

PUSHED TO THE EDGE:

SYRIAN REFUGEES FACE
INCREASED RESTRICTIONS
IN LEBANON

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EXECUTIVE SUMMARY

In January 2015, Lebanon introduced new criteria for Syrian nationals applying for and renewing their residency permits. These criteria apply to all Syrians, including those who are recognized as refugees by the UN refugee agency, UNHCR.¹ The new procedures – which require refugees to obtain several documents from different sources – are so onerous and expensive that many people are unable to renew their permits, leaving them in a precarious legal position. Without a valid residency permit even recognized, refugees are considered to be in breach of Lebanese law. This, in turn, exposes them to a range of human rights violations: without a valid permit refugees from Syria have limited or no access to public services such as education and healthcare; they can be detained by security forces and may be forcibly returned to Syria.

In addition to the new requirements for Syrians already in Lebanon, the authorities have imposed new entry conditions for Syrian nationals, the impact of which has been that many people attempting to flee the conflict in Syria cannot reach safety in Lebanon.²

In May 2015, the Lebanese authorities instructed UNHCR to temporarily suspend registration of Syrian refugees, including individuals already in the country and new arrivals. The authorities stated that this ban would remain in place until a new mechanism for registration of refugees is established.

Over the past 18 months Amnesty International has documented, in reports and briefing papers, how a range of measures introduced by the Lebanese authorities have restricted access to refugee protection.³ This includes restrictions imposed on Palestinian refugees from Syria in 2013 and 2014, which seriously undermined the human rights of that refugee community; and a number of prior restrictions applied by the Lebanese authorities on Syrians.⁴

¹ Inter-Agency Coordination Lebanon, *Protection Quarterly Dashboard*, January to March 2015, available at: https://data.unhcr.org/syrianrefugees/working_group.php?Page=Country&LocationId=122&Id=25 (accessed 18 May 2015).

² Amnesty International, *Lebanon: New entry requirements for Syrians likely to block would-be refugees*, available at: www.amnesty.org/en/documents/document/?indexNumber=mde24%2F002%2F2015&language=en (accessed 1 June 2015).

³ For more information see Amnesty International, *Lebanon: New entry requirements for Syrians likely to block would-be refugees*, 6 January 2015, available at: www.amnesty.org/en/documents/document/?indexNumber=mde24%2F002%2F2015&language=en; Amnesty International, *Denied refuge: Palestinians from Syria seeking safety in Lebanon*, 1 July 2014, available at: www.amnesty.org/en/documents/MDE18/002/2014/en/; Amnesty International, *Agonizing choices: Syrian refugees in need of healthcare in Lebanon*, 21 May 2014, available at: www.amnesty.org/en/documents/mde18/001/2014/en/

⁴ These abuses however are outside the scope of this report. For more information on abuses against Palestinian refugees from Syria in Lebanon see: Amnesty International, *Denied refuge: Palestinians from Syria seeking safety in Lebanon*, available at: www.amnesty.org/en/documents/MDE18/002/2014/en/

This report focuses on the most recent restrictions introduced in January 2015, and examines the human rights impact of these restrictions coming on top of those previously imposed. The report concludes that the restrictions are part of a policy of the Lebanese authorities to dissuade and prevent Syria's refugees from seeking protection in Lebanon.

Lebanon currently hosts around 1.2 million refugees from Syria. Over 1.18 million are registered with UNHCR⁵; however, UNHCR considers that most of those who are not registered also require international protection.⁶

Hosting a refugee population of this magnitude has placed an incredible burden on the country and its infrastructure. Lebanon today has the highest per capita concentration of refugees in the world, with Syrian refugees now accounting for one in every five people.⁷ The massive strain that Lebanon and other countries neighbouring Syria face as a result of the refugee crisis must be viewed in the context of a grossly inadequate response from the international community.

With the 2015 UN humanitarian appeal for Lebanon only 18% funded the country is struggling to cope.⁸ This shortfall in funding has meant that refugees receiving food vouchers are given just US \$19 per month – less than US \$0.63 a day where a loaf of bread costs around US \$1. Moreover, so far in 2015, countries outside of the region have offered only 4,500 resettlement and humanitarian admission places for refugees from Syria now living in Lebanon; that is less than 0.04 % of the total number of refugees currently in the country.⁹

Burden-and-responsibility-sharing are central to an effective global system of refugee protection.¹⁰ However, the international community has spectacularly failed in relation to the

(accessed 1 June 2015).

⁵ UNHCR, *Syria Regional Refugee Response, Inter-agency sharing portal, Lebanon*, last updated 7 May 2015, available at: <http://data.unhcr.org/syrianrefugees/country.php?id=122> (accessed on 18 May 2015).

⁶ For an explanation the difference between registered and not registered Syrian refugees see Lebanon Humanitarian INGO Forum, *Background paper on unregistered Syrian refugees in Lebanon, July 2014*, available at: <http://lhif.org/uploaded/News/d92fe3a1b1dd46f2a281254fa551bd09LHIF%20Background%20Paper%20on%20Unregistered%20Syrian%20Refugees%20%28FINAL%29.pdf> (accessed 18 May 2015). In addition to Syrian refugees there are 53,070 Palestinian refugees from Syria registered with the UN Relief and Works Agency for Palestinian refugees in the Near East (UNRWA). For more information see: UNRWA, *PRS in Lebanon*, available at: www.unrwa.org/prs-lebanon (accessed 27 April 2015).

⁷ UNHCR, *Mid-year trends, 2014*, available at: <http://unhcr.org/54aa91d89.html> (accessed 29 May 2015).

⁸ UNHCR, *Syria Regional Refugee Response, Inter-agency sharing portal, Lebanon*, last updated 10 April 2015, available at: <http://data.unhcr.org/syrianrefugees/country.php?id=122> (accessed on 27 April 2015).

⁹ Amnesty International interview in Beirut with UNHCR Lebanon, 21 March 2015. UNHCR aim to resettle 9,000 Syrian refugees from Lebanon in 2015.

¹⁰ UNHCR, *Conclusion on International Cooperation and Burden Responsibility Sharing in Mass Influx Situations, EXCOM Conclusions*, 8 October 2004, available at: www.unhcr.org/41751fd82.html (accessed 1 June 2015).

Syria refugee crisis. The lack of international support – in the form of a meaningful number of resettlement places and financial assistance - has almost certainly played a role in Lebanon's decision to impose such significant restrictions on refugees from Syria.

The 1.2million refugees from Syria living in Lebanon cannot go home. The responsibility for protecting and upholding the rights of the refugee population does not lie only with Lebanon. International support to the country must increase – urgently, and dramatically. This report is part of a wider Amnesty International campaign which seeks to move the Syria refugee crisis up the global political agenda and secure the political attention needed to develop meaningful solutions.

While Lebanon must be commended for enabling more than a million refugees to enter the country, and the enormous challenges the country faces acknowledged, the restrictions imposed on refugees are indefensible. In some cases they amount to a breach of the prohibition of *non-refoulement* – the obligation not to return individuals to a situation where they would be at risk of persecution or serious human rights abuses. The principle of *non-refoulement* is recognized as a norm of customary international law, and as such is binding on all states.¹¹

METHODOLOGY

In late March 2015 Amnesty International visited Lebanon and interviewed Syrian refugees affected by the new restrictions. The organization also met with non-governmental and civil society organizations, UNHCR, and a representative from the Ministry of Social Affairs. Amnesty International researchers made multiple requests to meet with the General Directorate of General Security – the Lebanese authority responsible for implementing the new restrictions – but received no response.

The issues covered in this report have been discussed extensively with a range of agencies who work with refugee populations in Lebanon. Not all of them wished to have their names disclosed; therefore Amnesty International has used generic terms such as “agency” and “non-governmental source” in this document. All names of Syrian refugees interviewed by Amnesty International in Lebanon have also been changed in order to protect their identities.

¹¹ UNHCR, *The principle of non-refoulement as a Norm of Customary International Law. Response to the Questions Posed to UNHCR by the Federal Constitutional Court of the Federal Public of Germany in Cases 2 BvR 1938/93, 2 BvR 1953/93, 2 BvR 1954/93*, 31 January 1994, available at: www.refworld.org/docid/437b6ddb64.html (accessed 1 June 2015).

BACKGROUND: RESTRICTIONS IMPOSED BEFORE 2015

Lebanon, to its credit, largely operated an 'open border' policy at the start of the Syria crisis. However, over the past two years the Lebanese authorities have imposed increasing restrictions on those seeking to enter Lebanon from Syria.

In August 2013, the Lebanese authorities imposed restrictions on the entry of Palestinian refugees from Syria, including the need for a valid pre-approved visa which required an application made by a guarantor in Lebanon.¹² In May 2014 the government put in place new entry requirements effectively closing the border to all Palestinian refugees from Syria.¹³ These measures did not apply to Syrian nationals but non-governmental sources working with refugees expressed concern at the time that these measures were only the first step in what was likely to be increased restrictions affecting all refugees from Syria.¹⁴ This proved to be the case.

In June 2014, the Lebanese authorities announced that only Syrians from areas bordering Lebanon where there was fighting would be allowed to enter the country.¹⁵ From August 2014 onwards, at least 45 municipalities across Lebanon¹⁶ imposed curfews for Syrians, restricting freedom of movement.¹⁷ The authorities and the army have increasingly targeted informal settlements where Syrian refugees are living, carrying out raids to arrest people suspected of being Islamist militants.¹⁸ Forced evictions are also justified on the premise of

¹² Amnesty International, *Lebanon: Denied refuge: Palestinians from Syria seeking safety in Lebanon*, 1 July 2014, available at: www.amnesty.org/en/documents/MDE18/002/2014/en/

¹³ Amnesty International, *Lebanon: Denied refuge: Palestinians from Syria seeking safety in Lebanon*, 1 July 2014, available at: www.amnesty.org/en/documents/MDE18/002/2014/en/

¹⁴ Amnesty International interviews with non-government sources working with refugees in Lebanon, May and June 2014.

¹⁵ For further information see Amnesty International, *New entry requirements for Syrians likely to block would-be refugees*, 6 January 2015, available at: www.amnesty.org/en/documents/mde24/002/2015/en/; Amnesty International, *Syria: Left out in the cold: Syria refugees abandoned by the international community*, 5 December 2014, available at: www.amnesty.org/en/documents/mde24/047/2014/en/; (all accessed 12 May 2015).

¹⁶ According to the government there are 1108 municipalities in Lebanon, however, Syrians are not spread evenly across all the different municipalities. See www.cas.gov.lb/index.php/about-lebanon-en (accessed 30 May 2015).

¹⁷ While some were imposed over a year ago, an increasing number of curfews were imposed following fighting in Aarsal, Lebanon, between the Lebanese Armed Forces and armed opposition groups operating out of Syria. A number of Lebanese nationals have been kidnapped and killed by the groups. For more information see Human Rights Watch, *Lebanon: At Least 45 Local Curfews Imposed on Syrian Refugees*, 3 October 2014, available at: www.hrw.org/news/2014/10/03/lebanon-least-45-local-curfews-imposed-syrian-refugees (accessed 18 May 2015).

¹⁸ See for example, The Daily Star, *Army raids Aarsal refugee camp*, 28 May 2015, available at: www.dailystar.com.lb/News/Lebanon-News/2015/May-28/299586-army-raids-aarsal-refugee-camp.ashx

security concerns.¹⁹

In October 2014, the Council of Ministers in Lebanon established a policy that expressly states the government's intention is to reduce the number of Syrians present in Lebanon; alleviate the burden placed on the people and economy of Lebanon as a consequence of hosting Syrian refugees; and to enforce Lebanese law to protect Lebanese nationals in all fields of work, among other things.²⁰

(accessed 4 June 2015).

¹⁹ Inter-Agency Coordination Lebanon, *Protection Quarterly Dashboard*, January to March 2015, available at: https://data.unhcr.org/syrianrefugees/working_group.php?Page=Country&LocationId=122&Id=25 (accessed 18 May 2015).

²⁰ The Council of Ministers includes the Prime Minister, the Minister of Social Affairs, Minister of Interior and Municipalities, and Minister of Foreign Affairs and Immigrants. ²⁰ Minutes of the Council of Ministers meeting as seen by Amnesty International dated 28 October 2014. The media also issued statements in October following a decision reached by the Lebanese cabinet. For example see: Daily Star, *Lebanon cabinet votes to stop accepting Syrian refugees*, 23 October 2014, available at: www.dailystar.com.lb/News/Lebanon-News/2014/Oct-23/275075-refugee-crisis-tops-lebanon-cabinet-agenda.ashx (accessed 28 April 2015).

CLOSED BORDERS FOR WOULD-BE REFUGEES

THE PRINCIPLE OF *NON-REFOULEMENT*

Lebanon has not ratified the 1951 Convention Relating to the Status of Refugees, or its additional optional protocol of 1967, and the government maintains that Lebanon cannot be a permanent country of asylum.²¹ However under international customary law, as well as the International Covenant on Civil and Political Rights, and the Convention against Torture, Lebanon is obliged not to return individuals to a situation where they would be at risk of persecution or serious human rights abuses. This is known as the principle of *non-refoulement* which prohibits the rejection of asylum-seekers at the border and the deportation of refugees.²²

Amnesty International believes that all asylum-seekers from Syria should be considered to be in need of international protection due to the nature of the conflict in Syria, which includes widespread human rights violations, war crimes and crimes against humanity.²³ Closing the border to those in need of asylum is a violation of the principle of *non-refoulement*, and making conditions in the host country extremely difficult for refugees to the point where they have no choice but to leave, can also amount to *refoulement*.

On 31 December 2014, the government of Lebanon issued guidelines that came into effect on 5 January 2015 stating that Syrians wishing to enter Lebanon would now be required to fulfil certain requirements and provide the necessary documents under one of seven categories.²⁴ Category one is for tourism, shopping, business, landlords, and tenants; category two is for studying, category three is for transiting to a third country, category four is for those displaced; category five for medical treatment; category six for an embassy appointment; and category seven for those entering with a pledge of responsibility (a Lebanese sponsor).²⁵ The majority of these categories allow for entry into Lebanon for a defined period of time, ranging from 24 hours to one month for a temporary business visa. In some cases the entry permit

²¹ UNHCR, *Lebanon Fact sheet*, Beirut, January 2014.

²² UNHCR, *UNHCR Note on the Principle of Non-Refoulement*, available at: www.refworld.org/docid/438c6d972.html (Accessed 18 May 2015).

²³ This is in line with UNHCR's position. For more information see: UNHCR, *International Protection Considerations with regard to people fleeing the Syrian Arab Republic, Update III*, 22 October 2014, available at: www.refworld.org/cgi-bin/texis/vtx/rwmain?docid=544e446d4 (accessed on 28 April 2015).

²⁴ The circular was amended on 13 January, 3 February and 23 February 2015, the latter of which is available in Arabic at: www.general-security.gov.lb/getattachment/e1e76fe0-181e-4fe7-a19c-9b175759ad49/Rules.pdf.aspx?chset=f247bae1-d485-42fa-8a33-079df973a536 (accessed 28 April 2014).

²⁵ *Ibid.*

can be extended, for example for medical cases and for embassy appointments.²⁶

Category four for the 'displaced' states that Syrians are not allowed to enter as displaced, except for exceptional cases under humanitarian criteria defined by the Ministry of Social Affairs. In April 2015 the criteria were disclosed and specifically apply to: "Unaccompanied and/or separated children with a parent already registered in Lebanon; persons living with disabilities with a relative already registered in Lebanon; persons with urgent medical needs for whom treatment in Syria is unavailable; persons who will be resettled to third countries."²⁷ The Ministry of Social Affairs told Amnesty International that they assess what constitutes an exception on a case-by-case basis, at the discretion of the Minister.²⁸

Amnesty International considers that category four, as explained by the Ministry of Social Welfare, would not include most of those fleeing the conflict and human rights abuses in Syria, in clear contravention of Lebanon's obligations under the principle of *non-refoulement*, a binding rule of international law. In effect, this means that those fleeing for example torture and sexual violence at the hands of one of the parties to the conflict in Syria would not be considered eligible to enter Lebanon. The Ministry of Social Affairs stated that while they have a "window of flexibility" the government does not see those fleeing persecution as an "extreme vulnerability case" in accordance with their humanitarian criteria.²⁹

Since these latest restrictions were imposed in January 2015, UNHCR has reported a drop in monthly registration of 80% in the first three months of 2015, compared to a similar period in 2014.³⁰ Given that the conflict in Syria continues unabated, the reduction in registration of refugees suggests that the new restrictions have deterred Syrians from seeking refuge in Lebanon.³¹

The Ministry of Social Affairs told UNHCR that they should not register people newly arrived from Syria - with the exception of humanitarian cases approved by the Ministry.³² On 24

²⁶ See General Security circular, 23 February 2015, available at: www.general-security.gov.lb/getattachment/e1e76fe0-181e-4fe7-a19c-9b175759ad49/Rules.pdf.aspx?chset=f247bae1-d485-42fa-8a33-079df973a536 (accessed 28 April 2014).

²⁷ Inter-agency Coordination Lebanon, *Protection Monthly Dashboard*, April 2015, available at: https://data.unhcr.org/syrianrefugees/working_group.php?Page=Country&LocationId=122&Id=25 (accessed 2 June 2015).

²⁸ Amnesty International meeting with a representative of the Ministry of Social Affairs, Beirut, 26 March 2015.

²⁹ Amnesty International meeting with a representative of the Ministry of Social Affairs, Beirut, 26 March 2015.

³⁰ UNHCR, *Syrian refugees in Lebanon, Snapshot*, January-March 2015, available at: <http://reliefweb.int/report/lebanon/syrian-refugees-lebanon-snapshot-january-march-2015> (accessed 28 April 2015).

³¹ Email correspondence with UNHCR, June 2015.

³² This has also been mentioned in public statements by the Minister of Social Affairs who has requested that UNHCR de-register new arrivals. See The Daily Star, *UNHCR to cross off 5,500 Syrian refugees: Derbas*, 29 April 2015, available at: www.dailystar.com.lb/News/Lebanon-News/2015/Apr-29/296164-

April 2015, the Ministry of Social Affairs requested that UNHCR de-register over 1,400 Syrian refugees who had arrived in Lebanon after 5 January 2015.³³ Following this, in May, UNHCR was ordered to temporarily suspend all refugee registration. This is because while they are considered to meet the definition of a refugee by UNHCR, they are not considered to meet the criteria under category four of the Lebanese government's new restrictions.

[unhcr-to-cross-off-5500-syrian-refugees-derbas.ashx](#) (accessed on 30 April 2015).

³³ Inter-agency Coordination Lebanon, *Protection Monthly Dashboard*, April 2015, available at: https://data.unhcr.org/syrianrefugees/working_group.php?Page=Country&LocationId=122&Id=25 (accessed 2 June 2015).

OBSTACLES FACED BY SYRIAN REFUGEES IN RENEWING RESIDENCY PERMITS OR REGULARIZING THEIR STATUS

On 31 December 2014, the General Directorate of General Security (General Security), which is part of the Lebanese Ministry of Interior, announced new criteria for Syrian nationals wishing to renew their residency permits or otherwise regularize their immigration status in Lebanon.³⁴ Very few details about these changes have been made publically available by the authorities.

The refugees to whom Amnesty International spoke found out about the details of the new renewal requirements either through word of mouth or when they attempted to apply at a General Security Office themselves.³⁵ They described a process that was confusing, cumbersome and expensive.

To renew a residency permit, each person over 15 years of age is required to pay an annual fee of US \$200 to General Security. This fee applied prior to the January 2015 restrictions. Applicants also incur costs for transportation, photocopying documents, and public notary services, among other things, which amount to an estimated US\$75 per person per application.³⁶

CRITERIA FOR RENEWING LEGAL STATUS

Syrian refugees applying to renew their residency permits have been divided into two categories by the Lebanese authorities: those registered with UNHCR and those who are not.

³⁴ The criteria was announced through a statement by General Security. For more information see: The Daily Star, *Lebanon announces unprecedented entry restrictions for Syrians*, 2 January 2015, available at: www.dailystar.com.lb/News/Lebanon-News/2015/Jan-02/282826-lebanon-announces-unprecedented-entry-restrictions-for-syrians.ashx; and www.general-security.gov.lb/results/001.pdf (in Arabic) (both accessed 2 June 2015).

³⁵ Interviews carried out by Amnesty International with Syrian refugees in Lebanon between 19 and 30 March 2015

³⁶ The figure of US \$75 is as estimated by the Norwegian Refugee Council (NRC) for refugees registered with UNHCR. As cited in NRC, *Legal Status of Refugees from Syria – Overview of the new entry and renewal regulations*, last updated 16 April 2015.

For both categories, refugees are required to³⁷:

- pay a US \$200 fee (which covers renewal for one year);
- provide a 'housing pledge' which confirms where the person lives. The process for obtaining this document requires several steps – see box;
- show valid ID or passport, as well as entry slip and return card;
- have two photographs stamped by the *Mukhtar* (Lebanese local leader).

In addition, refugees who **are registered with UNHCR** are required to provide³⁸:

- a 'pledge not to work', signed in the presence of a notary, which states that they will not work in Lebanon;
- UNHCR registration certificate.³⁹

Additional requirements for refugees **not registered with UNHCR** include:

- a 'pledge of responsibility' – essentially a sponsorship – made by a Lebanese national who commits to obtain a work permit for the Syrian individual or group of Syrians, or to sponsor and host a family (see box).

FURTHER DETAILS ON PLEDGES

Housing pledge: the housing pledge is a document that a landlord or tenant (person subleasing the property) must sign. The document confirms that the person signing – who must be a Lebanese national - is hosting a Syrian household and commits to notify the local General Security Office when the occupancy ends. The person signing the pledge should demonstrate his/her rights to the property and this can be done through either presenting a certified copy of the property deed, or a lease agreement if the person is a tenant subleasing to Syrians. Refugees living in informal tented settlements have to provide a residency statement from the local Municipality stating this.

Pledge of responsibility: this can be either be a sponsorship for an individual work permit by a Lebanese individual, or a group pledge of responsibility provided by a registered entity that hires a number of Syrian nationals. The pledge can also be a family pledge of responsibility by a Lebanese national to host and be fully

³⁷ As seen by Amnesty International in internal Lebanese memorandums by the government of Lebanon dated 30/12/2014 and March 2015, in addition to analysis carried out on the regulations by several international NGOs and UNHCR.

³⁸ As seen by Amnesty International in internal Lebanese government memos, in addition to analysis carried out on the regulations by several international NGOs and UNHCR.

³⁹ NRC has noted in practice that the UNHCR registration certificate should be valid for at least six months. Information available in: NRC, *Legal Status of Refugees from Syria – Overview of the new entry and renewal regulations*, last updated 16 April 2015.

responsible for one Syrian family. The Lebanese sponsor is required to be present at the General Security Office when the Syrian national is renewing their residency permit and in some cases required to return several times with the Syrian national. Sponsors are liable for any misdemeanours by the Syrian nationals they sponsor, in addition to being responsible for their work, housing, food and other costs.

All of the pledges and documents required for the renewal of residency permits, including the pledge not to work, must be signed by a notary public and this means the person seeking to renew their permit has to pay the notary office.

REFUGEES UNABLE TO RENEW THEIR RESIDENCY PERMITS

Agencies working with refugees estimate that most refugees will be unable to meet the requirements, let alone pay the US \$200 fee.⁴⁰

In many cases even when refugees provide all the necessary documents and pay the required fees their request to renew their residency permits are denied, for reasons that are often unclear.⁴¹ This was also the experience of most of the refugees interviewed by Amnesty International.

For example, refugees reported that they were turned back because the documents they obtained to support their application to renew their residency were only valid for a certain number of days after being stamped.⁴² This was not made clear to people when their documents were stamped. It is unclear whether there are official deadlines for submitting documents that have not been made public, or whether these are unofficial requirements being imposed by local General Security Offices.⁴³ Amnesty International could not find any information on official deadlines related to documents for renewing residency. Regardless of whether these are official or unofficial deadlines, the refugees must gather new documents and repeat the process, incurring new costs, if they can afford to do so.

Moreover, the documentary requirements appear to be subject to changes that are not made clear or officially announced. In March 2015 General Security issued an internal memo which states that refugees, including those registered with UNHCR, must provide proof of financial means to support themselves - such as bank statements, documents showing money transfers or proof of charitable or UN support, such as World Food Programme (WFP) pre-paid cards.⁴⁴ UNHCR and non-government sources working with refugees confirmed this

⁴⁰ Email correspondence with agencies working with Syrian refugees in Lebanon, May 2015.

⁴¹ Email correspondence with agencies working with Syrian refugees in Lebanon, May 2015.

⁴² This is a practice that has been observed by non-government sources working with refugees. It was also noted in interviews carried out by Amnesty International with Syrian refugees in Lebanon between 19 and 30 March 2015.

⁴³ The lack of clarity on these requirements were confirmed by a non-governmental organization working with refugees in Lebanon through email correspondence, 20 May 2015.

⁴⁴ Internal memo from March 2015 seen by Amnesty International.

practice was now widely applied.

CHALLENGES OF MEETING THE NEW REQUIREMENTS

Some refugees in Lebanon have chosen not to register with UNHCR for a range of reasons including, among other factors, obstacles in accessing registration centres, a belief that there is no benefit to registration or a belief that they do not require assistance.⁴⁵ Since May 2015, people have been unable to register because the Lebanese authorities told UNHCR to halt the registration process.⁴⁶ Syrian refugees who are not registered with UNHCR must obtain a Lebanese sponsor. However, the obligations that sponsors must take on and the time they have to give to the process (described earlier) are significant and it is very difficult for refugees to find individuals or companies willing to accept these obligations.

CASE STUDIES:

DIFFICULTIES IN FINDING A LEBANESE SPONSOR

Ali, aged 25, is a Syrian national who delivers coffee to offices in a Beirut neighbourhood. He was initially able to find a Lebanese sponsor; however due to the onerous requirements placed on Lebanese sponsors his sponsor withdrew his offer.

Ali told Amnesty International: *"I got a Lebanese sponsor – one of the clients I deliver coffee for agreed and we went to the General Security Office. He came once but he didn't have the patience to come again... I was told to come back in ten days. I went back but we had to wait a long time and the sponsor went away and now it's difficult for him to come. He has to go to General Security and present an undertaking stating that as a sponsor he is liable for the Syrian person under any case – whether he steals etc. Lots of sponsors run away at this stage because they don't want the responsibility..."*

DIFFICULTIES IN OBTAINING NECESSARY DOCUMENTS AND ARBITRARY REJECTIONS

Obtaining all of the necessary documents, including certified copies of lease agreements or real estate deeds from landowners in Lebanon, is impractical given that most refugees (82%)⁴⁷ that pay rent do not have written lease agreements with their landlords, especially in the low-cost housing markets.⁴⁸

⁴⁵ Lebanon Humanitarian INGO Forum (LHIF), *Background paper on unregistered Syrian refugees in Lebanon*, available at: <http://lhif.org/uploaded/News/d92fe3a1b1dd46f2a281254fa551bd09LHIF%20Background%20Paper%20on%20Unregistered%20Syrian%20Refugees%20%28FINAL%29.pdf> (accessed 29 May 2015)

⁴⁶ UNHCR, *Syria Regional Refugee Response, Inter-agency sharing portal, Lebanon*, last updated 7 May 2015, available at: <http://data.unhcr.org/syrianrefugees/country.php?id=122> (accessed on 18 May 2015).

⁴⁷ Figure cited by UNHCR in email correspondence, May 2015.

⁴⁸ Email correspondence with agencies working with refugees in Lebanon, May 2015.

Sara, aged 35,⁴⁹ who is in Beirut, stated that she had to move from her previous place of residency halfway through obtaining the required documents and a Lebanese sponsor (she is not registered with UNHCR). This was because the landlord in her first place of residence refused to provide her with proof of ownership of property, as he didn't want to register the property at the municipality because it would require him to pay additional taxes.⁵⁰

Sara therefore had to start the process of obtaining all the necessary documents again, as the previous ones were no longer valid. Despite going through the process again, getting a new lease, and paying the additional costs, she was refused renewal. She does not know why her residency renewal application was rejected the second time.

Sara described the challenging process she undertook to obtain all of the necessary documents, including going back to the notary several times, as the criteria detailing which documents were required was unclear to her. She said: *"I had to do the documents before the notary three times and then again when doing it with a sponsor. Each time it cost 50,000 LBP (US \$33) and each time I went back to General Security they refused them and I had to make amendments... I found out information about the new rules on Facebook and TV. I only knew about what exactly was required when I went to renew my residency permit. Each time they are telling me to bring something new..."*

EVIDENCE OF SOURCE OF INCOME REQUIRED

Bassim, aged 42, is a Syrian refugee registered with UNHCR.⁵¹ His residency permit expired on 16 February 2015. Prior to it expiring he attempted to renew it twice in Aley (a city near Beirut), where he lived at the time. On his second attempt General Security asked Bassim to provide proof of income or financial support through bank statements, which he was unable to do as he did not have a bank account in Lebanon.

He told Amnesty International that he has adequate savings in cash to support himself in Lebanon, but has been unable to prove this because he cannot open a bank account without a valid residency permit.⁵² He moved to Beirut on 5 March, in the hope that he could open a bank account there but has been unable to do so.

Bassim told Amnesty International: *"I came from Syria and I have good financial status and I don't need someone to transfer me money... I was referred back to the bank to open a bank account and told that I can't without a residency permit... I am lost because I don't know how to apply for residency... My idea now is to send money to my sister in UAE and for her to send it back to me to show that the money was transferred to*

⁴⁹ Interviewed by Amnesty International in Beirut, Lebanon on 19 March 2015.

⁵⁰ Several others told Amnesty International that it was common practice in Lebanon not to have properties registered with the municipality so as to avoid paying taxes.

⁵¹ Italics indicates that the individual mentioned has had their names changed in order to protect their identity. Interviewed by Amnesty International in Beirut, Lebanon on 24 March 2015.

⁵² Bassim told Amnesty International that prior to the Syria crisis he was co-owner of a landscaping company in the United Arab Emirates (UAE) and worked there for 12 years but was denied re-entry to the UAE in 2011 after the start of the crisis having applied for a visa six times. In Syria since 2012, Bassim worked in documenting arbitrary detention and enforced disappearances in Syria's prisons. He fled Syria to Lebanon in August 2014 after he received threats in Syria and a warning phone call telling him to leave.

me. I didn't have a plan to come here or to leave Syria but there is no other way."

Bassim is registered with UNHCR and has signed the pledge not to work. He would like to work but cannot find a Lebanese sponsor.

ARBITRARY REJECTIONS CONNECTED TO THE PLEDGE NOT TO WORK

The pledge not to work leaves Syrian refugees heavily dependent on humanitarian assistance programmes, which are increasingly under-funded (see below). Refugees who work, even intermittently, without meeting the new requirements with regard to sponsorship, are at risk of arrest and detention if caught.⁵³ Non-governmental sources noted that in practice some men of working age who are registered with UNHCR and who have signed a pledge not to work have their applications to renew their residency permits rejected because General Security appears not to believe that they are not working. They are told to return with a 'pledge of responsibility' from a Lebanese sponsor.⁵⁴

Amnesty International separately interviewed four Syrian men registered with UNHCR who said that when they went to renew their residency permits they were interrogated by General Security about whether they were working, despite having signed a 'pledge not to work'. All four men had their applications rejected and were told to get a 'pledge of responsibility' from a Lebanese sponsor.

Three of the men live in the Bekaa Valley and had their passports stamped by General Security stating that they should get a Lebanese sponsor or be deported.⁵⁵

Such arbitrary application of the already cumbersome requirements for renewing residency permits places refugees in an impossible situation.

CASE STUDY: REJECTION OF THE PLEDGE NOT TO WORK

Marwan⁵⁶, aged 41 from Homs in Syria, lives in an informal settlement in the Bekaa Valley, Lebanon and is registered with UNHCR. He told Amnesty International that he came to Lebanon in July 2012 after he was detained in Syria, along with three of his brothers, and accused of distributing food aid to civilians in areas under the control of armed groups in Homs. During his time in detention, *Marwan* says that he was tortured by the Syrian authorities and has suffered back pain ever since which has meant that he has not been able to work since coming to Lebanon.

He told Amnesty International: *"I signed a pledge not to work and I also got a municipality letter [housing*

⁵³ Amnesty International meetings with non-governmental organizations in Lebanon, March 2015.

⁵⁴ Amnesty International meetings with non-governmental organizations in Lebanon, March 2015.

⁵⁵ Amnesty International saw the stamps in all three passports which stated (translated from Arabic) 'It is required to provide a ledge of liability by a Lebanese or deport. Signed by Captain Fouad Maalouf (signature and seal).' The stamps were dated 23 February 2015; 19 March 2015; and 19 March 2015. Seen by Amnesty International on 26 and 27 March 2015.

⁵⁶ Interviewed by Amnesty International in Bekaa, Lebanon, 26 March 2015.

pledge]... My residency permit has been invalid since 17 March 2015. I went to General Security on 17 March presenting them with these documents at the Zahle General Security Office. The officer asked if I was not working and I said that I was not working. Then he [the officer] sent two officers to question me as if I had done something wrong. Then they sent me back to the officer [in charge] and said that I didn't confess that I am working. The officer [in charge] said that I must get a pledge of responsibility from a Lebanese sponsor or leave [Lebanon]."

Marwan told Amnesty International that he was unable to find a sponsor. His residency permit had been invalid from 17 March 2015 and a note stating that he must get a pledge of responsibility from a Lebanese sponsor or be deported was stamped in his passport.

EVICCTIONS, ARREST AND DETENTION

Agencies working with refugees in Lebanon have reported an increase in arrest raids and detention by Lebanese security forces in areas inhabited by Syrians on the premise of security. The number of forced evictions carried out by the Lebanese authorities has also increased in 2015, with more than 7,000 people forcibly evicted in the first quarter of the year and a further 6-7,000 at risk of forced evictions according to non-governmental sources.⁵⁷

CASE STUDY: ARREST RAIDS AND DETENTION

On 27 March 2015 Mouna, aged 35, described to Amnesty International how her husband and son were arrested and detained by the Lebanese Armed Forces (LAF) in a raid on the residential area where they live in north Lebanon that took place between 22 and 24 March. They were arrested because their residency permits had expired. However, when they tried after their release to renew their permits they were not able to do so.⁵⁸

Mouna said: "LAF arrested my husband and son because they had invalid permits which expired two months ago and they wanted them to pay US \$200 each to be released... They were released two days ago and given five days to get papers or get deported. They were beaten in detention and insulted... They [the LAF] only requested to see the papers of men and even took old men's papers – men over 50 years old – and beat them and even took a 10 year old child. They took them to a police station first (Kobbe) and then to Deir Ammar military barrack.

My husband didn't try before [to renew his residency permit] but since he was arrested he is trying to regularize his papers. Right now he is unemployed and needs work and a sponsor. Where are we supposed to get money from? They gave them the paper which states they have to get a Lebanese sponsor and US \$200 or else they will be deported to Syria."

Mouna and her husband are registered with UNHCR, while their son is not. Neither of them can afford to pay the US \$200 and they have not been able to find a Lebanese sponsor. Mouna told Amnesty International that they were unsure what to do next.

⁵⁷ Email correspondence with an agency working with Syrian refugees, May 2015.

⁵⁸ Interviewed by Amnesty International in Minieh, north Lebanon on 27 March 2015.

REGULARIZING RESIDENCY STATUS

One explicit change to the regularization process has been to deny anyone who has entered the country through an irregular border (and therefore illegally) the ability to regularize their status inside Lebanon. Those who entered unofficially must pay a fee of US \$633, leave within five days and can then re-enter if they meet the new entry requirements. If they are not able to pay the fine, they are permanently banned from re-entering Lebanon.⁵⁹

REGULARIZING RESIDENCY STATUS PRIOR TO THE NEW REGULATIONS

While Syrian refugees with expiring or expired residency permits were permitted to renew their residency permits annually under the previous requirements,⁶⁰ some were unable to afford the US \$200 fee or had crossed into Lebanon through an irregular border and consequently they did not have an entry stamp in their passports. They were therefore unable, or struggled, to renew their residency permits. For those who entered unofficially, to regularize their status they had to submit a petition to General Security which General Security could, at their discretion, accept or reject. If the petition was accepted then the refugee was required to pay a fine of US \$633.⁶¹ They did not have to leave the country and re-enter.

In August 2014 the Lebanese government issued a decree that was in effect from September to December 2014, which lifted the fee for the renewal of residency permits and for regularization of those who had entered through an unofficial border crossing. This was a positive step which allowed those without legal status to regularize their situation.⁶²

⁵⁹ NRC, *Legal Status of Refugees from Syria – Overview of the new entry and renewal requirements*, last updated 16 April 2015.

⁶⁰ Prior to the Syria crisis in 1993 Syrian and Lebanese governments signed a *Bilateral Agreement Regulating the Entry and Movement of Persons and Goods*⁶⁰ that committed both countries to facilitate the movement of persons and goods between both countries. The Syria refugee influx from 2012 changed the dynamics of the migration flow between the two countries and meant that Syrians weren't able to return to Syria in order to renew their residency permits, as they had previously done. In June 2013 the General Directorate of General Security announced Syrians could renew their residency permits within Lebanon for a period of six months, and that after one year they would be required either to re-enter Lebanon and obtain a new entry permit, or pay US\$200 per person above age 15. UNHCR, *Admission and Residency, Syrians in Lebanon*, updated on 4 February 2015.

⁶¹ NRC, *The Consequences of Limited Legal Status for Syrian Refugees in Lebanon, Lebanon Field Assessment Part II: North, Bekaa and South*, March 2014, available at: <http://reliefweb.int/report/lebanon/consequences-limited-legal-status-syrian-refugees-lebanon-nrc-lebanon-field-0> (accessed 30 May 2015).

⁶² 3RP in response to the Syria Crisis, *Regional Refugee & Resilience Plan 2015-16: Lebanon*, available at: www.3rpsyriacrisis.org/wp-content/uploads/2014/12/3RP-Report-Lebanon-formatted.pdf (accessed 30 April 2015).

DIFFICULT CHOICES: DWINDLING RESOURCES FOR REFUGEES FROM SYRIA

As noted earlier, Syrian refugees registered with UNHCR who want to renew their residency permits in Lebanon must sign a pledge not to work. This leaves them fully dependent on humanitarian assistance – from UNHCR or other agencies (or, in some cases, assistance from charitable organizations or individuals). However, the amount of humanitarian assistance available to refugees in Lebanon is extremely limited and has been reduced several times in the last 18 months because of shortfalls in the funding of the UN's Regional Resilience and Response Plan.⁶³

The shortages in funding have meant that 72% of Syrian refugees registered with UNHCR receive just US \$19 per month in food vouchers from WFP, in the form of an e-card.⁶⁴ Previously people had received US \$27. The amount of US \$19 per person covers less than 25 % of refugees' minimum basic expenditures.⁶⁵ Moreover, the shortage of funding for the Syrian refugee crisis means that food assistance will need to be further targeted and UNHCR anticipates that the number of refugees receiving food vouchers worth US \$19 per month will drop to 55% by mid-2015.⁶⁶

US \$19 per person per month is less than the US \$1.25 per day, which corresponds to the UN definition of absolute poverty.⁶⁷ It amounts to just US \$0.63 cents per day. In Lebanon a

⁶³ An estimated 29% of Syrian refugees registered with UNHCR are deemed to be severely economically vulnerable because they spend less than US \$435 a month. This is the threshold for the minimum amount of money needed on a monthly basis for a family to survive. However due to funding shortages, the UN is only able to provide 10% of these families identified with support to meet their basic needs. Information based on correspondence with UNHCR Lebanon and the document: Lebanon Crisis Response: *Targeted assistance for Syrian Refugees, Beirut, Lebanon*, February 2015.

⁶⁴ The decision to provide assistance to 72% of the Syrian refugees rather than blanket assistance was reached by WFP following a Vulnerability Assessment for Syrian Refugees in 2013, conducted by a number of agencies providing humanitarian assistance to refugees from Syria. In May-June 2014 75% of registered Syrian refugee families were identified as struggling to meet their food needs, however the percentage of those provided with assistance remained at 72%. See: Lebanon Crisis Response: *Targeted assistance for Syrian Refugees, Beirut, Lebanon*, February 2015; and UNHCR, *Refugees from Syria: Lebanon*, March 2015, pg. 6, available at: <http://reliefweb.int/report/lebanon/refugees-syria-lebanon-march-2015> (accessed 27 April 2015).

⁶⁵ UNHCR, *Lebanon Food Security LCRP Dashboard, April 2015* available at: http://data.unhcr.org/syrianrefugees/working_group.php?Page=Country&LocationId=122&Id=48 (accessed 29 May 2015)

⁶⁶ UNHCR, *Refugees from Syria: Lebanon*, March 2015, pg. 6, available at: <http://reliefweb.int/report/lebanon/refugees-syria-lebanon-march-2015> (accessed 27 April 2015).

⁶⁷ World Bank, *2008 World Development Indicators, Poverty data: A supplement to World Development Indicators 2008*, available at:

loaf of bread at a shop that is part of WFP's food voucher programme costs approximately LB 1500 or US \$1.⁶⁸ Agencies working with Syrian refugees told Amnesty International that in March 2015, following the reduction in assistance, families reported having to prioritize needs and were "reducing the frequency and quantity of meals, prioritizing children's food needs" and increasingly relying on debt."⁶⁹

The majority of Syrian refugees do not receive any housing assistance, with 81% of Syrian refugees that are registered with UNHCR paying rent.⁷⁰ Lebanon does not have any official refugee camps for Syria's refugees and 55% live in informal tented settlements or other sub-standard shelters or buildings.⁷¹ The majority rent privately owned shelters, be it apartments, warehouses, or garages with tenuous lease agreements. Many live in tents, in informal settlements built on privately owned land, where the average rent is set at US \$200 per month per family.⁷²

Many Syrian refugees have health complications linked to the traumatic experiences they faced while still in Syria and subsequently when fleeing the country. Health problems are compounded by complications associated with the extremely difficult conditions that the majority of refugees are forced to live in.⁷³ Access to medical care, especially secondary health care, is extremely limited for Syrian refugees due to the high cost of care, and other factors.⁷⁴

The lack of options and enforced 'pledge not to work' for those registered with UNHCR, as well as the requirements placed on those seeking a Lebanese sponsor, has led to an increase in debt and in negative coping mechanisms. These include a rise in child labour, such as

<http://siteresources.worldbank.org/DATASTATISTICS/Resources/WDI08supplement1216.pdf> (accessed 2 June 2015).

⁶⁸ Skype conversation with Syrian humanitarian worker (29/05/2015)

⁶⁹ Inter-Agency Coordination Lebanon, *Food Security Analysis, Quarterly Dashboard*, January-March 2015, available at: <http://reliefweb.int/sites/reliefweb.int/files/resources/Quarter1-FoodSecurityDashboard.pdf> (accessed 22 May 2015).

⁷⁰ Regional Refugee and Resilience Plan in Response to the Syria Crisis, 2015-2016, *Lebanon*, available at: www.3rpsyriacrisis.org/wp-content/uploads/2014/12/3RP-Report-Lebanon-formatted.pdf, pg. 82 (accessed 22 May 2015); and Amnesty International, *Agonizing choices: Syrian refugees in need of health care in Lebanon*, May 2014, available at: www.amnesty.org/en/documents/mde18/001/2014/en/ (accessed 30 May 2015).

⁷¹ UNHCR Lebanon Shelter LCRP Dashboard April 2015, available at: http://data.unhcr.org/syrianrefugees/working_group.php?Page=Country&LocationId=122&Id=22 (accessed 29 May 2015).

⁷² UNHCR, *Refugees from Syria: Lebanon*, March 2015, pg.8, available at: <http://reliefweb.int/report/lebanon/refugees-syria-lebanon-march-2015> (accessed 27 April 2015).

⁷³ UNHCR, *Refugees from Syria: Lebanon*, March 2015, pg.9, available at: <http://reliefweb.int/sites/reliefweb.int/files/resources/RefugeesfromSyria-LebanonMarch2015.pdf> (accessed 29 May 2015).

⁷⁴ Amnesty International, *Agonizing choices: Syrian refugees in need of health care in Lebanon*, 21 May 2014, available at: www.amnesty.org/en/documents/MDE18/001/2014/en/ (accessed 22 May 2015).

street children begging and working as street vendors⁷⁵, as children are less likely to be stopped at checkpoints, among other things. UNHCR has also indicated a rising number of forced marriages.⁷⁶

⁷⁵ International Labour Organization, *Assessment of the Impact of Syrian Refugees in Lebanon and their Employment Profile*, 2013, pg. 22, available at: www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_240134.pdf; and UNHCR, *Syrian refugees in Lebanon Quarterly snapshot*, January-March 2015.

⁷⁶ During 2014, 67% of reported cases of forced marriage were of children and data collected during the first quarter of 2015 indicates that this tendency is rising. UNHCR, *Syrian refugees in Lebanon Quarterly snapshot*, January-March 2015.

IMPLICATIONS OF HAVING IRREGULAR LEGAL STATUS

Irregular legal status exposes refugees from Syria to a host of vulnerabilities including risk of harassment, arrest and detention by the Lebanese authorities and the curtailment of freedom of movement, owing to not crossing checkpoints due to fear of the above.⁷⁷ This in turn means that refugees may not be able to access public services such as health care and education due to their lack of legal status and their fear of crossing checkpoints without adequate ID, among other things.⁷⁸

Obtaining civil documents such as birth certificates requires valid legal status. According to a UNHCR survey carried out in 2014, 72% of Syria refugee new-borns in Lebanon did not have an official birth certificate due to bureaucratic requirements that parents could not fulfil. These include providing proof of legal stay and marriage certificates, which requires them to have valid residency permits.⁷⁹ The situation for Syrian children born in Lebanon – a situation likely to be exacerbated by the new requirements on residency permit renewal described in this briefing – contravenes Article 7 (1) of the Convention on the Rights of the Child, ratified by Lebanon, which states that “The child shall be registered immediately after birth and shall have the right from birth to a name, the right to acquire a nationality and, as far as possible, the right to know and be cared for by his or her parents.”⁸⁰

⁷⁷ UNHCR, *Syrian refugees in Lebanon Quarterly snapshot*, January-March 2015.

⁷⁸ Email correspondence with an agency working with Syrian refugees, May 2015.

⁷⁹ UNHCR, *Refugees from Syria: Lebanon*, March 2015, available at: <http://reliefweb.int/report/lebanon/refugees-syria-lebanon-march-2015> (accessed 27 April 2015).

⁸⁰ UN OHCHR, *Convention on the Rights of the Child*, available at: www.ohchr.org/en/professionalinterest/pages/crc.aspx (accessed 12 May 2015).

INTERNATIONAL INACTION

The five countries that host the majority - 95%, some 3.8 million people - of Syria's refugees (Lebanon, Turkey, Jordan, Iraq and Egypt) are struggling to cope. The international community has provided extremely limited support and solidarity. The UN's humanitarian appeal for Syria was only 20% funded as of May 2015 and the number of resettlement places offered to refugees from Syria are equivalent to 2.2% of refugees in the main host countries. Syria's neighbouring countries have now reached breaking point.⁸¹ Some countries have resorted to deeply troubling measures including denying people entry to their countries and pushing people back into conflict-affected areas in Syria.⁸²

"After years in exile, refugees' resources are long depleted, and their living conditions are drastically deteriorating. I have met middle-class families with children who are barely surviving on the streets and praying to make it through the winter. Well over half of Syrian refugees in Lebanon are living in insecure dwellings — up from a third last year... With humanitarian appeals systematically underfunded, there just isn't enough assistance to provide for Syrian refugees."

Extract from a speech by UNHCR High Commissioner António Guterres⁸³

Syria's crisis, which entered its fifth year in March 2015, continues to be marred by international inaction in relation to the refugee crisis which is overwhelming neighbouring countries. With a budget shortfall of 81%⁸⁴ and only 85,522 resettlement and other forms of humanitarian admission places offered to refugees from Syria since 2013.⁸⁵ In 2014 and the first three months of 2015, Syrians represented the largest proportion of people risking their lives to cross the Mediterranean by boat to reach Europe.⁸⁶

⁸¹ UNHCR, *UN High Commission for Refugees Antonio Guterres - Written text of speech to UN Security Council*, 26 February 2015, available at: www.unhcr.org/54ef66796.html (accessed 18 May 2015).

⁸² Amnesty International, *Left out in the Cold: Syrian refugees abandoned by the international community*, 5 December 2014, available at: www.amnesty.org/en/documents/MDE24/047/2014/en/ (accessed 4 June 2015).

⁸³ UNHCR, *UN High Commission for Refugees Antonio Guterres - Written text of speech to UN Security Council*, 26 February 2015, available at: www.unhcr.org/54ef66796.html (accessed 18 May 2015).

⁸⁴ UNHCR, *Syrian Regional Refugee Response, Inter-agency information sharing portal*, last updated 21 May 2015, available at: <http://data.unhcr.org/syrianrefugees/regional.php> (accessed 4 June 2015).

⁸⁵ UNHCR, *Resettlement and Other Forms of Admission for Syrian Refugees*, 14 April 2015, available at: www.unhcr.org/52b2febafc5.html (accessed 24 April 2014).

⁸⁶ UNHCR, *Syrians in Southern Europe, UNHCR Regional Update*, March 2015, available at: www.unhcr.it/sites/53a161110b80eeaac7000002/assets/55277a920b80ee7fef003a31/Syrians_in_Southern_Europe_-_External_factsheet_-_2015.pdf (accessed 18 May 2015).

CONCLUSION AND RECOMMENDATIONS

In interviews with refugees from Syria in Lebanon, many expressed feelings of desperation and anxiety as a result of the multiple obstacles they were facing when attempting to apply for or renew residency permits for themselves and their families. The new criteria, such as the requirement to obtain a sponsor or a housing pledge, are in practice extremely difficult to comply with. Refugees – who are entitled to receive protection – are instead being forced into situations where they are not complying with Lebanese legal requirements and are at risk of arrest and deportation. The onerous requirements introduced by Lebanon appear to be part of a deliberate policy to deny refugee to people fleeing Syria and to reduce the number of refugees in Lebanon by making life there next to impossible.

The failure of the international community to provide anything close to adequate support to Lebanon is pushing the protection system in the country to breaking point as fewer refugees receive ever dwindling support.

Both Syrian refugees and Lebanon are being badly let down by the international community. However, the failures of international support cannot justify the measures put in place by Lebanon, particularly those that result in the ultimate betrayal of the refugee protection system: *refoulement*.

In light of its findings, Amnesty International makes the following recommendations.

To the government of Lebanon:

- Allow people fleeing the conflict in Syria to enter Lebanon and exempt them from pre-entry visa or residency requirements;
- In line with the international law principle of *non-refoulement*, ensure that no one fleeing Syria is forcibly returned to Syria, in any manner whatsoever, including deportation and rejection at the border;
- Immediately revoke all instructions to border officials which violate the principle of *non-refoulement*;
- End the suspension of registration of refugees as it is a key mechanism to identify those in need of international protection. Further, allow the UNHCR to re-register those who were de-registered due to their entry date being after 5 January 2015;
- Ensure that all refugees from Syria can renew their residency in Lebanon until there is a fundamental change in circumstances in Syria that means it is safe for them to return. To this end, remove obstacles to residency renewal, including the 'housing pledge', the renewal fee of US \$200, the 'pledge not to work' required by UNHCR registered refugees and the 'pledge of responsibility' required by non-registered refugees. Ensure renewal processes are

transparent and that information is publicly available;

- Allow refugees who have entered Lebanon illegally to regularize their status, without having to leave the country and at no cost;
- End the practice of detaining refugees whose residency documents have expired or who have irregular status;
- Publish clear and transparent information about administrative procedures relating to refugees' stay, legal status, and rights in Lebanon;
- Ensure that all children born in Lebanon can be registered in accordance with Lebanon's obligations under the Convention on the Right of the Child. To this end, allow refugees from Syria to register their children's births regardless of their residency status.

To the international community:

- Substantially increase financial contributions to the UN Regional Refugee and Resilience Plan (3RP);
- Support the government of Lebanon in increasing the capacity of national services to meet the needs of refugees from Syria and the host communities impacted;
- In accordance with the principle of shared responsibility and burden sharing, enshrined in the Refugee Convention, increase the number of resettlement and humanitarian admission places for refugees from Syria that are currently hosted in Lebanon and other neighbouring countries to 380,000 places by the end of 2016, over and above existing quotas; resettlement should be equally available to Syrian refugees and Palestinian refugees from Syria;
- Recognize resettlement as an important durable solution and protection mechanism that is distinct from humanitarian assistance.

To Syria's neighbouring countries including Lebanon, Jordan, Turkey, and Iraq:

- Allow all persons fleeing the conflict in Syria to enter and exempt them from pre-entry visa or residency requirements;
- In line with the international law principle of *non-refoulement*, ensure that no one fleeing Syria is forcibly returned to Syria, in any manner whatsoever, including rejection at the border.

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