# **LEBANON**

Submission to the UN Universal Periodic Review
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Human Rights Council
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# This report is submitted by the following NGOs members of the WG PASC (Working Group for the Persons Affected by the Syrian Crisis)

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Women Now
(See Annex 1 for more details)

This submission is presented for consideration as part of the Universal Periodic Review Stakeholder Report. It includes a summary of the human rights conditions in Lebanon along with recommendations on how the Lebanese government can improve these conditions and put an end to violations.

# A. Executive Summary

Anti-refugee rhetoric in Lebanon has significantly increased over the last 5 years, alongside restrictive policies and measures, both official and unofficial. This situation severely undermines social stability, fueling discrimination, forced evictions, and deportations. Refugees continued to face challenges due to insufficient legal documentation and the absence of refugee status determination, which has raised concerns over their safety and access to services. With political shifts in Syria and the fall of the regime, a new influx of Syrians into Lebanon began, adding further pressure to the already strained context.

#### **B.** Social Stability

- 1. As the context in Lebanon continued to deteriorate during these 5 years, relations between the Lebanese host community and the Syrian refugee population continued to worsen as well, adding to the already precarious safety and security of Syrian refugees. Tensions have escalated into physical assaults and vigilante attacks among the two groups sometimes life-threatening.
- 2. Racial discrimination has been a severe problem in the country as widespread and targeted campaigns have been reported against individuals from Syria. While 4% of Syrian households reported being subject to discriminatory curfews in areas where they live in 2022<sup>iii</sup>, this number peaked at an alarming 12% of Syrian households in 2023<sup>iv</sup>. Indeed, several municipalities have imposed arbitrary and discriminatory measures against Syrians residing within their jurisdiction. These measures did not just include curfews, but also raids, arbitrary detention, confiscation of documents, and wage caps. For instance, several municipalities and governorates have imposed curfews on Syrian refugees in April 2024. Similarly, other municipalities, such as Al-Qaa and Sin El Fil, implemented further discriminatory measures, including the restriction of Syrian children from enrolling in public schools unless they and their families had legal residency permits.
- 3. Several newly arrived Syrian asylum seekers were not allowed to enter informal tented settlements, while many of those already inside Lebanon defaulted on rent payments and found themselves houseless. The deteriorating safety and security of Syrian refugees in the country can be directly attributed to the increasingly hostile mood against them at both grassroot and governmental levels. VIII
- 4. Communications by the Government of Lebanon (GoL) have repeatedly expressed Lebanon's inability to continue managing the refugee crisis in the country. The GoL and several line ministers, Members of Parliament, municipalities, and political figures have been consistently perpetuating anti-refugee sentiments through a series of antagonistic statements. The threatening government statements and stances have serious implications on the public's perception of the refugee crisis in Lebanon. Undoubtedly, these statements contribute to the rhetoric of blaming Syrian refugees, particularly during a time when poverty rates are rising among the Lebanese population and there is intensified competition for limited resources.
- 5. In this strained context, members of the PASC WG have noted the rise in crime against Syrian refugees and their unwillingness to report on them due to their fragile situation<sup>ix</sup>. WG PASC members have observed a heightened vigilance towards Syrians, which has, in turn, fueled feelings of unsafety, a fear of the host community, and self-imposed mobility restrictions, all often leading to depression among Syrians<sup>x</sup>. Even refugee-led NGOs fear their staff members being stopped at checkpoints and harassed due to their legal status or nationality.<sup>xi</sup> Additionally, many WG PASC members have witnessed restrictive measures against the work of NGOs supporting Syrians in different regions across the country, creating significant challenges. Indeed, the shrinking civic

space, and hate speech and misinformation against organizations working on the refugee crisis, have created not just access constraints to providing assistance to those in need, but risks for staff members. xii

- 6. As the armed conflict escalated in Lebanon in September 2024, Lebanese communities were prioritized in the authorities' emergency response, leaving many displaced Syrian families without adequate emergency housing. \*\*iii The latter had to face soaring rent prices, social pressure to vacate for Lebanese Internally Displaced Persons (IDPs), and limited access to essential services such as food, water, blankets, medicine, and cash assistance. \*\*iv By the end of 2024, 55% of displaced Syrian refugees relied on informal support networks, while only 5% were accommodated in emergency shelters and 9% were homeless. \*\*v
- 7. Following the ceasefire, refugees continued to face barriers in accessing emergency shelters. Many found themselves unable to return to their pre-conflict places of residence due to the destruction of their houses and movement restrictions imposed by several municipalities.\*\*vi At least 35 measures were recorded in southern Lebanon aimed at preventing Syrian refugees from returning to their previous residences.\*\*vii
- 8. LGBTQIA+ refugees, particularly those from Syria, encounter significant and multifaceted discrimination in Lebanon. They often do not have adequate legal safeguards or access to essential services, and are exposed to increased risks of violence and exploitation. The intersection of xenophobia and homophobia exacerbates their already precarious circumstances, limiting their access to justice or support.

#### C. Forced Evictions

- 1. The rate of evictions has significantly increased, largely due to a set of restrictive decisions that increased refugees' vulnerability in Lebanon. For example, in 2023, the MoIM banned renting properties to refugees who are not registered with the municipalities and who do not possess legal residency<sup>xviii</sup>. This led to the arbitrary eviction of many Syrian refugees from their buildings and informal settlements.
- 2. In 2022, at least 1871 cases of refugees' forced evictions were documented, in early doubling the 955 cases documented in 2021. While the number dropped to 586 in 2023, it surged nearly sevenfold in 2024, reaching at least 4132 documented cases. The actual number is expected to be higher, as many cases are unreported. XXII
- 3. Refugees are often victims of forced eviction as a mean to affect their decision to return to Syria. xxiii Evicted refugees are more vulnerable to rights violations, including the heightened risks of forced deportation, arbitrary arrest, detention, exploitation, and abuse. xxiiv The arbitrary nature of forced eviction leaves refugees without access to legal support, protection, or justice. xxv
- 4. Forced evictions also take place under the pretext of clearing pollution, with the latest decision issued by the MoIM banning building or expand Syrian refugee camps near the course of the Litani River in the Bekaa and South governorates.\*\*XVI
- 5. During the 2024 conflict, many Syrian refugees fled from conflict-affected regions, seeking refuge in safer parts of the country. However, many Lebanese municipalities refused to accommodate these refugees, citing concerns over resources and security. This left many without safe housing alternatives, exacerbating their vulnerable situation. Indeed, the GoL's National Emergency Plan, announced on 31 October 2023, made limited reference to refugee communities and, of the 1,000

- plus established collective shelters for IDPs, a very little number was accessible to Syrian refugees.xxvii
- 6. Landlords also exploited the situation by raising rental prices beyond the means of many refugee families, xxviii effectively displacing them. Due to municipal restrictions and the difficulties faced in reclaiming their former homes, almost no Syrians are reporting to reside in their pre-conflict places of residence. XXIX
- 7. In 2025, 5 Syrian refugee families were forcibly evicted from camps in Deir al-Ahmar pursuant to a decision issued by the municipality in February. Another 15 Syrian refugee families received official warnings that they must vacate their homes within a week, with the threat of coercive measures if they do not comply. Five others were informed that they had to evacuate due to non-payment of a \$20 monthly tax imposed on Syrian refugees in the town.\*\*

## **D.** Deportations

- 1. Lebanon is bound by its international commitments under the Convention Against Torture and other instruments, as well as customary international law, to respect the rights of refugees, including the principle of non-refoulement. However, the gravity of the situation on the ground is far from complaint with the legal framework. Indeed, Lebanese authorities have increasingly engaged in the deportation of Syrian refugees, often without proper due process and in violation of the principle of non-refoulement, with many being handed over to Syrian authorities.
- 2. The decision to deport those who entered Lebanon illegally after April 24, 2019, was issued by the Supreme Defense Council in 2019. Unfortunately, this approach poses a grave risk to the affected refugees, particularly those wanted by security agencies in Syria, draft evaders, or army deserters. The lack of consideration for the sensitivity of their situation and the potential consequence of their detention highlights a disregard for their well-being and uncertain fate.
- 3. Of particular concern over the past 5 years has been the increase in reported raids and resulting arbitrary arrests against numerous Syrians and their forced returns from Lebanon to Syria a systematic practice by Lebanese security agencies which can in some instances be life-threatening. In September 2021, a deportation order was issued against six Syrian refugees who were detained by unidentified actors near the Syrian embassy. Although their deportation was later halted, the order reflects the disregard Lebanese authorities have for the principle of non-refoulement and the well-founded risks in Syria, including detention, enforced disappearances, torture, persecution, and other possible human rights violations. xxxiii In 2023, the Lebanese Armed Forces alone forcibly deported over 13,700 refugees from border areas, a nine-fold increase from 2022, including many registered with UNHCRxxxiii on in possession of legal residency some of which were individuals who had defected from the Syrian Armed Forces, as well as women and childrenxxxiv. Following the killing of a political figure in 2024, over 50% of refugee-related discourse publicly centered on deportation.xxxv
- 4. In May 2024, the DGGS imposed new rules emphasizing that Lebanese citizens must not employ, house, or provide accommodation to Syrians residing illegally in the country, under threat of administrative and judicial penalties to the Lebanese and immediate deportation for the Syrians. They also suspended renewing residency permits as a basis for housing contracts. Between January and June 2024, the Lebanese authorities deported at least 1,763 Syrians. Deportations persist in 2025, with ongoing raids across Lebanon continuing to target Syrian refugees.

5. The lack of adequate pathways towards legal residency and documentation increases the probability of deportation without due process. Deportees are often denied legal representation, contact with UNHCR, or the right to challenge their deportation.

# E. Legal Residency, Registration, and Refugee Status Determination

- Since 2015, several measures in Lebanon have substantially impacted the protection space for refugees in the country. Lebanon lacks a formal national framework for refugee status determination (RSD), relying primarily on the UNHCR for refugee recognition - although registration of Syrian refugees by the UNHCR was suspended by the government in 2015<sup>xli</sup>. This gap leads to inconsistent protection for refugees, leaving many asylum-seekers in legal limbo with unclear rights or status.
- 2. One of the main challenges faced by Syrian refugees in Lebanon is obtaining legal residency. While some flexibilities were put in place in order to expand legal and civil documentation for refugees, the reduced capacities of the public sector combined with the shortage of fiscal stamps and the devaluation of the local currency have all had a negative effect on the enjoyment of civil documentation by refugees. XIII The government has instituted a residency fee waiver and eligibility criteria, which should have allowed refugees who can document their legal entry before 2015 to apply for and receive residency. However, its policy effectively excluded many refugees who arrived after 2015 and those who could not show proof of coming to Lebanon before. Additionally, the Directorate General for General Security (DGGS) has reportedly rejected many applications for residency regardless of whether the applicants met the eligibility criteria, in many cases requiring refugees to acquire a sponsor even. This systematic discrimination, complicated and expensive procedures, and the inability to afford documentation fees are primarily responsible for low legal residency rates. XIIII Fees for legal and civil documentation that Syrians need continue to increase too and in an arbitrary manner, especially those that the DGGS requires, further limiting their access to these life-saving documents amid the forced returns campaign XIIIV.
- 3. Indeed, the percentage of refugees possessing proper documentation remains exceptionally low, xlv posing a greater risk of arrest, mistreatment and potentially deportation to Syriaxlvi without due process. xlviii The legal residency rates for Syrian refugees remains low, with 16% in 2021, increasing slightly to 17% in 2022xlviii and reaching 20% in 2023, only 20% of Syrian refugees aged 15 and above were registered. xlix By 2024, 93% of Syrian families continued to have at least one member without legal residency. This stagnant progression reflects a deadlock in addressing the situation since 2019.
- 4. The lack of legal residency exposes refugees to severe protection and security issues, including the inability to secure employment, housing, and services, as well as arbitrary arrest, harassment, and deportation. In addition to the constant fear of being stopped by security forces and facing potential fines for lacking residency permits, Syrian refugees can be easily exploited and are easy targets for crimes and abuse because they are unlikely to report offenders. Additionally, some registration processes require displaced Syrians to obtain documents or stamps from the Syrian Embassy in Lebanon, which can pose a significant risk to the safety of asylum seekers. II
- 5. While access to legal and civil documentation is a primary form of protection, it also acts as a major form of community tension management. The lack of documentation and an overall discourse that Syrian refugees are "irregular" in the country, acts as a driving factor for increased social tension. The promotion of access to civil and legal documentation has therefore combined

objectives to secure legal protection, reduce an overall perspective of irregularity among the Lebanese community, and reducing negative coping mechanisms and self-imposed restrictions by refugees.

- 6. Following the ceasefire declared between Lebanon and Israel in November 2024, North Lebanon experienced strict enforcement of residency restrictions at checkpoints, leading many refugees to self-restrict their movements. In the Beqaa, challenges remained, including raids, group arrests and deportations of individuals lacking documentation. In the South, which previously had the highest percentage of Syrians with residency, many faced difficulties in obtaining new documents or renew existing ones. In
- 7. Similar trends were reported regarding civil documentation, with many unable to register their marriages and the births of their children.\(^{\bar{b}}\)
- 8. However, the percentage of marriage certificates for Syrian refugees registered with the Foreigners' Registry witnessed progress over the past five year, increasing from 30% in 2021 to 33% in 2022<sup>Ivi</sup>, to 37% in 2023, and 42% in 2024<sup>Ivii</sup>.
- 9. Similarly, birth registration rose from 31% in 2021, to 36% in 2022, viii to 41% in 2023, lix and peaked at 42% in 2024 Nevertheless, the inability to cover registration costs remains the main reason for the high number of unregistered births, followed by a lack of awareness of the necessary procedures. ki

### F. Influx of Syrians to Lebanon Post-December 2024

- 1. The regime change in Syria in December led to a new wave of displacement, with around 124,000 new arrivals entering Lebanon between then and May<sup>lxii</sup>. Moreover, sectarian violence in Syria's coastal region has pushed for the sudden influx of at least 36,787 individuals into Lebanon's northern province as of May 2025<sup>lxiii</sup>, prompting concerns among Lebanese officials who warn that the fresh influx could trigger social and political tensions.<sup>lxiv</sup> Furthermore, the large influx of refugees raised concerns among the host community regarding a potential crisis in the Hermel and Northern Beqaa regions. Clashes at the Lebanese-Syrian Borders further exacerbated the situation.
- 2. Newcomers have been facing severe shortages of essential services and basic needs, including non-food items, water, electricity, WASH, and medicine, while many reside in temporary shelters. IXV

#### **G.** Recommendations

- 1. Ensure that the Ministry of Interior and Municipalities (MoIM), municipalities, and security forces coordinate fully together in terms of information sharing and rule of law to avoid any attempt of collective punishment such as evictions, raids, arbitrary detention, confiscation of documents, wage caps, and curfews and the violations that can emanate from that, especially discrimination on the basis of nationality.
- 2. Ensure protection of human rights defenders, political activists, journalists, military defectors, families of missing people, and LGBTQIA+ asylum seekers, who face a higher risk of imprisonment and torture upon deportation.
- 3. Support inter-community dialogue to diffuse conflict/disputes that have the potential to lead to safety and security risks.
- 4. Guarantee the protection of communities from violence perpetrated by, both, the Lebanese host and the Syrian refugee communities.

- 5. Investigate and hold accountable public officials, political actors, and media outlets who engage in hate speech, incitement, or discriminatory campaigns against refugees, in accordance with international human rights standards.
- Coordinate with UNDP to co-lead localized peacebuilding plans in hotspot municipalities, scaling
  up joint programming between humanitarian and development actors, through communitybased peacebuilding and local dialogue initiative, in order to strengthen inter-communal cohesion
  and conflict prevention efforts.
- 7. Halt the nationwide crackdown on refugees by security and municipal authorities and plan for a structured strategy instead of standalone discriminatory measures.
- 8. Coordinate with UN-Habitat to support community-based mediation mechanisms involving municipalities, landlords, host communities, and refugees to prevent eviction-driven tensions and promote peaceful dispute resolution.
- 9. Uphold the principle of non-refoulement that aligns with Article 3 of the Convention Against Torture, Article 14 of the Universal Declaration of Human Rights, and Article 14 of the International Covenant on Civil and Political Rights, and refrain from taking any unilateral decision to deport without due process any individual, especially those with reasonable justification about the risks incurred if they are deported.
- 10. Uphold rule of law and respect due process by giving anyone at risk of deportation to Syria the opportunity access to legal aid, meet with UNHCR, and present their argument against deportation. Any deportation that amounts to refoulement should be prohibited.
- 11. Give the space to donors, civil society, and the Lebanese justice system, to monitor the conditions for safe, voluntary, and dignified returns and ensure the protection of the most vulnerable.
- 12. Provide a regular, public, and transparent accounting of deportations, including reasons for removal, to international organizations and civil society in order to ensure accountability and the respect of rule of law.
- 13. Revoke the decision made by the Higher Defense Council No. 50 of 15/4/2019 and the General Director of the General Security decision No. 48380 of 13/5/2019 ordering the expulsion or deportation of Syrian nationals who entered Lebanon through unofficial border crossings after 24 April 2019, without the application of the necessary legal procedural safeguards to prevent refoulement. The classification of Syrians who entered Lebanon after 2019 must adhere to a Refugee Status Determination (RSD) mechanism that complies with international standards to ensure their protection from forcible return.
- 14. Engage with UNHCR to establish a joint RSD mechanism to distinguish between refugees and foreign migrants, in compliance with international standards and in cooperation with the international community, particularly UNHCR. This mechanism should assess the claims of newly arrived Syrians, document reasons for flight, and evaluate protection needs, with a formal review process every 6 months.
- 15. Commit to removing obstacles for refugees in reaching UNHCR offices.
- 16. Ensure that revisions of policies and regulations in relation to residency permits for Syrian refugees are transparent and inclusive. These regulations should tend to expand the access to residency for those that could benefit and resolve the expansive gap in accessing legal residency.
- 17. Mandate the DGGS to publish and apply clear, transparent, and flexible procedures for granting legal residency, with a 30-day notice for policy changes and an appeal mechanism—under Cabinet-approved parameters.
- 18. Ensure that the registration of important life events (birth, marriage, divorce, death) is accessible to all on a non-discriminatory basis, regardless of nationality, legal status, and SOGIESC.
- 19. Extend the alleviation of the one-year limit for birth registration to ensure that refugee children born in Lebanon receive proper documentation and are not at heightened risk of statelessness.

- Statelessness among refugee populations would undermine their possibilities for resettlement and return and impose further pressure on the Lebanese state.
- 20. Coordinate with UNHCR to assess and respond to exceptional LGBTQIA+ protection cases. Support case-by-case evaluations for LGBTQIA+ individuals whose circumstances fall outside traditional family or community frameworks, including through third-country resettlement or emergency relocation pathways.
- 21. Ratify the 1951 Refugee Convention and its 1967 Protocol to formally recognize refugee status in domestic law, align Lebanon's legal framework with international standards, and ensure access to rights and protection for all refugees.
- 22. Launch community outreach and legal awareness initiatives, engaging with local police and municipal actors and led by local civil society, to reduce tensions stemming from perceptions of "illegality" and "irregularity" among refugee populations.
- 23. Immediately ensure that all newly arrived Syrians undergo an RSD assessment process in coordination with UNHCR, in order to ensure they are provided with registration and the temporary documentation necessary during their stay in Lebanon.
- 24. Coordinate with UNHCR and municipalities to identify and prepare safe temporary shelters in border areas (Hermel, North Beqaa, Akkar) with access to clean water, shelter, and essential non-food items, in cooperation with humanitarian actors.
- 25. Issue a public communication strategy led by the Ministry of Social Affairs and the Ministry of Information, including radio, TV, and social media campaigns to counter misinformation, reduce tensions between host and refugee communities, and avoid scapegoating of new refugees.
- 26. Ensure proper border management, including the recording of entries and referral to UNHCR for protection screening, rather than punitive deportations.
- 27. Facilitate along with UNDP, local CSOs, and religious leaders inclusive community dialogue and grievance redress mechanisms in municipalities experiencing tensions due to recent influxes.

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