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COI QUERY

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Date of completion	22 April 2022
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COI QUERY RESPONSE – Lebanon

Residency for Syrians

Residency requirements for Syrian nationals in Lebanon, including sponsorship scheme

As of January 2022, there are some 1.5 million Syrian refugees in Lebanon, of which 839 788 are registered with the United Nations High Commissioner for Refugees (UNHCR).¹ According to a report by the United States Department of State (USDOS), ‘implementation of residency determinations’ in 2021 was slow, leading to ‘most Syrian refugees’ not being able to renew their legal documents, including due to not being able to obtain the ‘Syrian IDs required to renew their residency permits in Lebanon’.² Lebanon’s economic crisis has further affected refugees including Syrians, who cannot ‘cover costs associated with access to legal residency and civil documentation’.³ While Syrians could enter Lebanon ‘without many restrictions’ even after the start of the Syrian conflict in 2011⁴, in January 2015, the Lebanese government abolished its visa-free policy and introduced new entry restrictions for Syrian citizens.⁵ Also, in 2015, UNHCR – who had been authorised since 2003 to process and determine asylum claims⁶ – was instructed to stop registering Syrian refugees.⁷ Since January 2015, Lebanon introduced the following categories for Syrians⁸:

Syrian refugees who had already been registered by UNHCR prior to January 2015:

According to a report by the American University of Beirut (AUB) report, a UNHCR registration certificate ‘is valid for two years since its issuance’.⁹ UNHCR-registered Syrian refugees ‘are largely allowed to obtain residency permits’¹⁰, and Syrians who also have ‘valid documents

¹ UNHCR, Lebanon Fact sheet, 31 January 2022, [url](#), p. 1

² USDOS, 2021 Country Reports on Human Rights Practices: Lebanon, 12 April 2022, [url](#)

³ Inter-Agency Coordination Lebanon, 2021 End Year Sector Dashboard, Protection including Child Protection and GBV, 4 March 2022, [url](#), p. 3

⁴ ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), pp. 17,19

⁵ AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#); ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), pp. 17, 19; Martin Clutterbuck and others, Alternative protection in Jordan and Lebanon: the role of legal aid, July 2021, [url](#); USDOS, 2021 Country Reports on Human Rights Practices: Lebanon, 12 April 2022, [url](#); FMR, Syrian refugees’ return from Lebanon, October 2019, [url](#)

⁶ Martin Clutterbuck and others, Alternative protection in Jordan and Lebanon: the role of legal aid, July 2021, [url](#); ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), pp. 16-18

⁷ USDOS, 2021 Country Reports on Human Rights Practices: Lebanon, 12 April 2022, [url](#); Martin Clutterbuck and others, Alternative protection in Jordan and Lebanon: the role of legal aid, July 2021, [url](#); ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), p. 19; AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#)

⁸ AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#)

⁹ MEI, “Death by a thousand cuts”: Syrian refugees face dire conditions as Lebanon unravels, 3 May 2021, [url](#)

¹⁰ MEI, “Death by a thousand cuts”: Syrian refugees face dire conditions as Lebanon unravels, 3 May 2021, [url](#)

from Syria' may apply 'for residency for 6 months and renew it for another 6 months free of charge. However, after 1 year, they are required to pay \$200 for each household member above 15 years old. New-born babies born in Lebanon to Syrian parents who are already registered with UNHCR are qualified for registration.¹¹ While registration with UNHCR continues to be largely suspended, exceptions are made for 'a few special cases'¹², which fall under exceptional humanitarian circumstances, and which must be approved by the Ministry of Social Affairs.¹³ Sources state that UNHCR-registered Syrian refugees must sign a pledge to refrain from working in Lebanon, although it is not clear whether this applies only to men.¹⁴ The pledge not to work must allegedly be done in the presence of a notary.¹⁵

Syrians who can prove that they are entering Lebanon for specific purposes:

These include tourism, work visits, owning or leasing property, medical treatment, traveling for the purposes of transit, and attending a medical or embassy appointment, among others.¹⁶ Moreover, Syrians must provide 'provide supporting documentation and any requirements specified by the visa type'¹⁷, which can include scheduled appointments with a doctor or at an embassy, having a bank account, a specific amount of money in cash, a hotel booking, a date of departure, etc.¹⁸ Syrians who fall in this category are required to pay a \$200 fee each six months to renew their residency.¹⁹

Syrians who have a Lebanese sponsor (*kafeel*- sponsor or *kafala* - sponsorship scheme)²⁰:

Syrians who do not fall under the previous categories can stay in Lebanon if they can find a Lebanese person or company willing to sponsor them. Finding a sponsor can reportedly range from \$200 up to \$1 000.²¹ More specifically, under the *kafala* system, foreign migrant workers can 'be granted a work permit in Lebanon, having secured the sponsorship of their prospective employer'.²² It is the Lebanese sponsors who initially apply for the work permit and put down a deposit²³, and make 'a commitment to "obtain a proper work permit, and assume responsibility for the worker and their activities, and any action that could harm others

¹¹ AUB, Syrian Refugees in Lebanon: Protection amidst Crises, 2020, [url](#), p.11

¹² AUB, Syrian Refugees in Lebanon: Protection amidst Crises, 2020, [url](#), p.8

¹³ USDOS, 2021 Country Reports on Human Rights Practices: Lebanon, 12 April 2022, [url](#); AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#); AUB, Syrian Refugees in Lebanon: Protection amidst Crises, 2020, [url](#), p.8

¹⁴ AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#); FMR, Syrian refugees' return from Lebanon, October 2019, [url](#)

¹⁵ GCSP, Supporting Syrian Refugees amidst Lebanon's Crises, April 2021, [url](#), p. 6

¹⁶ USDOS, 2021 Country Reports on Human Rights Practices: Lebanon, 12 April 2022, [url](#); ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), p. 20

¹⁷ AUB, Syrian Refugees in Lebanon: Protection amidst Crises, 2020, [url](#), p.8

¹⁸ AUB, Syrian Refugees in Lebanon: Protection amidst Crises, 2020, [url](#), p.8; ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), p. 20

¹⁹ GCSP, Supporting Syrian Refugees amidst Lebanon's Crises, April 2021, [url](#), p. 6; MEI, "Death by a thousand cuts": Syrian refugees face dire conditions as Lebanon unravels, 3 May 2021, [url](#); AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#)

²⁰ UN Habitat, Beirut city profile, 2021, [url](#), p.115; ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), p. 20

²¹ MEI, "Death by a thousand cuts": Syrian refugees face dire conditions as Lebanon unravels, 3 May 2021, [url](#); HRW, Lebanon: New Refugee Policy a Step Forward, 14 February 2017, [url](#)

²² ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), pp. 14, 15

²³ UN Habitat, Beirut city profile, 2021, [url](#), p.115

or have security implications, and responsibility for their health care and accommodation”²⁴. Workers under *kafala* can only work in the agriculture, construction, sanitation, or cleaning sectors.²⁵ Receiving such a work permit leads to the issuance of a residence permit, valid for one year and renewable. The worker’s immigration status is thus linked to the duration of the contract.²⁶

Additionally, the contract of employment is a ‘unified standard contract’²⁷, under which the worker cannot ‘negotiate and amend contractual terms and conditions’²⁸. The contract gives employers the right ‘to terminate a contract if the worker “commits a deliberate mistake, act of negligence, assault or threat, or causes any damage to the interests of the employer or a member of his/her family”’. However, the contract does not ‘define what constitutes a mistake or act of negligence and does not require any supporting evidence to be presented’.²⁹ Furthermore, the employer can also terminate the contract if the worker ‘commits an act that is punishable by the Lebanese laws’.³⁰ Under the *kafala* system, ‘if the employer terminates their contract, the sponsorship gets automatically cancelled, turning workers into illegal aliens and putting them at risk of arrest and/or deportation’.³¹ If remaining in Lebanon, ending the contract results in the former worker having an ‘illegal status’.³² Syrians who fall under this category must pay \$200 per year to renew the residency permit of each person over 15 years old in the family.³³

UNHCR-registered Syrians who want to work through the *kafala* system must ‘forfeit their UNHCR registration’.³⁴ According to a report by the Geneva Centre for Security Policy (GCSP) foundation, since ‘sponsors know Syrians cannot receive refugee assistance again if they leave them, the system often creates abusive relationships’.³⁵

²⁴ ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), p. 20

²⁵ UN Habitat, Beirut city profile, 2021, [url](#), p.39; AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#); AUB, Syrian Refugees in Lebanon: Protection amidst Crises, 2020, [url](#), p.8; MEI, “Death by a thousand cuts”: Syrian refugees face dire conditions as Lebanon unravels, 3 May 2021, [url](#)

²⁶ ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), pp. 14, 15

²⁷ Amnesty International, Lebanon: ‘Their House is My Prison’ Exploitation of Migrant Domestic Workers in Lebanon, 2019, [url](#), p. 13; ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), pp. 14, 15

²⁸ ICJ, Unrecognized and Unprotected: The Treatment of Refugees and Migrants in Lebanon, November 2020, [url](#), pp. 14, 15

²⁹ Amnesty International, Lebanon: ‘Their House is My Prison’ Exploitation of Migrant Domestic Workers in Lebanon, 2019, [url](#), p. 13

³⁰ ILO, Information Guide for Migrant Domestic Workers in Lebanon, 2012, [url](#), p.15

³¹ Al Jazeera, The Lebanese revolution must abolish the kafala system, 14 November 2019, [url](#)

³² Maysan Alobaid, The Middle Eastern Consensus on the Kafala System, 3 September 2021, [url](#)

³³ GCSP, Supporting Syrian Refugees amidst Lebanon’s Crises, April 2021, [url](#), p. 6; AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#); FMR, Syrian refugees’ return from Lebanon, October 2019, [url](#)

³⁴ UN Habitat, Beirut city profile, 2021, [url](#), p.39; MEI, “Death by a thousand cuts”: Syrian refugees face dire conditions as Lebanon unravels, 3 May 2021, [url](#); GCSP, Supporting Syrian Refugees amidst Lebanon’s Crises, April 2021, [url](#), p. 6; AUB, Timeline of major policies influencing the livelihoods of Syrian refugees in Lebanon, December 2020, [url](#); AUB, Syrian Refugees in Lebanon: Protection amidst Crises, 2020, [url](#), p.8; MEI, “Death by a thousand cuts”: Syrian refugees face dire conditions as Lebanon unravels, 3 May 2021, [url](#)

³⁵ GCSP, Supporting Syrian Refugees amidst Lebanon’s Crises, April 2021, [url](#), p. 6

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ADDITIONAL SOURCES CONSULTED

ECOI.net; European Union – EUAA COI Portal; Refworld; Reliefweb.