Lebanon

Country Focus Report

December 2025

Credit: Piotr Chrobot

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A) An Introduction to the Enabling Environment

What we understand by an Enabling Environment is the combination of laws, rules and social attitudes that support and promote the work of civil society. Within such an environment, civil society can engage in political and public life without fear of reprisals, openly express its views, and actively participate in shaping its context. This includes a supportive legal and regulatory framework for civil society, ensuring access to information and resources that are sustainable and flexible to pursue their goals unhindered, in safe physical and digital spaces. In an enabling environment, the state demonstrates openness and responsiveness in governance, promoting transparency, accountability, and inclusive decision-making. Positive values, norms, attitudes, and practices towards civil society from state and non-state actors further underscore the supportive environment.

To capture the state of the Enabling Environment, we use the following six principles:

SIX ENABLING PRINCIPLES

1. Respect and Protection of Fundamental Freedoms
2. Supportive Legal and Regulatory Framework
3. Accessible and Sustainable Resources
4. Open and Responsive State
5. Supportive Public Culture and Discourses on Civil Society
6. Access to a Secure Digital Environment

In this Country Focus Report, each enabling principle is assessed with a quantitative score and complemented by an analysis and recommendations written by our Network Members. Rather than offering a singular index to rank countries, the report aims to measure the enabling environment for civil society across the 6 principles, discerning dimensions of strength and those requiring attention.

The findings presented in this report are grounded in the insights and diverse perspectives of civil society actors who came together in a dedicated panel with representatives from civil society to discuss and evaluate the state of the Enabling Environment. Their collective input enriches the report with a grounded, participatory assessment. This primary input is further supported by secondary sources of information, which provide additional context and strengthen the analysis.

Brief Overview of the Country Context

Lebanon entered 2025 at a critical juncture, with President Joseph Aoun being elected into office on 9 January, followed by the appointment of Prime Minister Nawaf Salam. This marked a potential turning point, with both leaders publicly committing to judicial independence, rule of law, and state institutional strengthening.

The political transition came at a time when the country has grappled with compounding crises. Lebanon's economy has contracted by over 40% since 2019, with local currency devalued by 95%, affecting 82% of the population through multidimensional poverty. The 2023-2024 armed conflict between Israel and Hezbollah-aligned groups displaced over 1.2 million people (20% of the population), caused more than 4,000 civilian casualties, and severely damaged infrastructure across southern Lebanon and the Bekaa Valley. Despite a November 2024 ceasefire, Israeli airstrikes and cross-border incidents have continued to affect several southern localities, reinforcing a climate of insecurity in areas where many civil society organisations (CSOs) are active. The World Bank has estimated that reconstruction for damages from the conflict would require an estimated US$11 billion. The economic woes also continued in January 2025. USAID suspended approximately US$72 million in aid, affecting over 2,000 direct employees and critical programs including education affecting 350,000 learners.

Simultaneously, international financial oversight has intensified. Lebanon was grey-listed by the Financial Action Task Force (FATF) in October 2024 and put on the European Union's High-Risk Third Country in June 2025. In response, the government has introduced enhanced anti-money laundering and counter-terrorism financing compliance requirements that has fundamentally disrupted CSO banking operations and access to international funding.

Yet, civil society demonstrated remarkable resilience and credibility. Throughout the 2023-2024 conflict and ongoing humanitarian crises, CSOs stepped into the vacuum left by limited state capacity, providing essential service delivery, humanitarian assistance, and community support that gained substantial public recognition and trust. The May 2025 municipal elections across 1,029 municipalities represented a significant opportunity for civil society to translate crisis-driven credibility into political influence through electoral monitoring, voter mobilization, and advocacy for transparent local governance.

B) Assessment of the Enabling Environment

PRINCIPLE SCORE

1. Respect and Protection of Fundamental Freedoms

Score:[1]

While Lebanon's Constitution guarantees freedom of association, peaceful assembly, and expression, the implementation remains deeply uneven. The 2024-2025 period witnessed a troubling escalation in legal harassment, intimidation, and extrajudicial pressure targeting journalists, activists, and rights defenders - creating an environment where civic actors operate under increasing legal and security risks.

1.1 Freedom of Association

Article 13 of Lebanon's Constitution guarantees freedom of expression, assembly, and association "within the limits established by law". While registration is theoretically possible for most groups (see Section 2.1), certain CSOs face additional barriers that effectively deny them freedom of association. For example, Lebanese law prohibits the establishment of official sexual orientation, gender identity, gender expression, and sex characteristics (SOGIESC) organisations. The SOGIESC organisation is Helem has waited over 10 years for its official receipt, with authorities considering their work "controversial." In practice, some groups who work on sensitive issues such as accountability and anti-corruption, banking reform, or LGBTQI+ issues also face operational challenges, such as delayed administrative approvals or being summoned for questioning.

A 2024 legislative proposal threatened to impose severe restrictions on foreign-funded associations and place other restrictions on the activities of CSOs. In August 2025, the Council of Ministers paused the proposal to prepare a government alternative. This process has

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[1]*This is a rebased score derived from the CIVICUS Monitor rating published in December 2024.*

received relatively little public attention but could have potentially substantial implications for freedom of association.

1.2 Freedom of Assembly

Freedom of assembly in Lebanon is regulated by the [1911 Ottoman Public Gatherings Law](#), which requires notification at least 48 hours prior to the event and grants the Ministry of Interior and security agencies broad discretionary powers to ban protests. Specifically, Article 3 allows the government to prevent any public assembly deemed likely to disturb public security, order, or morality, or to contravene the "regular and normal course of public interests." Additionally, [Article 346 of the Penal Code](#) criminalises gatherings of seven or more people without prior approval.

These structural rules, combined with ad hoc security decisions, continue to constrain peaceful assemblies despite formal guarantees. Specific incidents illustrate the pattern. Riot police used excessive force in October 2023 and April 2025, echoing the 2019 crackdown documented by Amnesty International. The 2019 crackdown was [extensively documented](#) by human rights organizations, revealing [systemic patterns](#) that have persisted into 2025. More recently, Lebanese authorities [arrested protesters](#) after an attack on UN peacekeepers in November 2024.

While Lebanon does not ban protests outright, the combination of vague legal requirements, broad discretionary powers, and documented patterns of excessive force significantly constrain the practical exercise of assembly rights. This selective tolerance appears linked to the political positioning of protesters. For instance, solidarity protests regarding the conflict in Southern Lebanon and Gaza in late 2024 were largely permitted. In contrast, protests challenging government accountability, corruption, or the influence of armed non-state actors encounter systematic obstruction and force. This pattern suggests that restrictions are applied based on political considerations rather than consistent legal standards, with authorities using discretionary powers to permit supportive demonstrations while suppressing critical voices.

1.3 Freedom of Expression

Article 13 of Lebanon's Constitution [guarantees](#) freedom to express one's opinion orally or in writing as well as the freedom of the press. The [Lebanese Press Law of 1962](#) provides additional protections for journalists and media outlets. Lebanon also ratified the [International Covenant on Civil and Political Rights](#) in 1972, which protects political critique and establishes that public figures are legitimately subject to criticism.

Despite these protections, online and offline expression faces systematic criminalisation. 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 [were repeatedly summoned](#) over corruption exposés and the Central Bank's role in the financial crisis, while Megaphone journalists faced summons over exposés on political elite misconduct and state procurement irregularities. Civil society watchdog Kulluna Irada also [faced](#) [defamation suits](#) for [publishing reports documenting](#) bank failures and advocating for depositor rights. These complaints, filed by lawyers representing banking interests, accused the organisation of "inciting depositors" to withdraw funds and "undermining the state's financial standing," charges effectively criminalizing policy advocacy.

Journalists continue to face arbitrary detentions for their work, including airport detentions. On 28 June 2025, Lebanon's Criminal Investigation Bureau contacted journalists Carine Abdel Nour and Bechara Charbel by phone [without written documentation](#) following publication of an investigative article on judicial appointments and corruption. This violated Articles 28–29 of the Lebanese Press Law, which require a written summons specifying the case number, charges, legal basis, and providing reasonable notice. The lack of documentation removed key safeguards meant to prevent arbitrary harassment and allow journalists to prepare their defence. Abdel Nour reportedly pointed that the phone summons was part of a [wider campaign](#)

of pressure against her, including over 600 coordinated reports aimed at suspending her social media accounts and economic intimidation targeting her sources. On 20 July 2025, investigative journalist Hajar Knio was also [detained by General Security officers](#) for roughly nine hours at Beirut's Rafic Hariri International Airport with her phone and laptop confiscated; she suggested the detention stems from her reporting on drug-trafficking networks and criticism of Hezbollah.

A particularly alarming pattern emerged in September-October 2025. Within a two-week period, four individuals, activists Abbas Zahri, Haroun Farhat, and Josiane Nahra, and journalist Joelle Abdel Aal of Sharika Walaken, were [summoned](#) or arrested by the Cybercrimes Bureau on expression-related allegations. The [Lebanese Center for Human Rights reported](#) that Public Prosecutor General Jamal Hajjar initiated action against Zahri over a Facebook post criticizing the ruling authority, leading to interrogation, post deletion, and an apology. Activist Haroun Farhat, who had exposed corruption in the Ministry of Education through TikTok investigations, [was arrested twice within days](#): first following a defamation complaint by former Secretary of the Equivalency Committee at the Ministry of Education, followed by a complaint by Head of Private Education Service. Abdel Aal was [summoned following a complaint](#) by artist Fares Karam over an investigation into the kafala system; she maintained silence during interrogation and was released without signing undertakings. Josiane Nahra was [summoned based on a lawsuit](#) from Charbel Eid of the Lebanese Forces party over tweets alleging misconduct by party officials.

Physical intimidation escalated in September 2025 when journalist and MTV News Director Walid Abboud received direct [death threats](#) at his residence in Keserwan. Flyers containing explicit threats of kidnapping, torture, and physical elimination were posted on his building. While the Minister of Information condemned the threats as an "attack on press freedom," no arrests have been reported.

Strategic lawsuits against public participation (SLAPPs) represent another constraint on expression. Since 2023, Daraj Media and its staff have [faced at least 14 lawsuits](#), largely initiated by banks, political figures, and affiliated lawyers. The number of cases increased significantly in 2025, coinciding with Daraj's investigative reporting on the Central Bank of Lebanon, financial misconduct, and money laundering involving political elites. These cases are designed to drain resources, intimidate journalists, and constrain investigative reporting, forcing outlets to shift energy from journalism to legal defence.

A pending legislative bill also threatens press freedom. On 31 August 2025, members of Lebanon's Parliament received [proposed amendments to the draft Media Law](#) that would reintroduce pretrial detention in vaguely defined "aggravated" expression cases, including alleged "dignity" or "private life" violations. The amendments would also bar outlets from covering complainants during pending litigation, replace notification with prior licensing for digital media, and require periodic reporting to authorities. A coalition of 14 Lebanese and international organizations [urged](#) Parliament to reject regressive changes, lift the secrecy over committee deliberations, and align the law with international standards.

Taken together, these constraints on association, assembly, and expression create a civic environment where formal constitutional guarantees exist but practical exercise of fundamental freedoms remains precarious, dependent on political considerations rather than consistent application of legal standards. Civil society actors navigate this landscape through strategic self-censorship, legal defence networks, and international advocacy, while authorities maintain control through selective enforcement rather than outright prohibition.

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2. Supportive Legal and Regulatory Framework

Score:
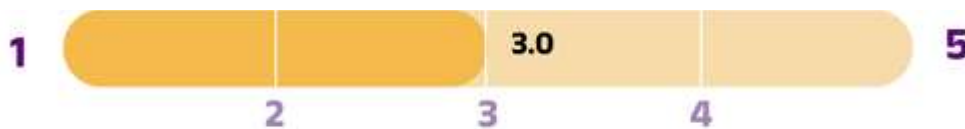
Lebanon's legal framework provides a notification-based system that is formally permissive. However, implementation gaps, including bureaucratic delays, centralised paper-based procedures, and banking sector de-risking which intensified since October 2024, create significant practical obstacles that reduce predictability and increase costs particularly for smaller CSOs.

2.1 Registration

The legal framework for associations is governed by the 1909 Ottoman Law on Associations, which in theory allows any group, including marginalised communities, to establish an association through a simple notification (ʿilm wa khabar) without prior approval. Article 2 of the law stipulates that the Ministry of Interior has three days to register the notification, and costs remain relatively low. Under this notification regime, once a compliant file is submitted, the association acquires legal standing without a discretionary ministerial approval step. Dissolution, where applicable, is decided by the Council of Ministers under the conditions specified in Article 3 of the law.

In practice, applicants during 2024–2025 frequently reported administrative back-and-forth, with the Ministry of Interior requesting resubmission or additional documents not specified in the law, as pointed out by experts consulted during the assessment. While no lawyer is legally required, many groups engage legal intermediaries to streamline filings, an added expense and delay that disproportionately affects smaller or volunteer-run organizations. Procedures remain largely paper-based and centralized in Beirut, with limited digitisation, creating uneven access for groups in Akkar, Tripoli, the Beqaa, and the South. Testimonies from experts also indicate perceptions that organisations with stronger political patronage may navigate registration and banking hurdles more easily.

Registration is further threatened by a May 2024 legislative proposal targeting "foreign associations" (defined as those with 25% non-Lebanese membership). The bill introduces intrusive reporting mandates and vague prohibitions against activities contrary to "state

interests," granting authorities unchecked discretion to revoke licenses and confiscate assets. Although the Council of Ministers [paused](#) the [proposal](#) in August 2025 to draft a government alternative, the bill's restrictive nature, and the lack of civil society awareness regarding it, remains a significant latent risk.

2.2 Operational Environment

In law, CSOs in Lebanon can generally set their goals and operate without routine, prior government approval of day-to-day activities. The [1909 Law on Associations](#) does not impose blanket legal restrictions on accessing domestic or international funding when sources are legitimate and transparent. Administratively, CSOs are [required](#) to submit annual balance sheets and updates on internal elections to the Ministry of Interior. While the 1909 Law does not explicitly mandate dissolution for reporting gaps, failure to comply, or the Ministry's refusal to process these filings, carries significant practical penalties. Without a validated annual receipt (ifadat) from the Ministry, organizations cannot update their files with banks, leading to account freezes under the strict AML/CFT measures enforced since late 2024.

A critical operational barrier emerged in 2024-2025, as the banking environment has become a major operational constraint. Following [FATF increased monitoring in October 2024](#) and the [EU's High-Risk Third Country listing in June 2025](#), banks have applied enhanced due diligence and de-risking measures. Experts participating in the assessment noted that many CSOs face prolonged onboarding, document requests (beneficial ownership, source-of-funds, activity evidence), transfer delays, and in some cases challenges opening or maintaining accounts – thereby affecting payroll, vendor payments, and receipt of grants. Transaction processing times have increased as financial institutions implement manual reviews, and some institutions have introduced additional fees to cover compliance-related costs, while others have reportedly restricted services or closed accounts as part of de-risking strategies. Though these are compliance-driven financial-sector measures, their practical impact is felt directly by CSOs attempting to maintain basic operations.

There are also upcoming legal reforms that threaten the operational environment for CSOs. On 30 May 2024, a [legislative proposal](#) was submitted to amend the Ottoman Associations Law, introducing severe restrictions on foreign-funded associations (defined as those with 25% or more non-Lebanese membership). The proposal mandates annual detailed reporting of projects, funding sources, and beneficiaries to the Ministry of Interior. More problematically, it prohibits activities deemed contrary to "Lebanese Constitution, state public policies, and/or supreme state interests". These broadly undefined terms grant authorities unchecked discretion and mandates immediate asset confiscation upon license revocation without judicial oversight.

On 13 August 2025, the Council of Ministers [expressed unspecified reservations](#) and decided to prepare a government alternative, though the timeline remains undetermined. 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. This information void represents a significant risk: organisations may face sudden restrictions without prior awareness or opportunity for advocacy.

2.3 Protection from Interference

The law offers formal protections against interference. Article 3 of the [1909 Ottoman Law on Associations](#) allows dissolution by decree of the Council of Ministers where an association is founded on unlawful bases framed in broad public-order terms (e.g., jeopardizing state integrity, changing the form of government). Article 6 prohibits secret/undeclared associations; and Article 12 provides penalties and a ban in cases of non-notification/secret associations. These provisions are broadly worded, which gives authorities legal room for discretionary enforcement, even though actual dissolutions have been rare in practice in recent years. Administrative measures (including a dissolution decree) are appealable to the State Council under general administrative law.

In practice, this legal recourse presents mixed accessibility. According to experts consulted during the assessment, while the State Council theoretically provides an avenue for all civil society organisations to challenge administrative decisions, smaller organisations face significant barriers. The appeal process requires legal representation, involves substantial costs for filing fees and attorney fees, and can extend over months or years without interim relief. Legal monitoring organisations have indicated that few CSOs have actually utilized State Council appeals to overturn registration denials or other administrative restrictions, partly due to resource constraints and partly due to perceptions that outcomes may be influenced by political considerations. Larger, better-resourced organisations in Beirut have occasionally pursued administrative appeals, but this option remains largely inaccessible for volunteer-run groups or those operating outside the capital.

Beyond formal legal frameworks, the operational reality reveals varied forms of interference. According to experts consulted during the assessment, direct police raids or security force operations aimed at intimidating CSOs have been limited in recent years, with no systematic pattern of physical raids on civil society offices documented during 2024-2025. However, interference takes other forms. Civic actors report selective pressure in sensitive areas such as accountability and anti-corruption work, banking reform advocacy, and LGBTQI+ rights. Rather than formal dissolution or physical raids, authorities employ administrative mechanisms such as repeated summons of staff members for questioning, delayed or denied permit approvals for public events, requests for extensive documentation beyond legal requirements, and coordination with banks to restrict financial access. Since late 2024-2025, the intensified banking constraints linked to FATF monitoring and EU High-Risk designation have functioned as indirect interference mechanisms. While driven by compliance requirements, there is a belief that politically connected organisations navigate banking procedures more easily than watchdog or rights-focused groups, which suggests selective enforcement that effectively constrains certain categories of civil society activity without direct confrontation.

PRINCIPLE SCORE

3. Accessible and Sustainable Resources

Score:

1 ——— 2.3 ——— 5
2   3   4
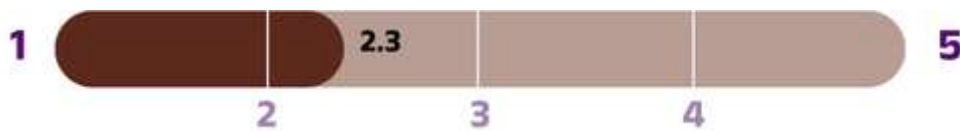
Access to resources for civil society in Lebanon is severely constrained and increasingly precarious. Funding opportunities concentrate among large, Beirut-based CSOs, while smaller organisations face opaque donor processes, weak domestic incentives, and critical banking sector restrictions imposed since late 2024. While some donors have piloted adaptive approaches since 2024, funding remains overwhelmingly short-term, fragmented, and unpredictable, forcing organisations into survival mode rather than strategic growth.

3.1 Accessibility

Access to funding in Lebanon is scarce and uneven, with opportunities concentrating among large, well-established, Beirut-based NGOs. Smaller or emerging CSOs, especially outside Beirut and many organizations of persons with disabilities (OPDs), report opaque donor processes, short proposal windows, and limited visibility of opportunities, even where aggregation platforms exist. According to experts consulted during the assessment, this limited visibility reflects multiple barriers. For instance, information about funding calls is not systematically disseminated to organisations working in remote areas. There are also language barriers where calls are published only in English or French without Arabic translations. In addition, gatekeeping occurs through informal networks where information circulates primarily among established organisations with existing donor relationships. Even where aggregation platforms exist to compile funding opportunities, many smaller organizations lack the capacity to regularly monitor these platforms or lack internet connectivity in areas with poor infrastructure.

Both domestic and foreign funding streams present distinct challenges. Domestic funding exists but remains limited. The prolonged economic crisis has reduced household and corporate contributions, and most sizable domestic support comes via a narrow set of foundations, companies or personal networks. These domestic sources typically prioritise socio-economic development aligned with government priorities, such as education, healthcare, and poverty alleviation, which means CSOs working on governance, human rights, accountability, or other politically sensitive issues rarely receive domestic funding opportunities. Tax incentives remain weak and narrowly defined. Under Lebanon's regime for "public utility organizations," donations and grants made by income-tax-liable enterprises and

individuals to such organizations are treated as deductible expenses, with the exemption reaching up to 10% of annual income, whereas donations to regular CSOs are generally deductible only up to 0.1% of income, pursuant to Legislative Decree No. 78/1977 and Article 7(9) of Legislative Decree No. 144/1959. However, this framework requires case-by-case government certification of public-utility status, which relatively few organisations obtain. There is no broad-based deduction mechanism that would stimulate mass individual giving to civil society organisations, leaving domestic philanthropy largely dependent on personal networks rather than systematic charitable giving. Foreign funding is often more substantial, yet access barriers, compliance constraints, and banking restrictions have increasingly complicated cross-border transfers to Lebanese CSOs.

Lebanon's FATF grey-listing in October 2024 and the EU's designation of Lebanon as a High-Risk Third Country for AML/CFT purposes have made it significantly harder for CSOs, especially newer and smaller ones, to open accounts, complete onboarding, and receive or transfer funds. EU-based financial institutions are required to apply enhanced due diligence to transactions involving Lebanese entities, and Lebanese banks have responded with heavier documentation requirements, longer processing times, higher banking charges, and in some cases account closures. These measures directly disrupt access to funding, slow down transfers through manual reviews, and force organisations to navigate overlapping EU, US, and UK regulatory frameworks that disproportionately burden those without dedicated finance and compliance staff.

There has also been a shift in bilateral and multilateral funding pipelines. In January 2025, the [USAID funding freeze](#) suspended approximately US$72 million in aid, [affecting over 2,000 direct employees](#) and critical programs including the Quality Instruction Towards Access and Basic Education Improvement (QITABI) education program affecting approximately 350,000 learners and 25,000 teachers. This suspension reduced near-term availability of grants and delayed ongoing disbursements, widening gaps for civil society actors most dependent on external funding. These combined factors create structural barriers for CSOs in Akkar, Tripoli, Beqaa, and the South, who face higher transaction costs, fewer donor touchpoints, and thinner local philanthropy compared to capital-based peers.

3.2 Effectiveness

The effectiveness of resources hinges on donor practice and local governance conditions. In Lebanon, donor requirements such as registration status, past turnover, audit history, and staff profiles, as well as short application windows, tilt access toward larger, established CSOs, shaping what gets funded and when. This often aligns programs with donor agendas rather than organically sequenced, community-driven priorities.

Since 2024, several donors have piloted more adaptive approaches such as crisis modifiers and re-phasing, no-cost extensions for projects, as well as limited core/institutional support in select windows. In addition, they have simplified due-diligence for smaller partners and adjusted monitoring, evaluation, and learning (MEL) frameworks to accept output delays when context deteriorates. These changes have improved delivery in volatile periods but remain uneven across portfolios and are not yet standard practice. The [EU's Lebanon Financing Facility (LFF)](#), a World Bank-administered multi-donor trust fund that channels grants for socio-economic recovery through UN agencies, international NGOs, and sub-grants to local NGOs and CSOs, with pledges totalling [US$73.79 million](#) from Canada, Denmark, France, Germany, Italy, Norway and the EU, represents one effort to provide alternative funding modalities, though this represents only partial diversification.

Donors are increasingly responsive to CSO security concerns: many allow duty-of-care, security, and staff wellbeing (mental health and psychosocial support - MHPSS) costs; accept remote/low-profile modalities; and, in sensitive areas, waive or scale down visibility. Some require conflict-sensitivity, protection from sexual exploitation and abuse (PSEA), data-protection, and risk registers with contingency actions. However, application is inconsistent. While these provisions exist as part of donor reporting frameworks, safeguards to ensure

information remains confidential and cause no harm approaches vary by institution. Some donors maintain strict protocols separating program monitoring from security reporting, while others require detailed beneficiary data that could raise operational risk if not adjusted case-by-case. Late-stage approvals, rigid branding rules, or detailed beneficiary-data requests without adequate protection mechanisms can increase risks for both organisations and beneficiaries working in politically sensitive contexts.

Results still depend heavily on individual champions (within ministries or donor teams) who unblock bottlenecks, while turnover and fragmented oversight undercut continuity. Short-term, awareness-heavy portfolios persist in several sectors, with fewer multi-year, systems-level investments that local actors say would yield more durable outcomes.

The June 2025 [EU High-Risk listing](#) also introduced mandatory enhanced due diligence measures that significantly altered banking and funding procedures for Lebanese entities. Under the FATF listing, Lebanese organizations faced heightened scrutiny but could often maintain international financial transactions with limited disruption. The EU designation introduces binding compliance obligations for EU-based institutions, including transaction-level reviews, documentation of beneficial ownership, and manual compliance sign-offs. Institutions failing to comply risk substantial penalties. These developments affect donor behaviour: some European governments and philanthropic institutions face legal or internal policy constraints when funding organizations based in high-risk jurisdictions. Several international NGOs and donors are conducting renewed risk assessments, which may delay or limit engagement with Lebanese counterparts. Internal policy restrictions at some institutions may reduce eligibility for partnerships with entities operating in jurisdictions classified as high-risk.

3.3 Sustainability

Funding sustainability is a persistent challenge. Available funding is short-term, fragmented, and often unpredictable, reflecting crisis-driven priorities and shifting pipelines. Planning horizons remain project-to-project, which constrains institutional development and keeps many organizations in survival mode rather than strategic growth.

Most CSOs lack reliable self-generated revenue or broad-based domestic giving. Diversification efforts such as small fee-for-service or community fundraising are complementary rather than transformative relative to the CSO needs.

Funding structures translate into short contracts, renewal uncertainty, and salary volatility due to foreign exchange and inflation exposure. Organisations report higher turnover, difficulties retaining technical roles, and periods of reduced hours or temporary furloughs when grants pause. To stay compliant while maintaining flexibility, many organisations rely more on consultancies and part-time arrangements, which weakens institutional memory, retention of highly skilled employees, and team cohesion. Start-stop cycles between project phases, bridges that arrive late, and procurement and payment delays lead to activity interruptions, beneficiary attrition, and MEL discontinuities including lost baselines and inconsistent follow-up. Even when no-cost extensions are granted, gaps without funds erode continuity and community trust.

Limited core and overhead coverage combined with thin operating reserves restrict investment in systems, safeguarding, data protection, and compliance. Organizations are prioritising delivery over institutional strengthening, reinforcing dependence on external grants and increasing mission drift toward donor-defined outputs. The EU High-Risk designation complicates humanitarian and development delivery, particularly in rural or underserved areas. Delays in fund transfers and restricted access to banking channels forces organizations to adopt alternative modalities, such as bulk cash disbursement, which raises concerns around security, compliance, and transparency. These trends risk limiting the sector's independence, representativeness, and resilience. Reduced access to regional and international platforms, including trainings, conferences, and exchanges, further isolates Lebanese organizations. If

sustained, these impacts could hinder institutional learning and innovation, weakening the long-term sustainability of the sector.

Score:
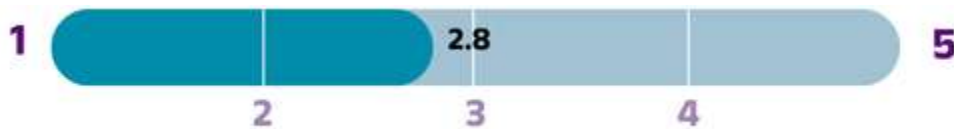
Lebanon has established a strong legal framework for access to information and some ministries engage civil society in specific policy processes. However, implementation remains severely uneven: transparency laws are weakly enforced, consultation processes are ad hoc and often exclude CSOs from sensitive reforms, and accountability mechanisms provide limited practical recourse.

4.1 Transparency

Lebanon has a formal legal framework for access to information through Law 28/2017, as amended in 2021. The law establishes the right to request information from all public bodies and any private bodies managing public funds, and sets a timeline requiring authorities to respond within fifteen days, with the possibility of a single extension of an additional fifteen days if justified. It also mandates proactive publication of core categories of information, such as institutional mandates, organizational charts, budgets, accounts, procurement awards, decisions, and key statistics, in accessible formats. On paper, the law lists specific grounds for withholding information, including national security, foreign relations, public safety, privacy and personal data, trade and industrial secrets, ongoing investigations, and deliberative documents, and requires that exceptions be interpreted subject to harm and public-interest tests. However, the breadth of exceptions, limited assistance to requesters, and weak sanctions have led the Global Right to Information Rating to describe Lebanon's law as "relatively weak overall," giving it 72 out of 150 points, so the legal guarantees remain partial and uneven.

Exceptions to disclosure are limited to specific areas, national security and defence, foreign relations, public safety, privacy and personal data, trade and industrial secrets, ongoing investigations, and deliberative documents. However but even these exceptions must be interpreted narrowly, subject to harm and public-interest tests. Fees are restricted to reproduction or copying costs, and the submission of requests is cost-free.

The 2021 amendment to the access to information law designates the National Anti-Corruption Commission (NACC) to receive complaints - including for administrative silence - ,

provide guidance, and issue decisions/recommendations. Appeals may be brought before the State Council (Shura Council) under general administrative law. Guidance and practice notes have clarified formats (including electronic submissions) and record-keeping obligations.

Despite the strong legal basis, application is uneven across institutions. Some administrations respond within deadlines and have improved proactive publication, notably in public finance and procurement, where budget/procurement data and user guides have become more accessible. Others still delay, invoke broad exceptions, or provide non-open formats. In addition, the Official Gazette is behind paywall and inconsistent datasets remain obstacles.

Civil society monitoring and the 2025 NACC implementation snapshot note incremental progress but persistent compliance gaps across ministries and municipalities. According to the First Annual Report on the Level of Implementation of the Right of Access to Information Law (2023), only about 40% of public administrations publish information proactively, and fewer than half of national administrations and roughly a quarter of local ones have appointed information officers as required. Complaints filed by TI-Lebanon led the NACC in 2024 to order disclosure of the Beirut Port container-terminal contract, yet the Ministry of Public Works has still not complied, while case studies documented by LCPS and a 2025 access-to-information report by Maharat and Gherbal show that some bodies respond within the legal deadlines whereas others delay for months or ignore requests altogether.

4.2 Participation

CSO participation in policymaking exists but is only partially enabling. Some ministries and public bodies invite CSOs to contribute, yet engagement is uneven across sectors, notice periods are often short, and the level of influence is usually technical rather than strategic. Consultations remain largely ad hoc and often symbolic. While some ministries engage NGOs in specific processes, participation is neither systematic nor inclusive across all sectors. In many cases, consultation occurs only when mandated by donors (e.g., United Nations Development Programme-supported initiatives) rather than as an institutionalised government practice.

Respondents highlighted that consultation windows are often too short to allow meaningful contributions, and CSOs are rarely invited to engage at strategic levels of policymaking. Participation is therefore uneven - more substantive when linked to legislative or executive follow-up (e.g., justice sector reform), but superficial or absent when political will is lacking. The volatile political environment and conflicting donor and government agendas further limit consistent, representative, and impactful engagement.

Public bodies responsible for public procurement implementation have, since 2022 and particularly over 2023-2025, held multi-stakeholder workshops with CSOs and businesses on user guidance and compliance practices, including sessions linked to the Public Procurement Reform Strategy 2022-2024, the MAPS assessment of the public procurement system, and trainings on the national e-procurement portal organised by the Public Procurement Authority. They have also released practical materials that reflect external feedback, such as the simplified Public Procurement Guide - Law 244/2021 and user manuals produced with the Institut des Finances Basil Fuleihan. The access-to-information rollout has involved orientations and exchanges on request handling, proactive publication, and complaint pathways, including national conferences and trainings convened by the National Anti-Corruption Commission and UNDP on the implementation of the Right of Access to Information Law at UNESCO Palace and elsewhere. In social protection, working meetings around program design and targeting have included CSOs and service providers through the development and validation of the National Social Protection Strategy, joint UN-government coordination fora, and civil-society led consultations such as the 2024 Civil Society National Consultation on Social Protection, as well as stakeholder-engagement plans issued by the Ministry of Social Affairs for social safety net projects. In these streams, inputs are more likely to affect how policies are executed (templates, guidance, training plans), even if they seldom change the core policy choices.

However, participation has been limited or symbolic in key reform areas. Draft budget processes and high-salience reforms (e.g., justice and institutional restructuring) typically proceed with minimal, late, or invitation-only outreach. The May 2024 Draft Law on Foreign Associations exemplifies this exclusion pattern, proceeding through parliamentary submission and August 2025 governmental review with complete absence of stakeholder consultation or even awareness, and discovered only through systematic monitoring of official proceedings.

In addition, comment windows can be too short for representative input; and final texts rarely publish a consult-and-respond record showing how submissions were used. Rapid ministerial circulars or emergency measures are often issued without prior consultation. Outside Beirut, opportunities are thinner, with travel and notice constraints limiting representation. The most striking example of systematic exclusion occurred during media law consultations. In 2023, the Administration and Justice Committee Chairman 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 organizations, parliament proceeded with closed-door sessions examining an outdated version with minimal amendments.

The June 30, 2025 parliamentary session on electoral reform ahead of the 2026 elections illustrated ongoing participation challenges. Civil society organizations, including LADE with EU support, launched dialogue initiatives and over 13,000 diaspora petition signatures were submitted calling for expanded expatriate voting rights. However, institutional responses remained limited, procedural concerns arose regarding agenda-setting without Bureau approval, and committee deliberations remained closed despite their constitutional significance.

There is also no institutionalized participatory budgeting at national level, and the 2023 Open Budget Survey gives Lebanon a public participation score of 0/100, noting the absence of formal mechanisms for citizen input across all stages of the budget cycle. At municipal level, practices remain largely ad hoc, generally limited to information-sharing or town-hall style hearings rather than co-decision on allocations.

4.3 Accountability

Lebanon's framework provides multiple formal avenues to hold public bodies to account through the Law 28/2017 on Access to Information, the National Anti-Corruption Commission Law 175/2020, and general administrative law principles enabling appeals to the State Council. However, rather than focusing primarily on formal complaint mechanisms, the more revealing measure of accountability lies in whether civil society participation actually influences government decisions and whether authorities demonstrate responsiveness to CSO input.

The practical reality shows significant gaps in accountability through participation. Authorities rarely publish consultation summaries, response matrices, or explanations of how CSO inputs were used. Where decisions are revised, there is little traceability between civil society submissions and final texts. There are no standard timeframes or obligations for feedback on consultation inputs. Outside Beirut, ad hoc meetings seldom generate written undertakings or public minutes, leaving CSOs without a clear basis to monitor follow-through on commitments made during consultations.

The June-July 2025 electoral reform debates illustrated these accountability gaps. Despite active civil society monitoring of parliamentary sessions, institutional follow-up remained limited, and despite ministerial commitments to reform, no comprehensive proposal was formally submitted. The operative text under parliamentary discussion was not published, sustaining uncertainty and limiting CSO ability to track how their inputs influenced deliberations. When CSOs requested feedback on their specific proposals for expatriate voting

expansion, no formal response was provided, and subsequent parliamentary discussions proceeded without acknowledging or addressing the substantive points raised in CSO submissions.

This pattern extends to other policy areas. In the 2024-2025 and 2025-2026 budget processes, CSOs submitted detailed analyses highlighting discrepancies in expenditure allocations and recommending transparency measures. These submissions were acknowledged through brief ministerial statements but were not reflected in the final budget law passed in late 2024, and no explanation was provided for why recommendations were not adopted. Similarly, in judicial reform discussions throughout 2024, civil society proposals on appointment mechanisms and disciplinary procedures received no substantive government response, with reform proposals ultimately shelved without clear justification related to CSO input.

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5. Supportive Public Culture and Discourses on Civil Society

Score:

1 ████ 2.3 ░░░░░░░░░░░░░ 5
2   3   4
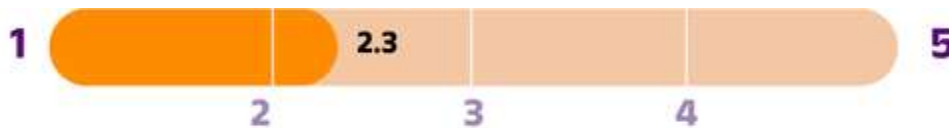
Public discourse on civil society in Lebanon is polarized and often hostile, particularly toward rights-based organizations and journalists covering sensitive topics. While civil society gained substantial credibility through effective crisis response during 2023-2024, this improved standing coexists with systematic campaigns to delegitimize watchdog journalism, recurring attacks on LGBTQI+ advocates, and structural barriers that exclude women, persons with disabilities, refugees, and residents of peripheral regions from equal civic participation. Trust in formal institutions remains low, and the positive framing of community-level solidarity has not translated into broader societal support for civil society as a political actor.

5.1 Public Discourse and Constructive Dialogue on Civil Society

Public discourse on civil society in Lebanon is polarized and often hostile, especially when actors challenge religious or political authorities. In high-salience moments, mass protests, major scandals, or oversight of public institutions, civil society groups are repeatedly framed by partisan politicians and allied media as foreign-funded, partisan, or self-serving. Since early 2025, banking-sector–aligned outlets and commentators have run smear campaigns and supported legal complaints against independent media Daraj and Megaphone and advocacy group Kulluna Irada, accusing them of "receiving suspicious foreign funds" and "undermining the state's financial standing" in connection with their coverage of banking-sector reform. These narratives, amplified on prime-time talk shows, portray reform-oriented CSOs and journalists as agents of an external agenda rather than legitimate watchdogs, which reinforces public doubt and discourages cooperation by mainstream political actors.

In May 2024, comedian and activist Shaden Fakih was targeted by coordinated online hate speech and legal complaints from religious authorities after a leaked stand-up clip, illustrating how smear campaigns and lawsuits are used to silence critical voices. In January 2025, LBCI and MTV crews were assaulted while reporting from southern Lebanon, signalling the risks journalists face when covering sensitive conflict-related issues and the chilling effect on public debate.

Although the intensity of attacks has ebbed at times over the past year, the pattern re-emerges at politically sensitive junctures, particularly when organizations expose corruption, question powerful interests, or advocate on socially contentious issues. Human-rights NGOs and LGBTQI+ advocates are disproportionately targeted, facing accusations that cast them as threats to social order or national interests.

At the same time, some narratives are more supportive: in October 2024, The New Humanitarian documented how civil society networks "filled the void left by the Lebanese state" during Israeli bombardment through mutual aid and community kitchens, while criticising the Lebanese government that it "has done little to prepare for the humanitarian fallout - reinforcing public recognition of CSOs' frontline role in crisis response. Community kitchen initiatives operated by CSOs have also been praised by the Ministry of Social Affairs for being culturally respectful and economically beneficial, with interest in replicating the model.

More structured dialogue occurs in technical settings where government officials and civil society engage on policy implementation. Expert panels on specific sectors, roundtables convened by ministries or international organizations, and occasional policy dialogues provide spaces where CSO input is sought and sometimes incorporated, particularly on implementation details rather than strategic direction. For instance, public procurement reform consultations and access-to-information implementation workshops have involved substantive CSO participation. However, these exchanges remain episodic rather than systematic, sector-specific rather than cross-cutting, and rarely influence broader public narrative. Such moments of constructive engagement are routinely overshadowed by systematic smear narratives and conspiracy-tinged claims in mainstream political discourse, which undermine CSOs' legitimacy and deter wider public participation.

Post-2023 conflict polarization intensified media criticism. In October 2024, MTV channel faced widespread attacks for war coverage viewed as insufficiently supportive of resistance narratives, and physical assaults were reported against individuals, including journalists, who publicly criticized Hezbollah on social media. This climate creates fear that restricts open civic discourse on politically sensitive topics and demonstrates how public discourse can shift from criticism to intimidation when civil society actors challenge powerful interests.

5.2 Perception of Civil Society and Civic Engagement

Perceptions of civil society are deeply divided. On the citizen side, survey evidence from Arab Barometer's 2024 shows that only 26 percent of Lebanese say they trust civil society organisations, even though CSOs and local volunteer groups are widely visible in relief and service delivery during crises. Overall political disengagement is high, with 76 percent saying they are uninterested in politics. These findings point to a public that simultaneously relies on CSO efforts yet remains sceptical of institutions and efficacy.

The mixed picture is reinforced by recent political dynamics. After the 2019 uprising, the election of "Change" MPs in 2022 briefly raised expectations; however, internal splits and the subsequent collapse of the Change bloc, coupled with limited progress on reforms, have fed disappointment among sympathizers and contributed to civic fatigue. This has dampened momentum for broader, sustained engagement even as community-level solidarity persists.

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 capitalize on its improved public standing and transition toward greater political influence. This shift in public discourse, from viewing civil society as gap-fillers to recognizing 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.

Formal civic education in Lebanon is nominally universal: National and Civic Education is a compulsory subject in schools under the 1997 national curriculum and CRDP civics framework, intended to teach rights, duties, democracy, and coexistence. In practice, textbook analyses show that civics is often taught through rote learning with a strong emphasis on social cohesion and obedience rather than critical debate on institutions and accountability. More participatory civic education largely depends on NGO and UN programmes, including Adyan's National Strategy for Citizenship and Coexistence Education and UNDP's youth civic and political participation initiatives, which reach thousands of young people but remain project-based and uneven across regions.

5.3 Civic Equality and Inclusion

On paper, Lebanon guarantees equality and core freedoms (Constitution Articles 7 and 13). However in practice, structural and legal arrangements produce uneven participation. Personal-status systems administered by religious courts, rather than a unified civil family code, generate unequal outcomes in family matters that affect women's mobility, custody, and economic independence. The nationality framework does not grant Lebanese women the same ability as men to confer nationality to spouses and children, creating a distinct layer of exclusion for mixed-nationality families.

Women face both digital and physical harassment that constrains civic participation. According to SMEX, 80 percent of all individuals subjected to digital threats and harassment between 2020 and 2023 were women. Such harassment is frequently coordinated and politically motivated, escalating during periods of heightened political tension or protest. Studies on women journalists and activists also document frequent verbal, sexual, and physical assaults during protests and field reporting, making public spaces themselves unsafe. This environment, coupled with weak institutional responses, has led to increased self-censorship among women in public roles and reduced participation in both online protests, assemblies, and media work.

For persons with disabilities, Law 220/2000 recognizes rights to accessibility, services, and inclusion, but implementation is weak: many public buildings and polling sites remain inaccessible; transport options are limited; and employment provisions are seldom enforced, reducing real avenues for participation. In June 2025, Lebanon ratified the Convention on the Rights of Persons with Disabilities (CRPD) and its optional protocol, which creates binding obligations on non-discrimination, accessibility, reasonable accommodation, and participation in public life; however, domestic practice has not yet been harmonized with these standards.

LGBTQI+ groups encounter recurring event bans, summons, and smear campaigns that deter association and public advocacy. Lebanese law prohibits the establishment of official SOGIESC organizations. In 2022, Interior Minister Bassam al-Mawlawi instructed security forces to ban LGBT gatherings, and in 2023 two draft bills were introduced to explicitly criminalize same-sex relations and punish anyone who "promotes homosexuality" with up to three years in prison, while authorities have in practice blocked registration of LGBT-focused associations such as Helem, creating a chilling effect on freedom of association and assembly for SOGIESC-focused CSOs.

Refugees, migrant workers, and communities outside Beirut, particularly in Akkar, the Beqaa, and the South, face overlapping legal, social, geographic, and economic barriers, including restrictive residency and documentation rules, high poverty and unemployment, and conflict-related displacement, which sharply limit their ability to participate in public life or engage with decision-makers. As a result, large segments of the population remain effectively excluded from consultations and civic organizing, with many fearing legal consequences and lacking access to decision-makers or affordable opportunities to engage.

Experience from organisations on the ground indicates that the security context compounds these exclusions and directly affects the enabling environment for civic participation. The presence of weapons outside state control and the influence of armed actors in certain localities raise perceived and sometimes real risks around assemblies and watchdog work, creating what civil society actors describe as "red lines" around certain topics or geographic areas. This security dynamic constrains the enabling environment by creating zones where civic activity is effectively restricted not through formal legal prohibition but through informal pressure and threat of violence. Even without formal bans, self-censorship, venue refusals, and last-minute cancellations are common where organisers expect confrontation or targeting. Organisations working on accountability, armed group conduct, or politically sensitive issues report adjusting programming, avoiding certain topics in public forums, or relocating activities to perceived safer areas. This self-censorship and geographic restriction effectively narrows civic space and limits the diversity of voices and issues that can be addressed publicly, fundamentally weakening the enabling environment by making full exercise of civic freedoms contingent on political context and geographic location rather than universal legal protection.

Taken together, these factors produce am environment that is formally open but substantively constrained. Some groups, typically well-resourced actors in Beirut, achieve partial inclusion, while women, persons with disabilities, refugees, migrants, LGBTQI+ people, and residents of peripheral regions face systematic barriers that limit equal participation.

PRINCIPLE SCORE

6. Access to a Secure Digital Environment

Score:

1 — 2.7 — 5
2 3 4
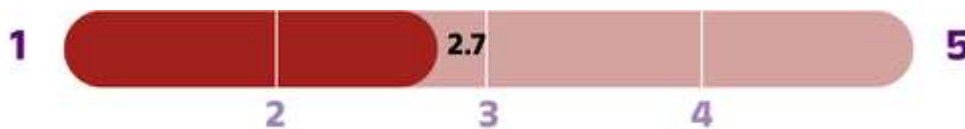
Lebanon's online space is formally open with high internet penetration, but users face selective prosecutions, opaque state–platform interactions, pervasive surveillance, targeted harassment, and uneven access. As a result, digital freedoms exist in law but are consistently undermined in practice, creating only a partially enabling environment.

6.1 Digital Rights and Freedoms

Lebanon's online space remains formally open but practically constrained. There is no systematic, nationwide censorship or routine internet shutdown policy, and public debate on social platforms is active.

Online speech is primarily regulated via Penal Code provisions on insult and defamation (including of public officials) and the Publications Law, which authorities apply to social-media content. Law 81/2018 on E-Transactions and Personal Data adds computer-crime and data-processing offenses but does not create clear protections for online expression. Enforcement runs through the Cybercrimes and Intellectual Property Bureau (ISF) and prosecutors.

However, enforcement remains selective: individuals are summoned, briefly detained, or pressured to remove posts/sign undertakings after criticizing officials or discussing sensitive topics. While many are released the same day, the pattern sustains self-censorship. For instance, within a two-week period in September-October 2025, four individuals, activists Abbas Zahri, Haroun Farhat, and Josiane Nahra, and journalist Joelle Abdel Aal of Sharika Walaken, were summoned or arrested by the Cybercrimes Bureau on expression-related allegations. The Lebanese Center for Human Rights reported that Public Prosecutor General Jamal Hajjar initiated action against Zahri over a Facebook post criticizing the ruling authority, leading to interrogation, post deletion, and an apology. Activist Haroun Farhat, who had been exposing corruption in the Ministry of Education through TikTok investigations, was arrested twice within days: first following a defamation complaint by Amal Shaaban (former Secretary of the Equivalency Committee at the Ministry of Education), then again following a complaint by Imad Al-Ashqar (Head of Private Education Service). His second arrest violated Article 107 of the Criminal Procedure Code, which prohibits detention for offenses with maximum

penalties not exceeding one year. Abdel Aal was summoned following a complaint by artist Fares Karam over an investigation into the kafala system; she maintained silence during interrogation and was released without signing undertakings. Nahra was summoned based on a lawsuit from Charbel Eid of the Lebanese Forces party over tweets alleging misconduct by party officials.

Major platforms (Meta, X, YouTube, TikTok) enforce their own Terms of Service and respond to government/legal requests (court orders, law-enforcement letters) for data or content restrictions. Some requests originating in Lebanon appear in platform transparency reports, but state transparency is weak. There is no statutory notice-and-appeal system, and authorities do not publish aggregate takedown/request statistics, limiting accountability. Where platform policies and local demands conflict, outcomes are inconsistent and rarely explained to users.

Online activity is monitored chiefly by the Cybercrime & IP Bureau and, at times, other security agencies. The tools, criteria, and scope are not publicly disclosed. Civil-society documentation describes complaint- and keyword-driven monitoring, device/account access requests in investigations, and occasional demands to reveal sources. Lebanon has no comprehensive policy to curb state or party-linked disinformation/manipulation; responses are ad hoc (platform moderation, media rebuttals), leaving users exposed to orchestrated smear campaigns. 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.

Although outright shutdowns are uncommon, users experience service outages, infrastructure faults, and price hikes that reduce affordable access, especially outside Beirut. The October-November 2024 hostilities caused extensive damage to telecom infrastructure. 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.

6.2 Digital Security and Privacy

Lebanon's digital security and privacy climate is disabling for many civil society actors. There are no routine national-level internet shutdowns, but since 2024 journalists, activists, and NGOs have faced a steady mix of spear-phishing, credential theft, account hijacks (particularly on messaging and social platforms), doxxing, coordinated smear campaigns, and periodic DDoS/defacement of media and CSO sites.

Individuals summoned by the Cybercrime & Intellectual Property Bureau report pressures to delete posts or sign undertakings before release; even short detentions or warnings reinforce a chilling effect on watchdog work and advocacy.

Speech-related offenses (insult/defamation of officials) and general cybercrime provisions are actively used online, while Law 81/2018 (e-transactions & personal data) lacks an operational, independent supervisory authority and has inconsistent enforcement. There is no clear, statutory notice-and-appeal process for government-initiated takedowns, and aggregate transparency on official content or data requests is not published, limiting accountability.

Digital harassment remains widespread and gendered. According to SMEX, 80 percent of all individuals subjected to digital threats and harassment between 2020 and 2023 were women. Such harassment is frequently coordinated and politically motivated, often using sexualized threats, doxxing, and smear campaigns aimed at silencing women's participation in public

debate. SMEX reports that gendered digital harassment disproportionately targets women journalists, human rights defenders, and activists. Journalist Carine Abdel Nour reported experiencing over 600 coordinated complaints filed against her social media accounts in July 2025, resulting in temporary suspensions of platforms critical to her professional activity. She considers this part of a broader pattern of digital pressure following her investigative article's publication.

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, instead focusing 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.

Privacy and data-use risks are structural. Major data controllers, telecom operators/ISPs, utilities, banks, and digital platforms, hold extensive personal datasets, yet breach notification is not systematic and public audit trails are rare. In this context, personal data can circulate through commercial data brokers, political or interest groups, or unknown third parties, with little visibility for affected users. Combined with SIM-swap attempts and targeted password-reset abuse, this leaves CSO staff and volunteers exposed to identity compromise and harassment.

The February 2024 deployment of the Astellia surveillance system compounds these risks, enabling real-time monitoring of communications without transparent legal frameworks or judicial oversight. The combination of targeted online attacks, coercive takedown practices during cybercrime investigations, gendered harassment, and weak, opaque data-protection enforcement produces a high-risk environment that deters participation and self-expression.

6.3 Digital Accessibility

Digital access in Lebanon is partially enabling. 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.

Internet service is available in most areas, and overall penetration is moderate, but affordability (tariff hikes and device costs) and service quality (outages, speed variability, and weak last-mile infrastructure outside major cities) significantly constrain use for a large share of residents and smaller CSOs. These constraints are most visible in Akkar, the Beqaa, and parts of the South, where connectivity is present but less reliable and travel to better-served hubs is costly.

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 literacy exists but is uneven, stronger among youth/urban groups but weaker among marginalised communities and smaller organizations. There are pockets of training (e.g., SE Factory; DOT Lebanon; university community centres; UNICEF/UNDP youth & community labs; periodic NGO/municipal courses), yet provision is fragmented, short-term, and rarely embedded in public adult-learning systems. Many CSOs lack budget for devices, assistive technologies, and paid tools, which limits effective use even when connectivity is available.

Lebanon ranks 157 out of 237 countries for mobile data affordability, making access prohibitively expensive for lower-income communities. These material constraints compound

legal risks to produce uneven digital freedoms. Barriers are higher for persons with disabilities due to limited availability of publicly-accessible infrastructure and captioning/screen-reader support and for low-income users who rely on prepaid mobile data. Power cuts and generator costs further reduce practical access for community centres and small NGOs.

C) Recommendations

Based on the evidence presented in this report, targeted recommendations are proposed for three key stakeholder groups. These recommendations are grounded in specific gaps identified across the six principles and designed to be actionable within realistic timeframes.

1. To the Government of Lebanon

Strengthen Legal Protections for Expression and Media

1.1 Decriminalize expression offenses by amending the Penal Code to replace criminal defamation and insult provisions (Articles 384-385) with civil remedies, bringing Lebanon into compliance with Article 19 of the International Covenant on Civil and Political Rights. Ensure that the draft Media Law (under review since 2023) removes pretrial detention provisions for expression cases and establishes the Publications Court as the exclusive venue for press-related matters. Publish the operative text of the draft Media Law and hold transparent parliamentary hearings with civil society participation before final passage.

1.2 Operationalize whistleblower protections under [Law No. 83 of 2018](#) by establishing clear guidelines preventing prosecution of corruption disclosures made in the public interest. Issue prosecutorial guidance clarifying that persons exercising access to information rights under Law 28/2017 and whistleblower protections may not be subject to defamation proceedings for disclosures made in the public interest. Enforce Article 107 of the Criminal Procedure Code prohibiting detention for offenses with maximum penalties not exceeding one year, particularly critical for expression cases.

1.3 Establish a dedicated Journalist Protection Unit within the Ministry of Information to provide rapid response coordination among the Internal Security Forces, Army Intelligence, and the National Human Rights Institution. Create a hotline, risk assessment protocols, and legal aid network for journalists facing threats, detention, or intimidation. Ensure transparent investigation and public reporting on progress in cases such as the September 2025 threats against Walid Abboud.

Implement Access to Information and Transparency Standards

2.1 Fully resource and staff the [National Anti-Corruption Commission (NACC)](#) to enable it to effectively receive and adjudicate complaints under [Law 28/2017](#) (Access to Information Law). While the NACC is technically operational since January 2024, it has only 3 out of 85 required personnel, preventing it from fulfilling its mandate for access to information appeals and oversight. Set minimum response timelines for information requests (15 days as stipulated) with automatic administrative penalties for non-compliance. Require all public bodies to designate focal points and publish annual compliance reports.

2.2 Mandate proactive publication of core government information in open, machine-readable formats: institutional mandates, organizational charts, budgets, procurement awards,

decisions, and key statistics. Remove paywalls from the Official Gazette and establish centralized online portals for government data. Conduct annual audits of agency compliance and publish results publicly.

2.3 Establish transparent consultation procedures for legislation affecting civic space, including mandatory minimum notice periods (at least 30 days), publication of draft texts, civil society hearings, and public documentation of how stakeholder input was used or rejected. Apply this standard to all pending legislation, including the draft Media Law and the proposed foreign associations amendment (submitted May 30, 2024 and under government review as of August 2025).

Address Banking Constraints on Civil Society

3.1 Coordinate with the Central Bank of Lebanon, commercial banks, and financial regulators to clarify that legitimate CSO banking operations and receipt of international grants are not per se violations of anti-money laundering frameworks. Provide exemptions or streamlined due diligence procedures for CSOs engaged in humanitarian work, service delivery, and rights advocacy. Establish a CSO-bank liaison mechanism to resolve account-opening and transfer delays caused by enhanced due diligence procedures implemented following FATF increased monitoring (October 2024) and EU High-Risk listing (June 2025).

3.2 Issue clear guidance to financial institutions distinguishing between legitimate CSO operations and suspicious activity, reducing unnecessary account closures and restrictions that have disrupted payroll, vendor payments, and grant disbursement since late 2024.

Strengthen Civil Society Legal Framework

4.1 Digitize the CSO registration process at the Ministry of Interior by establishing an online portal that accepts electronic submissions and provides automated acknowledgment receipts within the three-day statutory period stipulated in the 1909 Ottoman Law on Associations. Ensure equal access for organizations in provinces (Akkar, Tripoli, Beqaa, South) by allowing remote filing.

4.2 Withdraw or significantly revise the proposed foreign associations amendment (submitted by MP Simon Abi Ramia on May 30, 2024), which introduces undefined compliance criteria and asset confiscation provisions without judicial oversight. If modifications proceed, conduct transparent public consultation with affected organizations before any government-drafted alternative is finalized.

4.3 End discriminatory restrictions on SOGIESC organizations by revoking unlawful directives banning their establishment and events. Align domestic law with international human rights obligations, including commitments under the International Covenant on Civil and Political Rights.

Protect Freedom of Assembly

5.1 Modernize the 1911 Public Gatherings Law to replace broad discretionary powers with clear, objective criteria for assembly notification and transparent appeal mechanisms for any denial. Ensure that security agencies document reasons for restrictions and that organizers have timely recourse to judicial review.

5.2 Establish clear protocols limiting use of riot police and prohibiting excessive force during lawful assemblies. Train security forces on proportionality standards and establish independent oversight and accountability for incidents of excessive force.

2. To Donors and the International Community

Fund and Support Compliance Infrastructure

1.1 Provide technical assistance and capacity-building grants to help CSOs navigate enhanced anti-money laundering and counter-terrorism financing compliance requirements triggered by Lebanon's FATF grey-listing (October 2024) and EU High-Risk designation (June 2025). Support CSOs in strengthening internal compliance systems, financial management, and documentation procedures.

1.2 Explore options for establishing an intermediary funding mechanism or consortium to channel international funds to Lebanese CSOs while meeting EU and international compliance requirements, specifically to reduce de-risking friction by centralising partner due diligence and transaction documentation (Know Your Customer, sanctions screening, beneficial ownership checks, audit-ready payment packs) under one bankable compliance pipeline. Coordinate with EU member states to clarify that legitimate humanitarian and development funding to Lebanese CSOs is permissible when conducted through compliant channels under the EU high-risk third-country framework and enhanced due diligence expectations.

1.3 Consider advocating for proportionate, risk-based AML/CFT application to civil society and humanitarian transfers, including clearer safe-channel guidance that prevents indiscriminate restrictions on CSOs. Engage with EU institutions and FATF using the language of FATF Recommendation 8 and its implementation guidance to reduce unintended constraints on legitimate development and humanitarian work.

Provide Flexible, Multi-Year Funding

2.1 Shift from short-term, project-based funding to multi-year core/institutional support that allows CSOs to invest in organizational strengthening, staff retention, and systems development. This addresses the sustainability challenge (Principle 3, Score 2/5) where current funding structures translate into short contracts, high turnover, and inability to plan beyond project cycles.

2.2 Build flexibility into funding agreements to allow crisis-responsive programming, no-cost extensions, and adaptive management when operating context deteriorates, particularly relevant given Lebanon's ongoing economic and security challenges. Simplify due-diligence requirements for smaller or emerging CSOs partnering with larger organizations.

2.3 Support funding for grassroots, rural, and non-Beirut CSOs, and for CSOs working on sensitive issues (expression, rights advocacy, accountability, LGBTQI+ services) that face particular difficulty accessing conventional donor funding. Consider using intermediary organizations or trust funds to channel resources while protecting grantees' operational independence.

Support Evidence-Gathering and Advocacy

3.1 Fund civil society monitoring and documentation of civic space constraints, including tracking of defamation prosecutions, SLAPP litigation, journalist detentions, and restrictions on assembly. Support publication of annual shadow reports on implementation of access to information laws and consultation procedures.

3.2 Provide financial and technical support for legal defence of journalists, activists, and whistleblowers facing criminal summonses, detention, or civil litigation. Support media freedom organizations and journalist associations in providing rapid response legal counsel and psychological support.

3.3 Fund civil society participation in Lebanon's fourth Universal Periodic Review (UPR) process (scheduled January-February 2026) by supporting stakeholder submissions

documenting civic space constraints and recommending specific reforms aligned with international human rights standards.

Engage on Electoral and Democratic Reform

4.1 Support civil society organisations engaged in electoral monitoring, diaspora engagement, and electoral reform advocacy ahead of Lebanon's 2026 parliamentary elections. Provide technical assistance on voter education, observer training, and election integrity monitoring.

4.2 Fund dialogue initiatives on electoral reform, particularly around expatriate voting rights and participation mechanisms, building on civil society momentum from the May 2025 municipal elections and the June 2025 parliamentary session on electoral law (where over 13,000 diaspora petition signatures were submitted).

3. To Civil Society Organizations

Coordinate Monitoring and Advocacy

1.1 Establish a CSO coalition to systematically monitor government implementation of [Law 28/2017](#) (Access to Information Law) and document compliance gaps across ministries and municipalities. Publish annual shadow reports showing response rates, timeliness of replies, and quality of information provided. Use this evidence to pressure the NACC and government bodies for improved performance.

1.2 Create a monitoring mechanism to track and publicly report on civic space constraints, including arrests/detentions of journalists and activists, SLAPP litigation, threats against media professionals, and restrictions on assembly. Share findings with international human rights monitoring bodies and document patterns for potential future accountability mechanisms.

1.3 Convene a cross-sector anti-SLAPP working group (media, CSOs, bar associations, and rights groups) to coordinate response to abusive defamation and "insult" litigation targeting public-interest reporting and advocacy. Document cases across sectors, maintain a shared legal support roster and rapid-response protocols, and advocate for safeguards in the draft Media Law and related legislation, including early dismissal, cost-shifting, and protections for good-faith public-interest speech.

Strengthen Internal Capacity and Peer Support

2.1 Strengthen professional networks and collective protections within the media sector and among CSO communities. Address the documented breakdown of internal solidarity (e.g., within media outlets facing pressure) by establishing peer support protocols, shared legal resources, and mentoring arrangements for younger journalists and activists facing intimidation.

2.2 Develop capacity-building initiatives on digital security, source protection, and data privacy for journalists, activists, and CSO staff. Given the 80% of digital harassment victims being women and the deployment of Astellia surveillance system (February 2024), provide specialized training on secure communications, device protection, and psychological support for those experiencing threats.

2.3 Establish internal compliance support networks to help smaller CSOs navigate AML/CFT requirements and banking procedures triggered by FATF grey-listing and EU High-Risk designation. Create templates, guidance documents, and peer-to-peer troubleshooting forums to reduce isolation and duplicate effort.

Leverage Political Opportunities

3.1 Engage with the new government leadership (President Aoun and PM Salam) on commitments to judicial independence, rule of law, and freedom of expression. Hold public hearings where government officials are asked to translate rhetoric into concrete policy actions, digitizing registration, operationalizing the NACC, implementing ATML framework, etc.

3.2 Use the UPR 2026 process to amplify already-submitted stakeholder evidence and shape recommendations. Coordinate with CSO coalitions that submitted reports by the stakeholder deadline and prepare targeted briefings for reviewing states ahead of the pre-session and January 2026 review, including priority asks on freedom of expression, digital rights, and participation. Use the UPR as a platform for Geneva engagement, including bilateral outreach to delegations, side-events, and rapid follow-up on recommendations during the adoption and implementation phases.

3.3 Coordinate electoral reform advocacy ahead of 2026 parliamentary elections, building on the momentum from the May 2025 municipal elections and June 2025 diaspora engagement campaign. Press for transparency in electoral reform deliberations, meaningful CSO participation in drafting, and publication of operative texts before passage.

Engage Women, Marginalized, and Geographic Constituencies

4.1 Address the documented gendered dimensions of civic space constraints (80% of digital harassment victims are women; digital violence often uses sexualized threats). Establish gender-focused support networks and advocate for the Cybercrimes Bureau to treat online harassment as gender-based violence rather than defamation.

4.2 Ensure that civic space monitoring and advocacy efforts explicitly address barriers facing LGBTQI+ organizations, refugees, persons with disabilities, and CSOs based outside Beirut. Document how restrictions disproportionately affect marginalized groups and incorporate this evidence into advocacy.

4.3 Strengthen regional coordination mechanisms to ensure that CSOs in Akkar, Tripoli, Beqaa, and the South are included in national advocacy efforts, policy consultations, and international engagement. Address geographic inequities in donor access, notice periods for consultations, and participation in digital advocacy.

Document and Preserve Evidence

5.1 Establish archival and documentation systems to preserve evidence of civic space constraints, including recordings of defamation investigations, copies of SLAPP litigation filings, screenshots of social media harassment campaigns, and records of journalist detentions. This documentation will be essential for future accountability mechanisms and UPR processes.

5.2 Support fact-checking and counter-disinformation efforts to combat orchestrated smear campaigns against CSOs, journalists, and activists. Partner with media outlets to amplify accurate narratives about civil society's role and contributions.

Implementation Priorities

These recommendations are interdependent and most effective if pursued in coordination:

- **Immediate (0-3 months)**: Secure new government engagement on legal framework reform; support rapid-response protection and legal defence for journalists and CSOs facing threats or abusive litigation; establish compliance support networks for CSOs;

prepare concise UPR 2026 delegation briefings and engage in other UPR advocacy around the pre-session and in Geneva.

- **Short-term (3-6 months)**: Digitize CSO registration; fully resource and staff the NACC and access-to-information compliance audits; establish coalition monitoring mechanisms; finalize UPR stakeholder reports.
- **Medium-term (6-12 months)**: Implement media law reforms and revise/withdraw foreign associations amendment; strengthen financial institution cooperation on CSO banking; track UPR outcomes and drive follow-up on accepted recommendations through an implementation plan and periodic scorecards.

D) Research Process

Each principle encompasses various dimensions which are assessed and aggregated to provide quantitative scores per principle. These scores reflect the degree to which the environment within the country enables or disables the work of civil society. Scores are on a five-category scale defined as: fully disabling (1), disabling (2), partially enabling (3), enabling (4), and fully enabling (5). To complement the scores, this report provides a narrative analysis of the enabling or disabling environment for civil society, identifying strengths and weaknesses as well as offering recommendations. The process of drafting the analysis is led by Network Members; the consortium provides quality control and editorial oversight before publication.

For Principle 1 - which evaluates respect for and protection of freedom of association and peaceful assembly - the score integrates data from the CIVICUS Monitor. However, for Principles 2–6, the availability of yearly updated external quantitative indicators for the 86 countries part of the EUSEE programme are either limited or non-existent. To address this, Network Members convene a panel of representatives of civil society and experts once a year. This panel uses a set of guiding questions to assess the status of each principle and its dimensions within the country. The discussions are supported by secondary sources, such as V-Dem, the Bertelsmann Stiftung Governance Index, the RTI Rating from the Centre for Law and Democracy, and other trusted resources. These sources provide benchmarks for measuring similar dimensions and are complemented by primary data collection and other secondary sources of information available for the country. Guided by these deliberations, the panel assigns scores for each dimension, which the Network Members submit to the Consortium, accompanied by detailed justifications that reflect the country's specific context. To determine a single score per principle, the scores assigned to each dimension are aggregated using a weighted average, reflecting the relative importance of each dimension within the principle. This approach balances diverse perspectives while maintaining a structured and objective evaluation framework.