
FREEDOM OF EXPRESSION AND DIGITAL RIGHTS IN LEBANON

UNIVERSAL PERIODIC REVIEW SUBMISSION SESSION 51, 4TH CYCLE

SUBMITTING ORGANISATIONS

Small Media Foundation is a UK-based organisation that works to support the free flow of information in politically closed societies. The non-profit engages in research, advocacy, and training activities to support global advocates to uphold citizens' rights to freedom of expression and access to information. The Uproar programme is a Small Media initiative championing digital rights in over 34 countries across Africa, MENA region and Central Asia through the Universal Periodic Review.

SEEDS is a Beirut-based non-profit organization founded in 2016 that works to make legal knowledge accessible and empower individuals—especially marginalized groups—to claim their rights. Through its legal clinic, public campaigns, and policy advocacy, SEEDS promotes legal literacy, challenges restrictive laws, and pushes for reforms that expand civic space and uphold human rights. Its work spans legal education, strategic litigation, and community engagement, with a strong focus on freedom of expression, equality, and social justice.

University of Birmingham is a public research university based in Birmingham, England. Part of the prestigious Russell Group and founded in 1825, is part of an international network of research universities focussing on science and the humanities.

INTRODUCTION

1. The Universal Periodic Review (UPR) is an important UN mechanism aimed at addressing human rights issues across the globe. Small Media and Seeds for Legal Initiatives (SEEDS) welcome the opportunity to contribute to Lebanon's fourth review cycle.
2. At Lebanon's third cycle Universal Periodic Review (UPR) in 2019, Small Media, SMEX and Access Now made the following recommendations: ensure both online and offline freedom of expression—consistent with international standards and Article 19 of the International Covenant for Civil and Political Rights(ICCPR)—by reforming defamation and libel provisions that criminalize political criticism and blasphemy; revise the E-Transactions Law and update the new election law to prevent citizen data sharing while establishing an independent data protection authority; eliminate the practice of pretrial detention in freedom of expression cases; and amend Article 5 of the Access to Information Law with stronger enforcement to fully guarantee citizens' right to access information.¹
3. Similarly, SEEDS also recommended that Lebanon decriminalize defamation and insults and classify them as civil offenses that do not carry any prison sentences, recognizing the public's legal right to criticize and oppose public figures and authorities".²
4. In early 2025, Lebanon had 4.68 million active cellular mobile connections—equivalent to 80.4 percent of the population—although some of these connections merely supported voice and SMS services without providing internet access. At the start of 2025, internet usage reached 5.34 million individuals, resulting in an online penetration rate of 91.6 percent, while social media platforms were used by 4.02 million user identities, representing 68.9 percent of the total population.³
5. This submission examines freedom of expression online and offline in Lebanon since the third UPR, including: access to information, privacy, and digital equity. Independent journalists and media outlets have increasingly

¹ SMEX and Small Media, Digital Rights in Lebanon, UPR Submission, Session 37; See, <https://uprdoc.ohchr.org/uprweb/downloadfile.aspx?filename=8342&file=EnglishTranslation>

² Summary of Stakeholders' submissions on Lebanon: Report of the Office of the United Nations High Commissioner for Human Rights, P.4;See, https://upr-info.org/sites/default/files/documents/2018-12/e_1.pdf

³ Simon Kemp, Data Report, Digital 2025, Lebanon, 3 March 2025; See, <https://datareportal.com/reports/digital-2025-lebanon>

faced legal harassment, such as defamation and incitement lawsuits. A renewed pattern of summonses indicates the erosion of legal safeguards under the Publications Law.

- 6.** The period under review is defined by concerns over a shrinking civic space, compounded by censorship, politicized prosecutions, and the absence of comprehensive digital rights protections. The report concludes with recommendations urging Lebanon to align its actions with international human rights standards and practices.

UPDATES FROM PREVIOUS REVIEW

- 7.** During the third cycle of the Universal Periodic Review, the Lebanese Republic was reviewed in January 2021, where it received 297 recommendations and supported 179 of them—an increase of 39.84% compared to the second cycle.⁴
- 8.** Out of these, Lebanon supported thirteen (13) recommendations related to freedom of opinion and expression and access to information from Estonia, Romania, Canada, Greece, Australia, Latvia, Netherlands, New Zealand, Norway, Republic of Korea, Slovakia, Switzerland and Ukraine, which respectively called for enacting and implementing legislation to promote and protect the rights to freedom of speech and media; taking concrete steps to encourage freedom of expression and access to information; ensuring that human rights defenders, lawyers, and journalists are not subjected to intimidation, harassment, or arbitrary arrest in connection with their work, and fully guaranteeing the rights of freedom of expression for all defenders, both online and offline.⁵
- 9.** Lebanon also noted two recommendations guaranteeing freedom of opinion and expression and access to information from Estonia and Luxembourg, calling for a review of its defamation laws and alignment with international standards, thereby strengthening the constitutional and legislative framework for media freedom; and to lift all remaining restrictions on freedom of expression to guarantee unfettered access to

⁴ Lebanon Universal Periodic Review, [Universal Periodic Review - Lebanon | OHCHR](#)

⁵ Lebanon Universal Periodic Review, Matrix of Recommendations, [Matrice-Recommendations-Lebanon.docx](#)

information.⁶ No recommendations were made in relation to digital rights and the right to privacy.

- 10.** Despite Lebanon's formal endorsement of numerous UPR recommendations on freedom of expression, civil society and international observers report a persistent gap between law and practice. Journalists, activists, and protesters face legal harassment—interrogations, arbitrary detention, and digital censorship—through the misuse of defamation, cybercrime, and public-morality statutes. Security forces routinely summon and prosecute individuals over online speech without judicial authorization or respect for due process, resulting in de facto censorship and intimidation. Criminal insult, slander, libel, and incitement laws are weaponized against government critics, with security agencies pressuring targets to remove content and sign silence pledges.⁷
- 11.** Mainstream outlets remain dominated by politically connected owners, yet a vibrant independent online media sector—widely consulted by the public—strives to fill the gaps. Journalists also contend with an unresolved media bill, crippling economic collapse, chronic power outages, sectarian pressures, and wartime spillovers—border bombings and forced displacement since October 2023—underscoring persistent structural and safety challenges.⁸

FREEDOM OF EXPRESSION AND OPINION

- 12.** Promulgated on 23 May 1926 and amended in September 1990, Article 13 of the Lebanese Constitution guarantees the freedom to express opinions orally or in writing, the freedom of the press and publication, and the rights of peaceful assembly and association. These liberties “are guaranteed within the limits established by law,” meaning any restrictions must be prescribed by statute rather than imposed by ad-hoc or administrative measures.⁹
- 13.** Lebanon became a founding member of the United Nations in 1945 and incorporated the Universal Declaration of Human Rights into its

⁶ Ibid

⁷ Amnesty International, Lebanon: Defamation and Insult Laws Weaponized to Silence Critics, 7 August 2023, [MDE1870462023ENGLISH.pdf](https://mde1870462023ENGLISH.pdf)

⁸ See <https://rsf.org/en/country/lebanon>

⁹ The Lebanese Constitution, Article 13, [Lebanese Constitution- En.pdf](https://lebaneseconstitution.com/Lebanese_Constitution-En.pdf)

constitutional framework.¹⁰ In 1972, it ratified the International Covenant on Civil and Political Rights, thereby committing under international law to uphold civil and political freedoms—including freedom of expression—and to submit periodic reports to the UN Human Rights Committee.¹¹

- 14.** In the 2025 Reporters without Borders' Press Freedom Index, Lebanon improved from 140th in 2024 to 132nd out of 180 countries assessed (score 42.62), driven by modest gains in political, legislative, social, and security dimensions even as its economic score weakened. Freedom House's Freedom on the Net 2024 report rates Lebanon as "Partly Free" with an overall score of 50/100. It scored 9/25 for Obstacles to Access—citing infrastructure failures, economic collapse and conflict-related outages—22/35 for Limits on Content, highlighting the use of defamation, cybercrime and morality laws to block or remove criticism, and 19/40 for Violations of User Rights, noting frequent summons, arrests and defamation campaigns against online journalists and bloggers.¹²
- 15.** The *Press Law* of 1962 remains the foundational statute for Lebanon's print media. It confines newspaper ownership to Lebanese citizens and imposes stringent licensing requirements, including capital thresholds and government approvals for each publication. It grants broad discretion to the Ministry of Information to deny or revoke licenses, effectively limiting media diversity and cementing the market dominance of established, politically affiliated publishers.¹³
- 16.** Enacted in 1994, the *Audiovisual Media Law* introduced a two-tier licensing framework for radio and television broadcasters. "Category A" licences went to state-affiliated or well-connected investors, while "Category B" licences—ostensibly for independent outlets—were capped at a small number, curbing new entrants. Like the *Press Law*, it predates online streaming and web-based channels, leaving internet radio, video platforms, and digital-only broadcasters outside its clear remit and vulnerable to ad hoc regulation.¹⁴

¹⁰ Ibid.

¹¹ See https://treaties.un.org/pages/viewdetails.aspx?chapter=4&clang_=en&mtdsg_no=iv-4&src=ind

¹² See [Lebanon: Freedom on the Net 2024 Country Report | Freedom House](#)

¹³ See [Lebanon - Media Landscapes](#) and [Media Law International](#)

¹⁴ Ibid.

17. Lebanon's *Penal Code* criminalizes defamation of public officials and imposes fines and up to one year's imprisonment under Article 383. Article 384 extends this to six months–two years' jail for insulting the President, national flag, or emblem, while Article 385 punishes slanderous statements injurious to honor and dignity. Beyond defamation, Articles 292 and 317 expose those who insult foreign states or incite sectarian strife to penalties of up to two and three years' imprisonment, respectively.
18. *The Military Code of Justice* further criminalizes insults directed at the army or flag—punishable by up to three years in prison—and grants military courts jurisdiction over civilians for these offenses. Human Rights Watch has documented how these broadly worded provisions facilitate the harassment and silencing of journalists and activists, with security agencies summoning individuals for interrogation without judicial oversight and coercing pledges of silence in violation of due-process guarantees. Amnesty International also recorded a sharp rise in prosecutions under defamation and insult statutes since early 2023, noting sentences of up to three years handed down to government critics for peaceful expression.¹⁵
19. During the period under review, state institutions and influential private actors used criminal insult and defamation laws to suppress dissenting voices. Journalists, media professionals, and civic activists were increasingly targeted for exposing misconduct, criticizing government practices, or simply challenging dominant political narratives. Human Rights Watch reported that these legal provisions—often vaguely worded and arbitrarily enforced—serve not as tools of justice but as mechanisms of intimidation¹⁶
20. In June 2022, Lebanese comedian and activist Shaden Fakih became a prominent example of how criminal defamation laws and military court jurisdiction are used to suppress freedom of expression in Lebanon. In June 2022, the Permanent Military Tribunal in Beirut convicted Fakih for allegedly “damaging the reputation” of the Internal Security Forces (ISF) and “showing contempt” for its officers, following a satirical video she posted on Instagram during the COVID-19 lockdown. In the video, Fakih humorously called the ISF hotline asking if they could deliver sanitary pads to her home, highlighting the absurdity of lockdown enforcement mechanisms. The ISF

¹⁵ See [Lebanon: Journalists, Activist Summoned for Investigations | Human Rights Watch](#) and [MDE1870462023ENGLISH.pdf](#)

¹⁶ See Human Rights Watch World Report, Lebanon events of 2022, <https://www.hrw.org/world-report/2023/country-chapters/lebanon>

filed a complaint, leading to her interrogation by the Cybercrimes Bureau (May 2021) and subsequent trial before a military court—a venue typically reserved for service-related offenses by military personnel.¹⁷

21. Despite being a civilian, Fakih was tried under Article 383 of the *Penal Code* and Articles 147/157 of the Military Justice Law, and sentenced to pay the maximum fine of 1.8 million Lebanese pounds in lieu of imprisonment. Her defense team challenged the court's jurisdiction, arguing that trying civilians in military courts violates international standards. Human rights organizations, including Amnesty International, condemned the prosecution as a blatant misuse of defamation laws to stifle dissent and called for an end to the practice of subjecting civilians to military trials.
22. In 2023, Lebanese authorities increasingly used defamation laws to target individuals who speak out—especially those criticizing the government amid a deepening economic crisis. Throughout the year, numerous journalists, lawyers, and comedians were summoned, interrogated, or taken to court simply for expressing their views. In March, State Security summoned Jean Kassir, co-founder of Megaphone, over a post claiming that Lebanon was ruled by fugitives from justice, including officials linked to the judiciary. Around the same time, journalist Lara Bitar was questioned by the Cybercrimes Bureau following a complaint filed by the Lebanese Forces party, after she published an investigation into alleged toxic waste dumping. In July, journalist Dima Sadek was sentenced to prison after Gebran Bassil, head of the Free Patriotic Movement (FPM), filed a defamation lawsuit in response to her criticism of FPM supporters. In August, comedian Nour Hajjar was arrested for jokes he made during a stand-up show, and in September, journalist Majdoline Lahham was summoned following a post exposing alleged corruption by Judge Mohammad Ahmad Assaf, head of Beirut's Sunni religious Court.¹⁸
23. In early 2025, the deployment of criminal defamation laws to suppress investigative journalism and civic activism intensified, driven primarily by influential actors within the banking sector, often backed by sympathetic media figures.¹⁹ Journalists from online media outlets Daraj and

¹⁷ See [Lebanon: End military trial against comedian and drop all charges - Amnesty International](#), 23 June 2022

¹⁸ See Human Rights Watch Lebanon Report, events of 2023, <https://www.hrw.org/world-report/2024/country-chapters/lebanon>

¹⁹ See Daraj article (hala Nasreddine), <https://daraj.media/en/why-are-antoun-sehnaouis-media-arms-targeting-daraj/> 17 March 2025

Megaphone, as well as the executive director of Kulluna Irada, a Lebanese advocacy group, were summoned for interrogations after publishing reports on alleged corruption and financial mismanagement. These summonses—some prompted by lawsuits filed by prominent figures like SGBL CEO Antoun Sehnaoui—rely on broadly defined penal provisions that criminalize defamation, insult, and “undermining national sentiment.” Human Rights Watch and Amnesty International have both condemned this trend, describing it as a deliberate attempt to silence dissent and intimidate media outlets through judicial and extrajudicial means.²⁰

- 24.** In parallel, on July 3, 2025, the Mount Lebanon Criminal Court of Appeals delivered a landmark decision in favor of journalist George Ainati, overturning defamation claims brought by three major cement conglomerates and affirming that public-interest criticism of powerful economic actors falls squarely within the scope of protected expression. By rejecting attempts to silence journalistic scrutiny through strategic lawsuits, the ruling reinforces legal safeguards for press freedom in Lebanon and sets a critical precedent that economic clout cannot be used to intimidate or censor media voices.
- 25.** Members of the legal profession—including lawyers and judges—have also faced impediments and limitations. In April 2023, lawyer Nizar Saghieh was summoned by the Beirut Bar Association after publicly opposing recent amendments to the Bar’s *Code of Ethics* that prevent lawyers from making public statements without prior approval.²¹ The following month, Minister of Justice Henry Khoury issued two circulars imposing strict limitations on judges. One prohibits them from appearing in public or expressing opinions across any media platform—traditional or digital—with prior authorization. The other requires judges to seek permission before traveling abroad or participating in conferences with NGOs, embassies, or international bodies. Legal experts, including the Independence of the Judiciary Coalition and the International Commission of Jurists, condemned these moves as excessive, warning they erode judicial independence and violate international standards on freedom of expression.²²

²⁰ See [Lebanon: Journalists, Activist Summoned for Investigations | Human Rights Watch](#), 14 April 2025

²¹ [Beirut Bar Association Seeks to Muzzle Lawyers | Human Rights Watch](#), 29 April 2023

²² [Independence of the Judiciary Coalition Statement on Gaging Judges: A Blackout Imposed via Professional Ethics - Legal Agenda](#), 9 May 2023

26. LGBT people were increasingly targeted online and offline, compounding the risks faced by journalists, activists, and performers. Despite past court rulings affirming that consensual same-sex relations are not criminal, Article 534 of the penal code remains in force and continues to be used to justify discrimination. In August 2023, Caretaker Culture Minister Mohammed Mortada and MP Ashraf Rifi introduced bills that would explicitly criminalize same-sex conduct and punish anyone who “promotes homosexuality” with up to three years in prison. That same month, members of the extremist group “Soldiers of God” violently attacked a drag event in Beirut, while Internal Security Forces stood by without intervening. According to Human Rights Watch, online targeting of LGBT individuals has led to serious offline consequences, including blackmail, family violence, and arbitrary arrests by ISF agents.²³

27. In January 2024, journalist Riad Tawk was summoned by the Central Criminal Investigation Department after criticizing Attorney General Sabouh Sleiman’s decision to suspend an arrest warrant tied to the Beirut port blast. Amnesty International reported a broader wave of defamation lawsuits filed by top officials—including Caretaker Prime Minister Najib Mikati and former Interior Minister Nouhad Machnouk—against anti-corruption advocates and watchdogs.²⁴

28. Several media workers also lost their lives. Between October 2023 and late 2024, at least nine journalists and media workers were killed by Israeli airstrikes across southern Lebanon. On October 13, 2023, Reuters videographer Issam Abdallah was killed in Alma al-Shaab by Israeli tank fire, as confirmed by UNIFIL.²⁵ Multiple investigations—including one by Amnesty International—found that the journalists were clearly identified as press and not near any military activity, indicating the attack was deliberate and may constitute a war crime.²⁶

29. On 21 November 2023, Al Mayadeen reporters Farah Omar and Rabih al-Maamari, along with their driver Hussein Akil, were killed by Israel raids in Tayr Harfa.²⁷ In September 2024, Al Mayadeen journalist Hadi Al-Sayed

²³ Ibid.

²⁴ See Human Rights Watch World Report, Lebanon Events of 2024, <https://shorturl.at/3idX8>

²⁵ See [Reuters journalist Issam Abdallah killed by Israeli tank, investigation finds](#), 7 December 2023

²⁶ See [Lebanon: Deadly Israeli attack on journalists must be investigated as a war crime - Amnesty International](#), 7 December 2023

²⁷ Committee to Protect Journalists, Al-Mayadeen TV reporter and videographer killed by Israeli strike in south Lebanon, 21 November 2023, <https://cpj.org/2023/11/al-mayadeen-tv-reporter-and-videographer-killed-by-israeli-strike-in-south-lebanon/>

and Al Manar TV cameraman Kamel Karaki were targeted in separate strikes near Borj Rahhal and Qantara.²⁸ Then, on October 25, 2024, an Israeli airstrike hit the Hasbaya Village Resort, killing Ghassan Najjar and Mohammad Reda of Al Mayadeen and Wissam Kassem of Al Manar while they slept in a clearly marked media compound housing 18 journalists²⁹ from seven Lebanese and Arab media outlets—including Sky News Arabia, Al Jazeera, Al Jadeed, Al Mayadeen, Al Kahera, Al Manar, and MTV—who had relocated there a month earlier after an Israeli warning to evacuate the Ibl Al-Saqi area.

- 30.** Throughout the ongoing war in Lebanon, several journalists were killed or injured in indirect Israeli attacks, including strikes on civilian areas and media buildings. Among the casualties were Ali Yassin of Al Manar, Hassan Roumeh of Al Wadi News, and Mohammad Beitar, a media officer in Nabatieh. Media offices, like Al Mayadeen's Beirut bureau, were also destroyed, and other journalists—such as those from NBN, Al Jazeera, and Al Jadeed—faced shelling, gunfire, and intimidation while covering events in the South and Beirut. After the November 2024 ceasefire, violations persisted. Journalists were targeted while covering civilian returns and visibly marked press crews were shot at—despite operating far from active combat zones. In one instance, a stun grenade was dropped near Al Mayadeen's journalist, Hussein Sayyed Hassan, during a live interview in Yaroun. These attacks were widely documented by press unions and civil society as deliberate attempts to obstruct reporting and silence media presence on the ground.³⁰
- 31.** In September 2024, Al Akhbar war correspondent Amal Khalil received death threats from an Israeli number, warning her to flee the country or risk being killed.³¹
- 32.** Around the same time, Belgian journalists Robin Ramaekers and Stijn De Smet were assaulted by an armed mob while reporting in Beirut's Bashoura neighborhood, sustaining serious injuries. Days later, a crew from Italy's Rai

²⁸ International Federation of Journalists, Lebanon: Nine journalists and media workers killed since the war started in Gaza, 25 October 2024,
<https://www.ifi.org/media-centre/news/detail/article/lebanon-nine-journalists-and-media-workers-killed-since-the-war-started-in-gaza>

²⁹ See [Lebanon: US Arms Used in Israeli Strike on Journalists](#) | Human Rights Watch, 25 November 2024

³⁰ Interview with Hussein Chaabane, Legal Agenda, Beirut, July 2025

³¹ Lebanese journalist Amal Khalil faces direct Israeli threat amid escalating dangers for journalists in south Lebanon,LBC Group,16 September 2024, [Lebanese journalist Amal Khalil faces direct Israeli threat amid escalating dangers for journalists in south Lebanon - Lebanon News](#)

3 was attacked near Sidon by unidentified locals, resulting in the death of their driver from cardiac arrest.³²

33. During and after the 2024 Israeli war in Lebanon, journalists faced growing restrictions on their ability to report freely, particularly in areas under the influence of political factions. Reporters were frequently denied access to bombed sites or pressured to stop filming by unidentified individuals, often during live broadcasts. These incidents were especially common in zones controlled by Hezbollah and its allies, where media outlets perceived as politically opposed—such as MTV Lebanon, which has been labeled by some as anti-Hezbollah—were reportedly obstructed or asked to leave.³³
34. During the 2024–2025 conflict, Lebanese authorities intensified arbitrary raids, device seizures, and interrogations targeting journalists, undermining press freedom and due process. Notable cases include Alya Mansour,³⁵ arrested over a forged tweet showing Mansour replying to an Israeli public figure, implying she was engaging in friendly or collaborative dialogue with Israeli accounts, and Wissam Saade,³⁶ questioned over a misinterpreted 2019 phone message—both released without charge after public pressure. Additional journalists, such as Firas Hatoum, Nancy Sabeh, and Mounir Younis, were also summoned in connection with investigative reporting or social media posts. These actions—documented by SKeyes—alongside other cases of online incitement during the 2024 war that placed journalists and bloggers at serious risk, underscore the growing threat posed by digital hate campaigns and the persistent absence of meaningful state protection.³⁷
35. In January 2021, security forces violently dispersed demonstrators in Tripoli using tear gas, rubber bullets, and live ammunition, injuring hundreds and killing one person. Protesters, including children, were charged with terrorism by military courts, while detainees faced enforced disappearance and alleged torture—highlighting serious due process concerns.³⁸

³² See [War in Lebanon: journalists must be protected and allowed to work freely | RSF](#), 10 November 2024

³³ Ibid.

³⁴ Interview with Hussein Chaabane, Legal Agenda, Beirut, July 2025

³⁵ See [Online Incitement: Real-World Consequences for Journalists in Lebanon | Reports | News | Skeyes Media | Center for Media and Cultural Freedom](#), 21 November 2024

³⁶ See [Après la perquisition de son domicile et un interrogatoire, le journaliste Wissam Saadé remis en liberté - L'Orient-Le Jour](#), 30 May 2025

³⁷ See Online Incitement, op.cit.

³⁸ See Lebanon events of 2021, <https://www.hrw.org/world-report/2022/country-chapters/lebanon>

36. On 4 February 2021, civic activist and publisher Lokman Slim was shot and found dead in southern Lebanon. As of 2025, no one has been arrested or charged. Amnesty International has documented how basic investigative procedures were ignored—crime-scene evidence was not secured, leads linked to prior threats against Slim were not followed, and investigators pursued baseless personal theories—underscoring systemic judicial interference and the urgent need for an independent, transparent inquiry to bring his killers to justice.³⁹ UN human rights experts warned that the lack of a prompt, thorough, and impartial investigation violates Lebanon's obligations under the International Covenant on Civil and Political Right.

37. In addition to physical intimidation, journalists encountered bureaucratic hurdles. Accreditation requirements imposed by various parties—including the Ministry of Information, political groups, and local authorities—created an informal system of gatekeeping that limited access to conflict zones and sensitive areas. According to Reporters Without Borders and Maharat Foundation, these restrictions, combined with threats and harassment, have severely undermined press freedom and the ability of journalists to cover the war safely and independently.⁴⁰

38. On June 28, 2025, Lebanon's Criminal Investigations Bureau summoned Carine Abdel Nour, managing editor of the independent weekly Al-Hurra, and editor-in-chief Bishara Charbel for questioning—without specifying any formal charges. Their lawyer later learned informally that the summons was linked to an article written about Judge Zaher Hamadeh. Just days later, similar complaints were filed against the editorial team of Naqd following the publication of a video critical of Antoun Sehnaoui's ongoing legal campaign targeting independent media. Both outlets rejected the summonses, affirming that press-related offenses fall solely under the jurisdiction of the Publications Court.⁴¹

39. The Union of Journalists in Lebanon noted that these are the first cases in nearly two years in which the General Prosecutor has insisted on referring members of the press to the Cybercrime Bureau—marking a troubling escalation and a serious setback for media freedoms. She explained that in

³⁹ See [Lebanon: Killers of activist Lokman Slim must be brought to justice - Amnesty International](#) and Lebanon: UN experts concerned at slow progress in investigation and continued impunity for killing of prominent intellectual Lokman Slim, OHCHR, 2 February 2023, <https://www.ohchr.org/en/press-releases/2023/02/lebanon-un-experts-concerned-slow-progress-investigation-and-continued>

⁴⁰ See [Protection of Journalists and Their Sources | Maharat Foundation](#), 27 May 2024

⁴¹ See Legal Agenda by Laure Ayoub (Arabic), <https://shorturl.at/YZ3Ma> 4 July 2025

previous cases, the Union had successfully petitioned to transfer such matters to the Publications Court, in line with legal procedure. However, this time, the Prosecutor adamantly pursued interrogation of journalists through the Cybercrime Bureau, bypassing established protections under the Publications Law.⁴² Such measures directly undermine the Publications Law, which assigns exclusive jurisdiction over press offenses to the Publications Court.⁴³

- 40.** Lebanon's media law reform, launched in 2010, faced repeated setbacks as amendments increased punitive measures on speech, prompting strong backlash from civil society for deepening censorship and restricting free expression. In 2023, under mounting pressure, then-Minister of Information Ziad Makary partnered with UNESCO to revive the process. A revised draft was developed through a participatory consultation involving journalists, syndicates, and media experts, aiming to eliminate imprisonment for expression-related offenses, protect journalistic sources, and establish an independent regulatory authority.⁴⁴
- 41.** In May 2025, Lebanon's parliamentary subcommittee submitted a revised media law draft introducing major reforms: it decriminalizes defamation, abolishes the Print Publications Court, and incorporates hate speech provisions aligned with the Rabat Plan of Action. The draft also simplifies media registration—especially for digital platforms—by shifting to a notification-based system overseen by an independent authority. However, it preserves the Lebanese Press Union's control, limiting journalists' freedom of association.⁴⁵

FREEDOM OF INFORMATION AND CENSORSHIP OF CONTENT

- 42.** Lebanon's Right to Access to Information Law, was enacted in 2017 and amended in 2021 through *Law No. 233*. The law grants individuals the right to access a wide range of administrative documents, including budgets, decrees, contracts, and internal decisions, and mandates proactive disclosure by public institutions. The 2021 amendments removed the requirement for individuals to justify their interest in the information,

⁴² Interview with Ely Moufarrej, Beirut, July 2025

⁴³ See Legal Agenda by Laure Ayoub (Arabic), <https://shorturl.at/YZ3Ma>, op. cit.

⁴⁴ See [Lebanon: Proposed media law poses grave threat to freedom of expression | Maharat Foundation](#), 28 November 2023

⁴⁵ Interview with Lawyer Farouk Moghrabi, Beirut, May 2025.

streamlining the process and aligning it more closely with international standards.⁴⁶

43. Despite its progressive framework, implementation of the law remains limited. Many public institutions have failed to appoint designated information officers or establish digital platforms to facilitate access, as required by the law. Responses to information requests are often delayed, incomplete, or ignored altogether. The Global Right to Information Rating has also ranked Lebanon's as "one of the countries with legislation less prone to guaranteeing the right to information".⁴⁷
44. Oversight of the law's implementation falls primarily to the judiciary and the National Anti-Corruption Commission (NACC), established under *Law No. 175/2020*. However, the NACC faces significant operational challenges, including insufficient staffing, limited funding, and political interference. These constraints have hindered the Commission's ability to monitor compliance and enforce sanctions, undermining the law's effectiveness as a tool for combating corruption and promoting open governance.⁴⁸
45. Lebanon has no standalone film-censorship law; instead, a seven-member committee under the General Security Directorate wields opaque powers to open or "resume" cases on sweeping grounds—morality, religion, national security, or diplomatic sensitivities—often stalling approvals until after festival deadlines and effectively barring screenings, while religious bodies enjoy a de facto veto. But this is done in a random manner, such as what happened in 2023, when Culture Minister Mohammad Mortada's bid to ban Barbie for "promoting homosexuality" eventually ended up in screening the movie in Lebanese theaters, after it was rated viewers 13+ and with no substantive cuts, underscoring the contradictory and inconsistent nature of these censorship decisions.⁴⁹

⁴⁶ See Christelle Barakat, Clara Diba, "Access to Information in Lebanon: The Law and Its Implementation", December 2023, <https://www.lcps-lebanon.org/en/articles/details/4833/access-to-information-in-lebanon-the-law-and-its-implementation>

⁴⁷ See Lebanon - Global Right to Information Rating <https://countryeconomy.com/government/global-right-information-rating/lebanon?year=2020#:~:text=Lebanon%20is%20at%20the%2098%C2%BA,clicking%20on%20Economy%20of%20Lebanon.>

⁴⁸ Ibid.

⁴⁹ See "Film censorship in Lebanon: How does it work?", L'Orient Today, July 3, 2024, <https://today.lorientlejour.com/article/1347431/film-censorship-in-lebanon-how-does-it-work.html>

ACCESS TO INTERNET

46. Lebanon's Telecommunications Law (*Law 431/2002*) does grant authorities the legal power to order internet shutdowns, as outlined by the Telecommunications Regulatory Authority. However, there is no public record of a government-orchestrated nationwide internet blackout in recent years. The state can technically cut service at its three international gateways in Tripoli, Jdeideh, and Beirut.⁵⁰ Lebanon's telecom sector is monopolized by the state, which owns both fixed-line and mobile networks through entities like Ogero, Alfa, and Touch. Despite legal provisions for liberalization, the government retains control over infrastructure, pricing, and licensing—resulting in high costs, poor service, and resistance to reform.⁵¹ With its monopolisation of broadband networks, the Lebanese government falls short of the International Telecommunication Union's 'golden rules' for accelerating broadband adoption.⁵² These rules outline empirically proven 'best practices' for promoting internet adoption and include the advice to ensure 'full competition' in mobile and fixed broadband services.

47. Digital inclusion is a human rights matter. With increasing digitalisation, having adequate opportunities to exercise human rights increasingly depends on having internet access. Those without internet access have fewer options to express their views, obtain information, associate with others, access education and health services, find employment, and to find housing. All this problematically diminishes the practical value of their human rights and leads to new forms of social and political exclusion.⁵³

48. Considering the fundamental role that the internet now plays in enabling human rights, the UN High Commissioner for Human Rights⁵⁴ and academic research⁵⁵ have suggested that internet access should itself be considered a human right. Recognising such a right implies a responsibility of governments to ensure that all citizens have meaningful internet access.

⁵⁰ [Lebanon: Freedom on the Net 2024 Country Report | Freedom House](#)

⁵¹ Searching for a Signal, The State of the Telecom Sector in Lebanon (1992 - 2023), SMEX, January 2024, [Telecom Report draft 2](#)

⁵² <https://gen5.digital/enablers/mobile-broadband-six-golden-rules-to-accelerate-take-up/>

⁵³ Reglitz. (2023). The Socio-Economic Argument for the Human Right to Internet Access. *Politics, Philosophy & Economics* 22(4): 441-469. <https://doi.org/10.1177/1470594X231167597>

⁵⁴ OHCHR. 2023. It May be Time to Reinforce Universal Access to the Internet as a Human Right, Not Just a Privilege, High Commissioner tells Human Rights Council.

<https://www.ohchr.org/en/news/2023/03/it-may-be-time-reinforce-universal-access-internet-human-right-not-just-privilege-high>

⁵⁵ Reglitz. 2024. Free Internet Access as a Human Right (Cambridge: Cambridge University Press). <https://doi.org/10.1017/9781009520508>

Moreover, it requires governments to respect people's privacy online and their permissible uses of the internet e.g. for free expression and obtaining information.

49. Partial or localized outages have occurred for other reasons:

- a.** September 2022: Strikes by employees of Ogero, Lebanon's state telecom operator, led to widespread service outages across Beirut and other towns. These disruptions stemmed from wage disputes and fuel shortages—not from government censorship.⁵⁶
- b.** 2024: Israeli airstrikes on southern infrastructure—including transmission towers and internet stations—caused multi-day outages in Tyre, Nabatieh, and surrounding areas. SMEX documented that these blackouts were driven by conflict-related damage, not Lebanese policy.⁵⁷
- c.** September – November 2024: The massive wave of displacement during the 2024 war placed enormous pressure on Lebanon's already fragile telecom infrastructure—especially in areas like Beirut and Mount Lebanon, which absorbed tens of thousands of displaced families. As people fled southern towns and border regions, demand for internet and mobile services surged in safer zones, overwhelming local networks and causing slower speeds, frequent outages, and connectivity issues.⁵⁸

50. Digital rights advocates documented an uptick in content removal and account restrictions on Meta platforms. SMEX's Digital Safety Helpdesk recorded numerous cases where posts about Lebanon and Palestine were censored on Facebook, Instagram, and WhatsApp, raising alarms about the uneven application of community standards and the broader threat to free expression in crisis contexts.⁵⁹

51. Lebanon's telecommunications have become prohibitively expensive, especially amid the country's economic collapse, with rural areas suffering frequent outages and often limited to 2G or 3G service. By late 2022, roughly 75 percent of the population lived on under \$14 a day, yet mobile

⁵⁶ [Networks down in Lebanon as Ogero workers strike - DCD](#), 2 September 2022

⁵⁷ [How is South Lebanon coping with limited internet and communications amid Israeli bombing? - SMEX](#), 26 June 2024

⁵⁸ Interview with Mohamad Najem, SMEX Director, Beirut, June 2025.

⁵⁹ See [Digital Rights During the War on Lebanon: October 24-25, 2024 - SMEX](#)

data ranked 169th out of 233 markets worldwide at about \$3 per gigabyte, and fixed-line broadband averaged \$18.53 per month. Due to currency devaluation and the LL 1,500-to-USD official rate, communication and mobile data became cheaper between 2020 and 2022—only for users to lose credits when the government redressed the situation.⁶⁰ Because internet and mobile tariffs are set by ministerial decree, May 2022's decision to peg prices to the Sayrafa exchange rate instantly quadrupled data costs.

- 52.** By January 2023, a basic 1.5 GB plan had nearly tripled—reaching about \$35—and proposed hikes in March left consumers shouldering the full financial burden, with no clear sector restructuring or anti-corruption measures in sight.⁶¹ In May 2023, Lebanon ranked fifth-highest in communication service costs across the MENA region, creating a major hurdle to internet access—especially as the country endures one of the deepest economic and currency crises worldwide.⁶²
- 53.** Today, the cost of internet and communications in Lebanon is gradually rising again. Lebanon therefore does not meet the International Telecommunication Union's benchmark target according to which the costs of entry-level broadband services (i.e. 2GB of mobile broadband data) should not exceed 2 per cent of monthly gross national income (GNI) per capita (for comparison: in 2024, the world price for 2GB of mobile broadband data was 0.7 per cent of monthly GNI per capita.⁶³

THE RIGHT TO PRIVACY

- 54.** Lebanon's Constitution does not explicitly enshrine a general right to privacy. Limited protections under Article 14 are for the inviolability of the home. Though Articles 8 and 13 guarantee personal liberty and freedom of expression, respectively, these provisions have been interpreted only indirectly to cover privacy in communications. Although Lebanon is party to key international treaties, domestic law remains insufficiently aligned with global privacy norms.⁶⁴

⁶⁰ Interview with Mohamad Najem, SMEX, Beirut, June 2025

⁶¹ See Freedom House, Freedom on the Net, Lebanese 2023, <https://shorturl.at/Rn1Id>

⁶² See [Lebanon: Data protection law fails to protect people's privacy and data](#), 9 May 2023

⁶³ <https://www.itu.int/en/ITU-D/Statistics/Pages/ICTprices/default.aspx>

⁶⁴ See [State of Privacy_01_18.pdf](#), SMEX, January 2018

55. Law No. 81/2018 established Lebanon's first unified framework for electronic transactions and personal data, embedding core principles—purpose limitation, transparency, and data accuracy—and requiring many controllers to notify the Ministry of Economy and Trade before processing sensitive information. However, activists at SMEX argue the law falls short of global norms by omitting an independent supervisory authority, leaving enforcement and registration duties with the same ministry—inviting arbitrary oversight and lacking conflict-of-interest checks or meaningful sanctions.⁶⁵ Euro-Med Monitor further highlights that loosely defined “state security” exemptions enable routine, unregulated data collection and sharing by government agencies (evidenced by high-profile leaks of voters’ personal details), yet no investigations or accountability measures follow, underscoring systemic gaps in protecting citizens’ privacy.⁶⁶

56. Digital surveillance and data breaches have become a grave threat to privacy in Lebanon. In January 2024, SMEX reported that within a single week, the personal data of thousands of public school teachers—including names, phone numbers, email addresses, salaries, and bonuses—were leaked onto a WhatsApp group, yet no official investigation identified those responsible or led to any sanctions. The same SMEX report revealed that the Ministry of Public Health began requiring patients to submit photographs alongside their medical files and detailed health reports—information collected without clear legal basis or transparency around its use or sharing with third parties.⁶⁷ The annual online publication of Lebanon’s voter lists—which exposes personal details (full names, parents’ names, registration numbers, gender, birth dates, and sect) for around 4 million citizens—has been flagged by SMEX as a serious data-protection breach, enabling widespread access and misuse of sensitive information.⁶⁸

57. In 2021, Lama Fakih, head of the Beirut office at Human Rights Watch, was targeted by Pegasus spyware several times. Around the same time, the spyware was also used on Lebanese politicians (including former PM Saad al Hariri) and journalists. Even though the attackers remain unknown,

⁶⁵ See [An “Ugly” New Data Protection Law in Lebanon - SMEX](#), 11 October 2018

⁶⁶ See [Lebanon: Data protection law fails to protect people’s privacy and data](#), op. cit.

⁶⁷ See [Lebanon: Mass Data Breaches, Government Unable to Protect Citizens’ Privacy - SMEX](#), 30 January 2024

⁶⁸ See [Public voter lists risk more data breaches in Lebanon - SMEX](#), 24 February 2025

Pegasus spyware is known to be used by governments against human rights defenders, opposition politicians, and journalists.⁶⁹

⁶⁹ <https://freedomhouse.org/country/lebanon/freedom-net/2022>

RECOMMENDATIONS

In light of Lebanon's concerning record on freedom of expression and digital rights in general, we urge recommending States to offer the following nuanced and actionable recommendations to the Republic of Lebanon:

1. Repeal or amend laws that criminalize criticism of public officials—such as defamation and insult statutes under the Press Law—and replace them with proportionate civil remedies that protect journalistic and civic space. At the same time, Lebanon must adopt clear, rights-respecting definitions of hate speech, modeled on international standards like the Rabat Plan of Action, to distinguish protected expression from incitement to hatred, discrimination, or violence.
2. Establish independent oversight mechanisms to monitor free speech violations, investigate abuses, and protect individuals from arbitrary detention, harassment, or excessive force—ensuring that legitimate dissent is protected while harmful speech is effectively and lawfully addressed.
3. Fully implement the Access to Information Law by requiring each ministry and public institution to appoint an Information Commissioner, setting a maximum 15-working-day deadline for responses, imposing escalating administrative fines on non-compliant agencies, and launching a centralized digital portal and public awareness campaign so citizens can track requests and monitor government transparency in real time.
4. Create an independent Media Standards Council to publish transparent content guidelines aligned with international free-expression norms, operate a fast-track appeals mechanism for takedowns or license suspensions within a fixed timeframe, and include multi-stakeholder representation—civil society, media professionals, and legal experts—to ensure decisions are fair and insulated from political interference.
5. Promote digital rights and equal access to the internet by ensuring fair distribution of connectivity across all Lebanese regions, especially underserved rural areas. Prioritize capital investment in the development of the communications sector to improve coverage, reliability, and inclusion, recognizing affordable internet as essential to civic

participation, education, and economic opportunity. To increase broadband affordability and adoption, the government should end its monopolisation of broadband services. Further recognise a human right to access the internet that guarantees the free access and use to this medium for all citizens.

- 6.** Enact a standalone Data Protection Law modeled on the EU GDPR that covers both public and private sectors, establishes an autonomous Data Protection Authority empowered to conduct audits, issue binding decisions, and impose significant administrative fines, narrows “state security” exceptions to situations requiring prior judicial authorization, and mandates data-protection impact assessments and explicit user consent for high-risk processing. This model should also; restrict the use of spyware by government institutions and other agents without authorisation and oversight by independent courts and legally protect the use of encryption technology for personal and professional use e.g. for private messaging services.