or structural. Since its establishment, this committee has been criticized for lacking a clear and defined

(60) Ibid.

(61) Karen Rahme, “Reception Policies, Practices & Responses: Lebanon Country Report”, Respond Migration, 17 April 2020 . <https://tinyurl.com/ycnjyv8g>

(62) End-year funding update for the Crisis Response, 2019. <https://tinyurl.com/y2zwhvqz>

(63) Julian Borger. “Syria safe zones will not end need for asylum in west, UN refugee head warns.” The Guardian, 30 September 2015. <https://tinyurl.com/yxuge596>

(64) Ministry of Social Affairs. “The Maronite League recommended that the government reclaim the management of the Syrian displacement file. Basil criticized the reluctance for a solution, and Derbes emphasized that there is no word for resettlement.” Access Date: 25 June 2020. <https://tinyurl.com/y49z22sh>



“official agenda” in drafting this policy.⁽⁶⁵⁾

In 2017, the Former Minister of State for Displaced Affairs, Mouin Al Marabi, criticized the process of transferring and spending the granted funds, including aid and donations related to the refugee file given to the treasury of the Lebanese government without expenditure guidance or a governing plan, stressing that this will be among the priorities of the ministerial committee in its future work.⁽⁶⁶⁾ Moreover, in the Minister of Foreign Affairs has previously mentioned in 2016 the lack of financial transparency when it comes to expenditures, and the absence of accountability rules that allow for monitoring, auditing and accountability.⁽⁶⁷⁾

THE LEBANESE GOVERNMENT IMPOSED RESTRICTIONS ON SYRIAN REFUGEES TO MAKING THEIR CONDITIONS EXTREMELY DIFFICULT AND HARSH TO PRESSURE AND FORCE THEM TO RETURN TO SYRIA

In 2017, The Lebanese Government escalated its demands for the return of refugees to Syria and began placing pressure on the UNHCR to regulate the process of return.⁽⁶⁸⁾ In the same year, the Ministry of Social Affairs claimed that the return of refugees is the “actual solution” to the Syrian refugee file in Lebanon describing 2018 as “the year of categorizing the displaced in preparation for their return.”⁽⁶⁹⁾

The restrictions imposed by the Lebanese government on refugees increased with time, as the government aimed to worsen their conditions in the country as an attempt to forcibly push them to return to Syria. On 13 May 2019, the Lebanese General Security began implementing the decision of the Supreme Council of Defense to deport refugees who “illegally” entered the Lebanese territories after 24 April 2019. Between 13 May 2019 and 9 August 2019, approximately 2,447 Syrians were deported to Syria.⁽⁷⁰⁾

What is worrisome in those practices is that the decisions were issued without any judicial investigation to ensure that those people would not be at risk in case they are deported to Syria. This decision indicates a change in the Lebanese Government’s policy in managing this file, as the Government had previously,

(65) Reception Policies, Practices, and Responses. <https://tinyurl.com/ycnjv8g>

(66) Rana Saarti. “What is the importance of having a ministerial committee charged with managing the displaced persons file?” Lebanon Debate, 14 January 2017 <https://www.lebanondebate.com/news/303868>

(67) Ministry of Social Affairs, The Maronite league. <https://tinyurl.com/y49z22sh>

(68) Human Rights Watch, World report 2018, Events of 2018 In Lebanon. <https://tinyurl.com/yysz6lsa>

(69) Ministry of Social Affairs, “Bou Assi: 2018 is the year of classifying the categories of displaced persons in preparation for their return.” Access date: 25 June 2020. <https://tinyurl.com/y6jmfz4>

(70) Amnesty International, “Lebanon: Authorities must immediately halt deportation of Syrian refugees.” 27 August 2019. <https://tinyurl.com/y5ngjcce>



since 2012, refused to deport Syrians back to their home country.⁽⁷¹⁾ These decisions come in violation of section 1 of Article 3 of the Convention against Torture – ratified by Lebanon – which explicitly states that: “No State Party shall expel, return (“refouler”) or extradite a person to another State where there are substantial grounds for believing that he would be in danger of being subjected to torture.”

The increase in restrictions on refugees became evident in several decisions and other measures, notably the anti-foreign labor campaign launched by the Minister of Labor since November 2018 until the summer of 2019, focusing on Syrian workers and Syrian shops.⁽⁷²⁾ Moreover, on 21 October 2019, the Council of Ministers adopted a series of decisions on “radical reforms to revitalize the economy and to stimulate growth.” While, the Minister of State for the Displaced Affairs called for submitting a policy paper on the return of Syrian refugees and taking “the possible measures and means to urge civil society for a safe and dignified return of the displaced persons to their country” calling for increased contribution in the assumption of the cost of their burdens’ “borne by the State.”⁽⁷³⁾

The Lebanese Government clung to this policy in 2020. On 6 February,⁽⁷⁴⁾ and 9 June,⁽⁷⁵⁾ the Government insisted that the sole solution to this crisis is the “safe,” “dignified” and “non-coercive” return to Syria and rejected any form of “their integration, their inclusion or their settlement” in the host communities.⁽⁷⁶⁾ This insistence was demonstrated in the plan published by the Ministry of Social Affairs and initially unanimously approved by the Council of Ministers.⁽⁷⁷⁾

This plan put procedures and measures that the Government intends to adopt to return refugees to Syria by communicating and coordinating and cooperating with the Syrian government. These measures include launching awareness programs inside the camps and in municipality centers “to demonstrate the facilitations granted by the Governments of Lebanon and Syria” to encourage returns. In addition to, conducting an overall consensus for Syrian refugees present on Lebanese territories and exchanging this information with Syria “to overcome the legal, security and administrative obstacles that may hinder the return of some of the displaced persons” and other measures that may constitute a gross violation of human rights and expose refugees to significant risks especially with the continued arrests by Syrian authorities and the chaotic security situation in Syria.

On the other hand, this plan consists of several measures that will inevitably increase the pressure and restrictions on local and international organizations working with Syrian refugees and limiting freedom

(71) Legal Agenda, “Regarding the decision to deport Syrian citizens who entered Lebanon irregularly,” 25 June 2019. <https://tinyurl.com/ycweco2g>

(72) Daily Star, “Labor Ministry starts crackdown on foreign labor” 10 July 2019 <https://tinyurl.com/yd8d8je8l>
Rahme, Reception Policies, Practices, and Responses. <https://tinyurl.com/ycnjiv8g>

(73) Council of Ministers, “The Cabinet approves the 2020 budget and reform paper to advance the economy and stimulate growth.” 21 October 2019. <https://tinyurl.com/yxf3zv85>

(74) Bassam, Leila. “Lebanon cabinet approves financial rescue plan - ministerial sources.” Reuters. 6 February 2020 <https://tinyurl.com/y6o94etq>

(75) N.M. “Hitti: For the safe, dignified and non-forced return of displaced Syrians.” NNA. 9 June 2020. <http://nna-leb.gov.lb/ar/show-news/483595/>

(76) Bassam, Leila. Lebanon cabinet approves financial rescue plan. <https://tinyurl.com/yyp73wby>

(77) Cabinet session statement. 14 July 2020. <https://tinyurl.com/y5ccuaqh>



of association. The plan stipulated “activation of State supervision” on international organizations, their activities, projects and funding to allow State agencies to “monitor actors, follow-up on their activities, evaluate their work and use the evaluation results in future funding procedures.” Moreover, the plan sets conditions related to refugee aid. The government intends to establish a rule that for every assistance for a refugee there must be an equivalent assistance to the Lebanese host community or to the Lebanese State. As mentioned earlier, the Lebanese government is investing in the refugee file. It also intends to oblige donors and international organizations to allocate a certain percentage of refugee aid towards supporting “sustainable solutions such as resettlement in third countries and returns.” Finally, the plan mentioned that all international aid must pass through the ministerial committee concerned with the Syrian refugee file, as this committee has to directly communicate with the donors to distribute international assistance and to supervise the implementation of related projects, despite donors and other countries not trusting the Lebanese Government due to its lack of financial transparency and its mismanagement of public funds.

THE CHALLENGES FACED BY CIVIL SOCIETY ORGANIZATIONS SINCE THEIR ESTABLISHMENT

Civil society works in a politically volatile and unstable security environment, in addition to difficult social and economic conditions, and a political system based on sectarianism for participation and representation that limits the ability of civil society to be active, independent and influential in policymaking. The Lebanese political system affects the access and participation of NGOs in policymaking or in contributing to policy change and development. The polarization of political parties complicates and hinders the ability to agree on political issues, and thus, raises several challenges for civil society organizations when it comes to dialogue with the government on public policies.

ONLY 7 OF 17 ORGANIZATIONS WERE ABLE TO ESTABLISH A BANK ACCOUNT

The limitation of civil society in policy is also the result of weak state institutions and the urgent need in the areas of infrastructure and basic services, which further reduces their role in policymaking and development. In addition, security authorities exert pressure on these organizations, which influences the effectiveness of their capabilities and resources. This security situation worsened following the conflict in Aarsal in 2014, as civil society organizations working with Syrian refugees in Lebanon witnessed an increase in threats and pressure.⁽⁷⁸⁾

Despite the Lebanese Law on Associations and the Lebanese constitution creating a favorable legal environment for NGOs to work openly and undertake all kinds of economic, social and political activities,

(78) Based on private interviews with NGO workers, activists, and local NGO donors.



authorities use some penal code provisions and the Audio-visual Media law to prosecute individuals who criticize the government. It is currently possible to define the pattern of prosecution under which criminal charges are directed for peaceful criticism of government authorities and repression is used by State security agencies to ensure the silence of activists and human rights defenders, further contributing in the reduction of safe space for freedom of expression.⁽⁷⁹⁾

Since the official registration gives the organization several official benefits – such as the right to open a bank account and thus receive the necessary funding – it was found that only seven of the 17 organizations and associations that ACHR interviewed were registered and were able to establish a bank account. Meanwhile, nine organizations/associations face many difficulties in registering and obtaining a “notice of recognition” (or in Arabic “Elm wa Khabar”) from the Ministry of Interior and Municipalities, and four organizations were unable to register and five organizations were unable to open a bank account and they work through a memorandum of understanding with registered organizations and through joint projects.

Organizations/associations typically face difficulties in registering or in establishing bank accounts mostly due to the topic, goals and objectives of the organization, or the presence of foreign persons, particularly of Syrian nationality, and/or the inclusion of the word “Syria” in the title of the organization. According to the interviews we conducted, registration takes a minimum period of months and may extend to three years, similarly for creating a bank account. Moreover, some organizations face difficulties in transferring money as Lebanese banks are conducting strict investigations into civil society organizations working with Syrians under the pretext of transparency and combating terrorism, pursuant to executive orders issued by the United States in 2011 and 2012, some of which target the banking sector and impose penalties and steps taken against the Syrian Regime.⁽⁸⁰⁾

Therefore, many organizations were unable to register or open a bank account and depend on their registered partners to receive funding, which often delays and/or hinders the activity of the association.

CHALLENGES IN ACCESSING FUNDING

One of the main challenges for local non-governmental organizations is the difficulty in obtaining funding, especially in light of the complications and long bureaucratic procedures of the Ministry concerned in giving the official recognition to associations following their notification request. In addition to, complications related to the bureaucratic procedures for submitting grants applications to donors. Noting that, the United Nations agencies and the European Union prefer contracting with international organizations or with large civil society organizations networks with substantial experience in the humanitarian field, rather than contracting with small or emerging local organizations.

(79) Abi Yaghi, Yammine, Jagarnathsingh. Civil Society in Lebanon. <https://tinyurl.com/yypq64e4>

(80) US Treasury Department, “Syria Sanctions,” Resource Center. Last modified: 10 July 2020.



It should be noted that international assistance provided to local and national organizations remains significantly low compared to the international assistance of international organizations. In 2018, international aid targeted 3.1% of local and national organizations,⁽⁸¹⁾ a significant increase from previous years. In 2017, local organizations received 2.9% of international aid compared to 2.0% in 2016,⁽⁸²⁾ and 0.2% in 2014.⁽⁸³⁾

Indeed, the majority of organizations interviewed by the team reported relying on individual donations or grants from charities and independent donors. However, due to the urgency for funding required to meet the substantial needs and to ensure the continuity of work, some local organizations resorted to international bodies. Their relationship with the latter is described as paternal as international non-governmental organizations often subject local organizations to the decision-making process by funders and impose certain political agendas, in addition to many conditions such as long reports and complex evaluations that require a lot of time and effort. This affects their work and limits them to an executive role, despite their capabilities and their field experience. These conditions also affect their response to major humanitarian organizations gaps, often resulting from bureaucratic work that requires a lot of time. Local civil society has proven that it was not only an executive partner but also a channel that allows direct access to different communities and effective assessment of their needs.⁽⁸⁴⁾

THE CHALLENGES IN PROJECT IMPLEMENTATION

The Lebanese authorities are putting pressure on organizations that target Syrian refugees in their projects, particularly in the areas of vocational training and medical intervention. They are blocking and preventing training programs that help Syrians build professional skills in order to acquire livelihoods and shelter under the

PRESSURE

ON ORGANIZATIONS THAT TARGET SYRIAN REFUGEES
IN THEIR PROJECTS, PARTICULARLY IN THE AREAS OF
VOCATIONAL TRAINING AND MEDICAL INTERVENTION

pretext of implementing Ministry of Labor laws which limit the prospects of activity and work for refugees, which contradicts the policy of the Lebanese Government in repressing foreign labor, especially Syrians. The Government views these programs as contributors to the illegal entry of Syrian refugees into the Lebanese labor market.⁽⁸⁵⁾ For this reason, many organizations lost the ability to protect their foreign or Syrian employees after the Ministry of Labor launched a campaign to tackle foreign labor. Subsequently, these organizations were subjected to security inspection visits where the Lebanese security authorities confiscated the documents of Syrians employee, in addition to, interrogating and summoning them to security branches.

(81) UNHCR, Financial Tracking Service, Country Profile 2018, Lebanon. Last update: 25 June 2020. <https://tinyurl.com/yxzs3g7w>

(82) Development Initiative, Global Humanitarian Assistance Report 2019. 30 September 2019. <https://tinyurl.com/t3p53dx>

(83) Ziad Abdel Samad, Bihter Moschini. " Humanitarian Assistance in Lebanon: Overview, Challenges and Recommendations. Revisiting the Humanitarian System: The Call for Country Ownership in the Case of Lebanon. Lebanon Support. October 2016. <https://tinyurl.com/y4odlwf3>

(84) Ibid.

(85) The Impact of the Syrian Refugee Crisis, pages 361-394. <https://tinyurl.com/yxuenkn2>



Lebanese authorities are also exerting pressure on medical intervention projects. ACHR documented a case in which an individual in the medical field working with Syrians was arrested and forced to sign a pledge that he will refrain from working in this field. Moreover, organizations are at risk of harassment and restrictions during project implementation. Several medical clinics that operated amid COVID-19 by providing services in camps faced difficulties in obtaining work permits from the municipalities or the Ministry of Interior. Additionally, an organization active in Northern Lebanon reported having been pressured by the municipalities who obliged them to deliver part of the refugee aid to Lebanese families. It was also facing objections from religious bodies in its work in combating early marriage. Members of the organization were threatened with death and fire to the camps they work in.

On the other hand, the Lebanese Government takes decisions and measures that inevitably affect the work of organizations, such as the decision to remove the “refugee” status for Syrians fleeing the Syrian crisis, which led to the closure of the border, the refusal to give them residency permits, as well as, prosecution, arbitrary arrests, and deportation. In addition to refraining from establishing official refugee camps and recognizing the unofficial ones, thus depriving refugees residing in these camps from several services including water, electricity or sanitation.

ADVOCACY WORK SIGNIFICANTLY DECREASED ON SYRIAN REFUGEE ISSUES IN LEBANON

AS A RESULT OF THE LEGAL PROSECUTIONS OF SYRIAN REFUGEES WORKING IN THIS FIELD

Four organizations of the 17 organizations/associations interviewed by the team reported difficulties in obtaining permits from the municipalities to implement projects, especially projects in the health sector. While only one organization reports that the municipalities obliged them to allocate a portion of their aid to Lebanese families as a prerequisite to obtain permission for project implementation, despite Syrian refugees being the target of these projects and not the host community. Moreover, the director of the organization was arrested and forced to sign a pledge, preventing him from working in the health sector. It should be noted that this director does not work in the medical field or run a medical clinic.

PROSECUTION AND HARASSMENT OF CIVIL SOCIETY WORKERS

After the 2014 conflict in Aarsal, Syrian civil society workers were subjected to several security threats and prosecutions. Advocacy work on Syrian refugee issues in Lebanon significantly decreased after that year as a result of the legal prosecutions of Syrian refugees working in this field, causing terror and fear of practicing any activity aimed at affecting Lebanese policies. Arbitrary arrests increased under many pretexts, such as belonging to a “terrorist organization”, and participating in “armed opposition acts” in Syria. Some workers were able to leave the country, fleeing legal prosecution or following their



subjection to several violations.⁽⁸⁶⁾

Between March 2019 and June 2019, ACHR documented cases of activists being recurrently arrested and subjected to physical and psychological torture, interrogations, cellphone supervision and the withdrawal of their residencies. In addition to these cases, ACHR documented four cases for four organizations working with Syrian refugees, subjected to security inspections during the Ministry of Labor crackdown on foreign workers given the presence of Syrian refugees as volunteers or employees within the organization. During these inspection visits, authorities confiscated identity documents and summoned, arrested and interrogated several individuals, while some were tortured.

Since the beginning of 2020, ACHR has recorded seven cases of harassment against Syrian activists in Lebanon. The nature of these cases ranges from temporary detention at security checkpoints to arbitrary arrest/detention to torture and beatings. In addition to confiscating their identity documents as a means of pressure, despite these individuals identifying themselves as activists and/or lawyers. These cases were distributed among the following governorates: five cases in the Beqaa Governorate, one case in Baalbeck-Hermel Governorate, and one case in Beirut Governorate. It should be noted that all of these individuals are registered with the UNHCR.

Three of the associations/organizations interviewed reported their team and/or volunteers being subjected to arrest, detention, torture and seizure of their official documents. One of the interviewees was forced to sign a pledge to refrain from working in the health sector.

(86) Based on private interviews with NGO workers, activists, and donors of local NGOs.

LOCAL AND INTERNATIONAL LAWS PROTECTING ASSEMBLIES





Freedom must surely be present to ensure the ability of the work of organizations and its effectiveness within any society. This fact contributed to the presence of an active civil society in Lebanon, compared to its neighboring countries, since this freedom is guaranteed in the Lebanese constitution as well as international treaties and conventions. However, the local laws protecting the freedom of peaceful assembly and association in Lebanon are numerous and dispersed, some have been stipulated by special laws, some by general laws and others by the Law of Associations promulgated in 1909.

In general, the laws themselves are not problematic, the problem lies in the implementation of these laws through circulars and administrative decisions restricting the freedom of association. The local laws, as well as, the international laws applicable

CIRCULARS AND ADMINISTRATIVE DECISIONS

RESTRICTING THE FREEDOM OF ASSOCIATION

to Lebanon, enshrine the freedom of association in a liberal environment that allows organizations to work openly and effectively in all sectors. However, the reality is partly different as the Lebanese government resorts to administrative decisions or ministerial orders to restrict organizations and associations. These decisions violate the international agreements that Lebanon has ratified, as well as, the Lebanese Constitution which stipulates the freedom of assembly and association and freedom of expression.

THE INTERNATIONAL CONVENTIONS PRESERVING THE FREEDOM OF ASSOCIATIONS

The international conventions and treaties enshrine the right and freedom of individuals to establish or to participate in associations. The Lebanese Constitution states in its preamble that Lebanon adheres to the United Nations charter and treaties and the Universal Declaration of Human Rights and adopts their principles in all the rights and sectors in Lebanon, without any exception. Given that Lebanon has ratified a number of international conventions that protect the right to form and establish associations, it must respect those conventions and amend its local laws accordingly.

Article 20 of the Universal Declaration of Human Rights stipulates that “Everyone has the right to freedom of peaceful assembly and association.” Article 24 of the Arab Charter on Human Rights states that every citizen has “the freedom of assembly and association in peaceful manner and no restrictions shall be imposed on either of these two freedoms except when it is necessary for national security, or public safety, or the protection of the rights and freedoms of others.” In addition to, the declaration of the General assembly of the United Nations on the “Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms”⁽⁸⁷⁾ also known as “the UN declaration on Human Rights Defenders”,⁽⁸⁷⁾ declares in its fifth Article that each

(87) Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally



person, individually or in association with others, at the national and/or international level, has the right to meet or assemble peacefully, to form, join and participate in non-governmental organizations, associations or groups and to communicate with non-governmental organizations or intergovernmental organizations, with the aim of promoting and protecting human rights and fundamental freedoms. While, Article 7 of this Declaration gives everyone the right, individually or collectively, to develop or discuss issues related to advocacy on human rights.

The first paragraph of Article 22 of the International Covenant on Civil and Political Rights (ICCPR) guarantees the freedom of each individual to form and join an association. Any attempt by State authorities to restrict this right, according to the second paragraph of this article, should be “prescribed by law and which are necessary in a democratic society in the interests of national security or public safety, public order, the protection of public health or morals or the protection of the rights and freedoms of others.”

State authorities cannot use the aforementioned exceptions of Article 22 as legal justification to impose a general policy that restricts the formation and membership of assemblies. State authorities must, as a rule, protect this right and ensure that it is not interfered with, while restrictions should be an exception to this rule in accordance with the stipulated conditions.⁽⁸⁸⁾

Moreover, this exception should be narrowly and exceptionally interpreted where terms such as “national security” and “public safety” are understood to be in violent situations that are imminently threatening to the nation.

The principle of “necessity” in paragraph 2 of Article 22 should not be interpreted arbitrarily or out of context. Necessity in this context refers to restrictions put in place in response to a general need for society, while simultaneously respecting democratic values of tolerance and pluralism. Accordingly, the dissolution or prohibition of establishing any association is considered a more extreme form of restrictions based on paragraph 2 of Article 22. The legality of this strict restriction is limited to associations or organizations that adopt or promote principles that violate the rights and freedoms safeguarded in the ICCPR, in other words, those opposing democratic values and constituting a threat to the State/society. Thus, the general need in Lebanon regarding the Syrian refugee crisis disagrees with the restrictive procedures adopted by Lebanese authorities.

Any restrictive legal procedures (that meet the necessary conditions aforementioned) should be proportionate to the fundamental reason for the imposition of these restrictions. Authorities cannot claim any reason to impose restrictive measures and procedures that exceed the real need behind their imposition.⁽⁸⁹⁾ The Commission on Human Rights has always focused on the principle of proportionality

Recognized Human Rights and Fundamental Freedoms, 9 December 1998. <https://tinyurl.com/y3h755r8>

(88) Manfred Nowak, “UN Covenant on Civil and Political Rights: CCPR Commentary,” Engel Publishers, 1st ed., 1993, pages 380-81.

(89) Ibid, pages 386-387.



as a condition when imposing exceptional restrictions that meet the legal requirements.⁽⁹⁰⁾

The wording in Article 22 of the ICCPR is general and thus covers all forms of associations, including human rights associations.⁽⁹¹⁾ Additionally, Article 22 does not require the legal registration of institutions as a pre-requisite to benefit from these rights and freedoms. Meaning, de facto associations enjoy the same level of protection as registered institutions, as long as they possess some type of organizational structure.⁽⁹²⁾ Such protection for de facto associations is necessary in light of several countries restricting the scope of work for human rights associations.

The Special Rapporteur on the situation of human rights defenders referring to the protection of de facto associations and their members clarified in its annual report that “the criminalization of the participation in unregistered entities is contrary to the right to freedom of associations and violates a number of international human rights instruments. Imposing criminal sanctions for unregistered activities is very often exacerbated by lengthy, ambiguous and unpredictable registration requirements.”[especially in ambiguous legal texts.]⁽⁹³⁾

The Special Rapporteur clarified that the registration of human rights associations should not be mandatory, associations should rather notify of the establishment of the association.⁽⁹⁴⁾ The restrictions adopted by the State preventing unregistered associations from accessing funding are often “merely rhetorical [justifications] and the real intention of Governments is to restrict the ability of human rights organizations to carry out their legitimate work in defence of human rights.”⁽⁹⁵⁾

This is confirmed by Article 13 of the Declaration on human rights defenders which preserves the right of everyone individually and in association with others to “to solicit, receive and utilize resources for the express purpose of promoting and protecting human rights and fundamental freedoms through peaceful means, in accordance with article 3 of the present Declaration.”

It can also be said that the State duty is to protect and respect the right of individuals in forming associations includes the State’s positive duty to prevent any harassment and interference in this right. For instance, the Inter-American Court of Human Rights ruled that the safeguarded right in Article 16 of the American Convention on Human Rights (the right to form associations) requires the State to “provide the necessary means for human rights defenders to conduct their activities freely; to protect them when they are subject to threats in order to ward off any attempt on their life or safety; to refrain from placing restrictions that would hinder the performance of their work, and to conduct serious and effective investigations of any violations against them, thus preventing impunity.”⁽⁹⁶⁾

(90) Vladimir Petrovich Laptsevich v. Belarus, HRC. Communication no. 780/1997, 13-31 March 2000.

(91) UN General Assembly, Report of the Special Rapporteur on the situation of human rights defenders, A/64/226, 4 August 2009, paragraph 20. <https://undocs.org/ar/A/64/226>

(92) Ibid., Paragraph 21

(93) Ibid., Paragraph 65

(94) Ibid., Paragraph 59

(95) Ibid., Paragraph 94

(96) Kawas Fernandez v. Honduras. (IACHR, 2009)



It is important that Lebanese authorities respect the right of individuals in forming and joining associations according to the abovementioned standards as this right is related to a number of other civil and political given that all human rights under Vienna Declaration 1993 are universal, interdependent, interrelated and indivisible.⁽⁹⁷⁾ The most prominent rights related to the right to form associations are right to freedom of expression,⁽⁹⁸⁾ and the right to peaceful assembly.⁽⁹⁹⁾

The Human Rights Committee (the political and civil rights) clarified that for instance: “The freedoms of opinion and expression form a basis for the full enjoyment of a wide range of other human rights. Freedom of expression is integral to the enjoyment of the rights to freedom of assembly and association, and the exercise of the right to vote.⁽¹⁰⁰⁾ On another note, the Human Rights Committee clarified that any restriction on the right of individuals in forming and joining an association affects the right of individuals to peaceful assemble, under Article 21 of the ICCPR.⁽¹⁰¹⁾

The Special Rapporteur on the situation of human rights defenders indicated that “The protection of the right to freedom of association is fundamental to any democratic society, as there is a direct relationship between democracy, pluralism and the freedom of association.”⁽¹⁰²⁾ Therefore, criticizing authorities and monitoring their performance falls within the core tasks of human rights associations. This is confirmed by the Special Representative of the United Nations at the time, stating: “Any organization has the right to defend human rights, as the task of human rights defenders is to look critically at government procedures, and criticism of these procedures and the freedom to express these criticisms, are an essential element in any democracy and its legitimacy must be proven in laws and in practice.”⁽¹⁰³⁾

THE LOCAL LAWS PROTECTING THE FREEDOM OF ASSOCIATIONS IN LEBANON

Article 13 of the Lebanese Constitution preserves the freedom of association, stating that: “The freedom to express one’s opinion orally or in writing, the freedom of the press, the freedom of assembly, and the freedom of association shall be guaranteed within the limits established by law.”

Accordingly, the Lebanese Constitution considers the freedom of assembly one of the fundamental constitutional freedoms. Meaning, the legislative authority has the sole right to restrict the freedom of assembly, in accordance to the law and within the framework defined by Article 22 of the ICCPR, as in, restrictions that are “necessary in a democratic society in the interests of national security or public

(97) Vienna Declaration and Programme of Action adopted at the World Conference on Human Rights, 25 June 1993. <https://tinyurl.com/y2xmlbtj>

(98) Article 19, ICCPR.

(99) Article 21, ICCPR.

(100) Human Rights Committee, General Comment No. 34: Freedom of opinion and expression, CCPR/C/GC/34, 12 September 2011, paragraph 4.

(101) Human Rights Committee, General Comment No. 37: The Right to Peaceful Assembly, CCPR/C/GC/37, 27 July 2020, paragraph 100.

(102) Report of the Special Rapporteur on the situation of human rights defenders, A/64/226, paragraph 7, <https://undocs.org/ar/A/64/226>

(103) UN General Assembly, Report of the Special Representative of the Secretary-General on Human Rights Defenders, A/59/401, 1 October 2004, paragraph 49.



safety, public order, the protection of public health or morals or the protection of the rights and freedoms of others.”

Various Lebanese laws protect the right of association, however, the main law is the Law of Associations issued by the Ottoman Empire in 1909. Despite the fall of the Ottoman Empire, the independence of the Lebanese State and the passing of more than hundreds of years since its adoption, this law remains in place and is the fundamental tool that regulates the establishment, functioning and dissolution of associations in Lebanon.⁽¹⁰⁴⁾

Article 2 of this law exempts associations from licensing and only requires them to inform the government of its establishment in accordance with Article 6. Subsequently, upon formation of the association, the founders must submit a signed and sealed statement from the Ministry of Interior, provided that the statement contains the association’s address, goals, headquarters, names of those entrusted with administration matters, their capacity and their position. In return for submitting this statement, the founders receive a “notice of recognition,” and attached to this statement are two copies of the association’s statute, sealed with the association’s official stamp.⁽¹⁰⁵⁾

This law stipulated certain conditions for the establishment of associations, it prohibits:

- Forming associations on an unlawful basis that violates the laws and public morals or with the intent to disturb the State. Notice of recognition is refused for these associations, and they are subsequently dissolved by the Council of Ministers.⁽¹⁰⁶⁾
- Forming political associations that have nationalism or nationality as a basis.⁽¹⁰⁷⁾
- Forming clandestine/secret associations, which are defined by the Law of Associations and the Penal Code as associations with a purpose contrary to the law and carrying out the entirety or a portion of their activities in secret. Secret associations are also those who refrained from announcing their establishment and informing the authorities of their regulations and the identity of their members, despite the administration’s request to do so, or who provided authorities with false information.⁽¹⁰⁸⁾

The penalty for this violation, as defined by the Law of Associations, is the dissolution of the association and the fining of its founders, its administrative board and the owner of its meeting place or its renter, with an amount ranging between five and twenty-five gold coins (This currency is no longer in use today, this law has not been amended) However, the criminal penalty of secrecy, is the dissolution of the clandestine association, confiscation of its funds, and the imprisonment of those who held an administrative or executive position from six months to two years with a

(104) Law of Associations, 3 August 1909. <https://tinyurl.com/yahszyg6>

(105) Ibid, Article 6.

(106) Ibid, Article 3.

(107) Ibid, Article 4.

(108) Ibid, Article 12.

Article 337 of the Lebanese Penal Code.



fine of five to 500 pounds, while the remainder of the members are to be fined with half of the two penalties.⁽¹⁰⁹⁾

The importance of this law lies in securing freedom of associations by not subjecting it to licensing but rather to a system of notification through a “notice of recognition.” Authorities have no right to refrain from delivering a “notice of recognition” with the exception of three cases: If the statement does not include the information required by law, due to the lack of spatial jurisdiction, if the subject of the association is founded on an unlawful basis according to Article 3 mentioned above. In all of these cases, the administrative authorities’ role is limited to supervision to ensure the presence of the material elements legally required in the submitted documents. The administration is required to give the receipt of “notice of recognition” immediately, in the case that all these elements are met and it is not entitled to exert any supervision on the legality of the subject of the association.⁽¹¹⁰⁾

However, Article 19 gave the internal and judicial administrations the responsibility to implement this law,⁽¹¹¹⁾ and to inspect associations and forums, who are required to allow authorities entrance to their meeting place, provided that the authorities prove a necessity for inspection.⁽¹¹²⁾

Regarding Foreign Associations:

Matters differ for foreign associations which are governed by the High Commissioner decision no. 369, issued on 21 December 1939.⁽¹¹³⁾ This decision requires foreign associations to obtain a prior license from the “the representative of the High Commissioner” (knowing that this position no longer exists today) and is prohibited from establishing organizations in Lebanon without a special license for each of these organizations.⁽¹¹⁴⁾

This license is granted either temporarily, periodically or based on certain conditions, and may be revoked at any time with an administrative order from the “High commissioner or his representative.”⁽¹¹⁵⁾ Foreign associations that are refused a license, or have their license revoked, are required to cease their operations immediately and begin liquidating their funds within a month starting from the date of notification of the refusal or revocation.⁽¹¹⁶⁾ As for foreign associations that do not request licensing within the conditions specified in the decision, they are abolished by law and this abolishment is proven by an administrative order from the “Representative of the High commissioner”. This decision applies to individuals who have carried out administrative and non-administrative activities in unlicensed foreign associations. The decision imposes a sentence from six months to three years of imprisonment and a

(109) Article 338 of the Lebanese Penal Code.

(110) Arab Lawyers Forum, “Organizing Associations in Lebanon: Between Freedom, Law and Practice,” 10 February 2003. <https://tinyurl.com/y6fsmukn>

(111) Article 19 of the Law of Associations.

(112) Ibid, Article 18.

(113) Decision of the High Commissioner, no.369, issued on 21 December 1939. <https://tinyurl.com/y2k5lov9>

(114) Ibid, Article 1.

(115) Ibid, Article 2.

(116) Ibid, Article 9.



fine of between five and three hundred Lebanese pounds (the decision has not been amended to date) or one of these two penalties on every individual who manages, in any capacity whatsoever, or continues to manage these associations. As for individuals who do not manage these associations but have participated in their activities, they shall be sentenced from three months to two years of imprisonment and a fine of two pounds to one hundred pounds or either of these two penalties. The same penalty shall be imposed on anyone who violates the provisions of this decision in any form.⁽¹¹⁷⁾

Foreign associations may be:⁽¹¹⁸⁾

- An association, regardless of its form, or a group possessing the characteristics of associations, with headquarters outside of Lebanon.
- An association or group that possesses the characteristics of associations and its headquarters are in Lebanon, and:
 - Belongs to foreign associations or groups
 - Or is de facto managed by foreigners
 - Or has foreign management members
 - Or at least a quarter of its members are foreign
- A quasi-foreign association, which is one that, although Lebanese, has a political goal beyond the Lebanese context and is connected to foreign elements in its activities.⁽¹¹⁹⁾

This decision gave representatives of the High commissioner the right to request the directors of each group or association in Lebanon to provide them in writing, within a month, all information sufficient to determine the headquarters of groups or association, their true objectives, and the nationality of the actual members of their administration and directors.⁽¹²⁰⁾ It also requires associations to obtain prior license from the High Commissioner's representative for each amendment made to the statute or the internal policies and to the place of residence, as well as, each alteration in the formation of the association's office due to resignation or death, or any other reason, must be reported to the representative of the High Commissioner within eight days.⁽¹²¹⁾ Although the Law of Associations enshrines the freedom of association and is considered "liberal" to some extent, given its antiquity, its amendment remains necessary. The laws and decisions regulating the affairs of associations are outdated, for instance, the Law of Associations issued by the Ottoman Empire in 1909 still mentions powers and references that no longer exist such as "Royal Commissioners", "Royal Government", "Dar el Sa'ada " and others. It also specifies fines in currencies that are no longer in use, such as the Lebanese Syrian pound and gold coins. The High Commissioner decision issued in 1939 regarding foreign associations, also mentions references that no longer exist today, such as the High Commissioner.

(117) Ibid, Article 13.

(118) Ibid, Article 4.

(119) Ibid.

(120) Ibid, Article 5.

(121) Ibid, Article 7.



After several years of systematic violation of freedom of association and the notification system enshrined in Lebanese laws, particularly in the law of 1909, the Minister of Interior issued on 15 May 2006 circular no. 10/A.M/2006 on the establishment of associations and their functioning. This circular stressed on the freedom of association, requiring the publication of the notification in the Official Gazette, despite the law not requiring this and despite the costs of this publication which may be expensive for some, inevitably resulting in the prevention of some social groups from establishing associations, a right guaranteed by the constitution. The circular stipulates that the administration has no right to refuse giving a “notice of recognition” to an association, except in two cases: if the statement does not include the information required by law or if the subject of the association is incompatible with public morals, state security, or public order. It further establishes a second principle: a legally declared assembly can only be dissolved by decree of the council of Ministers.

This circular was amended by circular No 15 issued on 12 September 2008,⁽¹²²⁾ regarding the dissolution of the association. Based on this circular, the dissolution of an association has become either by a decision from the general assembly of the association, or by a decision from the competent court, or by the ministry in the case that the subject of the association has an unlawful basis. If the association is dissolved by an act from the ministry, the notification statement is immediately referred to the General directorate of General Security upon its signature. The latter conducts the necessary investigations and inquiries on all the activities and founders of the associations. The General Directorate of Political Affairs and Refugees is then directly informed on the outcome of these investigations and has the ability to “reject the notification”, and therefore refrain from giving notice of recognition. Finally, the minister refers the matter to the office of the Council of Ministers to approve the requisites for the dissolution of the association. State supervision on associations is evident in the draft law implemented by decree No. 10830 issued on 09 October 1962 which requires each licensed association to submit, to the Ministry of Interior and Municipalities, within the first month of the year, a list of its members’ names, a copy of its annual budget and its previous final account and this account is subject to the supervision of the competent ministry.

This “supervisory” role is increasing, as noticeable in recently issued circulars. On 8 November 2018, circular No. 24 issued by the Minister of the Interior,⁽¹²³⁾ regarding the latter monitoring associations according to a new mechanism determined by the Directorate General of Political Affairs and Refugees pursuant to the provisions of the Law of Associations issued in 1909. According to this circular, the law gives the administration “the cautious caring character” in regards to the activities of associations, within the scope of the laws and regulations, ensures the implementation of the provisions related to associations and allows the Ministry of Interior to appoint delegates tasked with supervising the association elections, monitor their budgets, and verify the identity of their members.

(122) Circular no.15 issued 1 September 2008, Official Gazette No. 38, publication date 18 September 2008, pages 3657-3658.

(123) Circular no.24 issued 8 November 2018, Official Gazette, No.49, publication date 15 November 2018, pages 5297- 5298.



Accordingly, the circular allowed the General Directorate of Political Affairs and Refugees, with the aim of preserving public interest, to “tighten supervision of associations, especially with regard to supervising the elections of the administrative bodies and monitoring their accounts according to a specific mechanism approved by the ministry.” This matter is worrying for freedoms, as it restricts freedom of association in Lebanon despite the circular confirming the obligation of the ministry to provide a democratic and legal environment for associations.

Moreover, the circular elaborates on the definition of “clandestine” despite the fact that legislators clearly defined this term, and thus preventing ministries from elaborating on the concept.⁽¹²⁴⁾ The circular considered each association refraining from informing the government of the required information “secretive/clandestine,” giving the State the right to dissolve it, confiscate its funds, and prosecute some of its members.⁽¹²⁵⁾

On the other hand, the circular mentioned that “the Department of Political Affairs, Parties and Associations shall prepare the necessary texts to grant licenses to form associations, parties and clubs.” The circular used the word “licenses” in contradiction to the text of Article 2 of the Law of Associations, which affirms that forming an association does not require a license, but only requires notifying the government after establishing the association in accordance with Article 6.

Consequently, the use of the word “license” contradicts Lebanese principles and laws regarding freedom of association and restricts this freedom and its effectiveness. However, this restriction is not limited to the use of the word and its meaning. In reality, Lebanese authorities treat the notice of recognition as if it were a license. Theoretically, approval from the State is not required in a “notice of recognition” system. However, practically in Lebanon, organizations/associations must submit a request to the authorities, which is then studied and investigated, and the organizations/associations, are not considered registered until after the authorities accept this request.

Moreover, the Ministry of Interior sometimes takes months, and even in extreme cases, years to give notice of recognition, causing difficulties for these organizations/associations, that cannot benefit from many rights and privileges limited to registered entities, such as the right to open a bank account. (which makes it easier to receive grants.)

Consequently, the State Council issued a decision stating that a notice of recognition is not a mandatory pre-requirement to the existence of an organization. The extent of respecting this decision depends on the Minister of Interior currently in office. For example, the Ministry of Interior issued an administrative decision in 2008 requiring the ministry to give organizations/association a registration number within

(124) Omar Taleb, “A trend towards restricting freedom of association in Lebanon? The Ministry of Interior issues a circular violating the constitution and the law on associations.” *Legal Agenda*. 7 December 2018. <https://tinyurl.com/yxgt6to8>

(125) Ismail Zainab, “the Ministry of interior tightens supervision of associations: controlling indolence or confiscating freedoms?” *Al Akhbar*. 17 November 2018. <https://tinyurl.com/y3hhp4sa>



30 days from the date of notification, but these directives were not applied in the ministry that followed.⁽¹²⁶⁾

In addition, the State Council issued decision no. 135/2003-2004 on 18 November 2003,⁽¹²⁷⁾ refusing to place restrictions on the establishment and dissolution of organizations/associations, except by a legal text. This decision also refused subjecting associations/organizations, regarding the legality of their establishment, to prior intervention from any administrative or judicial authority. It also considered that the Ministry of Interior is obligated to give notice of recognition without delay, and it does not enjoy discretionary authority in this regard as its role is limited to merely accepting the statement required by law from the association, and giving the association notice of recognition and a receipt proving the completion of the transactions stipulated by law, following an investigation to reveal the associations' true objectives and means of work. This decision stressed that such investigation does not exceed the freedom of association, considering that the statement issued by the Ministry of Interior is merely a statement or notice of recognition and "does not constitute a license."

These administrative decisions and circulars adopted by the Lebanese Government violate the international laws that Lebanon must abide by. They restrict freedom of peaceful assembly and association in a manner inconsistent with Article 22 of the ICCPR previously mentioned, which forbids placing restrictions on this right except by necessary measures in a "democratic society to maintain national security, public safety or public order or protecting public health or morals or protecting rights and freedoms of others." Returning to the aforementioned circulars, we see that the measures taken by the Lebanese Government do not constitute exceptional and necessary circumstances:

Circular No. 2018/24 which allowed the Ministry of Interior and Municipalities to monitor associations based on a mechanism determined by the General Directorate of Political Affairs and Refugees and "to appoint delegates to supervise the elections of associations, monitor their budgets and verify the identity of their members" or circular 1962/10830 requiring associations to submit a list of the names of its members, a copy of its annual budget and its previous final account, and in the latter is subjected to the monitoring of the competent ministry. These are evidently not necessary measures in a democratic society and are not related to national security, public safety, protection of public health or morals, or even the protection of the right and freedoms of others.

Furthermore, the Council of Ministers unanimously approved a policy paper on 14 July 2020 which includes measures that would inevitably restrict this right, such as, the policy paper initially approved by the Council of Ministers unanimously on 14 July 2020 which includes measures that would increase restrictions on this right, such as "reinforcing State supervision" on international organizations and activities, projects and funding methods, with the aim of "monitoring bodies and their activities, evaluating their work and using the results of the evaluation for future funding processes" and imposing

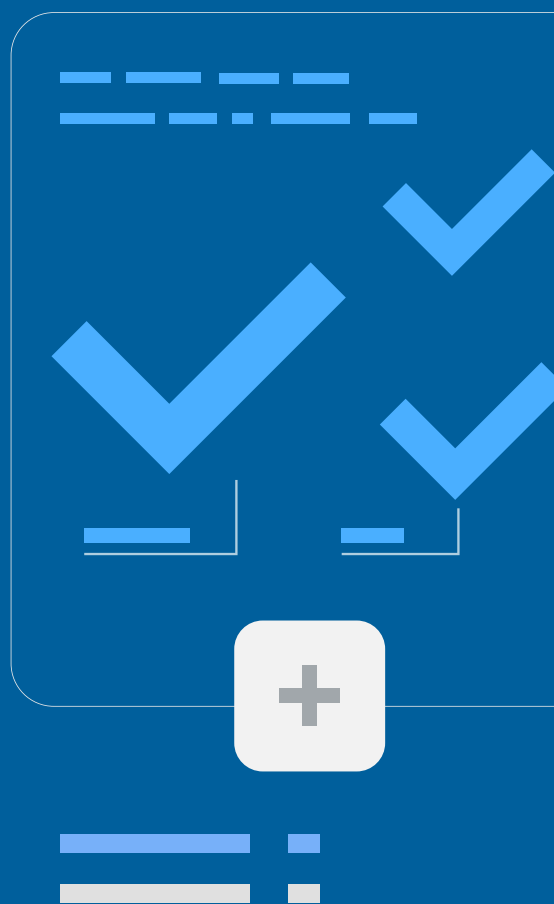
(126) "Mapping Civil Society Organizations in Lebanon. 16 April 2015. <https://tinyurl.com/yyltqrau>

(127) State Shura Council. Resolution No. 135/2003-2004, 18 November 2003, parties and associations cases, AlHaditha books, Vol.1, 2011, page 110.



the allocation of portions of the aid to Lebanese individuals or the Lebanese Government and portions for the support of specific objectives. These measures subject organizations to further supervision and constrain them to specific projects and targets. As such, these circulars and measures violate international laws regarding freedom of association, particularly Articles 19, 21, and 22 of the ICCPR, under which Lebanon has the obligation to ensure through legislation and measures the protection of the right to peaceful assembly and association.

CONCLUSION AND RECOMMENDATIONS





The work of civil society and non-governmental organizations is an integral part of any State in the world. Despite, civil society organizations being non-governmental bodies, but their activities contribute to State building. Therefore, Lebanon must respect the work and activities of civil society and support it to the fullest of its abilities, similarly to all concerned bodies, including civil society organizations. The latter has contributed to building a society in Lebanon and is considered one of the more active bodies in social causes, amid the multiple issues hindering the government's work, as well as, economic collapse and the inability to form a cabinet for many long months.

For this reason, the Access Center for Human Rights recommends the Lebanese Government to revise its laws and examine their contradiction with international laws and conventions and as such, recommends the following:

The Lebanese Government

- Security services must cease prosecution of civil society activists and workers, and recurrent visitations to pressure civil society workers. Security forces must ensure their protection from any security risks to facilitate their legal activities.
- Facilitate obtaining legal residency papers for civil society workers, exclude them from the Ministry of Labor plan to combat foreign labor, include the employees in social security without discrimination, to ensure their legal work and protect them from exploitation.
- Provide the necessary support to international associations and organizations in the stages of registration, opening bank accounts for them and their workers, to facilitate receiving funds in difficult currency, inevitably legally contributing to the Lebanese economy and resolving the large complications that cause organizations to obtain the funds in an informal way.
- Respect the principles and objectives of civil society, especially civil society organizations, and provide them with the necessary space to build a State in Lebanon, and to facilitate their work, projects and programs that contribute in society building.
- Include civil society, including organizations/associations working with refugees, in assisting the Lebanese Government in organizing the issues of refugees and marginalized groups, including the distribution of in-kind and material aid, in order to reach the largest possible target.

Considering that the responsibility lies primarily on the Lebanese State, supporting bodies and donors that contribute in building a State in Lebanon by providing Lebanon with funding, grants and donations that contribute to filling the gaps that Lebanon suffers from, as well as, developing and protecting the performance of civil society and directing it towards institutional and professional work, to pressure Lebanon to recognize the great role of civil society in society building. Accordingly, the Access Center for Human Rights recommends the following:



The International Community and Donors:

- Adopt a monitoring mechanism, in cooperation with civil society organizations, to assess the interventions of Lebanon and its fund distribution with regards to refugees and the Lebanese community.
- Allocate a portion of the grants awarded to Lebanon – in support of civil society organizations – directly and not through the Lebanese Government, and provide them with a free space to implement projects while taking into consideration the large extent of restrictions on their activities.
- Emphasize the necessity of public embedding for all concerned parties in regard to grants provided by the European Union and other donors, including civil society organizations. In addition to supporting these organizations in their area of intervention to expand their activities in refugee communities. Particularly, in providing emergency relief aid within the governmental response plan. Response selectivity and politically screening population groups will negatively impact the COVID-19 response. This includes targeting the discriminatory executive decisions taken by some municipalities against refugees.
- Contribute in pressuring Lebanon to allow free spaces for civil society organizations and advocacy on causes that civil society is working on internationally.
- Strengthen the capacity of civil society organizations and associations in order to enable them to influence government policy, participate in drafting it and provide political and human rights consulting.

Special Rapporteur on the situation of human rights defenders and the Special Rapporteur on the rights to freedom of peaceful assembly and of association:

- Remind Lebanon of its obligation to respect and protect the rights of human rights defenders and the right of people to peaceful and free assembly, including those who express different opinions and oppose government policy, without discrimination on the basis of race, nationality, gender and religion.
- Monitor the restrictions, procedures, and measures that Lebanon imposes on civil society activists and organizations and their violation of international treaties and laws. Monitor methods of the threat, intimidation, violence, and harassment practiced by security services against civil society activists and workers.



COPIES OF THIS RESEARCH PAPER SENT TO

The Lebanese Ministry of Interior and Municipalities.

The Lebanese Ministry of Social Affairs and Labor.

Lebanese Ministry of Labor.

European Union offices in Beirut, Geneva, Brussels, New York.

Special Rapporteur on the situation of human rights defenders.

Special Rapporteur on the rights to freedom of peaceful assembly and of association.

Multiple donors.



REFERENCES

- Abdel Samad, Ziad. Moschini, Bihter. "Humanitarian Assistance in Lebanon: Overview, Challenges and Recommendations. Revisiting the Humanitarian System: The Call for Country Ownership in the Case of Lebanon." Lebanon Support. October 2016. <https://tinyurl.com/y4odlwf3>
- Abi Yaghi, Marie-Noëlle. Yammine Léa. Jagannathsingh Amreasha. "Civil Society in Lebanon: The Implementation Trap." Civil Society Knowledge Centre. Lebanon Support. 1 January 2019. <https://tinyurl.com/yypq64e4>
- Al Kantar, Bassam. "NGOs are prospering in the time of the Syrian crisis." Al Akhbar. 23 April 2013. <https://al-akhbar.com/Arab/49833>
- Amnesty International. "Lebanon: Authorities must immediately halt deportation of Syrian refugees." 27 August 2019. <https://tinyurl.com/y5ngjccce>
- Arab Lawyers Forum. Organizing Associations in Lebanon: Between Freedom, Law and Practice. 10 February 2003. <https://tinyurl.com/y6fsmukn>
- Borger, Julian. "Syria safe zones will not end need for asylum in west, UN refugee head warns." The Guardian. 30 September 2015. <https://tinyurl.com/yxuge596>
- Cabinet session statement. 14 July 2020. <https://tinyurl.com/y5ccuagh>
- Circular no.15 issued 1 September 2008. Official Gazette No. 38. Publication date 18 September 2008. Pages 3657-3658.
- Circular no.24 issued 8 November 2018. Official Gazette No.49. Publication date 15 November 2018. Pages 5297- 5298.
- Civil Society Facility South. "Mapping Civil Society Organizations in Lebanon." 16 April 2015. <https://tinyurl.com/y3ossu7o>
- Council of Ministers. "The Cabinet approves the 2020 budget and reform paper to advance the economy and stimulate growth." 21 October 2019. <https://tinyurl.com/yxf3zv85>
- Daily Star, "Labor Ministry starts crackdown on foreign labor." 10 July 2019 <https://tinyurl.com/yd8dje8l>
- Decision of the High Commissioner. No.369. Issued on 21 December 1939. <https://tinyurl.com/y2k5lov9>
- Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms, 9 December 1998. <https://tinyurl.com/y3h755r8>
- Development Initiative. Global Humanitarian Assistance Report 2019. 30 September 2019. <https://tinyurl.com/t3p53dx>
- Dionigi, F. "The Syrian Refugee Crisis in Lebanon: State Fragility and Social Resilience." LSE Middle East Centre. February 2016. <https://tinyurl.com/y97mzyu9>
- Doctors Without Borders. "Aid lags as Syrian refugee numbers increase." 7 February 2013. <https://tinyurl.com/y6jx3yor>
- El Chmali, Laura. "The Impact of the Syrian Refugee Crisis on the Civil Society Sector in Lebanon." Border Crossing. Transnational Press London. 2017. Vol. 7(2), pages 361-394. <https://tinyurl.com/yxuenkn2>
- European Commission. "European Neighbourhood Policy and Enlargement Negotiations." Lebanon. Last Access: 10 July 2020.
- European Commission. "Managing the Refugee Crisis: EU Support to Lebanon and Jordan Since the Onset of Syria Crisis." Last accessed: 26 June 2020 <https://tinyurl.com/ybfhx9rh>
- European Commission. "Responding to the Syrian crisis: EU Support in Lebanon." Brussels IV Conference. June 2020. <https://tinyurl.com/y3h86v2d>
- European Council. "Brussels II Conference on 'Supporting the future of Syria and the region': co-chairs declaration." 25 April 2018. <https://tinyurl.com/y83rtsej>
- European Council. "Brussels III Conference on 'Supporting the future of Syria and the region': co-chairs declaration." 14 March 2019. <https://tinyurl.com/y7s8pz46>
- European Council. "Brussels IV Conference on 'Supporting the future of Syria and the region': co-chairs declaration." 30 June 2020.
- European Council. "Supporting the future of Syria and the region - Brussels conference." 4-5 April 2017. <https://tinyurl.com/y47zo6rq>
- Government of Lebanon and the United Nations. Lebanon Crisis Response plan. 2017-2020. January 2020 update. <https://tinyurl.com/yyu064gn>
- Human Rights Committee. General Comment No. 34: Freedom of opinion and expression. CCPR/C/GC/34. 12 September 2011.
- Human Rights Committee, General Comment No. 37: The Right to Peaceful Assembly. CCPR/C/GC/37. 27 July 2020.
- Human Rights Watch. World report 2018. Events of 2018 in Lebanon. <https://tinyurl.com/yysz6lsa>
- Ingram, George. "Civil Society: An essential ingredient of development." Brookings. 6 April 2020. <https://tinyurl.com/yyhtrxcq>
- Inter-Agency Coordination Group. End Year Funding Update for the Crisis Response Plan. 31 December 2019. <https://tinyurl.com/y2zwhvqz>
- International Covenant on Civil and Political Rights, 16 December 1966. <https://tinyurl.com/y85h68gf>
- Ismail, Zainab, "the Ministry of interior tightens supervision of associations: controlling indolence or confiscating freedoms?" Al Akhbar. 17 November 2018. <https://al-akhbar.com/Community/261868>
- Kawas Fernandez v. Honduras. (IACHR, 2009)



- Kelley, Ninette. "Responding to a Refugee Influx: Lessons from Lebanon." *Journal on Migration and Human Security*, 2017, Vol. 5, No 1, page 82-104. <https://tinyurl.com/yytlxslc>
- Law of Associations, 3 August 1909. <https://tinyurl.com/yahszyg6>
- Lebanese Penal Code, Legislative decree no. 340. 01 March 1943. <https://tinyurl.com/y92hq2jl>
- Lebanon Humanitarian Fund. "Principles Guiding 2019 Allocations." <https://tinyurl.com/ya7z2gsf>
- Legal Agenda, "Regarding the decision to deport Syrian citizens who entered Lebanon irregularly." 25 June 2019. <https://tinyurl.com/ycweco2g>
- Leila, Bassam. "Lebanon cabinet approves financial rescue plan - ministerial sources." Reuters. 6 February 2020 <https://tinyurl.com/y6o94etq>
- Megaphone. "The secrets of the Central Bank of Lebanon." YouTube. Video. 31 July 2020. <https://tinyurl.com/y3w8hf5w>
- Ministerial decree no.72 dated 23 March 2014.
- Ministry of Social Affairs. "Bou Assi: 2018 is the year of classifying the categories of displaced persons in preparation for their return." Access date: 25 June 2020. <https://tinyurl.com/y6jmfz4>
- Ministry of Social Affairs. "The Maronite League recommended that the government reclaim the management of the Syrian displacement file. Bassil criticized the reluctance for a solution, and Derbes emphasized that there is no word for resettlement." Access Date: 25 June 2020. <https://tinyurl.com/y49z22sh>
- Nowak, Manfred. "UN Covenant on Civil and Political Rights: CCPR Commentary." Engel Publishers. 1st ed. (1993)
- N.M. "Hitti: For the safe, dignified and non-forced return of displaced Syrians." NNA. 9 June 2020. <http://nna-leb.gov.lb/ar/show-news/483595/>
- OCHA. Lebanon Humanitarian Fund Annual Report 2019. 28 May 2020. <https://tinyurl.com/yaxmjt2e>
- OCHA. "OCHA in a message: What is the General Assembly Resolution No.46/182?" December 2011. <https://tinyurl.com/y2pw89v5>
- OCHA. "Syria: Five things you need to know about the Kuwait Pledging Conference." 13 January 2014. <https://tinyurl.com/yc7fobah>
- Rahme, Karen. "Reception Policies, Practices & Responses: Lebanon Country Report." Respond Migration. 17 April 2020. <https://tinyurl.com/ycnjv8g>
- Saarti, Rana. "What is the importance of having a ministerial committee charged with managing the displaced persons file?" Lebanon Debate. 14 January 2017 <https://www.lebanondebate.com/news/303868>
- Saavedra, Luz. "We know our wounds: National and Local Organizations Involved in the Humanitarian Response in Lebanon." ALNAP Country Study. 2016. <https://tinyurl.com/y2awumjt>
- State Shura Council. Decision No. 135/2003-2004. 18 November 2003. Parties and Associations Cases. AlHaditha books. Vol 1. 2011. Page 110.
- Taleb, Omar. "A trend towards restricting freedom of association in Lebanon? The Ministry of Interior issues a circular violating the constitution and the law on associations." Legal Agenda. 7 December 2018. <https://www.legal-agenda.com/article.php?id=5113>
- The Australian Embassy in Lebanon. "Direct Aid Program 2019-2020." Last Access: 26 June 2020. <https://tinyurl.com/y5u9uke4>
- UN. Funding channels. Last accessed: 26 June 2020 <https://www.un.org.lb/english/funding-channels>
- UN General Assembly. Report of the Special Rapporteur on the situation of human rights defenders. A/64/226. 4 August 2009. <https://undocs.org/ar/A/64/226>
- UN General Assembly. Report of the Special Representative of the Secretary-General on Human Rights Defenders. A/59/401. 1 October 2004.
- UN News. "Donors pledge \$3.8 billion in aid to people affected by Syria crisis at UN-backed conference." 31 March 2015. <https://tinyurl.com/yct45a4x>
- UN News. "Record \$10 billion pledged in humanitarian aid for Syria at UN co-hosted conference in London." 4 February 2016. <https://tinyurl.com/y7ykkn6j>
- UNDP, The Parliament. "The National Human Rights Plan: Freedom of Association." 20 November 2008. <https://tinyurl.com/yyea2wot>
- UNHCR, Financial Tracking Service. Country Profile 2018. Lebanon. Last update: 25 June 2020. <https://fts.unocha.org/countries/124/recipient-types/2018>
- UNHCR. Financial Tracking Service. Lebanon. Country Snapshot for 2019. <https://fts.unocha.org/countries/124/summary/2019>
- UNHCR. Financial Tracking Service. Lebanon. Country Snapshot for 2020. Last Update: 27 July 2020. <https://fts.unocha.org/countries/124/summary/2020>
- UNHCR. Funding update 2020. Lebanon. 29 April 2020. <https://tinyurl.com/yccmhgpo>
- UNHCR. "Lebanon at a Glance." June 2020. <https://tinyurl.com/y7f8ar6n>
- UNHCR, "Syrian refugees flee to Lebanon." 19 February 2014. <https://tinyurl.com/y5bggd7c>
- UNHCR. "The Operational Portal: Refugee Situations." Lebanon. Latest Update: 31 July 2020. <https://data2.unhcr.org/en/situations/syria/location/71>
- UNHCR. Where we work. Lebanon. Access Date: 27 July 2020. <https://tinyurl.com/y2hatsag>



US Treasury Department. "Syria Sanctions." Resource Center. Last modified: 10 July 2020.

Vienna Declaration and Programme of Action adopted at the World Conference on Human Rights. 25 June 1993. <https://tinyurl.com/y2xmbtj>

Vladimir Petrovich Laptsevich v. Belarus, HRC. Communication no. 780/1997, 13-31 March 2000.

World Bank. "Lebanon: Country partnership framework for FY17-FY22." 22 June 2016. <https://tinyurl.com/y3ragmbn>