EU SEE

SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY

# Enabling Environment Snapshot

## Lebanon

## June 2026

# Context

Period covered by the report: January-June 2026

Since the beginning of the year, Lebanon's environment continued to deteriorate as armed conflict resumed, displacement reached crisis scale and reform momentum stalled. On 2 March 2026, Hezbollah launched missiles and drones from southern Lebanon in the context of the wider regional escalation, after which the Lebanese government banned Hezbollah's military and security activities. In addition, Israeli operations rapidly expanded across Southern Lebanon, the Bekaa, and Beirut's southern suburbs. By late March, more than one million people had been displaced and the Ministry of Social Affairs estimated that available aid covered only around 30 percent of essential needs; OCHA's March-May 2026 Flash Appeal requested US$308.3 million to assist up to one million people.

The conflict crowded out reform space and sharpened the debate over the state monopoly on force. Parliament also extended its mandate by two years in March 2026, postponing parliamentary elections scheduled for May 2026. The Constitutional Council later upheld the postponement while indicating that the delay should be shortened if circumstances allow. This removed the primary electoral accountability mechanism precisely when emergency spending, displacement management and reconstruction decisions most required public oversight and democratic legitimacy.

Economically, civil society actors entered 2026 with lower predictability and higher transaction risk. The continuing interruption of previously U.S.-funded programming has affected sub-granting pipelines and partner staffing, while the humanitarian response has increased demand for civil society organisations' (CSO) services. Lebanon remains under FATF increased monitoring, and the EU's high-risk third-country listing requires EU obliged entities to apply additional checks to transactions involving Lebanese entities. For CSOs, the practical result is slower transfers, heavier due-diligence demands, and reduced willingness from banks and donors to transact with Lebanese entities, particularly smaller organisations with limited compliance infrastructure. These conditions define the reporting period as one in which structural pressures compounded rather than resolved, and in which the operating environment for independent civil society narrowed, not through a single event but through cumulative constraint.

# 1. Respect and protection of fundamental freedoms

Article 13 of Lebanon's Constitution formally protects freedom of expression, the press, assembly and association, while Articles 7 and 8 protect equality before the law and personal liberty. In practice, Lebanon continues to be rated "Obstructed" by the CIVICUS Monitor, and the January-June 2026 period shows a mixed picture: rights remain formally available, but their exercise is increasingly conditioned by legal, security and conflict-related pressures.

Freedom of expression remained vulnerable to cumulative pressure through criminal defamation, cybercrime procedures and exceptional forums, including the reported use of military jurisdiction in expression-related cases. Civil-society monitoring in February 2026 documented summonses involving journalists and public commentators, including Mahasen Mersel, Carine Abdel Nour and Assaad Rechdan, often through police or cybercrime channels

rather than the Publications Court. A separate reported complaint against journalist Sabine Youssef before the Military Court in April illustrates the contested use of exceptional jurisdiction: Lebanese military courts have been used in cases involving civilians where security or military interests are alleged, but rights groups have repeatedly criticised the referral of civilian journalists, activists and commentators to military courts in expression-related cases.

The main legislative opening was the draft Media Law. On 18 February 2026, UNESCO welcomed the completion of parliamentary committee deliberations and noted that the draft would abolish custodial penalties and pretrial detention for publication-related offences, create a specialised civil media court, extend the framework to digital media and establish an independent National Media Authority. However, on 23 April 2026, Joint Parliamentary Committees reopened the process after a competing proposal was tabled by an MP, raising the risk that the rights-protective text could be weakened before plenary adoption. As of early June 2026, no final adoption had been publicly reported; on 5 June 2026, Information Minister Paul Morcos publicly committed to defending the rights-protective version of the draft and to the freedom-of-expression provisions it contains.

Wartime conditions also created direct physical risks for journalists. The International Federation of Journalists issued safety guidance after the 2 March escalation. On 17 April 2026, four journalists were attacked in Debbine while covering post-conflict damage on the first day of the ceasefire, with assailants accusing them of treason and collaboration. On 22 April 2026, journalist Amal Khalil was killed in al-Tayri while reporting in southern Lebanon; UNESCO condemned the killing, and RSF reported that rescue access was obstructed. These incidents show that restrictions on press freedom in 2026 were not only legal or administrative, but also physical and conflict-related.

Freedom of assembly remains limited by prior-notification rules and broad security discretion. The key 2026 example was the February transport-sector mobilisation against fuel-tax and VAT measures, during which roads were blocked and the Army reopened traffic without reported arrests. The incident indicates that economic protest remains possible, but assemblies remain vulnerable to discretionary security management during the conflict.

## 2. Supportive legal and regulatory framework

Lebanon's association framework is still formally based on notification under the Ottoman Law of Associations of 1909, but implementation often functions as a permission-like process for sensitive organisations. Registration delays, annual reporting obligations, prior authorisation for foreign associations, discretionary inspection powers, the Council of Ministers' dissolution authority and banking compliance burdens make legal operation uneven, especially for organisations working on governance, SOGIESC rights, refugee support and accountability. ICNL's Lebanon monitor continues to identify association, operation and resource barriers affecting civic actors.

Two 2026 developments are most relevant. First, the restrictive draft law on foreign associations remained unresolved and no publicly revised government text was available by May 2026, leaving foreign and mixed-membership associations exposed to possible future restrictions. Second, on 19 February 2026, the Ministry of Labour approved the registration file of the Union of Journalists in Lebanon, formerly the Alternative Press Syndicate, and forwarded it for further review by the Ministries of Information and Interior. Public sources do not yet confirm final Ministry of Interior endorsement, so the case demonstrates both administrative responsiveness and the multi-agency friction that continues to delay formal recognition for actors operating outside established syndicate structures.

## 3. Accessible and sustainable resources

The resource environment in 2026 is defined by simultaneous humanitarian surge and funding contraction. CSOs remain legally able to receive domestic and foreign funds, but predictable public funding is negligible. The continued interruption of previously U.S.-funded pipelines has not been fully offset, leaving organisations with staffing gaps, paused sub-grants and reduced capacity to shift from development programming to emergency response. Registration delays and unresolved legal status also continue to limit direct donor access for some organisations working on politically sensitive issues, including governance, refugee support and SOGIESC rights, forcing reliance on intermediaries or informal funding channels.

The March 2026 escalation intensified demand for civil society services while available resources remained insufficient. The Minister of Social Affairs told Reuters that aid covered only about 30 percent of essential needs, while OCHA appealed for US$308.3 million for the March-May emergency response. Funding scarcity increases competition between humanitarian and governance programming, pushing many CSOs to prioritise relief operations over accountability, rights protection and participation work.

Financial access is additionally constrained by AML/CFT compliance. FATF keeps Lebanon under increased monitoring but does not itself call for enhanced due diligence solely on that basis. However, the EU high-risk third-country framework requires additional checks for EU obliged entities dealing with high-risk countries, and EU SEE has already flagged the impact on civil society funding flows. For Lebanese CSOs, the practical effect is slower transfers, heavier due-diligence requests and greater donor hesitation, particularly for smaller organisations with limited compliance capacity.

## 4. Open and responsive state

Transparency and participation remained uneven in the reporting period. Lebanon has an Access to Information Law and the National Anti-Corruption Commission can issue decisions, but the central issue is enforcement. Public bodies are still not consistently responsive, and the Commission's ability to compel compliance remains limited. During the conflict, public access to humanitarian data through official and UN platforms improved situational awareness, but did not substitute for full transparency over emergency spending, displacement management or reconstruction decisions.

There were limited 2026 openings on transparency and public-interest accountability. On 26 February 2026, a Beirut urgent-matters judge reversed the blocking of shinmimlam.com, a searchable commercial registry database, affirming the public-interest value of access to commercial registry data. Parliament's Human Rights Committee also approved a draft law abolishing the death penalty on 23 February 2026 and referred it to the General Assembly, creating another rights-related legislative opening.

Participation showed both openings and reversals. The draft Media Law process improved after UNESCO-supported consultations and committee review, but the 23 April 2026 referral back to a sub-committee after a competing proposal was introduced without prior civil-society consultation showed how quickly participatory gains can be reversed. The unresolved Foreign Associations draft law reflects the same risk: a potentially restrictive legal initiative proceeded through official channels with limited public visibility or stakeholder consultation and remained unresolved as of May 2026.

Lebanon's fourth Universal Periodic Review took place on 19 January 2026; the Human Rights Council is expected to adopt final outcomes at its June-July 2026 session, giving CSOs a concrete accountability window to track accepted recommendations and government follow-up. Judicial and public-interest advocacy also produced limited openings, including continued environmental advocacy and litigation around the Amchit monk seal cave. These cases show that CSO monitoring, legal action and public communication can still generate institutional responses, even where procedures are slow and politically uneven.

## 5. Supportive public culture and discourses on civil society

Public discourse on civil society was divided in 2026. CSOs gained credibility where they filled relief, displacement-support and information gaps during renewed conflict, but faced hostile framing when they challenged war narratives, religious sensibilities, security actors or entrenched political interests. This dual pattern is the main development in the January-June period.

Journalists and civic actors faced public labelling framed around treason, collaboration or sectarian betrayal, including pressure on voices perceived as challenging dominant political narratives from within their own communities. The Debbine assault demonstrates how wartime discourse can translate into physical intimidation of media workers. The May 2026 LBCI "Angry Birds" incident showed the same tension in the digital sphere: LBCI removed the satirical clip after a judicial order, but the Public Prosecutor later declined to prosecute the channel on the basis that the production fell within protected caricatural expression, while maintaining prosecution of separate content targeting a religious figure.

The information ecosystem also became a civic-space risk. A SKeyes monitoring report on the post-8 April 2026 "Zoom call" and "coup" narratives traced 52 instances of rapid amplification across social media, WhatsApp, broadcast media and official statements. The civic-space relevance is direct: when unverified security claims are repeated at scale, they can frame

watchdogs, journalists and critics as security threats and justify speech restrictions or retaliation. For CSOs, source verification, coordinated rebuttal and crisis communication are therefore protective measures, not only media-literacy work.

Positive discourse also remained possible. The EU's February 2026 launch of the Samir Kassir Award and the Ministry of Labour's movement on the Union of Journalists in Lebanon registration file reinforced press freedom as a public good. These openings are limited, but they can be used to counter narratives that treat independent media or rights-based civil society as partisan actors. However, the March 2026 escalation also narrowed civic space by redirecting CSO resources toward emergency response and reducing their ability to sustain public advocacy on governance reform, accountability and rights protection.

# 6. Access to a secure digital environment

According to DataReportal's Digital 2026 report, Lebanon had 5.38 million internet users at the end of 2025, representing 91.8 percent internet penetration, and 4.58 million social-media user identities. High connectivity does not mean secure or equal access: affordability, electricity interruptions, rural infrastructure gaps and conflict-related telecom disruption continue to affect the ability of CSOs and communities to use digital platforms reliably.

Surveillance and telecom fragility remained background risks, while the 2026 escalation created acute digital-security concerns. During the March 2026 escalation, SMEX documented threatening calls and SMS messages, caller-ID spoofing, fake WhatsApp and Telegram accounts and the use of easily available personal data, including advertising lists, traffic records and voter rolls. These practices directly affect civic space because journalists, CSOs and volunteers depend on phones and messaging applications for evacuation information, shelter coordination, referrals and field verification.

Online expression also remained exposed to enforcement pressure. SKeyes documented February 2026 cases in which Mahasen Mersel and Carine Abdel Nour were summoned in relation to online or publication-linked content, and both asserted that press-related matters fall under Publications Court jurisdiction. This confirms that digital speech is still vulnerable to police or cybercrime handling, rather than predictable judicial review under press-law safeguards.

Lebanon still lacks a dedicated personal-data protection law. In a conflict setting where spoofed messages, data exposure and digital harassment can affect movement, safety and public participation, this legal gap leaves civil society actors and communities with limited recourse when personal data is misused.

# Challenges and Opportunities

**Challenges**

The first challenge is compounding constraint. Armed conflict, displacement, legal pressure, funding contraction and financial-compliance burdens are not independent stressors: they reinforce each other. Organisations that lose funding cannot maintain the staff needed to document violations; organisations managing displacement cannot sustain governance or

accountability programming; organisations facing legal pressure cannot communicate freely about either. The result is a structural narrowing of civil society's operating capacity that is greater than the sum of its individual components.

The second challenge is narrative securitisation. In 2026, criticism of armed actors, religious leaders, war coverage or governance performance can be reframed as treason, collaboration, insult or destabilisation. This exposes CSOs and media workers to legal, digital and physical pressure across multiple channels. Without shared verification and rebuttal capacity, civil society actors are structurally disadvantaged in responding to this pressure.

**Opportunities**

Five concrete openings exist in the current period, and each requires deliberate civil society action to convert into measurable gains.

- The draft Media Law remains the most consequential legislative opportunity. The rights-protective text approved after UNESCO-supported consultations could, if adopted in its current form, abolish custodial penalties for publication offences, create a specialised civil media court and extend protections to digital content. Civil society's task is not to wait for a plenary vote: CSOs and press freedom organisations should publish a publicly accessible version tracker, document any regression from the February 2026 committee text, and establish a transparent benchmark against which any revised version can be assessed. A coalition position statement, submitted before sub-committee deliberations conclude, would anchor the public record.
- The Universal Periodic Review cycle opens a structured accountability window. Following the expected June-July 2026 adoption of UPR outcomes, CSOs can publish a compliance tracker mapping accepted recommendations against existing law and practice, organise briefings with diplomatic missions, and link reconstruction and recovery support to measurable civic-space benchmarks. This is one of the few formal multilateral leverage points available to Lebanese civil society in the current period.
- The information ecosystem threat documented by SKeyes can be converted into a protective asset. Rapid verification protocols, coordinated rebuttal mechanisms and shared digital-safety guidance, developed collectively rather than by individual organisations, reduce the ability of unverified security narratives to delegitimise civil society action. SMEX and SKeyes have the monitoring infrastructure; the gap is coordination and speed of response.
- Financial sustainability requires structural action rather than donor-by-donor negotiation. CSOs should map EU, multilateral and flexible rapid-response funding channels together, develop shared due-diligence documentation packs for banks and donors, and seek pooled support for compliance, digital security and core operating costs. This approach reduces the cost of compliance for individual organisations and presents donors with a lower-risk engagement model.
- The Union of Journalists registration case and the February 2026 Samir Kassir Award provide a narrow but usable space for positive norm reinforcement. Civil society should use these reference points in public communication to establish the legitimacy of

independent media and professional organising as public goods rather than political acts, countering narratives that frame journalism or CSO work as sectarian or foreign-driven.

*This publication was funded by the European Union. Its contents are the sole responsibility of the author and do not necessarily reflect the views of the European Union*


EU SEE
SUPPORTING
AN ENABLING ENVIRONMENT
FOR CIVIL SOCIETY
Funded by
the European Union
Hivos
people unlimited
CIVICUS
DEMOCRACY
REPORTING
INTERNATIONAL
European
Partnership for
Democracy
forus
TRANSPARENCY
INTERNATIONAL