Syrian Refugees in Lebanon  
Government Policy and Protection Concerns  
March 2015

Lebanon is not a state party to the 1951 Geneva Convention relating to the Status of Refugees or to its 1967 Protocol. It does not have specific legislation or administrative practices in place to manage a refugee influx of modest, let alone mass proportions.

UNHCR has operated in Lebanon for more than 50 years, working alongside the Government of Lebanon (GOL) to respond to the needs of persons displaced to and within Lebanon. The refugee population in the country mushroomed from less than 10,000 mostly Iraqis prior to the Syria crisis to 400,000 Syrian refugees in early 2013 and a million in early 2014. The country now hosts close to 1.2 million Syrian refugees in addition to 280,000 Palestinian Refugees and 46,000 Palestinian refugees from Syria.

The Syrian crisis has brought enormous challenges, yet despite these challenges, the more than 1 million Syrians who have fled to Lebanon have been protected. The UN characterizes the flight of civilians from Syria as a refugee movement and considers that most Syrians seeking international protection are likely to fulfil the requirements of the refugee definition. Lebanon considers that it is subject to a situation of mass influx and refers to individuals who fled from Syria to Lebanon after March 2011 as “displaced Syrians.” This term reflects the Government’s position that permanent settlement in Lebanon is not possible.

**Security climate**
The ongoing conflict throughout Syria has directly impacted the security situation in Lebanon, which can be described as tense, volatile and highly unpredictable.

Increased combat activities in Syria have had a direct impact on the situation in Lebanon, especially in the North and North-Eastern parts of the country. Frequent border incidents, such as cross-border shelling, surface to surface rocket attacks, air to surface missiles, and an increase in various types of terrorist attacks negatively influence the security climate in these areas.
Fighting which erupted in Arsal between Lebanese security forces and elements of the Nusra Front and Islamic State in mid-2014 had significant and enduring effects on the security operating environment throughout the country. The brutal killing of several Lebanese service personnel held captive by armed groups on the outskirts of Arsal and the fate of over 25 captives have ensured the continuation of the crisis since these initial clashes.

Armed elements continue their infiltration attempts across the Syrian border, mainly on the outskirts of Arsal and Ras Baalbeck, North Bekaa, targeting Lebanese Armed Forces (LAF). The current conflict in the Zabadani area of Syria led to heightened security measures in areas of Central Bekaa, contiguous to the region and heightened fears of militant incursions there from Syria. While snow has rendered a large scale offensive by extremist elements into Lebanon unlikely, an improvement in the weather may lead to increased risks of infiltration and large-scale confrontation on the border. This risk remains heightened if heavy fighting on the Syrian side continues and armed elements are pushed towards Lebanon.

The situation along the Southern border with Israel remains extremely volatile, particularly, in the area of the disputed Chebaa farms. On 28 January 2015, Hezbollah targeted an Israeli patrol along the Blue Line with anti-tank weapons and killed a number of IDF personnel. Israel retaliated with artillery fire into Lebanese territory. In addition to material damage caused, one of the shells directly hit a UNIFIL position and resulted in the death of one Spanish UN peacekeeper.

**Government Policy and Refugees**

Since the beginning of the Syria crisis, successive governments have struggled to confront and manage what has been dubbed the greatest threat to Lebanon since the country came to existence in 1943. In 2012, at the urging of UNHCR, Lebanon’s Prime Minister formed an Inter-Ministerial Committee to manage the refugee response, with the Minister of Social Affairs as the co-originator. This was a difficult job given the lack of firm engagement of other implicated Ministries, and the absence of capacity of within the Ministry to fully manage the response.

In February 2014, a new Government was formed. Within the first six months, a Crisis Cell was created to deal with the issue of Syrian refugees. The Minister of Social Affairs, Rashid Derbas, retained responsibility for the overall coordination of the response, however, the new Minister of Foreign Affairs, Gebran Bassil, early on expressed his commitment to greater engagement, in particular to reducing the total number of Syrians in Lebanon.

By spring 2014, with refugee numbers reaching 1 million, the Government began to more vocally express concerns about the influx. These were further amplified in May when scores of people flocked to the Syrian embassy to vote in the Syrian presidential elections. Notwithstanding reports that Syrians were coerced into public displays of support for the regime and that Lebanese nationals posed as Syrians, the visuals of this had a galvanizing effect.

In June, the GOL issued a policy statement articulating the following goals: 1) deny access to Syrians coming from areas which are not contiguous to Lebanon; 2) review the status of refugees and remove refugee status from those who are in Lebanon for economic reasons or who have travelled back to Syria since arriving in Lebanon; 3) promote the establishment of camps inside Syria or in the no-man’s land between the two countries.

The first step GOL took in implementing this policy was to ask UNHCR to review the cases of all Syrians registered with the Office who had gone to Syria and returned to Lebanon after June 1, 2014. Pursuant to that, GOL provided data on 1.5 million cross border movements of Syrians in
June and July for UNHCR to review. The Office analysed the data provided, identifying and reviewing 36,000 cases, 16,000 of which were ultimately inactivated.

Meanwhile, new registrations continued at an average of 10,000 per week. Beginning in August, following clashes in the north-western border town of Arsal, the GOL imposed border restrictions – beginning in the north and moving to the main Masnaa crossing in the east by the end of September- with a view to stop refugee movements into Lebanon, save for exceptional cases.

In October 2014, the Crisis Cell presented to the Cabinet a new refugee policy, which received approval. The policy is a one-page articulation of three main goals:

1. Reduce the numbers of refugees by, among other, stopping refugees’ entry into Lebanon (except for unpredicted exceptional humanitarian cases) and encouraging Syrian refugees to return to their country or other countries by all possible means.
2. Ensure security though the implementation of security measures including requiring municipalities to keep a census of refugees and the strengthening of municipal policing.
3. Ease the burden by preventing Syrians from working unlawfully, ensuring humanitarian assistance benefits refugees and vulnerable host communities equally and securing direct funding to state institutions through the Multi-Donor Trust Fund (MDTF) and through special programs to develop the Lebanese economy.

Throughout the fall, following the adoption of the October policy, the GOL initiated a series of measures which gradually restricted the flow of refugees into Lebanon. Subsequently, on December 31, January 13 and February 3, the GOL announced a new set of regulations which significantly reduced eligibility for admission, residency, and regularization. Additionally, in January and February, the LAF issued a series of eviction notices in the Bekaa, threatening to evict nearly 9,000 persons from settlements near the border. Lebanon has, until now, demonstrated remarkable tolerance and generosity towards Syrian refugees. However, official rhetoric vis-à-vis the refugee presence has grown considerably more hostile since August, most notably by the Minister of Foreign Affairs and to some extent by the Minister of Social Affairs. There are an increasing number of indications that after accepting more one million refugees, Lebanese generosity has begun to reach its limits.

**Protection Environment and Challenges**

**Admission to the country**

Overall admissions have reduced significantly since August, with requests for UNHCR registration appointments decreasing by 56% in the last quarter of 2014. In comparison to January 2014, monthly requests for registration have decreased by 78%.

In December, the GOL announced the basis upon which admissibility will be determined. As of 31 December, all Syrians wishing to enter Lebanon are required to state the purpose of their visit. In addition to valid identity documents, they must also have proof of the purpose of their visit. The new regulations provide a shorter period of legal stay (ranging from 24 hours to six months, based
on the purpose of travel\(^1\)) than the previous policy, which granted six months renewable for all Syrians.

Government public announcements also clarified that the measures did not pertain to refugees. Refugees would not be admitted to Lebanon unless for exceptional humanitarian reasons. Although not yet finalized, MOSA has indicated that four categories of persons are presently being considered for inclusion in the humanitarian exceptions. These are:

- Unaccompanied/separated children (under 16 years old) whose parents/legal guardians are confirmed to be displaced in Lebanon;
- Persons with disabilities dependent on family/relatives confirmed to be displaced in Lebanon;
- Persons needing life-saving medical treatment not usually available in Syria, or not available in a timely manner; and,
- Individuals pursuing resettlement or transitioning through Lebanon to a third country, with proof of onward travel outside Lebanon.

The GOL has made it clear that it is committed to providing for humanitarian exceptions provided those exceptions are limited in scope. In light of these constraints – and in order to provide for entry to those at most immediate risk – UNHCR proposes the addition of the following two categories: 1) civilians who are fleeing an immediate risk of harm; 2) civilians with acute vulnerabilities likely to severely deteriorate. UNHCR also urges that if a humanitarian exception is applied to an individual, it also includes his or her accompanying family members so that families are not separated at the border.

**Residency renewals**

Since late January 2015, Syrians registered with UNHCR can renew their residence permit for six months within Lebanon provided they pay a fee of USD 200 and present a UNHCR registration certificate valid for at least six months, a housing commitment signed by the landlord and endorsed by the *Mukhtar* and a signed and notarized pledge by the refugee not to work and, in some cases, including a pledge to leave the country upon expiry of their residence permit or when requested to do so by the GOL.

The USD 200 fee remains prohibitive for most refugees and therefore, there is a serious risk that most refugees will lose their legal status. They will be vulnerable to arrest and detention, and will face obstacles in securing civil documentation and assistance provided through public institutions, in particular as they will limit their movements. Moreover, the requirement of providing a ‘house commitment’ is a serious obstacle given that most do not have a lease agreement. For the relatively few who do, they will be vulnerable to pressure by landlords; these requirements impose a hurdle which is ripe for abuse.

Syrians who are not registered with UNHCR must secure a Lebanese sponsor to renew their temporary residence permit for a period of six months. Those who have resided in Lebanon for one year will also have to pay a fee of USD 200 and provide four other documents from Municipalities and landowners in order to demonstrate that they have secured housing. Lebanese families can only sponsor one Syrian individual or family and not for work purposes. Commercial or agricultural enterprises can sponsor Syrian workers, provided they can justify the need for the worker to the GSO.

\(^1\) These include tourism, business, ownership of property in Lebanon, study, transit, medical, and appointments in foreign embassies: each requiring specific documentary evidence.
These very stringent criteria have implications for UNHCR in that Syrians unable to meet the requirements may be motivated to seek registration as refugees, potentially resulting in a larger numbers of individuals registered with UNHCR. Although it is too early to draw conclusions, UNHCR noted an increase in requests by single males for registration appoints since January.

**Arrests, detentions and raids**
Currently, there are 1,408 Syrians in detention. Among them, 467 are registered with UNHCR. As imaginable, Syrians are detained more frequently for immigration related offenses. Persons that are arrested solely for illegal entry/stay are habitually released within 48 hours, as provided for under Lebanese Law. The DGGS has facilitated UNHCR access to Syrians detained at its detention facility, including those not yet registered.

Following serious security incidents in Arsal throughout August and September 2014, the Lebanese Armed Forces (LAF) and law enforcement authorities imposed stricter security measures including some impacting Syrian refugees directly. Most notable are security searches, including in informal settlements, during which authorities look for weapons, cash or wanted persons. At least 129 raids targeting refugee settlements have been registered between August and December 2014, and 38 raids have been reported to UNHCR in 2015. These have occurred throughout Lebanon, with the largest proportion of incidents in Tripoli and the Bekaa. During these searches, Syrian refugees have been arrested and detained with most being released in a matter of hours or days and a small number transferred to prosecution for minor crimes, such as irregular entry or failing to have a motorbike license.

**Evictions**
Over 11,000 people were evicted from collective sites (informal settlements and collective shelters) in 2014. The number of evictions or threats of evictions rose in the period of post-August hostilities in Arsal. Initially, evictions were concentrated in areas within 500 meters of LAF checkpoints/structures. However, since 1 December 2014, the LAF broadened its criteria, resulting in a rise in eviction notices and/or partial/complete evictions of informal settlements. UNHCR has seen an increase in evictions since then with a further 3,850 people evicted in the initial months of 2015 and a further 28,000 people remaining at risk of eviction.

**Refoulement**
Syrian refugees registered with UNHCR have received protection in Lebanon. Although Syrians with expired or without legal status are by law given self-deportation orders, the GOL has not enforced the deportation of Syrian refugees. Refoulement due to rejection at the border, however, is a significant concern. Border control checkpoints have recently been erected at Masnaa crossing on the Syrian side of the border, which refugees must pass through before they reach Lebanese processing facilities. Now, without regular access to monitor rejections in this area, the magnitude of the problem is difficult to ascertain.

**Birth registration**
At the end of February 2015, UNHCR has registered close to 51,000 Syrian children born in Lebanon. A survey conducted in 2014 indicates that close to 70 per cent of new-borns do not have birth certificates. The procedure for birth registration in Lebanon is lengthy and complex, with each step presenting a number of barriers for parents. Evidence of legal stay and lack of awareness about procedures are also impeding factors. UNHCR is working with the Ministry of Interior to remove these obstacles.

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2 The one notable exception to this policy occurred in August 2012, when a number of Syrians, including four who wished to see UNHCR, were deported to much public outcry.
Community relations
Relations between communities in the country, including refugees, were considerably strained in the immediate aftermath of the Arsal events of August\(^3\) manifested through the erection of roadblocks, tit-for-tat kidnappings between various groups and attacks on informal settlements, particularly in the Bekaa. Calls for restraint were issued at both the local and national levels and authorities took immediate action. Although relations remain tense in some areas, there have been few major incidents between Syrians and host community members.

Program highlights and challenges
Registration
In the last quarter of 2014, every week an average of 3,700 persons approached UNHCR seeking registration in one of UNHCR’s four registration centres in Lebanon. This represented a significant drop from highs of nearly 22,000 in July 2013. Refugees are registered using iris scan biometric technology. Each refugee is personally interviewed and needs are assessed. UNHCR’s registration operation in Lebanon is one of the largest and most complex urban registration programmes in the world.

Shelter
Eighty one per cent of refugees rent their accommodation, with the average rent being USD 200 per month. Finding appropriate accommodation is a constant concern and as their resources decrease, incidences of evictions rise. The most recent survey indicated that some 68% of all refugees are estimated to rent apartments, often sharing small basic lodgings with other refugee families in overcrowded conditions. The remaining 32% live in fragile environments such as tents in informal settlements, and sub-standard shelter including garages, worksites and unfinished buildings. UNHCR and partners prioritise improving shelter for those in the most insecure dwellings, particularly those in informal settlements, garages, warehouses, and unfinished buildings.

Camps
UNHCR and MOSA identified possible land for medium sized formal sites (10,000-20,000 persons), principally in the Bekaa Valley. These did not receive government approval. The Government policy in May 2014 called for camps in border areas which UNHCR cautioned is not advisable given that border areas are not secured by the Lebanese security forces, and that camps in such volatile areas could be used for rest and recuperation by armed fighters, for recruitment; be targeted by warring factions, aggravating insecurity already present in the border areas. Events in Arsal have borne this out. As of yet, there has been no political consensus around the establishment of camps in any part of Lebanon, however, following a wave of eviction notices in informal settlements in February 2015, UNHCR has renewed its advocacy on this issue, advocating for the approval of a refugee camp for the most vulnerable.

Education
Around 50% of the population of concern are children (635,000 children, of which 400,000 are of school-age\(^4\)). Enrolment and retention rates remain low. The Ministry of Education launched a three-year strategy, Reaching All Children with Education (RACE) in Lebanon in May 2014 that aims to enrol more than 400,000 children in education by 2016. UNHCR, along with UNICEF, is a member of the RACE Executive Committee and supports the initiative through coordination,

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\(^3\) For more information, see Security note.
\(^4\) Children aged five to 17.
secondment of staff to central and regional offices to ensure information management and monitoring, and provides equipment and material support to schools and regional offices.

In academic year 2013-2014, with increased support to Lebanese public schools and the creation of second shifts some 90,000 refugee children were assisted to enrol in public schools. So far, in academic year 2014-2015, some 100,000 refugee children have been assisted to enrol in public schools.

Ultimately, given the high number of children remaining out of school, UNHCR and partners are reviewing options and all possible alternatives to ensure that refugee children are provided with access to education. Efforts to facilitate access to non-formal education and increase linkages between these and the formal education system remain key to bridging the gap between the school system’s absorption capacity and the increasing number of school age refugee children in Lebanon.

Health
UNHCR, through its implementing partners, has agreements with 35 primary health care centres, 5 mobile medical units and 65 hospitals, allowing refugees to access health services at reduced rates. In 2014, an average of 88,000 refugees per month accessed primary health care services from all partners. At the primary health care level, clinics suffer from shortages of essential medicine supplies, especially for treatment of chronic diseases, reduced healthcare staff and short working hours, leading refugees to seek treatment for minor health issues at hospitals which are largely privatized and very costly. UNHCR and partners prioritise strengthening the primary health care sector to address the reproductive, mental and nutritional health needs of the refugee population. Basic medicines are provided to supplement the supply in primary health centres. Improved availability and quality of primary health care would help to decrease the need for more expensive hospitalisations.

UNHCR support for secondary health care focuses on life-saving and emergency care, supporting in 2014 an average of 4,800 hospitalisations a month. Due to the extremely high cost of health care and limited resources, many persons in need of chronic and hospital care go unsupported.

Water and Sanitation
The presence of refugees in local communities has put pressure on existing infrastructure and resources including drinking water, which is scarce in Lebanon. Access to water, sanitation and hygiene (WASH) in areas hosting Syrian refugees has deteriorated over recent months. The most urgent requirement is to ensure continuous access to safe water at a household level and basic sanitation facilities. Twenty-seven per cent of refugee families lack access to potable water and twenty nine per cent lack access to adequate sanitation facilities. A water strategy was adopted to address anticipated water shortages in the summer of 2014 and this included the mapping of areas at risk of water scarcity. This enabled a number of humanitarian agencies to access USD 4.4 million dollars in funding through the UNOCHA Emergency Response Fund (ERF) for the implementation of 16 emergency water supply projects. In addition, UNHCR has selected companies to design multiple projects worth 14.8 million Euro.

Institutional and community support
Institutional and community support projects made up 19.6% of the RRP6 and makes up 37% of the 2015 LCRP for all agencies. In 2014, UNHCR dedicated 15% of its operational budget for this sector as a critical means to assist Lebanese institutions and communities, address impacts of the presence of refugees and help ease communal tensions. To date, UNHCR has committed USD 80 million in institutional support to the Ministries of Education, Public Health, Water and
Energy, Social Affairs and Interior and Municipalities. In 2014, local communities benefitted from USD 93.3 million in direct support (including USD 9.7 million from UNHCR), while Lebanese institutions received a total of USD 77.9 million (including USD 50.5 million from UNHCR).

**Planning and Implementation**

On refugee matters, an extensive refugee coordination system is in place, steered by the Government, UNHCR, UNDP, RC/HC and working through nine sectors both in Beirut and in the field. Specialized agencies and relevant line ministries lead the sectors in their areas of expertise: Protection (MoSA, UNHCR, UNICEF, UNFPA), Shelter (MoSA, UNHCR), Basic Assistance (MoSA, UNHCR), Social Stability (MoSA, UNDP, UNHCR), Livelihoods (MoSA, UNDP), Food Security (MoSA, MoA, WFP, FAO), Health (MoPH, WHO, UNHCR), Education (MEHE, UNICEF, UNHCR), and Water & Sanitation (MoEW, UNICEF, UNHCR). NGOs participate in sector coordination, particularly in field locations.

Over 70 partners contribute to the humanitarian response as reflected in the RRP 6 and the recently released Lebanon Crisis Response Plan (LCRP). The latter forms the Lebanon chapter of the Regional Refugee and Resilience Plan (3RP) which was launched on the 18th of December 2014 in Berlin.

Like previous plans, the LCRP includes humanitarian support for refugees as well as for Lebanese institutions and host communities. There is an increased emphasis on the latter in the text even though the relative budgets for the refugee and resilience response remains close to what it has been in previous years (63:37 as opposed to 70:30 in previous years).

UN agencies worked closely with the Government of Lebanon to agree upon a common text for the LCRP, making it a joint plan. Compromises were made by all parties in order to reach consensus on fairly sensitive issues (primarily related to some of the protection risks and vulnerabilities faced by refugees). Strong advocacy from donors was critical in highlighting some of these critical issues and ensuring they received due attention in the Plan.