

UPR submission of the UNCT in Lebanon

I. Background and framework

1. The political uncertainty and arrested development described in the 2010 UPR submission of the UNCT have intensified, due to regional upheavals, including the conflict in Syria. This contributed to increased sectarian tensions between Muslims and anxiety among Christians in light of persecutions in neighboring countries. Involvement of Lebanese in the conflict in Syria, despite an initial agreement for dissociation, fuelled polarization between political blocs of March 14 and March 8 and the deterioration of the security. Gen. Wissam al-Hassan of the Internal Security Forces and former Minister Mohamed Shattah were assassinated in 2012 and 2013 respectively. Local conflicts or serious security incidents have taken place throughout Lebanon. Since early 2013, more than 430 persons have died and over 2280 were injured as a result of improvised explosive devices and car-bombs, attacks against the Lebanese Armed Forces (LAF) as well as violence on Lebanon's eastern borders and across the Blue Line. At least 25 army and security personnel remain hostage since August 2014 in the hands of Jabhat al-Nusra and ISIL. Four have been killed and the rest are held hostage subject to exchange for detainees awaiting trial or sentenced under charges of terrorism.
2. The precarious political situation is highlighted by extended periods under caretaker Governments and, since the end of President Michel Suleiman's term on 25 May 2014, a vacant Presidency. Citing the impossibility of holding parliamentary elections due to the security situation, Parliament extended its mandate, in November 2014, until 20 June 2017. A new draft electoral law has not been adopted due to disagreements among main political blocs. There is no political or constitutional agreement over Parliament's competence to legislate during the continued Presidency vacuum.
3. Hundreds of thousands of Syrians have sought safety in Lebanon since 2011. As at 20 March 2015, 1,177,234 Syrian refugees have registered with the Office of the United Nations High Commissioner for Refugees (UNHCR) in Lebanon, and 45,000 Palestinian refugees from Syria (PRS) have recorded with UNRWA in Lebanon. There has been an overall decline in the number of registrations and arrivals in light of restrictions imposed by the Government on the entry and extension of residence of Syrians since October 2014, or May 2014 in the case of PRS. Host communities, as well as a resourceful civil society have demonstrated remarkable generosity and energy in responding to this mass displacement. Yet, the socio-economic impact of the protracted refugee crisis has created significant strain and growing resentment that casts refugees not just as a socioeconomic burden but also as a risk to Lebanon's security and confessional balance. The number of poor in country is believed to have increased by 66% compared to pre-

2011 figures. Similarly, there has been a significant increase in unemployment rates, with a third of Lebanon's youth not able to find work. There is also increased pressure on social services, notably education and health as well as on infrastructure, particularly water and waste management. Some of Lebanon's development gains before 2011 have been reversed despite massive humanitarian assistance pouring in.

Scope of international obligations

4. Lebanon did not ratify new human rights or labor rights instruments since 2010 nor did it withdraw reservations despite accepting several UPR recommendations to that effect.

Institutional and human rights infrastructure and policy measures

5. Draft legislation to establish an independent National Human Rights Institution with a mechanism to prevent torture, as mandated by the Optional Protocol to the Convention against Torture, was developed in 2013 with UN and civil society participation, as was a detailed National Human Rights Action Plan (2012). Both drafts remain stalled before Parliament or the Cabinet with a backlog of over 300 other draft bills. The Government should proceed with establishing a standing inter-departmental body in charge of human rights with a functioning tracking and reporting system to follow up on the implementation of obligations and recommendations emanating from UN instruments and mechanisms.

II. **Cooperation with human rights mechanisms and OHCHR**

6. Torture has been the issue dominating Lebanon's recent interaction with human rights mechanisms at the risk of giving the impression that it is the only matter of concern. Following ratification of the Optional Protocol to the Convention against Torture, in 2008, Lebanon agreed to a mission of the Sub-Committee in 2010 and drafted a law to establish a National Prevention Mechanism (NPM) against torture. The drafters from Parliament, relevant Ministries and civil society, incorporated the NPM within a National Human Rights Institution and devised a selection system of Commissioners that fits the country's complex socio-political fabric. Draft amendments to the Criminal Code to align it with the CAT definition of torture and ensure prosecution of perpetrators and remedies for victims are also under development. The SPT mission report remains confidential.
7. Though Lebanon never submitted its initial report since ratifying the Convention against Torture in 2000, the Committee took action after receiving information on cases of torture in 2008 and initiated an inquiry procedure under article 20 that led to a mission to the country in 2013 and a confidential report submitted in early 2014. In October 2014, the Committee published a summary account of the

- inquiry procedure containing 32 recommendations. The Committee determined that torture is systematic “habitual, widespread and deliberate”. The Government submitted the requested follow up report in November 2014 and is preparing its initial report to CAT.
8. Following the issuance in 2010 of a standing invitation to all Special Procedures, the Special Rapporteur on Freedom of Religion or Belief undertook a mission to Lebanon in March 2015 to look into the country’s religious coexistence.
 9. Cooperation with OHCHR includes gender equality and women’s rights, stateless persons and domestic migrant workers, development of the Code of Conduct for the Internal Security Forces, and the National Human Rights Action Plan, which is also supported by UNDP.

III. Implementation of international human rights obligations

- Equality and non-discrimination
10. In its 2014 observations under the Discrimination Convention, 1958 (No. 111), the ILO Committee of Experts requested the Government to take the necessary steps to ensure that the future Labor Code contains provisions defining and prohibiting discrimination on the basis of all the grounds set out in the Convention in all aspects of employment and occupation, and all forms of sexual harassment including measures to raise awareness of these issues among workers, employers and their respective organizations, and measures for training labor inspectors and strengthening their action in this respect.
 11. Under the Equal Remuneration Convention, 1951 (No. 100), the Committee asked the Government to take specific measures to rectify gender pay gaps, including raising awareness among employers, workers and their organizations of the principle of equal remuneration for men and women for work of equal value.
 12. The 10 years national women strategy was developed in collaboration with UNFPA, by the National Committee of Lebanese Women (NCLW) articulating 12 strategic objectives commensurate with the main areas of CEDAW. A four-year action plan (2013-2016) of the strategy was elaborated in a participatory approach and transformed into an e-platform for periodic update and reporting by women NGOs and gender focal points. Yearly reports about progress achieved need to be generated and widely disseminated; asylum-seeker and refugee women and children should be integrated in national strategic plans.
 13. There has been significant improvement in terms of increasing the HIV/AIDS Voluntary Counseling and Testing centers nationwide, availing ART drugs free of charge by the Ministry of Public Health, enhancing capacities of providers, raising awareness about HIV/AIDS including among Syrian refugees. However, there remains a need for a policy to reduce stigma and discrimination against PLHIV, ensure that existing or new laws protect PLHIV so that access becomes

their legitimate right, develop private insurance schemes to cover PLHIV, and, update the multi-sectoral national strategic plan related to HIV/AIDS.

Right to life, liberty and security of persons

14. Death sentences were passed by Lebanese courts but none was implemented during the reporting period. Death sentences continue to be requested by the prosecution in terrorism cases. A campaign to end the death sentence by former Minister of Justice Chakib Cortbaoui did not succeed.
15. Thousands of cases of enforced disappearance from the civil war (1975-1990) remain unresolved and despite a judgment to force the publication of a confidential Government report, relatives are still unable to obtain a comprehensive response. Lebanon did not ratify the International Convention for the Protection of all Persons from Enforced Disappearance.
16. The Law to protect women and all members of the family from domestic violence was passed in April 2014 by the Parliament. It recognizes that women subjected to abuse by husbands and families need protection and legal recourse and establishes protection measures and related policing and court reforms aimed at advancing women's rights and safety. The law still falls short in certain areas namely leaving women at risk of marital rape and other abuse. Lebanon should consider revising and amending the law to ensure that it meets international standards, criminalize marital rape, develop a national action plan to operationalize the law and take additional steps to criminalize sexual harassment in the workplace and public spaces, and that marriage to the victim does not exempt a sexual offender from punishment.

Administration of justice, including impunity, and the rule of law

17. The trial in absentia before the Special Tribunal for Lebanon in The Hague of 5 defendants for the assassination in 2005 of former Prime Minister Hariri and 21 others started in January 2014. This is a rare case of accountability for Lebanon's numerous political assassinations.
18. Access to free legal aid during investigation and in court, which is delegated to two Bar associations, remains problematic and the system needs to be reviewed and better monitored to ensure that fair trial guarantees are met.
19. As more than half of detainees in Lebanon's overcrowded prisons are awaiting trial UNODC supports the transfer of the prison administration from the Ministry of Interior to the Ministry of Justice and the modernization of operations. Two major achievements are reported: (1) the adoption by the Cabinet of the prison transfer strategy, (2) the establishment of prison data management software. Prisoners' files were automated to give the Ministries of Justice and Interior adequate information, including on demographics, judiciary information such as the court and judge assigned to a case, type of offence and to monitor progress of

- the judicial procedure and address the gaps and the challenges such as the length of pre-trial detention and misuse of legal provisions. This data system also allows for the generation of detention tracking reports for the commission responsible for the early release process and in terms of reducing procedural delays and allowing prisoners to benefit from rehabilitation programs.
20. The overcrowded and inadequate administrative retention center of the General Security is still in operation; plans to relocate it to more appropriate premises remain hampered by funding constraints.
 21. At the request of the Lebanese Armed Forces in 2014, UNODC and WHO trained 20 doctors and officers on health in military prisons using the Istanbul protocol as a preventive tool to torture.
 22. A number of reforms were introduced to the juvenile justice system through law 422/2002. The age of criminal responsibility may be raised from 7 to 12 years, but it is still not prescribed by the Law. There are still many gaps in the implementation with children often held in pre-trial detention from one day to few months. Proportionally, more non-Lebanese children, particularly Syrian, are subject to prosecution. In spite of positive results since 2002, there is need to implement international standards in juvenile justice, including clear mechanisms to determine the best interests of the child in court cases such as custody, guardianship and adoption, which remains subject to confessional personal status laws.

Right to privacy, marriage and family life

23. Lebanon should decriminalize homosexuality by removing Article 534 from the Lebanese *Penal Code* which is still used to detain and conduct medical examination of persons accused of “unnatural intercourse”.
24. For the first time in Lebanon, a civil marriage was held in 2012. The adoption of a civil personal status law and civil marriage has been blocked since 1936¹ mostly by religious authorities which differ in the way they deal with civil marriage held abroad. The marriage was approved by the Higher Committee for Consultations in the Ministry of Justice, and officially registered in 2013. In 2014, the Ministry of Justice submitted to the Secretariat of the Council of Ministers a draft law to govern civil marriages held in Lebanon until the adoption of the needed laws; several other proposals were also submitted by MPs. To be able to marry, the couple had to disaffiliate from their respective religious community. Questions have been raised regarding the legality of the discretionary power exercised by the Minister of Interior, who refuses to register over 60 civil marriages that have already taken place.

¹ Decision 60 LR issued in March 1936 provided for the addition of a new community to be governed by a civil law of personal status alongside the historical religious sects. The Muslim sects blocked its implementation objecting to the inclusion of the right to convert in the text

25. There is a significant increase in child marriage among Syrian refugee girls as a negative coping mechanism. Humanitarian actors are addressing this phenomenon through awareness raising, promoting livelihood programs among women and girls, and providing various services. A draft law for Regulating Marriage of Minors was prepared by the NCLW and referred to the Parliamentary Administration and Justice Commission for review; it will also be discussed with religious communities. Lebanon should accelerate ratification of the draft bill. In addition, there is need for concerted and coordinated efforts to develop a comprehensive toolkit for preventing child marriage and targeting various stakeholders including parents, religious and community leaders, and educational institutions. Lebanon should also strengthen the capacity of law enforcement agencies on the implementation of the *2011 Anti-Trafficking Law No. 164*.
26. Placement of children in care institutions remains a challenge. Approximately 20,000 children are placed in 200 residential-care institutions. The majority of these children are not orphans or abandoned, nor in need of a temporary protection. Although the Government acknowledges the need to promote family-based care, the Social Welfare Department subsidizes 183 organizations sheltering children. Despite the development of the national standards operating procedures for case management of children victims of violence, enforcement of the laws guiding how and when children are removed from the care of their families remains weak. Foster care should be promoted. All placements must be reviewed periodically, in view of international standards.

Freedom of movement

27. There has been a multiplication of municipal curfews mostly targeting Syrian nationals, whether refugees or migrant workers. The legal basis for these curfews is unclear and coincides with the multiplication of municipal police forces with limited oversight by the Ministry of Interior and no regulatory framework. UN agencies are developing projects to address these gaps.

Freedom of religion or belief, expression, association, and peaceful assembly, and right to participate in public and political life

28. In 2014, under the Labor Inspection Convention, 1947 (No. 81), the ILO Committee of Experts recalled that it had been asking the Government to limit intervention by labor inspectors in the internal affairs of trade unions and confederations solely to cases of complaints raised by a significant number of members. The Committee requested the Government to cancel a provision under which labor inspectors can monitor trade union activities. The Committee noted that it expects the Government to remain neutral in its dealings with workers'

- organizations and ensure that the recognition and formal administrative authorization of all trade unions is carried out in an impartial manner.
29. In 2013, in the context of two complaints relating to freedom of association and trade union rights, the Freedom of Association Committee requested the Government to keep it informed of progress in the process of ratification of ILO Convention No. 87 on freedom of association and protection of the right to organize, noting that in 2012 the Ministry of Labor had submitted to the Cabinet a draft law to authorize its ratification. The Committee urged the Government to swiftly take the necessary measures to lift the prohibition placed on public sector employees, including teachers, to establish and join organizations of their own choosing, and to allow them to fully exercise their trade union rights.
 30. The Committee requested the Government to state in what way workers who are excluded from the scope of the Labor Act (especially domestic workers, workers in the agricultural sector and contract workers in public administration) can enjoy their trade union rights and, to take the necessary measures to secure these rights for all.
 31. The Committee requested the Government to guarantee respect for free and voluntary collective bargaining between the parties including, where appropriate, by amending the legislation to remove the need for previous approval by the Government in order for a collective agreement to enter into force
Despite signs of improvements, such as changes in the law that allow children younger than 18 to join associations, *child participation* in the legal system remains low. Children are rarely asked for their opinion, including in judicial and administrative proceedings. With UN support, the National Youth Policy was formally endorsed in April 2012 and developed under the overall leadership of the Ministry of Youth and Sports.
Right to work and to just and favourable conditions of work
 32. The ILO Committee requested the Government to take the necessary measures, in collaboration with the social partners, to provide genuine protection in law and in practice for migrant domestic workers against direct and indirect discrimination in all aspects of their employment. The Committee also requested the Government to ensure that the bill concerning the employment of domestic workers is adopted in the near future.
 33. In 2013, under the Forced Labour Convention, 1930 (No. 29), the ILO Committee noted that migrant domestic workers in Lebanon are excluded from the protection of the Labour Law, have a legal status tied to a particular employer under the *kafala* (sponsorship) system, and legal redress is inaccessible to them. Migrant domestic workers had been subjected to various situations of exploitation, including delayed payment of wages, verbal, and sexual abuse, in addition to experiencing poor living conditions, such as lack of a separate bedroom and inadequate food. The Committee urged the Government to take measures to ensure that migrant workers are fully protected from abusive practices and

- conditions that amount to the exaction of forced labour. The Committee expressed the firm hope that the bill regulating the working conditions of migrant domestic workers and the Standard Unified Contract regulating their work would be adopted soon. It also urged the Government to ensure that sufficiently effective and dissuasive penalties are applied to persons who subject these workers to conditions of forced labour.
34. In 2013, under the Worst Forms of Child Labour Convention, 1999 (No. 182), the ILO Committee requested the Government to adopt pending amendments to the Labour Code regarding the prohibition of the worst forms of child labour. Hence, decree No. 8987/2012, prohibiting the employment of children under the age of 16 and defining a new list of the worst forms of child labour (including the association of children with armed conflict) was adopted. In September 2013, the Government adopted a National Action Plan to eliminate the Worst Forms of Child Labor by 2016. Even though the Plan addresses the needs of all children in Lebanon without discrimination, the provisions in the Plan are insufficient for the magnitude of the current Syrian refugee crisis. Notwithstanding these important policy advances, the situation of vulnerable households in Lebanon remains extremely worrying and is effectively forcing children into engaging in some of the worst forms of child labor and exploitation, as the most recent Vulnerability Assessment of Syrian Refugees confirmed.

Right to health

35. The government succeeded, with the support of WHO, in adapting and standardizing the clinical management protocols of the most common conditions at the primary health care (PHC) level, including childhood illnesses, aiming at improving the quality of care for the most vulnerable populations utilizing the PHC services. In addition, UNICEF has agreed with the MoPH to provide Mental Health support as well as related psychotropic medications to deal with the psychological impact of the long-duration crisis on the population. The Mental Health program is integrated within the PHC network. The MOPH expanded by 15 % the network of its PHC system across the country to improve access to health services for the poorest populations. The Government also succeeded in maintaining its catastrophic illnesses program for the non-insured, and reinforced the capacity of the public hospitals in terms of medical technology and human resources, therefore increasing access to hospitalization for the poor. Under its general policy for ensuring universal health coverage, the Government has approved a World Bank funded project, supported by both WHO and UNICEF in effect in 2015 for three years for a prepaid set of services (preventive-curative) at PHC with a referral system, targeting 150,000 vulnerable Lebanese identified by the national poverty index.
36. The Government succeeded in reducing maternal mortality rates below the MDG target. Assessment of causes of maternal deaths, capacity development on emergency obstetric care; improving the monitoring of maternal deaths by putting

- in place a hospital-based notification and audit system; scaling up of the public hospitals, and improvement of services at PHC level have all contributed to this success. The challenge at this stage is to focus more on enhancing the detection, and management/referral systems for pregnancy related complications that could lead to death or near miss. More so, detecting causes of deaths among Syrian refugee women remains a key responsibility by the Government. The Government should also enhance the vital statistics system in Lebanon to better capture causes of maternal mortality outside hospitals.
37. The Government succeeded in developing a curricula on Reproductive Health (RH). A monitoring system is being established to track progress and improvement in knowledge among students exposed to the extra-curricular RH education. The Government needs to accelerate revision of the current text books at all levels and to ensure integration of the RH curricula in various disciplines. The government is availing a wide range of modern contraception nationwide including emergency contraception for Lebanese and refugee communities but needs to ensure that distribution of contraception adopts a comprehensive approach reaching out to refugee women, and taking into consideration socio-cultural barriers that may hinder access to contraception.
 38. The Government also finalized the Food safety law and submitted it to the parliament. A national initiative supported by WHO to ensure food safety inspection across the country was launched. A draft law for protection of mental health patients is proposed but not yet finalized.
 39. The Government is currently developing, with UNICEF, a National Nutrition Protocol to ensure that any malnutrition case is managed under consistent guidelines that ensure monitoring clarity as well as harmonized treatment. Furthermore, a preventive program including infant and young child feeding in emergency is underway targeting children between 6-24months with adequate complementary/weaning food, to provide timely prevention of any deterioration of their nutrition status.
 40. Despite initial high commitment and enforcement the Government is unable to fully implement the Tobacco banning law 174 issued in 2012 to prohibit smoking in public places.

Right to education

41. In an attempt to address enrolment gaps between Lebanese students and those of other nationalities, the Ministry of Education and Higher Education (MEHE) issued a series of circulars from July 2014, restricting the registration of prospective students in public educational institutions (excepting university level) for a limited period to Lebanese nationals. Even though *public schools* are accessible in all areas of Lebanon, and MEHE attempts to improve the quality of

- teaching and learning, the majority of parents continue to choose private schools for their children (if they can afford). The percentage of Lebanese children enrolled in public schools continues to drop due to the perception of poorer quality of teaching in those schools.
42. The Ministry of Education and Higher Education (MEHE) has generously given access to refugee pupils in Lebanon effective for the school year 2014/2015. Despite this effort, the overall *enrolment of Syrian refugee children* remained critically low amongst registered refugees at 25% per cent for primary school-aged children and much less for the secondary level during the 2014-2015 academic year. With the support from international donors and partners, 106,000 children are enrolled into formal public primary education.
 43. As of January 2015, 86,563 Syrian youth refugees in the 15-18 age group were registered with UNHCR in Lebanon. Among these refugees, only 1.3% were registered in formal secondary education. Most Syrian youth of secondary school age are out of school

Persons with disabilities

44. The Chair of the Committee on the Rights of Persons with Disability conducted an advocacy visit in July 2014 and promoted the ratification of the Convention.

Minorities and indigenous peoples

45. There are estimated to be tens of thousands of stateless persons in Lebanon without exact number known by any authority. There has not been an official census since 1932 and many stateless persons do not have civil registration records. Causes of statelessness include gender-discriminatory provisions depriving women of the right to transmit nationality and a complex civil registration system that requires access to the courts for late registration of births. Lebanon should:
 46. Ensure that birth registration is accessible to all children born on Lebanese territory, including refugee children and the children of *maktoum al kayd* (unregistered) stateless fathers;
 47. Amend the *1951 Personal Status Law* to allow for administrative registration of births after one year;²
 48. Facilitate late registration judicial cases by providing legal aid to families without financial means and reducing the cost of proceedings, such as the cost of DNA evidence;
 49. Remove the requirement for legal stay for the registration of refugee births that take place on the Lebanese territory;

² A recommendation was made to “[a]mend all discriminatory provisions in personal status laws in particular issues related to child custody, inheritance and divorce” during the 1st cycle UPR examination of Lebanon, but was rejected. See: Report of the Working Group of the Universal Periodic Review: Lebanon, A/HRC/16/18, 12 January 2011, para. 83.1 (recommended by Israel), available at: <http://daccess-dds-ny.un.org/doc/UNDOC/GEN/G11/102/11/PDF/G1110211.pdf>.

50. Issue a circular to *Mukhtars* reminding them that proof of legal stay is not required in order to authenticate the birth notification, as per the *1947 Law of Mukhtars*;
51. Issue a circular from Ministry of Interior and Municipality to local civil registries instructing that only the birth certificate issued by the *Mukhtar* is required to legally register a birth; and
52. Amend the *1925 Law* to remove gender-discriminatory provisions.

Migrants, refugees and asylum-seekers

53. Hosting an exceptionally large refugee population, Syrians mostly, spread in about 1300 settlements all over the country, and Palestinians, including those fleeing Syria, Lebanon faces multiple challenges for which it needs continued international support to ensure that all refugees are treated humanely and can live in dignity. Lebanon should further:
54. Develop a specific legal framework defining and protecting rights and freedoms of refugees and amend the *1962 Law on Entry and Exit* with a view to de-penalizing the illegal entry or presence of asylum-seekers and refugees registered by the UN and reconsider the ban on employment for registered Syrian refugees at a time of declining household assistance;
55. Establish a comprehensive legal framework to ensure that asylum-seekers and refugees, especially children, are not arbitrarily detained and only as a measure of last resort, for a legitimate purpose and for the shortest possible period;
56. Modify requirements for renewing the residence permits of refugees from Syria so that certified copies of a lease or real estate deed and declaration of commitment to leave Lebanon upon expiry are no longer required;
57. Lower the cost of residence permit renewal, either by waiving or reducing the 200\$ fee, particularly for the 29% among refugees assessed as severely economically vulnerable;
58. Ensure that no deportation measures are taken before assessing the protection needs of foreign nationals or stateless persons who have indicated in any manner a need for international protection;
59. Ensure strict adherence to the international principle of *non-refoulement*, including at the border, through ensuring that all persons in need of international protection are allowed access to Lebanon; and
60. Include in the humanitarian admission criteria under discussion Syrians at immediate risk of harm or with acute vulnerabilities.

Palestine refugees from Lebanon

61. A law passed in 2001 *de facto* prevented Palestine refugees from legally acquiring, transferring or inheriting property in Lebanon. Many Palestine refugees are living in properties that they cannot officially register in their names. This deprives them of the opportunity to acquire stability of tenure and otherwise benefit from property ownership. Controls imposed by the Lebanese authorities

- on entrance of building materials into overcrowded camps also limits the ability of Palestine refugees to improve conditions and quality of their dwelling. Socio-economic conditions in all Palestine refugee camps in Lebanon remain substandard, with poor quality of infrastructure and overcrowding. Many of those who left Nahr el Bared Camp following the conflict in 2007 continue to live in particularly difficult conditions. In 2010, the occurrence of extreme poverty among Palestine refugees was four times higher compared to the Lebanese population³. UNRWA's ongoing Camp Improvement Initiative is faced with chronic underfunding.
62. While the relaxation since 2010 of restrictions on freedom of movement in/out of Nahr El Bared Palestine refugee camp are welcomed; this camp, along with other camps, are subjected to entry and exit controls which can be tightened during periods of heightened security. Restrictions on movement can limit access to employment and essential services and can also expose Palestine refugees to increased risk of arrest and detention.
 63. An estimated 3,000 to 4,000 Palestine refugees continue to live in Lebanon without any formal valid identification (so-called "non-IDs"). This results in restrictions of movement, risk of arrest and difficulties completing civil registration. Lack of documentation creates profound difficulties to access secondary or university education, and makes obtaining an official work permit impossible. The Lebanese authorities have issued special ID cards to more than 1,800 such persons since 2008, however relatively few of these remain valid. The failure of persons to renew or apply for these IDs can be attributed to the limited validity, the lack of its widespread formal recognition by Lebanese authorities, the complex application process and the high rate of rejections. Further efforts should be made to ensure that the situation of "non-ID" Palestine refugees is adequately addressed with a view to enabling them to complete civil registration processes.
 64. Since 2005, Palestine refugees have been allowed to work in the private sector and some regulated professions as determined in ministerial orders published annually. In 2010, two ratified amendments to the labor law and the social security law formally lifted the condition of "reciprocity" previously applied to Palestine refugees enabling them to acquire work permits free of charge and to have limited access to the benefits of the National Social Security Fund. However, many liberal or syndicated professions exclude Palestine refugees under their bylaws. The 2010 law amendments did not require an adaptation of such bylaws. Furthermore, obtaining a work permit is a lengthy procedure that needs to be repeated annually. 56% of Palestine refugees were unemployed in 2010⁴ and those who do work are mostly in the informal sector. Lebanon should continue improving access to the labor market for Palestine refugees, including through further simplification of the work-permit application process, and through collaboration with professional syndicates to remove barriers related to nationality

³ Source: AUB/UNRWA Survey. This survey is being updated in 2015, with results expected by July 2015.

⁴ Ibidem

or reciprocity that continue to prevent Palestine refugees from practicing some syndicated professions.

Palestine refugees from Syria (PRS)

65. Between March 2011 and August 2013, PRS were allowed relatively free access to Lebanon. Since May 2014, entry into Lebanon has been greatly restricted by the Lebanese authorities. The restrictions on PRS remain more stringent than the restrictions applied to Syrian refugee entrants. PRS face difficulties in regularizing their legal status in the country and are periodically prevented from doing so by the Lebanese authorities. When regularization is possible, the fees are prohibitively high for many PRS families (200\$/person p.a.). Many of those without regular status are issued with 'departure orders' by the Lebanese authorities and told to leave before certain date. While these are not being actively enforced, detention is a risk and many PRS report fear of deportation or limiting their movement citing fear of detention. Those without legal status also face difficulties obtaining relevant civil status documentation for birth, marriage/divorce and death.
66. The long-term implications of this are not yet known but without resolution could see the emergence of a newly undocumented population with associated protection risks. Legal status is also a prerequisite of the authorities for the issuance of official exam results for students. PRS should enjoy the same legal status and access to temporary legal residency in Lebanon as other refugees fleeing Syria, including with regard to the waiver of costs for the renewal of visas, pending the cessation of hostilities in Syria.

Internally displaced persons

67. Sporadic combats by the border in Syria, cross border shelling, air bombing, several rounds of violence in Tripoli between 2011 and 2014, or combats on the outskirts of Sidon (June 2013) or in the Bekaa (August 2014) led to forced displacement of Lebanese citizens and refugees. Most of these persons were able to return unless security considerations prevented it due to proximity of the border or military installations.