



SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

Enabling Environment Snapshot

Lebanon

June 2025

Context

Lebanon's political and economic environment has undergone unprecedented challenges and opportunities in recent years. The armed conflict from October 2023 to December 2024 between Israel and Hezbollah-aligned groups [displaced](#) over 1.2 million people (20% of the population), [caused](#) over 4,047 civilian casualties [including](#) at least 240 children and left 16,638 injured. It also severely damaged infrastructure across southern Lebanon and the Bekaa Valley. Assessing the impact of the conflict, the World Bank and the National Council for Scientific Research – Lebanon [estimate](#) a US\$6.8 billion loss to physical assets, US\$7.2 billion for economic losses, and that a total of US\$11 billion would be needed for recovery and reconstruction.

Lebanon has also been experiencing severe economic collapse since 2019. The GDP [declined](#) over 40%, local currency was [devalued](#) by 95%, and multidimensional poverty has [affected](#) 82% of the population. Public institutions largely fail to provide basic services, creating a governance vacuum filled by civil society, which [assumed](#) outsized responsibilities and demonstrated high effectiveness in service delivery, particularly during conflict-induced displacement and reconstruction.

In [January 2025](#), new President Joseph Aoun was elected, followed by the appointment of Prime Minister Nawaf Salam, marking a potential turning point for state reform. This new political leadership, combined with the May 2025 [municipal elections](#) across 1,029 municipalities, offers civil society a platform to convert grassroots credibility into formal participatory influence at the local level. Despite these constraints, Lebanon enjoys a strong civil society that is among the most capable of expressing itself in the region and plays a pivotal role in driving reform, promoting transparency, and advancing accountability at this critical stage.

1. Respect and protection of fundamental freedoms

Article 13 of Lebanon's [Constitution](#) guarantees “freedom to express one's opinion orally or in writing, the freedom of the press, the freedom of assembly, and the freedom of association”, while Article 7 [ensures](#) equality before the law, and Article 8 [safeguards](#) personal liberty. However, the implementation of these rights remains uneven, and recent events reflect increasing violations across multiple dimensions. Lebanon is currently [rated](#) “Obstructed” by the CIVICUS Monitor, reflecting a context where civil society remains active but is subject to frequent legal and extralegal restrictions on core freedoms.

Freedom of expression has been under threat. Between 2019 and March 2024, the Cybercrimes Bureau [launched](#) 1,684 defamation investigations, primarily targeting online expression. From March to April 2025, journalists from Daraj and Megaphone were [repeatedly](#) summoned over corruption exposés, while the watchdog Kulluna Irada faced defamation suits for “inciting depositors.” These cases illustrate a broader trend of using criminal defamation to suppress dissent, in violation of Lebanon's international obligations under the International Covenant on Civil and Political Rights (ratified in 1972).

A [draft Media Law](#), which has been gaining traction since [2023](#), continues to advance through parliament with provisions for prison terms of up to three years for online defamation, excluding civil society from consultation processes. The Coalition to Defend Freedom of Expression in Lebanon has [warned](#) that if approved, the legislation would "severely curtail freedom of expression and press freedom." In May 2025, political commentator Wissam Saade was [detained](#) by General Security following a search of his residence. While the case stemmed from a former domestic worker's call to Israel and not his journalism, the incident reflects the broad powers granted to security agencies to investigate journalist contacts with "enemy states", raising concerns over press freedom.

The armed conflict has also impacted freedom of the press. At least 12 journalists were [killed](#) during the October–December 2024 hostilities between Israel and Hezbollah-aligned groups, including three in a 25 October 2024 Israeli airstrike on a clearly marked press facility in Hasbaya. Human Rights Watch and Amnesty International [found](#) these incidents to be "apparent war crimes" under international law. In January 2025, [Skeyesmedia](#) also reported that Israeli forces had deliberately targeted civilians and media crews, placing journalists' safety in serious jeopardy.

Freedom of assembly in Lebanon is [regulated](#) by the 1911 Ottoman Public Gatherings Law, which [requires](#) prior notification and grants the Ministry of Interior and security agencies broad discretionary powers to ban protests, often used to suppress peaceful assemblies. Problematic laws continue to exist, such as Article 346 of the [Penal Code](#) which criminalises gatherings of seven or more people without prior approval. These provisions, alongside restrictions on public servant strikes, continue to limit peaceful assembly rights, despite government rhetoric about respecting freedoms. [Outdated](#) Penal Code articles, such as 384 and 385, criminalise criticism of public officials, while the Cybercrimes Bureau continues to summon and intimidate activists, contributing to self-censorship. Riot police used excessive force in October 2023 and April 2025, echoing the 2019 crackdown [documented](#) by Amnesty International.

2. Supportive legal framework for the work of civil society actors

Lebanon's civil society is governed by the [Ottoman Law of Associations \(1909\)](#), which operates on a notification system. This means CSOs must submit founding documents to the Ministry of Interior, but no prior approval is formally required. However, in practice, the registration process can take several months, and groups working on politically sensitive issues, such as governance, sexual orientation, gender identity, gender expression, and sex characteristics (SOGIESC) rights, or refugee support, report delays or denials without formal justification. For instance, SOGIESC organisation Helem has [waited over 10 years](#) for its official receipt, with authorities considering their work "controversial."

In addition, Lebanese law prohibits the establishment of official SOGIESC organisations. These [restrictions](#) have been reinforced by unlawful directives from former Interior Minister Bassam al-Mawlawi [banning](#) SOGIESC events, and by parliamentary bills introduced in 2023 that would [criminalize](#) same-sex relations and punish anyone who “promotes homosexuality” with up to three years in prison. There are [11,676 registered associations](#) that currently operate under this framework, representing significant CSO presence despite administrative obstacles.

CSOs are not required to obtain permits for day-to-day operations, but [Decree 24/EM/2018](#), which increased government control and scrutiny over associations, significantly expanded reporting requirements. It mandates that associations submit details of board members, financial accounts, and project activities annually, giving authorities wide discretion to request clarifications or conduct inspections.

Foreign associations, in contrast, operate under [Legislative Decree No. 369/LR \(1939\)](#) and must obtain prior authorisation, with license renewals subject to political vetting. Lebanon's banking crisis has created additional barriers: banks now require enhanced due diligence for CSO accounts, freeze pre-2019 USD accounts, and limit monthly withdrawals to US\$150-400, while [Lebanon's addition to the FATF “grey list” in 2024](#) has resulted in [intensified](#) anti-money laundering compliance requirements for civil society.

The Council of Ministers retains the power to [dissolve associations by decree](#), without prior court proceedings. While affected groups can theoretically challenge dissolution decisions in administrative court, legal recourse is limited and slow. More commonly, authorities use administrative delays and bureaucratic obstacles rather than formal dissolution to restrict CSO operations. Despite [Article 13 of Lebanon's Constitution](#) guaranteeing freedom of association, the gap between legal rights and practical implementation has widened significantly, creating substantial operational challenges for civil society organisations.

On 30 May 2024, a [draft law](#) was proposed with severe restrictions on foreign associations (including those with 25% non-Lebanese membership), requiring annual detailed reporting of projects, funding sources and beneficiaries. It prohibits activities deemed contrary to 'Lebanese Constitution, state public policies, and/or supreme state interests' - undefined terms granting authorities unchecked discretion - and mandates immediate asset confiscation upon licence revocation. Despite its sweeping implications, the proposal has received zero public attention or CSO reaction, with only one legal [analysis](#) by Legal Agenda in June 2024. The Council of Ministers [reviewed](#) it on 13 August 2025, expressing unspecified reservations and deciding to prepare a government alternative, though the timeline remains undetermined.

3. Accessible and sustainable resources

While CSOs can access both domestic private and foreign funding sources, domestic government funding remains [non-existent](#), forcing organisations to rely entirely on international donors, private contributions, and individual funding. In a context of limited to no

public government funds for civil society, this donor dependency also affects the direction of the programming of CSOs and their development policies.

Legal barriers - such as the prohibition of official SOGIESC organisations and delayed registration for sensitive-issue CSOs - limit access to direct donor funding. Many affected organisations must rely on intermediary CSOs to channel funds, which constrains programme scale and sustainability.

Access to funding for marginalised groups faces additional barriers. Restrictions to legal registration of SOGIESC organisations affect their ability to access direct donor funding, as many formal funding mechanisms require legal registration. As a result, such organisations often depend on intermediary CSOs or informal networks to secure financial support, which constrains programme scope and sustainability.

Lebanon's overwhelming foreign aid dependency creates catastrophic vulnerabilities when funding sources become unreliable. The January 2025 USAID suspension crisis dramatically illustrated this dependency, [affecting](#) over 2,000 direct employees in Lebanon. The US government [directly accounted](#) for 22% of total funding for NGOs, which received approximately US\$293 million in 2024. Critical impacts included the Quality Instruction Towards Access and Basic Education Improvement (QITABI) [education program](#) affecting approximately 350,000 learners and 25,000 teachers, [university scholarships](#), with over 1,300 students having received funding since 2010, and immediate suspension of development programmes across all sectors. [USAID](#) has spent approximately [US\\$123 million](#) in Lebanon since 2023 and provided over [US\\$1.3 billion](#) through aid programmes covering agriculture, education, and water sectors. The [EU's Lebanon Financing Facility \(LFF\)](#) provides [alternative funding](#) through multi-donor trust funds, with [generous pledges](#) totalling US\$73.79 million from Canada, Denmark, France, Germany, Italy, Norway and the EU, though this represents only partial diversification of funding sources. Such donor dependency, combined with the absence of public funding and legal barriers affecting certain CSOs, [undermines](#) the long-term sustainability and independence of civil society. Shrinking aid budgets, intensified competition for limited resources, and restrictive regulations increase vulnerability to political shifts, weaken coordination and credibility, and diminish civil society's capacity to plan, adapt, and act as an effective watchdog.

4. State openness and responsiveness

Lebanon has a comprehensive Access to Information Law but implementation remains severely limited. [Law No. 28 of 2017](#), amended in 2021, legally obliges state administrations to publish crucial information such as annual budgets and administrative decisions, and allows anyone to request information with a 15-day response requirement. However, years later, the law has [not yet](#) been fully implemented due to lack of awareness, insufficient resources for digitisation, and systematic non-compliance by government agencies. Human Rights Watch submitted 72 information requests since 2017 and received [only 18 substantive responses](#), with only 10 arriving within the stipulated 15 days. The Gherbal Initiative found that [only 33%](#)

of public administrations responded to information requests in 2019. A critical implementation gap exists as the designated Anti-Corruption Commission for oversight on implementation of the law has not been made operational, leaving no independent body to regulate access to information requests and appeals. While the Central Inspectorate Bureau conducts administrative oversight, it is not mandated to manage information request appeals under this law.

Civil society consultation in policymaking shows mixed patterns, with significant exclusion on sensitive issues. While Lebanon has a [diverse civil society sector](#) whose relative freedom allows it to publicly declare positions and lobby members of parliament, there is no [direct consultation](#) with developmental civil society members on issues of economic recovery. The most striking example of systematic exclusion occurred during media law consultations, where the Administration and Justice Committee Chairman in 2023 [rebuffed requests](#) from civil society to attend closed sessions and contribute to the draft legislation. The Coalition to Defend Freedom of Expression [warned this exclusion](#) created “real danger that the legislation could grant authorities free rein to harass, intimidate and silence critics”. Despite UNESCO conducting a [comprehensive consultation process](#) involving MPs, media owners, journalists, syndicates, academics, and civil society organisations, parliament proceeded with [closed-door sessions](#) examining an outdated version with minimal amendments. The Foreign Associations Amendment exemplifies this exclusion pattern - proceeding through parliamentary and governmental review with complete absence of stakeholder consultation or even awareness, discovered only through systematic monitoring of official proceedings.

Government discrimination against CSOs critical of government policies appears selective rather than systematic. While [Freedom House](#) notes that civil society groups have some ability to influence pending policies, their influence is often contingent on participation in opaque processes, and organisations working on sensitive issues face increasing restrictions. Since 2019, [intimidation and detention](#) have become increasingly common as tools deployed by the regime against civil society actors. The January 2025 election of [President Joseph Aoun](#) and the appointment of [PM Nawaf Salam](#) create potential for improved relations, as both leaders are committed to judicial independence and rule of law. Lebanon is heading toward its fourth Universal Periodic Review, [scheduled](#) for January-February 2026, with stakeholder submissions having been completed by the July 2025 deadline. This stage provides opportunities for civil society and other actors to influence the review process through their documented assessments and recommendations.

5. Political culture and public discourses on civil society

Public discourse around civil society has markedly improved during Lebanon's multiple crises, with organisations gaining substantial credibility through effective humanitarian response when state capacity failed. The stark contrast between civil society effectiveness and limited state response during the 2023-2024 conflict and subsequent displacement crisis fundamentally shifted public narratives. The [New Humanitarian](#) reported civil society networks “stepping up to respond to spiralling humanitarian needs from intensifying Israeli attacks” while the Lebanese government “has done little to prepare for the humanitarian fallout”. When the

displacement crisis escalated, [civil society filled the void](#) left by the state, as volunteer networks expanded and cross-sectarian cooperation demonstrated civic solidarity that challenged traditional sectarian divisions.

However, hostile discourse targeting civil society actors persists, particularly around journalists and marginalised communities. Journalists covering sensitive political topics face [systematic labeling](#) as “regime change agents” and foreign operatives, with this narrative used to discredit investigative reporting on corruption and governance failures. The May 2024 controversy over comedian Shaden Fakih's routine [sparked](#) hate speech campaigns from religious authorities and social media users, leading to lawsuits that forced her to remain abroad due to safety concerns. Post-war [polarization intensified](#) media criticism, with the MTV channel facing widespread attacks for war coverage viewed as insufficiently supportive of resistance narratives. [Physical assaults](#) were reported against individuals, including journalists, who publicly criticised Hezbollah on social media, [creating a climate of fear](#) that restricts open civic discourse on certain topics.

Positive public discourse has emerged around civil society's culturally-sensitive community support models. Community kitchen initiatives operated by CSOs have been praised for being both culturally respectful and economically beneficial at the local level, upholding traditional hospitality norms while supporting local economies through local procurement and employment. The Ministry of Social Affairs [values the project](#) and has shown interest in investing in replicating the model in different deprived areas of Lebanon. This positive framing contrasts sharply with previous sectarian-based service delivery, as civil society organisations demonstrated their ability to serve diverse communities without discrimination.

Civil society is now leveraging its [enhanced public credibility](#) to transition from service delivery to political influence and oversight. Organizations [monitored](#) the May 2025 municipal elections, covering 1,029 municipalities across eight governorates and 3,018 village headmen positions. The elections, postponed three times by parliament, represent a critical opportunity for civil society to capitalise on its improved public standing and transition toward greater political influence. This shift in public discourse, from viewing civil society as gap-fillers to recognising them as actors in the political arena, marks a significant evolution in Lebanon's political culture. In the local context, once civic groups choose to participate in or support electoral campaigns, they are widely regarded and treated as political actors, a transformation that offers opportunities for influence and agenda-setting but also increases their exposure to political contestation. The May 2025 municipal elections illustrated this transformation in practice, challenging the traditional dominance of sectarian political parties and demonstrating how crisis response can reshape civic legitimacy.

6. Access to a secure digital environment

As of January 2025, 91.6% of Lebanon's population (5.34 million people) had [internet access](#). However, digital access [remains uneven](#), with [rural areas](#) facing greater infrastructure challenges and electricity blackouts that exacerbate the digital divide. Lebanon [ranks](#) 157th out of 237 countries for mobile data affordability, making access prohibitively expensive for lower-income communities.

In February 2024, Lebanon's security agencies implemented [EXFO's Astellia system](#), enabling real-time surveillance of 2G, 3G, and 4G communications. The system's deployment

has raised alarm among digital rights groups for its broad and opaque monitoring capabilities in the absence of judicial oversight. According to Maharat Foundation, the system allows authorities to access telecommunications metadata and content without transparency or adequate legal safeguards, creating potential for political misuse and threatening freedom of expression. [Freedom House](#) reports that journalists and activists have increasingly self-censored amid concerns over surveillance, a trend that intensifies during periods of political crisis.

The October–November 2024 hostilities caused extensive damage to telecom infrastructure, thereby impacting civil society’s ability to fully utilize digital platforms. The Ministry of Telecommunications confirmed that [175 Touch and 161 Alfa stations](#) were offline, nine of them permanently destroyed. Repair crews were unable to access affected sites due to bombardments, leading to extended communication blackouts across the South, Bekaa, and Mount Lebanon. Officials warned of potential nationwide outages. Emergency mitigation included seven-day prepaid extensions and one-month bill deferrals, but these measures failed to restore stable access.

[Digital harassment](#) remains widespread and gendered. According to SMEX and the Arab Foundation for Freedoms and Equality, gendered digital harassment in Lebanon disproportionately [targets](#) women journalists, human rights defenders, and activists, often [using](#) sexualised threats, doxxing, and smear campaigns aimed at silencing their participation in public debate. SMEX [reports](#) that 80% of all individuals subjected to digital threats and harassment between 2020 and 2023 were women, underscoring how women disproportionately bear the burden of online abuse. Such harassment is frequently coordinated and politically motivated, escalating during periods of heightened political tension or protest. Victims report limited recourse, as the Cybercrimes Bureau - [created by a memorandum](#) and not legislation or decree - often fails to treat such cases as gender-based violence. Rather it [focuses](#) on defamation or “spreading false news” charges against the complainants themselves. This environment has led to increased self-censorship among women in public roles and reduced participation in online civic spaces. Lebanon, as a State Party to the Convention on the Elimination of All Forms of Discrimination against Women ([CEDAW](#)), is obligated under Article 7 to ensure women’s equal participation in public life and, pursuant to [General Recommendation No. 35](#), to take effective measures to address technology-facilitated gender-based violence.

The Cybercrimes Bureau [routinely investigates](#) social media posts for alleged insults, “spreading false news,” or “undermining state prestige.” Between 2019 and early 2024, it opened [1,684 cases](#), and in 2025 alone, activists, journalists, and CSOs (e.g., Daraj, Megaphone, Kulluna Irada) were [summoned over online content](#). The Bureau has also been used by politically affiliated media outlets to pursue critics, notably in defamation cases that legal experts argue should fall under civil court or press tribunal jurisdiction. Its role in silencing dissent, particularly online, has drawn [concern](#) from Human Rights Watch and SMEX, who [warn](#) that the criminalisation of expression under cybercrime frameworks is shrinking Lebanon’s already fragile digital civic space.

Challenges and Opportunities

Challenges

Over the next four months, civil society faces significant funding challenges from USAID suspension impacts and ongoing security threats to journalists and activists. Resource diversification remains critical as organisations adapt to funding uncertainties and legal restrictions that could affect both foreign and domestic civil society operations.

The expanding use of legal harassment mechanisms against activists across political divides, including pro-government voices, indicates a broader deterioration in civic freedoms that transcends traditional political boundaries. Problematic legislation like Article 346 of the Penal Code (criminalising gatherings of 7+ people) and restrictions on public servant strikes continue to **limit** peaceful assembly rights, despite new government rhetoric about respecting freedoms.

Opportunities

1. **New Leadership Commitments to Civic Space:** The new government has made explicit commitments that create leverage for civil society advocacy:

- [President Aoun's pledges:](#) Protection of “individual and collective freedoms that are the essence of the Lebanese entity”, respect for media freedom and freedom of expression, and commitment that all citizens be “under the roof of law”.
- [Prime Minister Salam's commitments:](#) Adopting “the language of honesty and dialogue”, listening to citizens' voices and demands, and establishing accountability mechanisms through parliamentary oversight sessions.

Civil society actors can use these leadership pledges as advocacy leverage by publicly referencing them to hold the government accountable, pressing for concrete policy actions, and engaging in dialogue to ensure freedoms, media independence, and accountability mechanisms are implemented in practice.

2. **UPR Process Leverage:** With Lebanon's 4th cycle of the Universal Periodic Review (UPR) scheduled for early 2026, civil society can leverage the process to:

- Submit stakeholder reports by late 2025, documenting gaps between government rhetoric and implementation.
- Use the civic space roadmap's seven recommendations as a ready-made framework for UPR submissions.
- Engage in pre-session advocacy with reviewing states using specific examples of violations.
- Monitor government acceptance and implementation of UPR recommendations post-review.

3. **Enhanced Credibility:** Civil society's enhanced public credibility from crisis response creates unique leverage for policy advocacy and meaningful engagement with new government structures on transparency, digital rights, and civic participation

improvements. The government's emphasis on improving Lebanon's international standing creates opportunities to frame civic space protection as essential for international credibility and accessing reconstruction funding.

The convergence of new leadership commitments, upcoming electoral processes, and international review mechanisms provides an unprecedented window for advancing human rights reforms - but only if civil society can effectively coordinate monitoring, advocacy, and accountability efforts across these multiple pressure points.

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