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Policy Brief

Supporting the Future of Syria and the Region: The Lebanese Government's Redundant Commitments and Slow Progress

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About the author
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Executive Summary

Lebanon has hosted Syrian refugees since the beginning of the conflict in Syria, leading the country to have the highest refugee per capita rate in the world. The international community has recognized this as a global public good, and has been providing unconditional humanitarian assistance to Lebanon and other neighboring host countries by holding annual donor pledging conferences since 2013. At the same time, the Lebanese government has made a number of policy commitments to tackle the refugee response since 2016, which have been reiterated year after year, to a point that it did not present any new pledges during the last Brussels conference in 2019. Monitoring the government's progress, it has become apparent that Lebanon has failed to fulfill its promises: Out of the twenty-two commitments made to the international community, the government has met only one. Commitments such as pledges linked to CEDRE, developing action plans, ensuring the application of residency fee waiver, and respecting the principle of non-refoulement were either not implemented or violated. In addition, twelve commitments were unclear and either refer to overarching objectives or require more information to identify clear action and measure progress. This policy brief concludes that in light of the existing international humanitarian assistance due to the presence of Syrian refugees, the Lebanese government should make most use of the available assistance and ensure a sustainable impact on the public sector and service delivery by respecting the commitments it made throughout the years.

1
The Lebanese government estimates hosting 1.5 million Syrian refugees, more than the 914,649 UNHCR-registered Syrian refugees as of December 2019, in addition to 27,700 Palestinian refugees from Syria and around 180,000 Palestinian refugees. UNHCR. 2019. 'Syria Refugee Response Lebanon Syrian Refugees Registered - 31 December 2019.'

2
Development Initiatives. 2019. 'Global Humanitarian Assistance Report 2019.'

3
UNHCR. 2019. 'Global Trends Forced Displacement in 2019.'

Introduction

Lebanon currently hosts the highest number of refugees per capita in the world with over 1 million Syrian refugees.[1] Since the arrival of refugees to Lebanon with the start of the Syrian war in 2011, the international community has spearheaded the humanitarian response. This is due to the absence of the Lebanese government's political will and financial resources to address the crisis as well as the absence of a legal framework addressing Syrian refugees in Lebanon. In 2015, the UNHCR, UNDP, and the Ministry of Social Affairs (MoSA), on behalf of the Lebanese government, developed the Lebanon Crisis Response Plan (LCRP), a sectoral response strategy addressing Syrian refugees and vulnerable host communities.

To date, seven international donor conferences have been held to support Syria and neighboring countries with the displacement of Syrian refugees. The first three, entitled 'International Humanitarian Pledging Conference for Syria', were held in Kuwait in 2013, 2014, and 2015. In 2016, the 'Supporting Syria and the Region' conference was held in London, and the remaining three, 'Supporting the Future of Syria and the Region', were held in Brussels in 2017, 2018, and 2019.

In the absence of a state-led response to the humanitarian crisis in Lebanon, the international community took the lead to address the refugees' needs

In the absence of a state-led response to the humanitarian crisis in Lebanon, the international community took the lead to address the refugees' needs. Lebanon was among the 10 largest recipients of international humanitarian assistance in 2017, which amounted to $11.6 million.[2]

This policy brief assesses the Lebanese government's progress on commitments made during the Brussels II donor conference. The first section presents an overview of the international donor pledging conferences supporting Lebanon with the Syrian refugee presence in the country. The second section identifies commitments made by the Lebanese government during donor conferences in the past three years and reports on its progress in implementing those commitments.

Appeals, Commitments and Funding Received to Support Syria and Neighboring Countries

The start of the war in Syria in 2011 has led to the world's largest refugee and displacement crisis with more than 6 million internally displaced persons and 6.6 million UNHCR-registered refugees.[3] The international community mobilized financial support to address the refugee crisis, by organizing donor conferences that have been convened annually since 2013 in Kuwait City, London, and Brussels (table 1).

Table 1

International pledging conferences tackling the Syrian crisis

date	Conference	Location	Appeals	Pledges[4]
3 January, 2013	International Humanitarian Pledging Conference for Syria[5]	Kuwait City, Kuwait	$4.39 billion Syrian Humanitarian Assistance and Response Plan (SHARP): $1.41 billion Regional Response Plan (RRP): $2.98 billion[6]	$1.54 billion[7]
15 January, 2014	Second International Humanitarian Pledging Conference for Syria[8]	Kuwait City, Kuwait	$6.54 billion SHARP: $2.28 billion RRP: $4.26 billion[9]	$2.4 billion[10]
13 March, 2015	Third International Humanitarian Pledging Conference for Syria[11]	Kuwait City, Kuwait	$8.4 billion Syria Response Plan (SRP): $2.9 billion Regional Refugee & Resilience Plan (3RP): $3.4 billion 3RP Resilience/stabilization component: $2.1 billion	$3.6 billion
4 February, 2016	Supporting Syria and the Region[12]	London, United Kingdom	$7.73 billion Syria Humanitarian Response Plan (HRP): $3.18 billion 3RP: $4.55 billion[13]	$11.2 billion 2016: $5.8 billion 2017-2020: $5.4 billion[14]
4-5 April, 2017	Supporting the Future of Syria and the Region[15]	Brussels, Belgium	$8 billion HRP: $3.4 billion 3RP: $4.6 billion	$9.7 billion[16] 2017: $6 billion 2018-2020: $3.7 billion
24-25 April, 2018	Supporting the Future of Syria and the Region[17]	Brussels, Belgium	$9.11 billion HRP: $3.51 billion 3RP: $5.6 billion[18]	$7.8 billion 2018: $4.4 billion 2019-2020: $3.4 billion[19]
12-14 March, 2019	Supporting the Future of Syria and the Region[20]	Brussels, Belgium	$8.83 billion HRP: $3.33 billion 3RP: $5.5 billion	$9.4 billion 2019: $7 billion 2020 and beyond: $2.4 billion

4
Pledges target the Syria Humanitarian Response Plan, Regional Refugee and Resilience Plan, or other appeals.

5
'Second International Humanitarian Pledging Conference for Syria Concept Note.' 2013. UNOCHA.

6
'Second International Humanitarian Pledging Conference for Syria.' 2014. UNOCHA.

7
'Second International Humanitarian Pledging Conference for Syria Concept Note.' 2013.

8
'Second International Humanitarian Pledging Conference for Syria.' 2014.

9
'Second International Humanitarian Pledging Conference for Syria Concept Note.' 2013. UNOCHA.

10
'Third International Humanitarian Pledging Conference for Syria Conference Report.' 2015. UNOCHA.

11
Ibid.

12
'Co-hosts declaration from the Supporting Syria and the Region Conference'. 2016. The National Archives.

13
'Overview: 2016 Syria Humanitarian Response Plan & 2016 - 2017 Regional Refugee and Resilience Plan.' 2016. United Nations.

14
'Co-hosts declaration from the Supporting Syria and the Region Conference.' 2016.

15
'Supporting the Future of Syria and the Region: Post-Brussels Conference Financial Tracking.' 2017. European Council.

16
The pledge appears higher than the appeal as it includes pledges beyond 2017.

17
'Supporting the Future of Syria and the Region - Brussels conference.' 2018. European Council.

18
Syria Crisis 2018 Needs Overview and Funding Requirements. 2018. United Nations.

19
'Supporting the Future of Syria and the Region - Brussels conference.' 2018.

20
'Supporting the Future of Syria and the Region - Brussels III conference.' 2019. European Council.
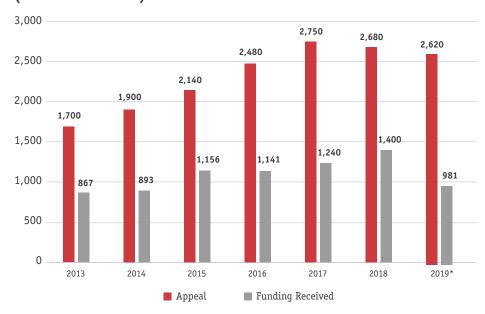
21
Government of Lebanon and the United Nations. 2019. 'Lebanon Crisis Response Plan 2017-2020 (2019 Update)'; Inter-Agency Coordination Lebanon. 2017 'LCRP 2017 End Year Funding Update v2'; Inter-Agency Coordination Lebanon. 2018. 'LCRP 2018 End Year Funding Update v1'; and Inter-Agency Coordination Lebanon. 2019. 'LCRP 2019 Quarter 3 Funding Update v2.'

The international community has pledged billions of dollars to the regional response. However, funding to Lebanon over the years fell short from the response needs (figure 1). On average, the support that Lebanon received from donors was half of what was needed and requested.

Figure 1

Funding received by Lebanon compared to response needs (in millions of USD)

*Received funds for 2019 includes the period of January-September 2019[21]

Sources **Government of Lebanon and the United Nations. 2019. 'Lebanon Crisis Response Plan 2017-2020 (2019 Update)'; and Inter-Agency Coordination Lebanon. 2017-2019. 'LCRP End Year Funding Update.'**

Lebanese Government Commitments Since 2016: Redundant Promises and Immeasurable Progress

Although the government has been making commitments since the 2016 London Conference,[22] it has shown little progress toward achieving them. The 2018 Brussels II conference's 'Lebanon Partnership Paper' was the last document presenting new commitments: During the 2019 Brussels III conference, the Lebanese government simply extended the promises made in 2018. It should be noted that several factors affected the authorities' work: The parliamentary election, which took place after the Brussels II conference, and the post-elections government formation which took over eight months at the time.

The following section identifies the government's various commitments during the 2018 Brussels II conference, based on sectoral relevance. Out of twenty-two commitments, ten are clear actionable and twelve are unclear ones whose progress is difficult to monitor. Out of the ten precise commitments whose progress is measurable, the government has implemented only one, failed to implement six, while data to determine the status of the remaining

22
London Conference. 2016. 'Lebanon Statement of Intent Presented by the Republic of Lebanon'; Supporting the Future of Syria and the Region Brussels Conference. 2017. 'Annex: Supporting resilience and development effort of host countries and refugees in the context of the Syrian crisis - Lebanon'; Supporting the Future of Syria and the Region Brussels II Conference. 2018. 'Lebanon Partnership Paper.'

three commitments is lacking. As for the remaining twelve commitments, seven pertain to overarching objectives, two lack data to identify specific committed actions and measure progress, and three are unclear due to the way they are presented in the partnership paper. The work on the commitments made during the Brussels II conference requires monitoring, through the identification of specific, realistic, and measurable benchmarks. A framework for that purpose is in the process of being developed by the Lebanese government, the European Union, and the United Nations.[23]

During the 2019 Brussels III conference, the Lebanese government simply extended the promises made in 2018

23
Interview held with an operational response actor, on 7 June, 2019 in Beirut.

Table 2

The ten clear commitments

Status	Commitment	Progress
Met	Developing a National Strategy for Technical Vocational Education and Training	Education
Unmet	Developing an action plan accompanying the National Strategy for Technical Vocational Education and Training	Education
	Finalizing an action plan to the Lebanese youth strategy adopted by the Council of Ministers in 2012	Education
	Developing and implementing a long-term vision on the educational sector set out in annual operational plans	Education
	Reiterating that the main durable solution for Syrian refugees in Lebanon is their safe, dignified, and non-coercive return to Syria, in accordance with international law and the treaty of non-refoulement	Protection
	Ensuring all eligible refugees can renew their residency free of charge	Protection
	Reaffirming the CEDRE conference commitments	Livelihoods
Insufficient data to determine status	Bringing down the number of children outside any form of learning	Education
	Retaining children who are already in the formal system	Education
	Strengthening the system through sound performance measurement, cost-efficiency, and transparency of financial and delivery data	Education

Met commitment

The only commitment that the government has met relates to the education sector. It has developed and adopted the 'National Strategic Framework for Technical Vocational Education and Training in Lebanon' (2018-2022) in 2018.[24]

24
Ministry of Education and Higher Education. 2018. 'National Strategic Framework for Technical Vocational Education and Training in Lebanon.'

25
Ibid.

26
Youth Forum for Youth Policy. 2012. 'The Document of the Youth Policy in Lebanon.'

27
Legal Agenda. 2019. 'Position Paper on the Decision to Summarily Deport Syrian Nationals Who Entered Lebanon Irregularly.'

28
Ibid.

29
Human Rights Watch. 2019. 'Syrians Deported by Lebanon Arrested at Home.'

30
Legal Agenda. 2019. 'Position Paper on the Decision to Summarily Deport Syrian Nationals Who Entered Lebanon Irregularly.'

31
The Russian Initiative refers to the Russian government's initiative for the return of Syrian refugees to Syria, for which it sought the support of Western leaders as well as Syrian refugee hosting countries in 2018. Although details of this initiative have not been disclosed, such returns require international support and funding as well as UNHCR monitoring. See: Issam Fares Institute. 2018. 'Position Paper on Russia's Initiative For The Return of The Syrian Refugees to Their Country.'

32
National News Agency. 2019. 'Hariri at Brussels III: We are Committed to Working with UNHCR on Any Pragmatic Initiative That Ensures the Safe Return of the Displaced Syrians, Including the Russian One.'

33
The Daily Star. 2019. 'Refugees Minister to Submit Return Plan to Cabinet 'Soon'.

Unmet commitments

As for the six unmet commitments, their status is as follows: Although the government adopted the technical vocational education and training strategy, it has not adopted an accompanying action plan for it. The strategy states that relevant institutions will develop their own action plans to monitor progress.[25] Similarly, the 'Document of the Youth Policy in Lebanon',[26] endorsed by the Council of Ministers in 2012, has also not been met with an action plan as promised. Moreover, the government failed to develop and adopt a national education strategy, though there is a sectoral response plan addressing Syrian refugees, namely the Reaching All Children with Education (RACE) I and II strategies.

In terms of protection, the government has not respected its commitment to abide by the principle of non-refoulement. The government has made it clear on numerous occasions that Lebanon is neither a destination for refugees nor a country in which they would integrate. Instead, Lebanon would just be a place of transit for them. According to the government, the main durable solution is their safe return to Syria in accordance with the principle of non-refoulement, as well as resettlement to a third country. This position is acknowledged by international partners and iterated in papers presented in the London, Brussels I, and Brussels II conferences. In light of this, and based on the Higher Defense Council's (HDC) decision, the General Directorate of the General Security issued, on 13 May,

> **The government has made it clear on numerous occasions that Lebanon is neither a destination for refugees nor a country in which refugees would integrate**

2019, a decision (No. 43830/ ع.م.ق) to deport Syrians who entered Lebanon illegally after 24 April, 2019.[27] Although the HDC does not have the authority to deport foreigners,[28] 2,731 Syrians were deported between 21 May and 28 August, 2019 without a due judiciary process,[29] in violation of the principle of non-refoulement.[30] In addition, former Prime Minister Saad Hariri committed publicly to safe returns and mentioned the Russian initiative—an unclear proposal which supports the return of Syrian refugees to Syria—during the Brussels III conference.[31, 32] Furthermore, the Lebanese State Ministry for Displaced Affairs was developing a national scale plan on refugee returns to Syria, which was to be presented to the Council of Ministers before it resigned in October 2019.[33]

The government has not sufficiently ensured that all eligible refugees can renew their residency free of charge, due to the inconsistent application of the residency fee waiver[34] and the complicated procedure of acquiring legal residency.[35] The latter is important for Syrian refugees' protection, as residency facilitates access to justice and mobility. This waiver has not had the intended result, as 73%[36] and 88%[37] of Syrian refugees over the age of

15 reported not having legal residency in 2018 and 2019 respectively. More-over, only 10% of Syrian households with all members aged 15 and above had a legal residency permit in 2019.[38] In 2015, the government adopted a series of entry and residency policies[39] including imposing an annual fee of $200 to acquire residency permits and requesting from UNHCR to suspend the regis-tration of Syrian refugees. As a result, the percentage of Syrian households with all members aged 15 and above holding legal residency decreased from 58% in 2014 to 28% in 2015.[40] Waiving the residency fee and improving the regulatory framework related to Syrian refugees were key factors that the government recognized in its statement of intent during the 2016 London conference. As a result, it waived the residency fees for Syrian refugees who had registered with the UNHCR before 2015. However, the waiver is not applicable to those who hadn't registered with UNHCR to be able to work legally, as registering required that they 'pledged not to work' and also excludes Syrian refugees who have entered Lebanon after 2015. Furthermore, advocacy efforts to expand the fee waiver have not been met with a com-mitment by the government in the 2018 and 2019 Brussels conferences.

Only 10% of Syrian households with all members aged 15 and above had a legal residency permit in 2019

In the Brussels II conference partnership paper, livelihoods commitments were framed within the context of macro-scale economic reform measures rather than specific employment interventions for vulnerable Syrian and Lebanese, namely by reiterating the Conférence économique pour le développement, par les réformes et avec les entreprises (CEDRE) commitments. Less than a month before the Brussels II conference, the international donor community convened in Paris for the CEDRE conference in support of the Lebanese economy whereby the government committed to a structural and sectoral reform agenda[41] in exchange for funding pledges for the 'Capital Investment Plan' (CIP) that includes a list of 269 infrastructural projects.[42] CEDRE was framed in the context of the spillover effects of the war in Syria and the impact of the resulting refugee crisis on the Lebanese economy and infrastructure. CIP projects were prioritized based on mitigating impacts of refugees' presence in the transport, water and irrigation, wastewater, electricity, and telecommunications sectors. Over two years after CEDRE, the government still has shown little progress in implementing reforms.[43] On 17 October, 2019, ongoing nationwide protests erupted in light of the country's dire economic situation that includes poor fiscal management, high income inequality, low growth rates, high public debt, poverty, and unemployment.

CEDRE's 'Vision for Stabilization, Growth and Employment' discusses generating inclusive job creation and equitable access to employment oppor-tunities without mentioning whether these would be available for Lebanese only or for other nationalities as well. Furthermore, the CIP identified 35

34
Yassin, N. 2018. '101 Facts & Figures on the Syrian Refugee Crisis.' Issam Fares Institute for Public Policy and Interna-tional Affairs.

35
Government of Lebanon and the United Nations. 2019. 'Lebanon Crisis Response Plan 2017-2020 (2018 Update).

36
Ibid.

37
UNHCR, UNICEF, and WFP. 2019. 'Vulnerability Assessment of Syrian Refugees in Lebanon.'

38
Ibid.

39
Atallah, S. and D. Mahdi. 2017. 'Law and Politics of 'Safe Zones' and Forced Return to Syria: Refugee Politics in Lebanon.' The Lebanese Center for Policy Studies.

40
UNHCR, UNICEF, and WFP. 2018. 'Vulnerability Assessment of Syrian Refugees in Lebanon.'

41
The Lebanese government committed to 73 reform measures. Atallah S., G. Dagher, and M. Mahmalat. 2019. 'The CEDRE Reform Program Needs a Credible Action Plan.' The Lebanese Center for Policy Studies.

42
Atallah S., G. Dagher, and M. Mahmalat. 2019. 'CEDRE Capital Investment Plan: Scrutinizing the Allocation of Projects and Funds Across Regions.' The Lebanese Center for Policy Studies.

43
Based on ongoing LCPS research monitoring the Lebanese govern-ment's progress in implementing CEDRE's commitments. For further information, refer to the LCPS Government Monitor.

projects as "response to Syrian crisis through generated employment" and two that would provide "employment for habitants and displaced Syrians", namely in Ibl es Saqi Dam and Khardali Dam in South Lebanon. While the CEDRE documents vaguely address employment for Syrian refugees, the government committed during Brussels I to provide job opportunities for Lebanese as well as Syrian refugees within the CIP.

Economic commitments during the Brussels I conference built up to CEDRE by emphasizing on structural reforms, CIP, and Public-Private Partnerships. Livelihoods commitments have drastically changed after Brussels I. The prior London conference announced the potential creation of 300,000 to 350,000 jobs, "60% of which could be for Syrians".[44] The government committed to lifting the 'pledge not to work' that UNHCR-registered Syrian refugees were required to sign, making them depend on humanitarian assistance for their livelihood; however, this has been implemented inconsistently.[45] Although it also recognized the importance of facilitating access to work permits for Syrians in 2016, those licenses are accessible within the sponsorship system and conditional to Syrian refugees' renunciation of their registration with the UNHCR.[46] Due to unregulated informal employment, limited job opportunities, and the dire economic state, the Ministry of Labor enforced in 2019 measures to formalize informal labor (Decision No. 8 of May 2019) and adopted guidelines on foreign labor including quotas and occupations (Decisions No. 1/41 and 1/49 of January 2019).

The CIP identified 35 projects as 'response to Syrian crisis through generated employment' and two that would provide'employment for habitants and displaced Syrians'

Commitments with insufficient data to determine their status

As for the remaining three commitments, limited data was available to determine their status. The government committed to continue and renew efforts to decrease the number of children outside any form of education. The absence of accurate and unified data on Syrian refugees, including the number of children enrolled in formal and non-formal education programs, is the main impediment to tracking children's access to education and identifying children that are out of school or any form of learning. A starting point in this regard is collectively identifying these children as well as ensuring the provision of education opportunities. Similarly, the government committed to continue and renew efforts to retain children already in the formal education system, and so the collection and publication of microdata tracking each student's educational enrollment is required in this regard. In addition, lack of data also limits monitoring progress in strengthening the education system through sound performance measurement, including teachers' and students' performance, cost-efficiency, and transparency of financial and delivery data.

44
London Conference. 2016. 'Lebanon Statement of Intent Presented by the Republic of Lebanon.'

45
Human Rights Watch. 2017. 'Lebanon: New Refugee Policy a Step Forward.'

46
The sponsorship system entails the provision of a work permit to a foreign national through a pledge of responsibility obtained by a Lebanese sponsor who is the employer as well.

Table 3

The twelve unclear commitments

Status	Commitment	Sector
Overarching Objectives	Continuing to meet refugees' needs based on the LCRP	General Response
	Supporting and upholding the rule of law to preserve a dignified stay for refugees	Protection
	Reaffirming commitment to the London Syria conference and Reaching All Children with Education (RACE II) goals of having all children and youth accessing quality education	Education
	Addressing barriers to education	Education
	Supporting the healthcare sector to maintain its resilience	Health
	Supporting the healthcare sector to prevent the deterioration of vulnerable populations' health in Lebanon	Health
	Supporting the development of Lebanon's social protection systems	Social Protection
Lack of data	Expanding the financial tracking system as well as monitoring and evaluation under the LCRP steering committee to ensure follow-up of the commitments made during the conference	General Response
	Reviewing the appropriateness and impact of the response	General Response
Commitment without an action	Acknowledging the importance of having accurate data on Syrian refugees in Lebanon	General Response
Unclear actionable steps to measure progress	Fostering stronger national ownership of the response by developing coherent and integrated national development frameworks	General Response
Vague	Implementing former agreements not yet met	General Response

The 'Lebanon Partnership Paper' presents commitments that are not clear since they are not tied to specific achievable actions. Instead, they are either overarching response or sectoral objectives, or require more information in order to be clear in terms of the specific actions pertaining to achieving the commitments.

47
Such policies include a set of decisions taken in the first half of 2019 to deport Syrians who have entered Lebanon illegally after 24 April (Decision No. 43830/ع.م.ق of May 2019), to enforced measures to formalize informal labor (Decision No. 8 of May 2019) and adopted new guidelines on foreign labor including quotas and occupations (Decisions No. 1/41 and 1/49 of January 2019), as well as to demolish structures of informal tented settlements based on The Lebanese Construction Law Act, No. 646 of 2004.

48
London Conference. 2016. 'Lebanon Statement of Intent Presented by the Republic of Lebanon.'

49
Ministry of Education and Higher Education. 2014. 'Reaching All Children with Education.'

50
UNHCR, UNICEF, and WFP. 2018. 'Vulnerability Assessment of Syrian Refugees in Lebanon.'

Overarching objectives

Seven commitments refer to overarching objectives that the government and its international partners strive to meet in the long term. First, they generally committed to continue working toward LCRP objectives to meet refugees' needs, yet their work is dependent on available funding, targeting mechanisms, and aid allocation. Moreover, working toward the LCRP objectives is also affected by ad hoc policies implemented by the government.[47]

Second, the government committed to support and uphold the rule of law to preserve a dignified stay for refugees. In light of this, and with the absence of a national legal framework for refugees, municipal level policies—such as curfews, evictions, and detention of Syrians—should be observed and controlled within the rule of law. In 2016, the Lebanese government committed "to launch a new approach and vision on how to manage the temporary and ongoing stay of the Syrians in a way that is neither prejudicial to the interests of the country nor to those of the Lebanese citizens."[48] However, the government has neither implemented nor reiterated this commitment in following conferences.

Third, the government reaffirmed its commitment to the RACE II strategy (2017-2021), which primarily aims for equitable access to quality education, whether formal or non-formal.[49] In light of RACE I, the government introduced the second shift for Syrian students enrolled in public schools in 2014 as well as non-formal education opportunities that aim to decrease the number of children outside any form of education. There are 488,000 Syrians between the ages of 3 and 18 in Lebanon, and less than half of them are enrolled in public schools.[50] Enrollment rates in the past few years have been steady, with 59,149 and 154,209 non-Lebanese students enrolled in the first and second shifts respectively during the 2017-2018 academic year, and 52,000 and 156,000 non-Lebanese students enrolled in the first and second shifts respectively during the 2018-2019 academic year.[51] In 2018-2019, 346 schools provided second shift.[52] In addition, there are raised concerns relating to the quality of education, like the outdated Lebanese curriculum[53] and unmonitored non-formal education programs.[54] In order to monitor progress in this topic, the government should define actionable tasks toward reaching equitable access and quality education and to ensure progress on the RACE II overarching objectives. Multiyear subsidies are needed to upscale outreach since the education sector is greatly dependent on international funding.[55]

> **There are 488,000 Syrians between the ages of 3 and 18 in Lebanon, and less than half of those school aged Syrian refugees are enrolled in public schools**

51
Ministry of Education and Higher Education. 2019. 'RACE II Fact Sheet.'

52
Ibid.

53
Ministry of Education and Higher Education. 2014. 'Reaching All Children with Education.'

54
Interview with a government actor, on May 13, 2019 in Beirut.

55
Ibid.

Fourth, the government also committed to addressing barriers to education, another overarching objective. Syrian refugees report various additional obstacles to education: For children between the ages of 3 and 5, their age

was the main reason for not attending school,[56] while for children between the ages of 6 and 14, transportation costs (13%) and education material's costs (10%) were cited as the main reasons.[57] Among adolescents between the ages of 15 and 17, the need to work (10%) and marriage (7%) were the main reasons reported for not attending.[58] As addressing such barriers is crucial, progress should also be measured in relation to other obstacles faced in accessing education opportunities, such as the capacity of public schools in enrolling new children and the availability of alternative education pathways. Specific barriers to education should be broken down to actionable objectives and monitored accordingly.

Fifth, supporting the healthcare sector's resilience is a long-term objective that does not relate to specific actions in order to be met. This entails strengthening the strained healthcare system and capacity building in terms of financial, structural, and human resources, to absorb the additional demands and to provide quality care.[59] With the support of international partners and operational response actors, healthcare services provided to Syrian refugees include hospital care and primary healthcare. Syrians can access 53 hospitals across the country—public and private—with subsidized care for obstetric care and life-threatening conditions.[60] Moreover, in terms of primary healthcare, Syrians can access the existing structures that also cater to Lebanese beneficiaries. These include the Ministry of Public Health's (MoPH) network of 220 Primary Healthcare Centers (PHCs), the Ministry of Social Affairs' 220 Social Development Centers (SDCs), around 700 mostly NGO health clinics, as well as Mobile Medical Units (MMUs) that provide parallel healthcare services.[61] The support includes providing direct healthcare services and mobilizing vulnerable communities to go to existing healthcare facilities, like having beneficiaries go to PHCs for healthcare services rather than MMUs. Moreover, Lebanon's healthcare sector has continuously responded to the needs of Syrian refugees while also mitigating shocks such as containing disease outbreaks,[62] and it remains at risk of disease outbreaks, like tuberculosis, measles, mumps, hepatitis A, cholera, to cite just a few.[63]

Sixth, the government committed to support the healthcare sector to prevent the deterioration of the health status of vulnerable populations in Lebanon. The commitment, however, did not specify how the government intends to provide such support. More Syrian households required primary healthcare services: It increased from 46% in 2017 to 54% in 2018, reaching 63% in 2019.[64] Of those who required those services, 90% reported receiving the required care, a slight increase from 87% in 2018.[65] This indicates that beneficiaries seeking primary healthcare were able to get it, but it does not indicate the quality of the services provided. Inability to cover healthcare costs is the main barrier to accessing primary healthcare, including the doctors' fees (75%), costs of drugs, diagnostic tests or treatments (57%), and transportation (28%).[66] Moreover, 22% of Syrian households reported needing

56
UNHCR, UNICEF, and WFP. 2019. 'Vulnerability Assessment of Syrian Refugees in Lebanon.'

57
Ibid.

58
Ibid.

59
Interview held with an operational response actor, on 29 November, 2019 in Beirut.

60
Government of Lebanon and the United Nations. 2017. 'Lebanon Crisis Response Plan 2017-2020.'

61
Ibid.

62
Ammar, A. et al. 2016. 'Health System Resilience: Lebanon and the Syrian Refugee Crisis.' Journal of Global Health.

63
WHO. 2014. 'Who Donor Snapshot - Lebanon.'

64
UNHCR, UNICEF, and WFP. 2019. 'Vulnerability Assessment of Syrian Refugees in Lebanon.'

65
Ibid.

66
Ibid.

67
Ibid.

68
Ibid.

hospitalization in the prior six months, out of which 81% could access the required care in 2019.[67] The main reason for not being able to access care was treatment costs (80%).[68] Due to the patients' inability to cover hospitalization bills, public hospitals are faced with a $15 million deficit from MoPH that has accumulated since 2011.[69] This is due to unmet funding coverage for hospitalization costs of subsidized or unsubsidized care for Lebanese and non-Lebanese.[70]

Public hospitals are faced with a $15 million deficit from MoPH that has accumulated since 2011

69
Government of Lebanon and the United Nations. 2017. 'Lebanon Crisis Response Plan 2017-2020'.

70
Ministry of Public Health. 2016. 'Health Response Strategy'.

71
Supporting the Future of Syria and the Region Brussels II Conference. 2018. 'Lebanon Partnership Paper.'

Seventh, the commitment to support the development of Lebanese social protection systems was made by the government and international partners. A national policy on social protection is currently being developed by the government with UNICEF's support. This commitment highlights a "particular emphasis on reforming and expanding the National Poverty Targeting Program, drawing from the experience of humanitarian social safety nets, and emphasizing a graduation approach into active labour market participation."[71]

Commitments that lack data to measure progress

There is a lack of data as to the government's progress in meeting two commitments. First, the government pledged to expand the financial tracking system as well as monitoring and evaluation under the LCRP steering committee. However, it is unclear what the public authorities' role has been in this regard.

Second, the government and the international community also committed to review the appropriateness and impact of the response. Operational response actors continuously evaluate this via vulnerability assessments and response targets presented in the funding appeals. Moreover, LCRP's mid-term review, conducted in 2019 with the purpose of planning post 2020, confirmed that the response remains highly relevant as it focuses on humanitarian and stabilization efforts.[72] However, the government's role in assessing the appropriateness and impact of the response is undetermined.

In 2015, the government requested UNHCR to suspend the registration of Syrian refugees, affecting their status and limiting the presence of accurate data on Syrians in the country

72
TRIAS Consult and Particip. 2019. 'Mid Term Review of the Lebanon Crisis Response Plan (2017-2020) and United Nations Strategic Framework (2017-2020)'.

Vague commitments

The government made three additional unclear commitments, one that is not tied to an action but is rather an acknowledgement, one with unclear actions or intentions, and another that is vague in terms of content.

In 2015, the government requested UNHCR to suspend the registration of Syrian refugees, affecting their status and limiting the presence of accurate data on Syrians in the country. It also affected UNHCR's ability to respond to

unregistered Syrians' needs in the country, to support their returns and integration in Syria, as well as resettlement.[73] The importance of restoring UNHCR registrations was referenced in the 2018 Brussels II conference document. Although the Lebanese government has not committed to resuming registrations, it has recognized the importance of accurate statistics on the Syrian refugee population. However, it did not specify any steps that would potentially be taken in this regard.

Moreover, the government committed to fostering stronger national leadership and ownership of the response by developing coherent and integrated national development frameworks that would be based on needs assessments. This commitment neither detailed the specific actions that should be taken nor identified certain sectors that are included in it. It was followed by a statement that explained the importance of 1) using national structures and services as appropriate, 2) implementing reforms in the government's public service delivery structures, and 3) facilitating work permits, entry visas, and residency permits for INGOs. The latter part of the statement referred to the former Lebanese foreign minister's decision to freeze the issuance of residence permits to international UNHCR staff.[74]

In addition, the government committed to implementing former agreements but the 'Lebanon Partnership Paper' does not refer to any specific ones. This commitment is hence vague in terms of content with immeasurable progress in this regard.

Optimizing the Impact of Humanitarian Funding

The government's commitments to the international community aim to facilitate policy frameworks and to cooperate with international partners in order to strengthen the progress on meeting the LCRP objectives. The commitments outlined in the Brussels II 'Lebanon Partnership Paper' are to ensure the protection of Syrian refugees, address their needs, as well as improve service delivery to them and vulnerable host communities. Humanitarian needs of Syrian refugees remain valid, since their displacement has been protracted and the Lebanese government has not shown substantial progress after over two years and two months of making these commitments. When it comes to refugees' presence in Lebanon, protection and livelihoods-related commitments have shown limited progress due to the lack of political will to either adopt policies or to implement them coherently. However, the government's pledges to the education, social protection, and health sectors require the development of realistic and clear indicators in order to be able to measure and reflect progress. And for that purpose, there is a crucial need to strengthen transparency and accountability.

Lebanon's poor infrastructure and weak public sector and delivery of social services predate Syrians' displacement in the country. The need to build the capacity of public institutions and develop inclusive actionable sectoral

73
UNHCR. 'Protection.' https://www.unhcr.org/lb/protection

74
UNHCR. 2018. 'Spokesperson's comment on Lebanon.'

strategies is evident for the country itself. As the need for humanitarian funding persists and the international donor community continues to support the response, the Lebanese government should make most use of this opportunity and ensure that funds are used in a way that will leave a sustainable and positive impact behind by strengthening public sector institutions and improving the quality of public service delivery.

LCPS

About the Policy Brief
A Policy Brief is a short piece regularly published by LCPS that analyzes key political, economic, and social issues and provides policy recommendations to a wide audience of decision makers and the public at large.

About LCPS
Founded in 1989, the Lebanese Center for Policy Studies is a Beirut-based independent, non-partisan think-tank whose mission is to produce and advocate policies that improve good governance in fields such as oil and gas, economic development, public finance, and decentralization.

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