



European Union  
Election Observation Mission

**LEBANON 2022**

Final Report



**Parliamentary Elections**

15 May 2022



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**LIST OF ACRONYMS**

AM	Amal Movement
APS	Alternative Press Syndicate
AZM	Azm Movement
CC	Constitutional Council
DGCS	Directorate General of Civil Status
DGPAR	Directorate General of Political Affairs and Refugees
FM	Future Movement
FPM	Free Patriotic Movement
HRC	High Registration Committees
HZB	Hezbollah
ISF	Internal Security Forces
LADE	Lebanese Association for Democratic Elections
LAF	Lebanese Armed Forces
LBCI	Lebanese Broadcasting Corporation International
LCP	Lebanese Communist Party
LDP	Lebanese Democratic Party
LF	Lebanese Forces
LKP	Lebanese Kataeb Party
LNP	Liberal National Party
LTA	Lebanese Transparency Association
LUPD	Lebanese Union for People with Physical Disabilities
MFA	Ministry of Foreign Affairs
MM	Marada Movement
MoIM	Ministry of Interior and Municipalities
MTV	Murr TV
NB	National Bloc
NBN	National Broadcasting Network
NMC	National Media Council
OCV	Out-of-country voting
OTV	Orange TV

PS	Polling Station
PSP	Progressive Socialist Party
PRC	Primary Registration Committees
PWD	Persons with Disabilities
SCE	Supervisory Commission for Elections
SMMU	Social Media Monitoring Unit
SSC	State Shoura Council
SSNP	Syrian Social Nationalist Party
TSG	Tashnag
UNDP	United Nations Development Programme

## I. EXECUTIVE SUMMARY

- The period after the 2018 parliamentary elections has been characterised by political instability, drastic deterioration of socio-economic conditions, an acute financial crisis, and the plummeting of the national currency. The large wave of demonstrations of October 2019 against political deadlock and a socio-economic crisis caused by government corruption and mismanagement resulted in the fall of Saad Hariri's government. The tragic explosion at Beirut harbour on 4 August 2020 further deteriorated the overall situation, and the general elections took place against the backdrop of political and social tensions.
- Although preparations were affected by limited financial and human resources, the election authorities delivered the 15 May parliamentary elections timely as scheduled by the 28 December 2021 governmental decree.
- These elections were overshadowed by widespread practices of vote buying and clientelism, which distorted the level playing field and seriously affected the voters' choice. The campaign was vibrant, but marred by various instances of intimidation – including on social media - and cases of campaign obstruction. The online space was slanted by prevalent information manipulation. The legal framework for campaign finance suffers from serious shortcomings concerning transparency and accountability. While the freedom of speech was generally respected, the media failed to provide equal visibility and balanced coverage.
- The **legal framework** constitutes an overall adequate basis for holding democratic elections, although important reforms are needed to address enduring and serious legislative gaps in various fields which fall short of the relevant international commitments to which Lebanon adheres. These include the powers and functioning of the Supervisory Commission for Elections (SCE), campaign financing regulations, the principle of equality between men and women, the right of certain categories of citizens to vote, counting procedures for the out of country ballots and media and social media legal provisions. The 2022 electoral legal framework remains almost unchanged from that of the previous elections and none of the 25 recommendations of the EU EOM Lebanon 2018 was implemented.
- The election law establishes the number of seats to be elected in each district without specifying the underlying criteria, which falls short of international good practice. The district magnitude leads to significant differences in the ratio between voters and seats, which is inconsistent with the principle of **equality of the vote**. In small districts where many lists were competing, there were high percentages of wasted votes, affecting the proportionality of the system.
- **Voter registration** in Lebanon is passive. Voter lists are drawn up by the MoIM based on civil status records. For these elections, the deadlines for establishing preliminary and final voter lists were shortened. While no concerns were raised regarding the

inclusiveness of the voter register, the fact that voters cannot easily change their place of registration leads to many of them having to travel to another electoral district on election day. In the context of the economic crisis, this rigid provision did not facilitate voter participation.

- **The registration of candidates** and lists was smooth and uncontroversial, although limitations on the right to stand fall short of international commitments and best practice. A total of 718 candidates ran on 103 lists for 128 seats in the Parliament of Lebanon.
- The Ministry of Interior and Municipalities (MoIM), as well as governors and sub-governors, were in charge of **administering the elections**. They were operating with severely reduced means because of the economic crisis. The Supervisory Commission for Elections (SCE) did not have any funds and lacked qualified human resources. While the election law qualifies the SCE as independent, it also sets its dependence on the MoIM for financial and administrative resources and does not provide the SCE with legal personality. The SCE had no sanctioning powers for violations of media campaign and campaign financing regulations. It also lacked an explicit mandate to monitor social media campaigning.
- Due to the lack of financial and human resources, **election preparations** started very late, with the budget allocated to the MoIM less than a month before the elections. They were, however, mostly on time, and the technical preparations were supported by the international community. The MoIM managed to overcome the biggest challenge of the election preparations, which was to secure electricity supply for polling and tabulation centres. 15,000 civil servants were appointed by the MoIM as polling staff, but did not receive any in-person training due to financial constraints.
- The EU EOM assessed that **the campaign** was marred by the lack of a level playing field and the negative impact of the overall crisis on the size and diversity of candidates' campaign activities. Numerous cases of vote buying, and clientelism have been reported. Distributing „bread bags“, food parcels and medical supplies as well as generators, solar power and fuel were among the practices used by certain political parties and candidates, often in their offices, to unduly influence the voters. Instances of intimidation, including of female candidates, destruction of campaign material, and the obstruction of campaign activities, have also been observed and reported from several districts.
- **Campaign finance** legal provisions do not guarantee transparency and accountability. The inadequate legal framework and poor oversight, including the insufficiency of sanctioning mechanisms, affecting the level playing field and the integrity of the voters' choice. All EU EOM observers reported a high monetisation of the campaign, where a culture of in-kind and financial handouts for electoral purposes by institutions owned or managed by candidates or parties, prevailed.

- **Freedom of the media** was generally respected during the campaign period. However, several cases of intimidation of journalists occurred, and extensive self-censorship was reported, as well as limited violent incidents against the media representatives.
- The state-run *Tele Liban* had only one election programme that offered free access to candidates, with very few of them participating. In contradiction with the law, **the public and private media** failed to provide equal visibility to all candidates and candidates' lists. This was amplified by the paid-for electoral content financed by the candidates, lists of candidates and political parties to access the three major private television channels. The official voter education campaign was highly insufficient on the broadcast media. The SCE proved unable to ensure compliance of the media with their legal obligations
- Freedom of **speech online** was curtailed by the law and by recurring intimidation practices. The election law did not reflect the increased use and specificity of social media and the SCE did not have an explicit mandate over campaign violations on social media. Voters' data were not sufficiently protected and were broadly used for campaign purposes. Candidates, especially independent and opposition ones, largely relied social media to campaign, including through boosted content. The online space was distorted by a widespread discreditation of opponents by contestants, derogatory comments by social media users, and aggressive and highly organised information manipulation to impose narratives by pages and accounts affiliated to parties
- Only eight women among the 118 **women** candidates (16.4 per cent) on the lists were elected into Parliament. Reforms are needed to include in the legal framework temporary positive measures, such as quota to strengthen equality between men and women and women's representation in Parliament, in line with Lebanon's international commitments.
- Reforms are needed to better protect electoral rights (such as the right to adequate voter information and education, and the secrecy of the ballot), to reinforce the independence of the judiciary and to shorten the excessive deadlines for the **resolution of appeals** against election results.
- **Out-of-country voting** (OCV) took place on 6 May in 10 Middle Eastern countries and on 8 May in 48 other countries, with 225,624 registered voters. Despite the late provision of financial resources to organise the OCV, the logistics of the voting process went rather smoothly and the MFA increased transparency by setting up live transmission from all polling stations and reacting quickly to solve issues highlighted by their own monitors and domestic observers. The fact that the OCV ballots were counted by the registration committee judges across Lebanon led to delays in the results tabulation.
- **On election day**, the EU EOM deployed 167 observers to the 26 minor districts of the country, who observed in 798 polling stations. The lack of training of polling staff became clearly visible on election day, as they showed a weak performance and committed procedural mistakes. The secrecy of the vote was not always guaranteed, with



practices such as the reading out loud of voters' names when checking their presence on the voters' list, or of insufficient visual barriers while voters were in the polling booths. In 10 per cent of polling stations, observers saw people, mostly candidate agents, attempting to influence voters. Candidate, and list agents were present in high numbers in all polling stations, controlling voter attendance and often displaying an intrusive behaviour. This was especially true in Baalbek-Hermel, where large numbers of Hezbollah and Amal agents and a tense atmosphere were observed. As for the tabulation, the performance of the judges was assessed as professional, despite a lack of clear procedures, as well as a difficult and disorganised work environment.

### **Priority Recommendations**

The EU EOM has made 23 recommendations for improving the way elections are organised, managed, and conducted in Lebanon. They include six priority recommendations:

- 1. Establish mega centres based on voter pre-registration, in order to facilitate the participation of voters. This process requires regulation, sufficient time for technical preparations, as well as broad voter information campaigns.**
- 2. Establish the SCE as a separate legal entity that is fully independent from the MoIM, including in financial and administrative terms.**
- 3. Give the SCE the mandate and capacity to check and audit all personal accounts of the candidates and their children and spouse, by lifting the bank secrecy on these accounts and creating a dedicated unit within the SCE for this purpose.**
- 4. Strictly regulate the provision of goods, services or payments by institutions owned or managed by candidates or parties (including companies, foundations and charities) during the electoral campaign period, to avoid being used for electoral purposes.**
- 5. Empower the SCE to impose dissuasive fines on candidates and lists that do not submit on time the mandatory campaign finance reports or violate campaign spending ceilings. This should be accompanied by enforcement measures, for example the prohibition to run in future elections in case of non-payment of these fines.**
- 6. Adopt temporary special measures to increase women's representation in the Parliament.**

## **II. INTRODUCTION**

The European Union (EU) deployed an Election Observation Mission (EOM) to observe the 15 May parliamentary elections in Lebanon following an invitation from the Ministry of Interior and Municipalities. The EOM was present from 27 March to 16 June 2022.

The EU EOM was led by the Chief Observer, György Hölvényi, Member of the European Parliament from Hungary. The EU EOM comprised a core team of 10 experts based in Beirut and 30 long-term observers who arrived on 10 April and deployed to all regions of the country. 40 short-term observers were present from 9 to 19 May and deployed throughout the country.

For the election day, the EU EOM was reinforced with 66 locally recruited observers from diplomatic representations of the EU Member States, Canada, Norway and Switzerland. In total, the EU EOM deployed 167 observers from 27 EU Member States, as well as from partner countries Canada, Norway and Switzerland. In addition, a delegation of nine Members of the European Parliament was led by Brando Benifei, Member of the European Parliament from Italy.

The mission's mandate was to observe all aspects of the electoral process and assess the extent to which the elections complied with regional and international commitments for elections, as well as with national legislation. The EU is independent in its findings and conclusions. The mission followed an established methodology and adhered to the "Declaration of Principles for International Election Observation", endorsed under United Nations auspices in October 2005 and now espoused by over 50 organisations.

## **III. POLITICAL CONTEXT**

The 15 May 2022 Parliamentary Elections were scheduled by the governmental decree signed on 28 December 2021. Despite the rumours about their postponement, the elections took place on time. They have become a first important stage in a series of the next crucial political developments linked to the formation of a government and the election by parliament of the Lebanese president.

The previous parliamentary elections of 6 May 2018 preserved the balance between the two major political forces in the country, the March 14 alliance and the March 8 alliance. The March 8 obtained a simple majority in parliament by securing 70 seats against the 53 seats allocated to the former.<sup>1</sup>

The Future Movement's leader Saad Hariri formed a national unity government in January 2019, comprised of a wide spectrum of the Lebanese political forces (the Future Movement, Lebanese Forces, Progressive Socialist Party, Hezbollah, Amal Movement, the Free Patriotic Movement).

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<sup>1</sup> The 2018 elections resulted in the following seat distribution: The March 14 alliance consists of the Future Movement (21 seats), Lebanese Forces (14), Progressive Socialist Party (9 seats), Lebanese Kataeb (3), and seven independent MPs. The March 8 alliance includes the Free Patriotic Movement (18 seats), Hezbollah (13), Amal Movement (16), Marada Movement (3), Syrian Social National Party (3), Tashnag Party (3), Liberal Democratic Party (1) and 5 independent MPs. The newly emerged political forces were represented by 1 seat.

The period after the 2018 parliamentary elections has been characterised by political instability, drastic deterioration of socio-economic conditions, an acute financial crisis, and the plummeting of the national currency. The large wave of demonstrations of October 2019 against political deadlock and a socio-economic crisis caused by government corruption and mismanagement resulted in the fall of Saad Hariri's government. A long period of political uncertainty ensued, while the economy continued shrinking, the currency lost eventually 90 per cent of its value and unemployment and poverty rates soared. The COVID-19 pandemic and the tragic explosion at Beirut harbour on 4 August 2020 compounded the already dire situation.

The Sunni constituency faced a blow by the February 2022 decision of FM leader and former Prime Minister Saad Hariri not to engage in the elections and his request to all FM followers to follow his example. Despite this move, former FM members, other Sunni leaders registered as independent candidates, and there is a tangible presence of MPs stemming from or close to the Future Movement in the newly elected Parliament.

A distinct dividing line in the Lebanese political discourse, exacerbated in election times, is the major political actors' allegiance to competing regional powers. During the campaign, i.a. some candidates from the Sunni camp, the Lebanese Forces, the Party of Socialist Progress, and Kataeb advocated for the country's sovereignty and neutrality, calling for Hezbollah's disarmament and launching verbal attacks against the Hezbollah – Amal Movement tandem for following the Iranian-Syrian agenda. In turn, Hezbollah insisted on the armed resistance to Israel, accusing those Lebanese political forces that demand its disarmament as acting in favour of Lebanon's enemies. Although the events of October 2019 were short-lived, they gave rise to new, civil society-stemming political forces, who aspired to form a parliamentary representation. The elections' outcome has demonstrated that the newly emerged forces could be able to have a say in Lebanese politics.<sup>2</sup>

#### **IV. IMPLEMENTATION OF PREVIOUS EU EOM RECOMMENDATIONS**

The 2022 electoral legal framework remains almost unchanged from that of the previous elections.<sup>3</sup> The EU EOM Lebanon 2018 presented a list of 25 recommendations, many of which required the adoption of legislative amendments. None was implemented and almost all are still valid and, even if not reiterated in the current report, should be considered by a future electoral reform. These include, among others, allowing Lebanese women to pass on their nationality to their children (priority recommendation in 2018), ensuring that married Lebanese women are not automatically transferred to their husband's place of voter registration and simplifying the procedures for changing the place of voters' registration. Other 2018 recommendations still to be considered concern giving the right to vote for serving military personnel, as well to naturalised

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<sup>2</sup> The MPs stemming from the October 2019 popular protest movement have obtained 13 seats and could reach the necessary quorum to jointly introduce draft laws or lodge appeals to the Constitutional Council.

<sup>3</sup> Following a contented approval process, the law 8/2021 was approved by the Parliament. It included some amendments to the election law 44/2017 the most important regarding the suspension of the creation of a separate electoral district of six seats for the Lebanese diaspora and of the introduction of biometric voting cards.

Lebanese citizens from the time that they are granted citizenship and implementing facilities enabling pre-trial detainees to exercise their right to vote. In addition, the 2018 recommendation for the implementation of measures ensuring the full participation of people with disabilities in the electoral process is still relevant and would require future actions.

The EU EOM's recommendations are setting a framework for a gradual Lebanese led reform process. It is paramount to continue regular, transparent and inclusive dialogue on the implementation of the recommendations with local stakeholders including newly elected political forces, civil society partners and religious actors. Additionally dialogue with like-minded international partners in a structured framework could contribute to strengthen democracy in Lebanon in a sustainable way.

## **V. LEGAL FRAMEWORK**

### **Electoral Legislation**

*The legal framework is overall adequate for holding democratic elections, but important reforms are needed to address serious and enduring legislative gaps in various fields.*

The legal framework constitutes an adequate basis for holding democratic elections, although it continues to fall short of relevant international commitments to which Lebanon adheres. A comprehensive revision of the election law would be needed in order to address serious and enduring gaps and ambiguities in areas such as campaign finance regulations, the principle of equality between men and women, the right of certain categories of citizens to vote, the powers and functioning of the Supervisory Commission for Elections (SCE), the counting procedures for the out of country ballots, media and social media legal provisions.

Lebanon's legal framework relating to the 2022 parliamentary elections is based on the Lebanese Constitution of 1926 (with its amendments), the National Pact of 1943, the Taif Agreement of 1989, the Law 250/1993 on the establishment of the Constitutional Council (CC), the Election Law 44/17 June 2017, as well as other relevant laws and regulations. Lebanon has ratified the major international and regional legal instruments covering electoral rights, and the Constitution incorporates the country's international and regional obligations.<sup>4</sup> However, certain fundamental parts of the legal framework have still to be implemented.

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<sup>4</sup> International Covenant on Civil and Political Rights (ICCPR), the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD),<sup>4</sup> Following a contented approval process, (CPRW), United Nations Convention Against Corruption (UNCAC), the Arab Charter of Human Rights. Lebanon ratified the UN Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) with reservations to amendments to the election law 44/2017, the most important regarding the suspension. Lebanon is in the process of ratifying the Convention on the Rights of Persons with Disabilities and its Optional Protocol. The preamble of the Constitution also notes that Lebanon abides by the UN covenants and that the "Government shall embody these principles in all fields and areas without exception".

## Electoral System and Constituency Delimitation

**The district magnitude as determined by law led to inequalities in the weight of votes and a high number of wasted votes in small districts, compromising the proportionality of the system.**

The 128 members of parliament are elected for a four-year term through a system of proportional representation with open lists. The electoral system is based on a confessional distribution of seats, half of the seats being reserved for Muslims and the other half for Christians. While voters can vote for any candidate in their district, candidates can only run for a seat corresponding to their confession (see *VIII. Registration of Candidates*).

The 2017 election law created 15 major districts, subdivided into 26 minor districts, and fixed the number of seats to be contested in each of them (see *Annexe 1*). Major districts play a role in the seat allocation to the winning lists, which is calculated according to the Hare quota and the largest remainder method. Minor districts are relevant for the attribution of seats to the individual candidates from the winning lists. Competing lists must contain a number of candidates corresponding to at least 40 per cent of the seats of the major district, including at least one seat for each of the minor districts. Voters may cast one vote for a list and one optional preferential vote for a candidate on the same list.

The legally determined district magnitude (i.e. the number of seats assigned to each district) leads to significant differences in the ratio between voters and seats. Based on the voter register for these elections, the average voter-per-seat ratio at the national level was 30,996 (3,967,507 voters elected 128 seats), but this ratio ranged from 16,853 in Beirut 1 to 46,866 in South Lebanon 2, meaning that the weight of a vote in Beirut 1 was three times higher than one in South Lebanon 2 (see *Annexe 2*). This is inconsistent with the principle of equality of the vote.<sup>5</sup>

The small number of seats in some districts led to a high number of wasted votes, especially in districts where many lists were competing, reducing the proportionality of the system. For example, in North I, where eight lists competed for seven seats, 42.73 per cent of the valid votes were wasted, as six lists did not reach the electoral quotient. In South 1 (five seats, seven lists), 45.58 per cent of the valid votes were wasted (see *Annexe 3*).

The electoral district boundaries largely correspond to the administrative division of the country, with some notable exceptions.<sup>6</sup> The law does not explain the criteria for allocating a certain

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<sup>5</sup> ICCPR, Art. 25: “Every citizen shall have the right and the opportunity (...) to vote and to be elected at genuine periodic elections which shall be by universal and equal suffrage.” ICCPR GC 25, par. 21: “The drawing of electoral boundaries and the method of allocating votes should not distort the distribution of voters”.

<sup>6</sup> For example, Beirut constitutes one governorate, but is divided into two major electoral districts, with Beirut 1 only comprising Christian seats and Beirut 2 mostly Muslim seats. Baalbek and Hermel are two separate administrative districts, but form one single electoral district. The administrative unit Saida was split into

number of seats to each district. This lack of legally established and objective criteria falls short of international good practice.<sup>7</sup>

## **VI. ELECTORAL ADMINISTRATION**

### **Structure and Composition of the Election Administration**

**The election authorities faced a severe lack of human and financial resources and showed little transparency.**

The administration of elections is the responsibility of the Ministry of Interior and Municipalities (MoIM), as well as governors and sub-governors on the local level. Within the MoIM, the Directorate General for Political Affairs and Refugees (DGPARG) was responsible for the technical election preparations, and the Directorate General of Civil Status (DGCS) was in charge of voter registration. The MoIM and the local administration were operating with severely reduced means because of the economic crisis, with most of the staff working only a few days per week due to high transportation cost. Insufficient communication from the MoIM resulted in governors and sub-governors lacking essential information, like a timeline for election preparations or the final voter lists. The EU EOM observed varying performances by the local election administration, with some demonstrating a high level of commitment despite the difficult situation. The MoIM overall showed a lack of transparency and did not publish important election-related information.<sup>8</sup> Due to internal differences and an opaque management within the MoIM, the EU EOM had difficulties in gaining access to key interlocutors within the Ministry.

In addition to these permanent state institutions, temporary committees are appointed for each election, mainly to conduct the results tabulation. In December 2021, the MoIM established per decree 15 main and 15 additional High Registration Committees (HRC), as well as 159 Primary Registration Committees (PRC).<sup>9</sup> These committees were headed by judges designated by the MoIM based on lists provided by the Ministry of Justice.<sup>10</sup> In the run-up to election day, the

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two by the 2017 law: while Saida villages was attributed to the South 2 major district, the city of Saida was added to the minor district of Jezzine, to which it is not connected geographically, to form the South 1 major district.

<sup>7</sup> See Venice Commission (2002): Code of Good Practice in Electoral Matters, par. I.2.2.; UN Human Rights Committee Communication No. 923/2000: “in the absence of any reference by the State party to factors that might explain the differences in the number of inhabitants or registered voters per elected representative (...), the Committee is of the opinion that the State party violated the author’s rights under article 25 of the Covenant.”

<sup>8</sup> This includes information on contracts and procurement, justification of decisions, a detailed budget or election calendar. Also, some important decisions were not published until several days after they had been adopted. For example, the change of a polling centre for the out-of-country voting was only published after election day.

<sup>9</sup> Two PRC less than in 2018. Few days before election day, four additional PRC were added for the district of Akkar.

<sup>10</sup> The power to appoint judges was transferred from the Ministry of Justice to the MoIM through Law 8/2021 that amends Art. 40 of Law 44/2017.

MoIM had to replace many judges who refused to assume their duties due to the low remuneration or their appointment to a duty station far from their place of residence.

The legal mandate of the Supervisory Commission for Elections (SCE) includes overseeing compliance with campaign finance, as well as media and advertising regulations. By law, the 11 SCE members should have been appointed by 22 November 2021, six months before the end of the parliament mandate.<sup>11</sup> The SCE launched its activities on 25 January 2022 with seven members who had been nominated in 2017 and one in 2018, and lacking three members who were only nominated on 16 March 2022.<sup>12</sup> While the election law qualifies the SCE as independent, it also sets its dependence on the MoIM for financial and administrative resources. The SCE lacked funds as well as qualified human resources, like auditors. SCE members stated that they faced a lack of political support, a lack of commitment from the media to comply with the legislation, and that they could not fulfil their tasks independently. The SCE showed a restrained attitude towards stakeholders, which resulted in a difficult access to information, although some members in their individual capacity shared important updates on the commission's work with the EU EOM.

*Priority Recommendation: Establish the SCE as a separate legal entity that is fully independent from the MoIM, including in financial and administrative terms.*

*Recommendation: The election administration, including both the MoIM and the SCE, to publish relevant election-related information in a timely, comprehensive, and machine-readable manner, so that citizens and all stakeholders are better informed about election processes. This includes, for the MoIM, decisions and their justifications, supplier contracts, details on the election budget and calendar, and for the SCE, campaign finance reporting.*

### **Administration of the Election**

**The basic election preparations were carried out, albeit at the last minute, with important aspects such as polling staff training being cancelled due to lack of resources.**

The budget for the elections was LBP 320 billion (EUR 14.8 million), including LBP 260 billion for the MoIM and LBP 60 billion for the MFA for out-of-country voting. While the budget law was approved by parliament on 29 March and signed by the President on 7 April,<sup>13</sup> transfers to the election authorities were not made until the first week of May. Besides the fact that the budget was less than a third of the 2018 elections budget, another problem for the election administration was the fluctuating exchange rate and the fact that contractors wanted to be paid in cash in USD.

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<sup>11</sup> Art. 9-23 of Law 44/2017, Art. 11 of Law 08/2021.

<sup>12</sup> Presidential Decree No. 8949.

<sup>13</sup> Law 282, published in the Official Gazette on 8 April 2022.

The MoIM did not establish a detailed election calendar that would have allowed to assess the timeliness of the election preparations. UNDP<sup>14</sup> published a basic calendar with the main legal deadlines for the preparations. Some of these deadlines, like the one for voters who wanted to register for the out-of-country voting, or the public inspection period of the preliminary voter lists, expired even before the official call for elections on 29 December 2021.<sup>15</sup>

The technical preparations were completed on time. While the MoIM was responsible for printing ballot papers and envelopes, most of the election material was procured by UNDP. Private companies were contracted to pack and transport the election material to the districts. The main challenge of the election preparations was to ensure electricity supply for polling and tabulation centres. As the offer from the state electricity company exceeded the entire election budget,<sup>16</sup> the MoIM decided to rely on local generator providers, shifting the responsibility to the local administration, who only received funding for this in the week before election day. This plan was successful, as no major problems related to electricity supply were observed on election day.

The initial list of polling stations (PS) was published on time, but there were changes up to three days before election day.<sup>17</sup> As for the polling staff, 15,000 civil servants were appointed by the MoIM.<sup>18</sup> They were assigned to their PS by the sub-governors only on the day before election day to avoid pressure on them. Due to financial constraints, no in-person training for polling staff was organised. UNDP developed training manuals and audio-visual material to be used instead. Polling staff voted on 12 May in 44 polling centres across the country. The EU EOM observed the early voting and noted an overall lack of knowledge of the voting procedures, an early indicator of the weak performance of the polling staff observed on election day.

Preparations for results tabulation were completed just in time for election day. As in 2018, the tabulation software and the hardware was provided by a private company, ArabiaGIS. A dedicated private network was set up to connect the servers in 29 tabulation centres across Lebanon. A nationwide simulation of the tabulation process, which was to include hands-on training for judges and data entry staff, was postponed from 28 April to 5 May. No concerns were raised about the vulnerability of the tabulation system itself.

In the run-up to election day, the SCE plenary met once a week, and its five subcommittees daily. The SCE published over 40 decisions and announcements, clarifying campaign rules for candidates and the media, but not on their campaign monitoring findings. Apart from the media

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<sup>14</sup> The UNDP Lebanese Electoral Assistance Project (LEAP) provided technical assistance focused on the administration of elections, SCE media monitoring, voter education, electoral dispute resolution, and women's participation. Phase II of the project (2020-2023) has a EUR 7.9 million budget and is funded by the EU and USAID.

<sup>15</sup> Presidential Decree No. 8590 from 29 December 2021.

<sup>16</sup> Electricité du Liban requested EUR 14.8 million to ensure the required 2,000 MW.

<sup>17</sup> MoIM Decision 352 from 14 April 2022. After that, there were four amendments, the last one published on 12 May.

<sup>18</sup> In the first week of May, personal data of the nominated polling staff, including their district of assignment, was leaked and circulated online.



monitoring unit run by UNDP, the SCE was severely limited in its activities because of the lack of funds. For example, no auditors were hired before election day to audit the candidates' monthly financial reports.

### **Voter Education**

**The official voter education campaign started late, and the television channels, including the public one, failed to comply with their legal obligation to broadcast official voter education spots.**

The legal mandate of the SCE includes voter education,<sup>19</sup> and the law states that media outlets should air voter education programmes produced by the Ministry of Information and the MoIM.<sup>20</sup> The official voter education campaign was developed by UNDP on behalf of the MoIM and the SCE. The three videos produced for this campaign focused on basic information on how, when, and where to vote. In addition, UNDP developed animated videos with electoral information on specific topics like ballot papers, electoral campaign spending, or filing complaints on election day. UNDP also produced six videos advocating for enhanced participation of persons with disabilities. Moreover, UNDP supported the MoIM in the development of a dedicated software to allow voters to locate their polling station. Overall, the quality of the UNDP voter education material was good, but the campaign started late.

Although the election law requires the broadcasters to allocate at least three hours per week and per television channel during the whole campaign for official voter education programmes, under SCE supervision, this obligation was poorly implemented. MTV was the only television channel to broadcast official voter education spots, with the logo of the MoIM, from 22 April to 8 May, with an average duration of five minutes per week over three weeks, far from the minimum requirement.<sup>21</sup> The state-run *Tele Liban* did not air any official nor unofficial voter education spots, whereas all commercial channels, *Al Jadeed*, LBCI and MTV, broadcasted voter education content produced by themselves or by civil society organisations.

From 20 April, the official Facebook page for the 2022 parliamentary elections released 25 posts on Facebook containing the video and visual voter education material developed by UNDP.<sup>22</sup> 21 of them were shared in the days just before the elections, between 3 and 15 May, and ten were paid-for in order to be displayed to a larger audience, which significantly increased their reach. Voter education posts started generating substantial interactions only shortly before the elections.<sup>23</sup> The late start of the posting did not allow for a timely voter education campaign on Facebook.

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<sup>19</sup> Art. 19 par. 10 of Law 44/2017.

<sup>20</sup> Art. 75 of Law 44/2017.

<sup>21</sup> According to EU EOM quantitative monitoring, from 18:00 to 24:00 daily from 13 April to 13 May.

<sup>22</sup> Official Facebook page for the Lebanese Parliamentary Elections: [Lebanon Elections](#) [لبنان انتخابات](#) The SCE did not share voter education material on its social media accounts.

<sup>23</sup> Up to 1,500 interactions from 10 May onwards.

The EU EOM social media monitoring unit observed few instances of voter education material shared by political pages or accounts. However, several international organisations, as well as Lebanese civil society organisations, online media, and diaspora websites, have released video or written material on the election law, the allocation of seats, the ballot papers, or the voting system.<sup>24</sup>

*Recommendation: Increase the duration and frequency of the dissemination of the official voter education campaign and enforce the corresponding media obligations.*

## **VII. VOTER REGISTRATION**

### **The Right to Vote**

The voting age is set to 21 years, which excludes the citizens who have already reached the legal majority age of 18, and which is contrary to international common practice.<sup>25</sup> For certain other categories of citizens, the right to vote is still severely restricted. This falls short of Lebanon's international obligations. The law disenfranchises serving military personnel of all ranks and divisions, whereas naturalised male citizens can only vote or run for office ten years after their naturalisation. No measures are in place for the exercise of the right to vote of pre-trial detainees.

*Recommendation: Lower the voting age from 21 to 18, the age of majority.*

### **Voter Registration Procedures**

**No concerns were raised about the voter register, but rigid registration provisions did not facilitate voter participation.**

Voter registration in Lebanon is passive. The permanent voter register is updated once a year, regardless of whether there are elections. Voter lists are drawn up by the Directorate General of Civil Status (DGCS) of the MoIM based on civil status records.<sup>26</sup>

For these elections, the deadlines for establishing preliminary and final voter lists were shortened.<sup>27</sup> The Civil Status Registration Offices had to provide updated voter lists to the DGCS between 20 November and 5 December 2021 (half as long a period as before), incorporating new voters that reached the voting age of 21 years, and deleting deceased voters. The same deadline was valid for the Criminal Record Department and judicial courts regarding the exclusion of

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<sup>24</sup> This includes LADE, SEEDS for Legal Initiatives, Megaphone, The Lebanese Diaspora Network, Konrad Adenauer Stiftung Lebanon Office, AD 4 Peace, and UNDP.

<sup>25</sup> Only nine countries around the world have a voting age of 21. On 19 March 2009, Parliament voted unanimously to adopt a draft Constitutional Law to reduce the voting age in Lebanon from 21 years to 18 years. However the Constitutional amendment process, requiring the approval of two thirds of both the Council of Ministers and the Parliament, was never concluded afterwards.

<sup>26</sup> The voter lists include names, date of birth, gender, confession, civil registry number, neighbourhood (village/ town/ area), Qada (administrative district), governorate, minor electoral district, and country of voting.

<sup>27</sup> Law 8/2021 that amends Law 44/2017.

convicted voters. According to the DGCS, they were able to meet this deadline. The preliminary voter lists were published on the MoIM website and put on display by municipalities, Qadas and governorates between 15 December 2021 and 1 January 2022. Not only was this public inspection period shortened from 40 to 15 days, but it also coincided with a holiday period, which is why not many voters checked their registered data, according to the DGCS. On 1 February 2022, the DGCS established the final voter lists and sent them to the Directorate General for Political Affairs and Refugees (DGPARG) within the MoIM.<sup>28</sup>

The preliminary voter register counted 3,970,073 voters. After the public inspection period, the final number of 3,967,507 voters was announced on 15 February, including 50.97 per cent female voters, and representing a 5.89 per cent increase compared to 2018. EU EOM interlocutors generally expressed no concerns regarding the inclusiveness of the voter register; minor inaccuracies were likely due to outdated civil registry records. According to the DGCS, about 607,500 of the registered voters had no ID and could therefore potentially not vote.

In Lebanon, voters are registered to vote in their paternal ancestral village. To change the place of registration is possible but requires a lengthy procedure and is rarely undertaken. A transfer can only be requested after three years of residence, requires a certificate of residence signed by an elected local representative (mukhtar) and the agreement of the MoIM. Even then, transfers of location are only integrated in the voter lists after a period of one year, except for women who get married, in which case their registration is transferred to their husband's paternal village immediately. This represents a discriminatory provision against women (see also XII. *Participation of Women*).

Many voters do not live where they are registered and have to travel to their electoral district on election day, which was even more difficult this year in the context of the economic crisis and higher transport costs. „Mega centres“ were to be set up for these elections, which would have allowed voters to cast their vote for their electoral district at a central location. This idea was however discarded, allegedly due to logistical and financial constraints.

*Priority Recommendation: Establish mega centres based on voter pre-registration, in order to facilitate the participation of voters. This process requires regulation, sufficient time for technical preparations, as well as broad voter information campaigns.*

## **VIII. REGISTRATION OF CANDIDATES**

***An uncontroversial process, although limitations on the right to stand fall short of Lebanon's international commitments.***

The candidate registration closed on 15 March with 1,043 registered candidates, 77 more than in 2018. Candidates must specify the confessional seat and the district where they intend to run and must be of the same confession as the seat they contest. These provisions fall short of

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<sup>28</sup> Art. 28-35 of Law 8/2021.

international practices related to the right to stand.<sup>29</sup> The registration process went smoothly, with only two rejected candidates, as they had previously removed their confession from their civil registry record. One of them appealed to the State Shoura Council (SSC), the administrative body in charge of the resolution of these complaints. The SSC ruled in favour of the appellant and, in an unprecedented decision, concluded that a candidate who removed their confession from their civil registry records has the right to stand in elections, although they must still prove it by other means.

By 4 April, the candidates had to organise themselves into lists complying with the seat allocation in each electoral district, as well as with the confessional distribution of those seats. Finally a total of 718 candidates were running on 103 lists. The candidates are required to pay a non-reimbursable nomination fee, set for these elections at approximately EUR 1000 that could still be considered a significant amount in the current economic situation.<sup>30</sup>

## **IX. CAMPAIGN ENVIRONMENT**

### **Legal framework of the Election Campaign**

The campaign period started with the registration of candidates on 10 January 2022. There is no explicit ban on electoral campaigning on election day for candidates and lists or on the use of state resources.<sup>31</sup> The law provides for an electoral silence period only for the media, 24h before election day until the closing of the ballot boxes. In the absence of clear legal provisions, the SCE interpreted the law extensively and issued a statement announcing that during the electoral silence period campaign activities are also prohibited and, that it applies to out of country voting days (6 and 8 May) and to the early voting day also (12 May). This proved unfeasible to implement<sup>32</sup> and it was considered illegal by a Court decision following a complaint by one of the candidates. This confusing legal provision regarding the electoral silence would require clear regulation by the election law and related sanctions for violations.

*Recommendation: Stipulate, in the election law, the electoral silence period 24 hours before and on general election day, and the total prohibition of any campaign activities for candidates, lists or parties during this period, as well as define sanctions for related violations to be imposed by the SCE.*

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<sup>29</sup> UN Human Right Committee, CCPR/C/79/Add.78, Lebanon (1997): “*The Committee notes with concern that every Lebanese citizen must belong to one of the religious denominations officially recognized by the Government, and that this is a requirement in order to be eligible to run for public office. This practice does not, in the Committee’s opinion, comply with the requirements of article 25 of the Covenant.*”

<sup>30</sup> UN, ICCPR, General Comment 25, para. 16 “*fees or deposits should be reasonable and not discriminatory.*”

<sup>31</sup> The only prohibition stipulated by art.77, para.1 of the election law is that of distributing leaflets or any other campaign material throughout the election day at the gates or inside the polling centre.

<sup>32</sup> A total of 97 violations, related to breaches of the eight days of silence period, were identified by the EU EOM media monitoring unit between 13 April and 15 May on the state broadcaster Tele Liban and the commercial television channels Al Jadeed, LBCI and MTV. These 97 silence period violations amounted for 50 per cent of the total number of media violations recorded over the same period.

## Election Campaign

*Generally a vibrant campaign, but vote-buying and clientelist practices seriously undermined the voters' choice.*

The campaign period took place between 10 January and 13 May. Candidates resorted to a diversity of means (public rallies, door-to-door-meetings, billboards and other visibility materials, *iftar* invitations, phone calls, etc.) in accordance with their spending capabilities, as well as family and public networks. While, in general, the campaign activities may be characterised as vibrant, in some regions in the south, for instance, in South Lebanon 2 and 3, where the tandem Hezbollah-Amal movement prevails, their intensity was considerably lower than in the rest of the country.

Campaign messages concentrated on the socio-economic crisis and the ways of its resolution, as well as fighting corruption. Candidates opposing Hezbollah advocated for independent and sovereign Lebanon against regional interference, while Hezbollah pointed to the necessity of continuing the struggle against “external enemies.”

The EU EOM assessed that the campaign was marred by the lack of a level playing field and the negative impact of the overall crisis on the size and diversity of candidates’ campaign activities. Numerous cases of vote buying and clientelist practices were reported.<sup>33</sup>

The districts South 2 and 3, and Bekaa 3 have been dominated by the Hezbollah-Amal tandem, which prevented the candidates and lists belonging to other political affiliations from campaigning, as mentioned above, thus leaving them little chances, if any, of electoral success. In many polling stations there, Hezbollah and the Amal Movement garnered more than 90 per cent of the votes (in some cases 100 per cent), especially in the Bekaa 3, followed by the South 2 and South 3.

This can be explained by the overwhelming support of the Hezbollah-Amal Movement tandem by the local Shia population, who, despite the availability of several lists, opted for their Shia political leaders. Furthermore, there have been documented cases of intimidation by the Hezbollah-Amal Movement with regard to their electoral opponents, even though the fact of their dominance would make such a brazen interference unnecessary.<sup>34</sup>

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<sup>33</sup> Almost all EU EOM observers have observed or have received reports from reliable sources on widespread practices of clientelism and vote buying. Distributing „bread bags“, food parcels and medical supplies, as well as generators, solar power and fuel, were among the tactics used by certain political parties and candidates, often in their offices, to unduly influence the voters.

<sup>34</sup> The participants of a public rally, organized by the list Building of a State Abbas in Bekaa 3 were frightened by gunfire near the rally’s venue. A candidate from the list was beaten up in Baalbek. Later on, three candidates from the same list, all members of the local Shia community, withdrew their candidacies. The EU EOM observed intimidation of opposing candidates’ agents by Hezbollah and Amal Movement in South 12. One of them was the female candidate Bushra al-Khalil, running in Zahrani-Tyre, who reported to EU EOM about her systematic intimidation by the Amal Movement.

Instances of intimidation, including of female candidates, destruction of campaign materials, and the obstruction of campaign activities, have also been observed and reported from other districts (Beirut 2, Bekaa 2, Mount Lebanon 4). However, these violations remained localised and cannot be considered as having had an impact on the election results.

A subject of particular concern has been the non-observance of legal provisions with regard of election day campaigning near or inside PS. The EU EOM observed campaign activities, such as distribution of material, in the vicinity of 14 per cent of PS and campaigning inside of 9 per cent of PS.

To prevent election day campaign violations, the SCE published a statement to introduce electoral silence period starting from midnight on the day before the election day not only for the media, as stipulated by the law, but also for candidates, lists and representatives of political entities and parties.<sup>35</sup> However, this, together with other similar statements published on 15 May, had little impact, if any, on observance of the silence period. In a post-electoral statement, the SCE informed that it had observed 324 violations related to the electoral silence.<sup>36</sup>

### **Campaign online**

Most contestants had a well-established presence online. Financial challenges, unequal access to traditional media, and the need to renew parties' messaging to attract the youth partially moved the campaign online. The EU EOM social media monitoring showed that the FPM, the Lebanese Forces, and independent candidates were all very active during the campaign and triggered the highest interactions both on Facebook and Twitter.<sup>37</sup> Some parties, including Kataeb and Marada, were very active but triggered less to few interactions.<sup>38</sup> Contestants mostly shared messages on campaign topics, as well as messages, pictures, and slogans on their campaign activities.<sup>39</sup> However, a large part of the candidates' postings was partially or totally devoted to discrediting opponents.<sup>40</sup> The main topics of the campaign online were corruption, economy, regional politics, and the lack of infrastructure.

Social media platforms allowed visibility to independent and opposition candidates, including through paid-for content.<sup>41</sup> However, the level playing field was heavily tilted in favour of wealthier candidates who had more resources to create and boost content. While candidates representing the new emerging forces and media pages supporting them released political ads on

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<sup>35</sup> On 29 April, the SCE adopted Statement no. 14, specifying that on the Lebanese territory any campaign activities must stop at zero hour the day before the election day and that: "The local media and advertising outlets, as well as candidates, lists and representatives of political entities and parties must adhere to the electoral silence period."

<sup>36</sup> SCE, Evaluation of the Electoral Process, 19 May 2022.

<sup>37</sup> The EU EOM monitored 80 Facebook pages and 87 Twitter accounts of political actors from 27 March till 15 May. See Annex 6 for more details.

<sup>38</sup> Marada reposted news from media rather than to create original content.

<sup>39</sup> This formed respectively 62 per cent and 42 per cent of their postings on Facebook and Twitter.

<sup>40</sup> Discrediting messages formed 17 per cent of the postings on Facebook and 25 per cent on Twitter.

<sup>41</sup> The EU EOM analysed political ads shared on 243 Facebook pages from 22 March till 15 May. Online spending ranged from USD 100 to 27,396.

a myriad of individual pages, partially reflecting their offline division, established parties or wealthy candidates relied on one or a handful of pages only to share their messages.<sup>42</sup> The Facebook spending of the pages of the Lebanese Forces, Kataeb, and the list “Beirut needs a heart” (Fouad Makhzoumi) amounted to a third of the total spending of the 128 new emerging forces pages.<sup>43</sup> Compared to other forces, the March 8 alliance only rarely resorted to paid-for-content on Facebook.

The EOM observed that part of the candidates continued campaigning on Facebook and Twitter until election day. Some 93 pages of candidates, parties, and media monitored by the EU EOM still ran ads on 15 May on Facebook.

### **Campaign in the media**

The campaign in the media significantly stepped up in the final run-up to the polls. The wealthiest candidates were buying up the paid-for “election packages” proposed at a high cost by the three major commercial television channels, *Al Jadeed*, LBCI and MTV. These packages included access to news programmes, debates and interviews, as well as live coverage of campaign events such as the presentation of the lists of candidates. While most candidates could not afford it, they switched instead, for free access or lesser rates, to the partisan media, like television broadcasters *Al Manar* (Hezbollah), NBN (Amal Movement) and OTV (FPM), according to their own political affiliations and alliances.

Independent candidates also turned to the alternative media platforms, like *Thawra TV* and *Megaphone*, and to the local media, mainly radio stations and news websites, whose rates for political content were less costly. The State-run *Tele Liban* offered free airtime to candidates, with very few of them participating, only 16 out of a total of 718 candidates running, and provided light coverage of the campaign mainly through the news and live broadcasts of rallies and speeches.

### **Campaign Finance**

***An inadequate legal framework coupled with the acute socio-economic crisis allowed for the proliferation of vote-buying practices, affecting the level playing field.***

The Election Law No. 44/2017 regulates campaign finance for both candidates and lists. The legal framework for campaign finance generally falls short of certain international commitments and best practices concerning transparency and accountability due to the lack of some crucial provisions, the limited mandate, capacity and sanctioning power of the SCE in monitoring

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<sup>42</sup> The new emerging forces shared ads on 128 pages monitored by the EOM, releasing a total of 3,338 ads, for USD 117,000. Among new emerging forces, Citizens in a state stood out as the most organised one, since it had a party page that ran ads covering all the districts the party was running in. The page was the third largest spender on Facebook (115 ads, USD 16,896).

<sup>43</sup> Lebanese Forces (largest spender on Facebook): 115 ads, USD 27,396; Kataeb party: (second largest spender): 143 ads, USD 17,294; Beirut needs a heart (fourth largest spender): 103 ads, USD 9,446.

campaign finance, and the lack of public disclosure requirements for financial statements, among others.<sup>44</sup> Despite the 2018 EU EOM's recommendations, the SCE continued to have a limited mandate and lacked human and financial resources, as well as sanctioning power and even a legal personality.

The deep socio-economic and financial crisis, near dysfunctionality of the banking system, as well as the lack of effective control and sanctioning mechanism to ensure accountability have all affected the level playing field.

The monitoring of campaign finance is limited to the electoral campaign bank account that the candidates and lists have to open when registering, with total bank secrecy on other personal accounts of the candidates or of their close relatives.<sup>45</sup> This allows candidates to avoid using their electoral bank account, and potentially channel illicit sums of money through totally opaque bank accounts, to which neither the SCE nor other institutions have access.

*Priority Recommendation: Give the SCE the mandate and capacity to check and audit all personal accounts of the candidates and their children and spouse, by lifting the bank secrecy on these accounts and creating a dedicated unit within the SCE for this purpose.*

Although, according to the law, all transactions above LBP 1,000,000 (EUR 27) should be done by cheque, in practice the electoral expenses were largely paid in cash, posing further challenges to tracing funds and verifying compliance with spending limits. The SCE acknowledged to the EU EOM that it does not have the capacity to monitor these cash transactions.

Even if the law imposes campaign-spending limits to candidates and lists, variable according to the size of the districts, the SCE had no resources to assess the reliability of the financial information provided by candidates and the respect of these ceilings.<sup>46</sup> The definition of campaign spending is very broad and includes, besides conventional expenses, payments for the transport of voters, travel expenses of non-resident voters, and expenses made by other persons in favour of candidates or lists or with their express or tacit consent. On 22 March, Meta rolled out its Ad Library for Lebanon, providing more transparency on spending on Facebook. Online spending was, however, limited compared to the overall spending. Unfortunately, the full features

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<sup>44</sup> UNCAC art.7, para. 3 "Each State Party shall also consider taking appropriate legislative and administrative measures, consistent with the objectives of this Convention and in accordance with the fundamental principles of its domestic law, to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties"; UNCAC art. 13 "governmental authorities must ensure that the public has effective access to information and must respect, promote and protect the freedom to seek, receive, publish and disseminate information concerning corruption"; Venice Commission, Guidelines on the Financing of Political Parties, art.12 "The transparency of electoral expenses should be achieved through the publication of campaign accounts."

<sup>45</sup> According to art.60 (1) of the election law, the money of a candidate's spouse, ascendants or descendants are considered part of the candidate's personal money that can be used for campaign purposes. Welfare associations owned by candidates are a common vehicle for distributing money and in kind support to targeted voters.

<sup>46</sup> The lowest spending ceiling for candidates was in Beirut 1 (EUR 275,000 at the free market rate of 15 April) and the highest in South 3 (EUR 1,000,000 at the free market rate 15 April). For the 2018 elections, the candidates' spending ceiling ranged from EUR 423,000 in South 1 to EUR 1,300,000 in South 3.



of Ad Library, providing aggregated information on candidates and party spending, started working late in the process. In addition, medias and CSOs did not provide substantial financial information to voters based on the available information ahead of the elections.<sup>47</sup>

All EU EOM observers reported a high monetisation of the campaign, where a culture of in-kind and financial handouts for electoral purposes by institutions owned or managed by candidates or parties, prevailed. These practices are due to a legal provision according to which the distribution of services and payments during the campaign period are not subject to the spending ceilings and do not fall under the control of SCE if the same have been provided for three years prior to the elections. The candidates are not obliged to report these to the SCE, which thus has no control over such practices. This enables the bypassing of campaign finance prohibitions by wealthy parties and candidates, who can influence the voters' choice in exchange for basic necessities, particularly in the current economic crisis.

*Priority Recommendation: Strictly regulate the provision of goods, services or payments by institutions owned or managed by candidates or parties (including companies, foundations and charities) during the electoral campaign period, to avoid being used for electoral purposes.*

Opacity governs the financing of political parties. While the law forbids foreign contributions or donations for candidates and lists, there is no such prohibition related to the financing of political parties, and the SCE does not have access to their bank accounts.

While financial reports have not been submitted by all candidates and sanctions have never been applied in previous elections, only a limited number of candidates and lists submitted the mandatory monthly financial reports. According to the law, the MoIM should impose a fine of LBP 1,000,000 per day of delay (approx. EUR 27 at the free market rate on 28 May), but this minimum amount does not constitute a deterrent and has in fact never been applied.<sup>48</sup> For exceeding the spending ceiling, there is also a fine equivalent to three times the amount of the excess that has also never been applied. Following the 2018 elections, 222 candidates never submitted any financial statement, three submitted with delay, but no fines were imposed.<sup>49</sup> Moreover, seventeen of them ran again in the 2022 elections. In practice, the lack of sanctions allows candidates to ignore the already scarce legal provisions concerning campaign finance. A clear sanctioning mechanism enforced by the SCE could prevent such practices in future elections.

*Priority Recommendation: Empower the SCE to impose dissuasive fines on candidates and lists that do not submit on time the mandatory campaign finance reports or violate campaign spending ceilings. This should be accompanied by enforcement measures, for example the prohibition to run in future elections in case of non-payment of these fines.*

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<sup>47</sup> As part as its monitoring of campaign finance, the Lebanese Transparency Association has meticulously documented campaign spending of contestants online. However, information will be published only after the elections.

<sup>48</sup> This amount has not been updated to reflect the current devaluation of the LBP.

<sup>49</sup> According to the law, the MoIM should impose a fine of LBP 1,000,000 per day of delay (approx. EUR 27 at the free market rate 26 May). This amount has not been updated to reflect the devaluation of the LBP.

Overall financial reports should be submitted 30 days after the elections, and as of 17 June, the legal deadline, 752 candidates (out of the 1043 registered initially) and 68 lists (out of 103) submitted the overall campaign finance report to the SCE. The SCE has only 30 days to examine and audit them, otherwise the reports are considered approved, allowing thus for irregularities in campaign finance to be left unsanctioned. This deadline considered extremely short and the SCE has consistently raised this issue.

*Recommendation: Provide for an adequate timeframe for the SCE to audit the overall financial reports submitted by candidates and lists.*

There are currently no requirements in the election law for the public disclosure of financial reports or of the candidates and lists who did not comply with the campaign finance reporting requirements.<sup>50</sup>

## **X. MEDIA**

*The politically affiliated and sectarian media scene proved unable to provide a level playing field for candidates. This was further exacerbated by the candidates' dependence on financial resources in accessing major television channels and by the SCE incapacity to regulate the media in a timely manner.*

### **Media environment**

The Lebanese media landscape is diverse and dynamic.<sup>51</sup> Private television channels provide the bulk of the political content, together with online and local media. Apart from a few independent-leaning broadcasters and publishers, the whole media scene is fractured along sectarian and political lines, distorting pluralistic and balanced media coverage. Private media ownership generally involves political parties, business interests and wealthy families which influence media content.<sup>52</sup>

The State-run *Tele Liban* and *Radio Liban*, credited with low audience ratings, are controlled by the presidency, the government, and the speaker of parliament, leaving little access to non-established political parties. The economic crisis negatively impacts the media sector, inflating costs and devaluating salaries and incomes.<sup>53</sup>

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<sup>50</sup> Law No.28/2017 on the right of access to information.

<sup>51</sup> According to the National Media Council (NMC), in 2021, there were, as licensed media for news and political content: eight television channels, 19 radio stations, 110 publications including 59 dailies, and 825 websites.

<sup>52</sup> See *Media Ownership Monitor Lebanon* report (2018) <https://lebanon.mom-rsf.org/en/>

<sup>53</sup> The *Daily Star*, a renowned newspaper funded in 1954, closed in October 2021; *Future TV*, controlled by Future Movement, stopped broadcasting news and political content in September 2019, also linked to the party's decline.

### *Freedom of expression in the media*

Freedom of expression suffers from political pressures, including violence and intimidation, both from non-State actors and the government, deterring media investigation and inducing self-censorship. The fate of Lokman Slim, the latest political commentator and journalist murdered in Lebanon in February 2021 following alleged threats from pro-Hezbollah activists, resonates as an alarm to all media. Lebanon ranked 130 out of 180 countries in the 2022 Reporters without Borders (RSF) World Press Freedom Index, down from 107 in 2021.

### *Media legal framework*

The Constitution safeguards freedoms of the press and of opinion. However, in contravention to international engagements, Lebanon still criminalizes, with up to three-year imprisonment and through vaguely worded provisions, media related offences such as insults towards the head of state and the army, defamation, slander and allegations against religion.<sup>54</sup> Although prison sentences are seldom applied to journalists, with most cases not reaching court, they have a dissuasive effect on the media, especially during election periods.<sup>55</sup>

*Recommendation: Suppress imprisonment penalties for defamation, libel, offences against religion and legitimate information actions, and withdraw media-related offences and crimes from military courts' jurisdiction..*

The Right to Access to Information Law (2017), which aims to ensure the transparency of the government and other state institutions, and journalists' timely access to public information including in election periods, is not implemented consistently.

According to the election law, all media must ensure "equal media visibility for all candidates and candidates" lists" coverage to all candidates, with the public media providing free access to candidates and the private media fulfilling strict obligations for paid political content.<sup>56</sup>

The SCE acts as the state media regulator during election periods, with limited sanctioning power. It can mainly address warnings to the media in case of violations, fine them when publishing opinion polls 10 days before election day, and refer all other offences, following instruction, to the Court of Publications for sanctions ranging from fines to provisional suspension of a programme or temporary closure of the media.

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<sup>54</sup> Criminal Code (art. 385 to 389, 473 to 475, 582 to 584); Military Code of Justice (art. 157).

<sup>55</sup> Human Rights Watch 2021 report <https://www.hrw.org/news/2021/05/04/freedom-speech-lebanon-under-attack>

<sup>56</sup> Election law, art. 72 to 74.

### *Campaign in the media*

Freedom of the media was generally respected during the campaign period. However, several cases of intimidation of journalists occurred, and extensive self-censorship was reported, as well as limited violent incidents against the media.<sup>57</sup> Journalists working for alternative online media or for investigative programmes on television, as well as a few female journalists, complained of being targeted by smear campaigns on social media.<sup>58</sup>

Whereas the campaign in the media officially started on 10 January, all television channels intensified their election broadcast after the publication of the candidates' lists on 4 April. Most of them offered a broad range of election programmes, including news, live events, debates and interviews with candidates. Debates between candidates were exceptional since, according to broadcasters, candidates were avoided direct confrontation. Paid-for electoral content, including political ads and live coverage of rallies, was widely broadcast on commercial television channels and, to a lesser extent, on politically affiliated ones.<sup>59</sup>

The state-run *Tele Liban* had only one election programme that offered free access to candidates with very few of them participating, partly due to the unattractive low audience ratings of the public broadcaster and to its incapacity to organize free access to all candidates willing to do so.<sup>60</sup> *Tele Liban* mainly covered the activities of the president, the government, the speaker of parliament, as well as of the ruling political parties in its news programmes.

*Recommendation: Free and equal access of candidates and candidates' lists to the state-run media, including broadcasters Tele Liban and Radio Liban, to be granted and organized consistently, under SCE oversight.*

In contradiction with the law, the media failed to provide equal visibility to all candidates and candidate lists. This was amplified by the selective flow of paid-for electoral content, mainly on the three major private television channels, *Al Jadeed*, LBCI and MTV. Also, politically affiliated media, *Al Manar* (Hezbollah), NBN (Amal Movement) and OTV (FPM), mainly

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<sup>57</sup> As confirmed to EU EOM by journalists covering Mount Lebanon 2 and Bekaa 1 districts. Also, a reporter covering vote-buying for *Al Jadeed* in Kesrwan was summoned by the State Security in Beirut on 9 May.

<sup>58</sup> *Megaphone* and *Daraj* alternative news websites, and the investigative team of *The corrupt regime falls* programme on *Al Jadeed*, complained of online harassment, including death threats. SKeyes media watchdog and the Alternative Press Syndicate documented incidents of journalists being abused by Amal Movement and pro-Hezbollah militants in Sarafand (16 April), Beit Jbeil (20 April) and Baalbek (29 April). EU EOM observers also reported several cases of journalists' intimidation and self-censorship countrywide.

<sup>59</sup> According to credible estimates made by the EU EOM interlocutors, prices ranged from EUR 1,000 for 30 seconds to EUR 500,000 and above for a full package on some of the commercial television channels (*Al Jadeed*, LBCI, MTV), spiralling up during the last two weeks of the campaign.

<sup>60</sup> On *Tele Liban*, from 13 April to 13 May, free airtime was granted, in the dedicated *Lebanon Today* daily programme, to only 16 candidates (two per cent of the total number of 718 candidates running for elections), nearly all of them being independent and civil society candidates, for an average duration of 35 minutes each.

favoured their own lists and candidates with fewer paid-for electoral content, contributing to unbalanced electoral media coverage in favour of established political parties.

Most television broadcasters did not abide by their obligation to display onscreen the specific „sponsored programme“ logo when their electoral coverage was paid for, including live campaign events. Major media confirmed to the EU EOM that the official rates they sent to the SCE were “fake” and underestimated, infringing the law, with transactions taking place in cash.

The SCE did not act in a sufficiently efficient way to ensure compliance of the media with relevant regulations. In general, the SCE has not shared sufficient information on media related violations with the public or with the EU EOM. According to credible election stakeholders, as of 28 April, 405 media violations were identified by the SCE, partly for alleged inflammatory speech, without indication that effective action took place. As of 30 May, no media-related cases had been referred to the Court of Publications by the SCE, said the Court.

The silence period, preventing direct campaign in the media 24 hours before and during election days, was generally not respected, with multiple violations on most television channels.

*Recommendation: The SCE to be given sanctioning powers to directly impose timely fines and/or suspension of programmes to the media, including on television channels, when violating their obligations during the campaign.*

### ***E-day and post-election period***

Although comprehensive media coverage of the voting took place on 15 May, journalists’ access to polling stations for voting and counting on election day, as well to tabulation centers on 16 May, was limited or prohibited on several occasions by security forces, electoral staff, and militants of candidates’ teams and political parties.<sup>61</sup>

*Recommendation: Accredited media to be granted access to information in order to enhance transparency and credibility in the process. Explicitly include access to tabulation in the law.*

Limited media-related incidents involving journalists were reported. According to SKeyes media watchdog and the Alternative Press Syndicate (APS), the most serious case happened in Ansar (Nabatiyeh governorate), when a Shiite video reporter for *Megaphone*, an independent news platform, was beaten up by pro-Hezbollah activists in a polling center while covering violations, mostly represented by Amal Movement and Hezbollah militants unduly accompanying voters behind the booth. His equipment was damaged and confiscated, the incident necessitated the intervention of the army. In Machghara (West Bekaa), according to similar sources, an *Al Manar*

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<sup>61</sup> According to EU EOM observers, journalists were barred from accessing the tabulation centres during tabulation operations in Baalbek, Beit ed-Dine, Marjayoun, Tripoli and Zahle.

television channel crew was assaulted by pro-Lebanese Forces activists, with one staff member of the media beaten up when their car came under attack.

***Media monitoring findings (see also Media monitoring Annex 5)***

According to the EU EOM media monitoring,<sup>62</sup> the four television channels monitored quantitatively - public: *Tele Liban*; commercial: *Al Jadeed*, LBCI and MTV - broadcasted a total of 295 hours 5 minutes 33 seconds of election coverage. Out of this total, 35 per cent were devoted to interview programmes, mostly because these provided important financial resources to the media since most candidates had to pay for accessing the commercial television channels.

A significant number of major media violations was observed: 186 in total, with 89 for inflammatory speech occurrences, and 97 for silence period breaches.<sup>63</sup> The sponsored programmes such as interviews were by large not advertised as such on the commercial television channels, and seldom for live campaign events with the notable exception of LBCI.<sup>64</sup> Also, the paid political ads (in percentage) were unevenly broadcasted, mostly in favour of independent pro-14 March (36) and National Dialogue Party (33) on *Al Jadeed*, National Dialogue Party (26), Hunchak (24) and Kataeb (16) on LBCI, Kataeb (35) and LF (20) on MTV.

Failure to respect the legal obligation to grant equal access to all candidates and candidates lists was significantly monitored on all four television channels. On *Al Jadeed* (in percentage of the total coverage of political actors): civil society, independent pro-14 March and independent (36 per cent together), PSP (10), FPM (eight), Kataeb (seven), LF (four), Hezbollah (three), Amal Movement (two). On LBCI: independent, independent pro14-March and civil society (33 per cent together), FPM (13), Kataeb (12), PSP (seven), LF and Hezbollah (three per cent each), Amal Movement (one). On MTV: independent pro-14 March, civil society and independent (34 per cent together), Kataeb (16), LF (15), FPM (eight), PSP (four), Hezbollah and Amal Movement (less than one per cent each). On *Tele Liban*: Hezbollah (31), LF (19), Amal Movement (16), PSP (11), FPM (five), Kataeb (three), civil society (two). Also, most of the coverage of the political actors was neutral in tone, except for *Al Jadeed* which negatively

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<sup>62</sup> Quantitative media monitoring of four television channels daily from 18:00 to 24:00 (13 April to 13 May): *Tele Liban* (public); *Al Jadeed*, LBCI and MTV (private). Qualitative media monitoring: *Annahar* (news website); *Megaphone* (online news platform); the Facebook pages of two politically affiliated television channels (NBN, affiliated with Amal Movement; OTV, affiliated with FPM); the website of one politically affiliated television channel (*Al Manar*, Hezbollah).

<sup>63</sup> Out of 97 silence period violations monitored by the EU EOM on *Al Jadeed*, LBCI, MTV and *Tele Liban*, 48 were related to out of country voting (OCV), 22 to early voting for polling staff, and 27 to general elections.

<sup>64</sup> E.g., on 9 April, LBCI was the only television channel to play the logo “sponsored programme” onscreen while covering live an important FPM campaign rally in Beirut with the head of the party, Gebran Bassil, contrary to other private broadcasters covering the same event, as *Al Jadeed*, *Al Manar* and OTV, which did not display the logo. On 29 April, an important Hezbollah rally with participation of the head of the party Hassan Nasrallah was covered live by *Al Manar*, NBN and OTV, none of them displaying the “sponsored programme” logo. This most probably indicates in both cases that either the coverage was paid for, or that it was broadcasted for free, unlawfully in both cases.

covered Amal Movement (45 per cent of the party's total coverage), Hezbollah (26) and FPM (25), and MTV which negatively covered Hezbollah (34).

The coverage of the public authorities (president, prime minister, government, speaker of parliament) was assessed as mostly institutional, non-partisan and neutral in tone on the four television channels, whereas the coverage of the religious leaders was significantly described as sectarian in their favour on *Tele Liban*, LBCI and MTV.

As for the news websites and social media platforms monitored qualitatively, they mostly reflected their respective political affiliations in the case of *Al Manar* (Hezbollah), NBN (Amal Movement) and OTV (FPM), whereas *Annahar* and *Megaphone* were assessed as more independent leaning but still partisan both against the ruling political parties.

## **XI. SOCIAL MEDIA AND DIGITAL RIGHTS**

***Legal obstacles and intimidation limited freedom of speech online, while derogatory speech and information manipulation distorted the online space.***

### **Social Media Environment**

Social media is the preferred source of information for the population under 40 years old that shifted away from traditional media, due to media's complacency towards political stakeholders and the erosion of accountability mechanisms.<sup>65</sup> The most followed pages and accounts on Facebook, Twitter, TikTok, Instagram, and YouTube are mostly entertainment pages which are less political in nature although they did circulate some electoral messages.<sup>66</sup> Internet penetration is high in Lebanon, among the highest in the region, despite rising infrastructure and economic challenges that impact internet's speed, stability, and affordability. The telecommunication sector is essentially owned by the government.<sup>67</sup> Ninety-five percent of the population over 13 years old had access to social media as of January 2022.<sup>68</sup> Men represent most social media users predominantly on Twitter.<sup>69</sup>

With some 3.15 million users, Facebook was the preferred platform for information sharing while Twitter was the most influential one that shaped the political discourse. Political messages were also circulated through YouTube, Instagram, or TikTok, however to a lesser extent. WhatsApp is the most commonly used messaging platform in Lebanon. Parties and contestants extensively relied on it to distribute campaign messages, including unsolicited personal and

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<sup>65</sup> [Media and Information Landscape in Lebanon](#), Maharat Foundation, 2021

<sup>66</sup> They gather 10 to 20 times more followers on average than political pages. See annex 6

<sup>67</sup> On 20 May, the Telecom's Minister Johnny Corm announced that Lebanon's telecommunication sector would start using the central bank flexible exchange rate (LBP 23,900 v. LBP 1,500 to the dollar on 20 May). This large price increase risks excluding part of the population from the internet.

<sup>68</sup> We are Social | Hootsuite Digital Report January 2022, [Lebanon report](#)

<sup>69</sup> Women formed 12,2 per cent of Twitter users in Lebanon as of January 2021, Hootsuite Digital 2021.

group messages, as well as voting instructions up until election day. Some candidates resorted to the video platform Zoom to reach out to out-of-country voters.

A number of international and national organisations, as well as media outlets, exposed information manipulation and promoted digital literacy throughout the country. Albeit encouraging, these initiatives were too recent to be able to reverse the long-standing effect of the sectarian and political polarisation that affected news consumption.

## **Legal Framework**

There is no law regulating online speech in Lebanon. This has led to confusion over whether it should be subject to the Penal code or the Publications law, which offers more protection. In 2016, the Publications Court of Cassation has ruled on appeal that the Publications Court had no jurisdiction over social media posts. Online postings are therefore subject to the Penal Code and other laws that unduly restrict freedom of expression online. This conflicts with Lebanon international commitments (*see Media section*).

In addition, the legal framework is used as a repressive tool rather than an effective way to seek redress. Selective lawsuits and summoning by security agencies have repeatedly been used against critical voices, especially after the October 2019 uprising, leading to self-censorship. Among others, political figures, members of the parliament, prosecutors have filed complaints, mostly under claims of slander and libel, that resulted in people being summoned by security agencies requesting to delete posts and to sign a pledge, without a Court decision.<sup>70</sup> For example, during the campaign period, at least one candidate was summoned by the Cybercrimes Bureau over a Facebook post released several months earlier that criticised an FPM official. To avoid further prosecution, the candidate signed a pledge and committed to not post about this person again.

Silencing of critical voices and intimidation online has been a long-standing issue. Several contestants, mainly independent Shia candidates, reported to the EU EOM serious coordinated threats and intimidation online, including rape and death threats.<sup>71</sup> Only one reported lodging a complaint. Threats and intimidation mirrored instances of offline violence and intimidation targeting Shia candidates that did not run on the Hezbollah or Amal lists. Intimidation silenced dissenting voices, affecting the plurality of opinions online and voters' ability to make informed decisions.<sup>72</sup>

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<sup>70</sup> It includes the Cybercrimes Bureau, the Army Intelligence, and the General Directorate of State Security. According to [Human Rights Watch](#), the Cybercrimes Bureau reported that it had conducted 4,154 defamation investigations between 1 January 2015, and 7 December 2020. [Muhajir](#) Observatory for Expression Online precisely documented 16 cases of summoning by the security agencies over online posts in 2021 and 2022, including eight cases when the defendants were asked or forced to delete their online messages, and six cases when they were asked to sign a pledge.

<sup>71</sup> Candidates in Beirut 1, Beirut 2, Bekaa 2, Baalbek, and South 3.

<sup>72</sup> ICCPR, GC 34, para. 23: "States parties should put in place effective measures to protect against attacks aimed at silencing those exercising their right to freedom of expression. [...] All such attacks should be vigorously investigated in a timely fashion, and the perpetrators prosecuted."



The election law does not reflect the increased use and specificity of social media, nor does it give the SCE an explicit mandate over violations on social media. For the first time, the SCE monitored the campaign online based on the provisions of the chapter VI of the election law, on election media coverage and advertising.<sup>73</sup> Eight monitors trained and equipped by UNDP extensively monitored contestants' online postings and spending, and documented violations.<sup>74</sup> However, violations could not be sanctioned, nor did they lead to early warnings. On 9 May, the SCE published figures on the percentage and nature of the violations documented on social media, albeit without further action.<sup>75</sup> While the SCE did not have a specific legal obligation in this regard, releasing broader information may have helped holding contestants and supporters accountable for their online postings and countering derogatory speech online.

*Recommendation: Include explicit provisions on campaign on social media in the election law and give the SCE powers to effectively sanction violations.*

The 2018 law on Electronic Transactions and Personal Data does not sufficiently protect privacy and user data. The rules for collection, processing and saving of data are vague, lack time limits, and their implementation fails to provide enough safeguards against abusive data collection and processing, including by the ministries of defence, interior, and public health.<sup>76</sup> Cases when individuals can withdraw their consent are limited and based on unclear criteria.<sup>77</sup> The public also lacks awareness about their personal data usage. Additionally, the law does not establish an independent oversight body, and grants the Ministry of Economy and Trade power over data collection and processing, thus failing to provide check and balance mechanisms.<sup>78</sup>

This has resulted in personal data being broadly collected, exposed, heavily circulated, and used without users' knowledge nor consent, including during the campaign period. Out of 15 political parties' websites, only five provided some information about their data protection policy, although most failed to give details on the duration and purposes of data collection, the criteria to share data with third parties, or how to withdraw consent.<sup>79</sup> Candidates, lists, and parties used voters' personal data up until election day to circulate mass surveys and campaign messages, at times through repeated, targeted, and unsolicited messages by SMS, phone calls, and

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<sup>73</sup> The SCE monitored campaign violations and campaign silence on social media, based especially articles 74 and 78 of the law.

<sup>74</sup> On 19 May, the SCE released its [first report](#) on the electoral process, according to which sectarian and inflammatory speech intensified on social media closer to the elections and distorted the electoral process.

<sup>75</sup> Types of violation in percentage: defamation-libel: 68,84 ; stirring up sectarian strife: 8,84 ; incitement to violence and riots, and support of terrorism: (figure missing); treason and atonement: 16,28. <https://www.facebook.com/photo/?fbid=123329586997079&set=pcb.123329626997075>

<sup>76</sup> ICCPR, GC 34, para. 18: "... every individual should have the right to ascertain in an intelligible form, whether, and if so, what personal data is stored in automatic data files, and for what purposes."

<sup>77</sup> Law No. 81 Relating to Electronic Transactions and Personal Data (E-Transactions Law), article 92.

<sup>78</sup> The article 97 of the law also grants ministries of defence, interior, and public health the authority to handle licensing of data in certain cases.

<sup>79</sup> FPM, the Lebanese Forces, Citizens in a State, the National Bloc, Lihaqqi.

WhatsApp.<sup>80</sup> Contestants obtained voters’ data through collection during offline events, including charity ones, through local municipalities, private companies, or by buying the voters list.<sup>81</sup> Part of them established mini-call centres, operation rooms, dedicated software, and applications to reach out to voters and map the electorate up until election-day.<sup>82</sup>

*Recommendation: Amend the data protection law to effectively ensure the protection of personal data and establish an independent oversight body to oversee the collection and processing of personal data. Guarantee citizens protection against unsolicited information, including political propaganda during the election campaign.*

### **Social Media Monitoring Findings**

The EU EOM social media monitoring unit (SMMU) monitored election-related online content from 27 March till 15 May, principally on Facebook and Twitter. The SMUU analysed 2,741 Facebook posts, 1,584 tweets, and 6,466 comments on Facebook and Twitter.<sup>83</sup> Hezbollah is categorised as a terrorist organisation in the USA and therefore forbidden on Twitter and Facebook. However, it relied on a network of supportive pages and accounts both on Facebook and Twitter that shared its narratives.

Official election-related information was mostly shared on Facebook by the page „Lebanon Elections انتخابات لبنان“, operated by the MoIM.<sup>84</sup> The page had low key activity until the end of April, which did not allow for a proper progressive public outreach, and steadily lost followers.<sup>85</sup> It started generating more interactions as it increased its postings, in the week leading up to the elections. A more timely and regular communication on social media would have provided more visibility and ease voters’ access to information. In addition, election-related information was scattered on several pages online. The social media account of the SCE on Facebook and Twitter

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<sup>80</sup> ICCPR, GC 16, para. 10: “The gathering and holding of personal information on computers, data banks and other devices, whether by public authorities or private individuals or bodies, must be regulated by law.” ICCPR, article 17: “No one shall be subjected to arbitrary or unlawful interference with his privacy... Everyone has the right to the protection of the law against such interference or attacks.”

<sup>81</sup> The mission received direct reports of data collection, buying, or processing in Beirut 1 and 2, Mount Lebanon 2, 3 and 4, Bekaa 1 and 3, South Lebanon 1.

<sup>82</sup> This included parties, lists, and candidates: FPM, Hezbollah, Kataeb, Lebanese Forces, Vote for change, Zahle the message, Fouad Makhzoumi,

<sup>83</sup> The SMMU set up a regular quantitative monitoring of Facebook and Twitter from 27 March till 15 May. Some 82 pages on Facebook and 54 accounts on Twitter selected for their political relevance and number of followers (candidates, political leaders, parties, as well as institutions, journalists, media, CSOs, religious leaders, etc.) were regularly monitored, based on the number of interactions they generated. The SMMU also monitored a list of political and electoral keywords, as well as comments on the two platforms (see annex for details). In addition, the SMMU randomly monitored trending topics on Instagram and TikTok as part of its qualitative social media listening.

<sup>84</sup> <https://www.facebook.com/Lebelect>

<sup>85</sup> See Annex 6: postings for the 2022 elections started on 9 November 2021. Out of the 101 posts created until 15 May, 60 were posted in the last two weeks. The page posted on average twice per week until 30 April 2022.

were activated late in the process and had marginal numbers of followers.<sup>86</sup> None of the three accounts was verified by the platforms. Having verified pages and account would provide clarity on the source and reliability of the information shared.

One in four campaign posts on Facebook and Twitter analysed by the SMMU criticised or discredited parties and candidates, at times harshly, thus polarizing the online space.<sup>87</sup> This included boosted content on Facebook, half of which was posted by pages supportive of new emerging forces. These pages were especially vocal online, partially due to their younger audience and the lack of access to the traditional media.<sup>88</sup> Some 51 per cent of the negative content shared by parties and candidates targeted the so-called March 8 forces, dividing the political stakeholders in two camps, the pro- and anti-Hezbollah. Hezbollah concentrated 21 per cent of all discreditation postings, followed by the Lebanese Forces (18 per cent). Hezbollah's militias and weapons, together with sovereignty, corruption, fraud, economic and political failures of the government formed the bulk of the negative campaign. The prevalence of adversarial content dominated the online debate and forced voters into polarized discussions.

Polarization was reinforced by the widespread use of derogatory speech, by contestants and followers. The SMMU identified 166 posts and tweets of contestants between 1 and 15 May in breach of article 74 of the election law.<sup>89</sup> On 9 May, the SCE announced that almost 69 per cent of all violations documented on social media were slander and libel. The EOM analysed over 100 comments containing insults, accusations of corruption, murder, and treason; insults of contestants' families; and insults of sexual nature.<sup>90</sup> In addition, some female candidates faced vicious attacks and hashtags over their kids' disability and sexual orientation, two characteristics protected against hate speech. The absence of public condemnation of such instances and the lack of accountability mechanisms entrenched impunity.

Hashtags have been extensively used by parties to push narratives, create trending topics, and criticize opponents.<sup>91</sup> They were mostly created following offline events, capitalizing on events

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<sup>86</sup> The Facebook page of the SCE, open on 13 March, had 25 followers, and its Twitter account, open on 24 March, had 93 followers. They generated zero to three interactions on Facebook and zero to 12 on Twitter.

<sup>87</sup> In total, 23,61 per cent of the post analysed on Facebook and 27,39 per cent of the tweets contained negative content.

<sup>88</sup> Ten per cent of the 243 political ads shared on Facebook and analysed by the SMMU were negative ads, targeting mostly all political forces (42 per cent), Hezbollah (21 per cent), FPM (12 per cent), FPM and Hezbollah (8 per cent) and other forces including the Lebanese Forces, Kataeb, the March 8 alliance, Paula Yacoubian. Fifty per cent of them were shared by online media pages, 25 per cent by candidates and politicians, 21 per cent by parties, 4 per cent by civil society.

<sup>89</sup> This included slander, incitement to religious strife, accusation of unbelief, and distortion of information.

<sup>90</sup> This targeted among others Samir Geagea, Hezbollah, Gebran Bassil, Neamat Frem, Sethrida Geaga, Paula Yacoubian, Fouad Makhzoumi, Elie Ferzli, Michel el Murr junior, Walid Jumblatt, President Aoun. This included: "The vomit bloc represented by the castrated", "Syria's garbage and Iran's spies, sheep, rat", "You are traitors", "Traitor son of a dog", "You, swindler, thief, and murderer!"

<sup>91</sup> For example, #don't vote for Lebanese Forces was trending on 8 April after a comment by an FPM supporter; #Nadim Gemayel was trending on 4 May, heavily discrediting him; #The Right Word was created in support of Suleiman Frangieh on 10 May; #This Finger was created following Hassan Nasrallah's speech on 14 May, and was used to both support and discredit Hezbollah.

rather than shaping them.<sup>92</sup> The SMMU observed manufactured amplification and coordination of messages online (by so-called “electronic armies”), until election-day, conducted by real and fake accounts supportive of Hezbollah, FPM, the Lebanese Forces, Michel Moawad, and Fouad Makhzoumi.<sup>93</sup>

This has led to fierce battles of hashtags online to set the trends. Hashtags and their circulation were purposively designed to manipulate the online space, thus interfering with voters’ free formation of opinion.<sup>94</sup> Furthermore, the Facebook pages and Twitter accounts supportive of Hezbollah showed a high level of organization and manipulation on social media, mixing human activity and bots.<sup>95</sup>

In addition, the EOM observed various types of information manipulation on Twitter and Facebook, including rephrasing of titles and news articles to fit one’s narratives, doctored video and pictures, misleading and false content, false context. They were shared across the political spectrum, to deceive voters.<sup>96</sup> Although such instances remained limited and at times satirical, part of it may have tangibly impacted the elections in districts where the margin between winning and losing candidates was low.

## **XII. PARTICIPATION OF WOMEN**

***The absence of measures to enhance women’s representation in decision-making bodies is contrary to Lebanon’s international commitments.***

Traditionally, women’s participation in Lebanese political life has been minimal, and many of the female candidates met by the EU EOM observers reported cultural, financial, or political barriers to their participation. Female candidates and journalists throughout the country reported to the EU EOM being seriously threatened and discredited online. The mission’s social media monitoring picked up degrading comments, threats and insults of sexual nature, and incitement to violence.

There were 118 women candidates (16.4 per cent), a two per cent increase compared to previous elections. While 18 women candidates were affiliated with political parties, only seven are party

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<sup>92</sup> Eli Ferzli’s conflict with protesters on 20 April; Fouad Makhzoumi visit to Sheikh Abdul Latif Derian on 13 April; Gebran Bassil’s visit to Akkar on 30 April and to the Bekaa on 2 May were all followed by the creation of hashtags and counter-hashtags to push narratives online.

<sup>93</sup> See Annex 6

<sup>94</sup> [ICCPR, HRC GC 25](#), para. 19: “Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind.”

<sup>95</sup> See social media annex.

<sup>96</sup> For example, the statement of the Shia religious leader Sheikh Ahmad Kabalan on the election law on 9 April, see Annex 6; the doctored video of the non-recognized Shia leader Nazeer Al-Joshi deceptively placed in front of Hezbollah slogan and flags; disinformation on vote buying shared by online media in Tripoli on 6 April.

members, and 93 were independent. Only 8 women<sup>97</sup> (6,25 per cent) were finally elected in the new Parliament, still at the near bottom of women's parliamentary representation in the Middle East and worldwide. The parliament did not include in the legal framework positive measures to accelerate equality between men and women and encourage women's representation in the decision-making bodies, in line with Lebanon's international commitments.<sup>98</sup>

*Priority Recommendation: Adopt temporary special measures to increase women's representation in the Parliament.*

No steps were taken either to address the discriminating legal provisions regarding the nationality law, which still do not allow women to pass their citizenship to their children, and those related to the automatic transfer of their voter registration, once married, to their husband's place of registration.

### **XIII. PARTICIPATION OF PERSONS WITH DISABILITIES**

*The exercise of political rights of persons with disabilities is still not fully guaranteed in law and practice.*

The legal framework on the rights of persons with disabilities (PWD) is limited and lacks enforcement measures, and PWD face complex barriers to achieving their rights. The Law 2020/2000 on the Rights of Disabled Persons was not implemented, and neither were various ministerial decrees, decisions, and circulars issued in the past years. As a positive development, on 29 March 2022, the parliament authorised the government to ratify the Convention on the Rights of Persons with Disabilities and its Optional Protocol.

The MoIM took, for the first time, the decision to place polling stations on the ground floor of schools in order to facilitate the access of PWD and a certain number of tents were installed. However, according to EU EOM observations, even if 51 per cent of the observed polling stations were situated on the ground floor, only 43 per cent were accessible to people with reduced mobility. In the absence of Braille ballot papers, visually impaired voters continued to be limited in the independent exercise of their right to vote. Voter education in sign language was insufficient,<sup>99</sup> although all 12 videos shared by the SCE on Facebook were doubled with sign language. In 14 per cent of the visited polling stations, EU observers noted persons with reduced mobility being carried to their polling station and offered inappropriate assistance.

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<sup>97</sup> Nada Boustany (FPM), Inaya Ezzedine (Amal), Ghada Ayoub (LF), Sethrida Geagea (LF) and independent candidates Najat Saliba, Cynthia Zarazir, Halima Qaqour, Paula Yacoubian

<sup>98</sup> Lebanon ratified CEDAW in 1996, thus has an obligation based on art. 7 to take all appropriate measures to eliminate discrimination against women and advance gender equality, including by the "adoption by States parties of temporary special measures aimed at accelerating de facto equality between men and women." Lebanon made reservations about art. 9 (2) dealing with equality in matters of citizenship laws, art. 16 (c), (d), (f), and (g) of dealing with equality in family laws, and art. 29 (1) dealing with settling disputes between member states.

<sup>99</sup> According to the EU EOM social media monitoring. The SCE shared 12 videos between 1 March and 28 April.

#### XIV. CITIZEN AND INTERNATIONAL ELECTION OBSERVATION

**The legal framework allows for election observation in line with international commitments, and the Supervisory Commission for Elections accredited more observers than in 2018.**

The election law sets the conditions for domestic and international election observation and generally allows for observation in line with international commitments and best practice.<sup>100</sup> The Supervisory Commission for Elections (SCE), responsible for observer accreditation, published the principles and procedures of election observation for these elections, as foreseen by law.<sup>101</sup> Domestic observers reported no difficulties regarding their accreditation, nor restrictions in their work in the period up to election day. The SCE accredited 1,610 national and 523 international observers.<sup>102</sup>

The largest domestic observation effort was undertaken by the Lebanese Association for Democratic Elections (LADE). LADE deployed 42 long-term observers to monitor the campaign, plus over 1,100 short-term observers for election day. LADE published several reports before and after the elections, including on vote buying during the campaign period and violations on election day. The Lebanese Union for People with Physical Disabilities (LUPD) deployed 200 observers, mainly to monitor the accessibility of polling stations.

Other organisations monitored aspects of the electoral process without seeking accreditation to access polling stations. The Lebanese Transparency Association (LTA) monitored the elections with a focus on transparency and campaign spendings. The Maharat Foundation conducted media and social media monitoring. In April, the SCE published two letters to the Maharat Foundation accusing them of violating the election law and monitoring the media illegally as they had not requested accreditations.<sup>103</sup> The Electoral Reform Coalition, consisting of LADE, LUPD, LTA and Maharat, reacted to this letter with a public statement condemning the SCE's restrictive interpretation of the election law and the "worrying indication of restrictions on civil society associations and their freedom to access, analyze and publish information."<sup>104</sup>

As for international observers, apart from the EU EOM, the SCE accredited observers of the League of Arab States, the National Democratic Institute, and the Organisation internationale de la Francophonie.

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<sup>101</sup> SCE Decisions No. 4 and No. 5, both published on 25 January 2022.

<sup>102</sup> Overall, the SCE issued 5,419 accreditations for these elections, including for media representatives. In 2018, they had issued about 4,300 accreditations.

<sup>103</sup> SCE letters of [13 April 2022](#) and of [20 April 2022](#).

<sup>104</sup> <https://maharatfoundation.org/media/2148/communique-stop-maharat-s-activities.pdf>

## XV. ELECTORAL DISPUTES

*Reforms are needed to better protect electoral rights, to reinforce the independence of the judiciary and to shorten the deadlines for the resolution of appeals against election results.*

The legal framework for elections does not provide detailed and sufficient provisions protecting electoral rights, as the provisions regarding violations occurring during the electoral campaign period are limited and confusing, with no clear authority in charge with deciding on such irregularities. The EU EOM observers reported that candidates lack trust in the judicial system, which is widely seen as inefficient, and subservient to various political forces due to the lack of independence.<sup>105</sup> In addition, there are no provisions regarding the filing of complaints at polling station level or at the level of the Primary or High Registration Committees related to irregularities on election day.<sup>106</sup> The Penal Code also lacks provision on electoral offences other than bribery. Moreover, according to art.5 of the election law, criminal prosecution for electoral crimes is dropped six months after election results are announced. As a result, a culture of electoral impunity prevails despite widespread allegations of vote buying, various instances of intimidation, threats and destruction of electoral material or exceeding of the campaign ceiling.<sup>107</sup>

### Complaints Relating to the Election Results

The Constitutional Council (CC) is the institution mandated to decide on appeals against the parliamentary elections results.<sup>108</sup> The ten members of the current CC were appointed in 2019 and in 2021, half of them by the National Assembly and half by the Council of Ministers, for a six-year period. Decisions are taken by a qualified majority of seven members, and a quorum consists of eight members, which has sometimes hindered the adoption of decisions. The CC's decisions are final.

According to the law on the establishment of the CC, the right to challenge the parliamentary election results is limited to the defeated candidates and only against the winning candidates in the district in which they contested.<sup>109</sup> The electors of the district do not have the right to file an

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<sup>105</sup> In May 2021, the parliament's administration and justice committee drafted a reform bill aiming to boost independence and transparency in the judiciary (Draft Law amending Legislative Decree No. 150/1983 on the Organisation of the Judiciary). In September 2021, the minister of justice asked for an opinion from the Venice Commission on the draft law, which has not yet been released. CCPR, General Comment 32, p. 19: *"The requirement of competence, independence and impartiality of a tribunal in the sense of article 14, paragraph 1, is an absolute right that is not subject to any exception."*

<sup>106</sup> This legal loophole is particularly important since these are admissible evidences in case of an appeal to the CC, but there is no procedure for such complaints and in practice, only three such complaints were registered for these elections, despite various incidents across the country.

<sup>107</sup> The EU EOM was informed only of five complaints filed with the Public Prosecutor and with the SCE concerning various violations during the electoral campaign and the election day, filed by the LF, FPM and by independent candidates/lists.

<sup>108</sup> Art. 19 of the Constitution, Law No. 250 of 14 July 1993 on the Establishment of the Constitutional Council amended by law No. 150 of 30 October 1999 and further amended by Law No. 43 of 3 November 2008.

<sup>109</sup> Art. 24 of the Law 250/1993 on the Establishment of the Constitutional Council amended by law No. 150 of 30/10/1999 and further amended by law No. 43 of 3/11/ *"The Constitutional Council decides on the validity of an elected MP mandate and conflicts and challenges arising from the elections of MPs by virtue of a request that the losing candidate in the electoral district submits to the CC presidency within a period of thirty days"*

appeal. Under the previous election law with a majoritarian electoral system, the CC considered that a losing candidate could lodge a complaint only against winning candidates of the same confessional seat the defendant ran for. The election law 44/2017 did not include provisions concerning the complaints against election results. Due to this legal gap, the CC, following the 2018 elections, reinterpreted the aforementioned provisions and considered that a candidate could challenge also the results of candidates for other confessional seats, either from other list or even from their own list.<sup>110</sup> Such important aspects should be clearly mentioned in the law and not be left at the interpretation of the CC, in order to guarantee an effective remedy to all candidates and lists, in line with international commitments and good practices.<sup>111</sup>

*Recommendation: The election law to clearly regulate the right of appeal against the election results for all losing candidates against any candidate that competed in that district.*

Currently, the deadline for submitting the appeal is 30 days from the official announcement of the results, and the CC has four months to rule on the appeal.<sup>112</sup> These deadlines are excessively long and run against good practices, permitting potential uncertainty over the electoral results while cases are being determined, as the Parliament members whose election is being contested remain in function until a final CC decision.<sup>113</sup>

*Recommendation: Shorten the timeframe for lodging and deciding on an appeal against the election results. Provide adequate human resources for the CC, to allow for thorough investigation and quick decisions on the appeals.*

At the end of the complaints period, on 17 June, 15 appeals against election results were filed, among which four concerning the results of North 2, and two concern Mount Lebanon 1 and South 1, respectively. The allegations are related, for example, to irregularities, cancellation of certain polling station results, violence and intimidation of candidates, the method of calculation of the electoral quotient for the allocation of seats to the lists. In certain cases, if the CC accepts the claims of the defendants, the results could impact the mandate of several deputies. Such

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*maximum*"; art 46 of Rules of Procedures of the CC/2000.

<sup>110</sup> In the CC decision no.16 /2019.

<sup>111</sup> UN, ICCPR Art. 2.3 "Each State Party to the present Covenant undertakes: (a) To ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy"; Venice Commission, Code of Good Practices on Electoral Matters, CDL-AD (2002) 23, art. 99 "Standing in such appeals must be granted as widely as possible. It must be open to every elector in the constituency and to every candidate standing for election to lodge an appeal." Venice Commission, Code of Good Practices on Electoral Matters, Guideline II 3.3. f "all candidates and all voters registered in the constituency concerned must be entitled to appeal. A reasonable quorum may be imposed for appeals by voters on the results of elections."

<sup>112</sup> Once an appeal is submitted, the President of the CC appoints another CC member as a rapporteur with investigating powers, who shall present a report to the President within three months of his appointment. Immediately after the submission of the report the Council will convene and must issue its decision within one month. However for the 6 May 2018 elections, the CC's decisions on appeals were published on 21 February 2019.

<sup>113</sup> Venice Commission, Code of Good Practice on Electoral matters, Guideline II 3.3. g, Explanatory Report, para. 95. "Time-limits for lodging and deciding appeals must be short (three to five days for each at first instance)".



uncertainties will need to be avoided in the future by the fast management of these cases before the new Parliament takes over, and this would need to be addressed by a future electoral reform,

## **XVI. OUT-OF-COUNTRY VOTING**

**The out-of-country voting logistics went smoothly despite the lack of financial resources, but the counting of ballots at the minor district level delayed the tabulation of results.**

The 2017 election law introduced out-of-country voting (OCV), which was first implemented for the 2018 parliamentary elections. The law foresees the creation of a dedicated electoral district with six seats for the OCV, but this provision was suspended for these elections.<sup>114</sup> As a result, out-of-country voters voted for their original electoral district in Lebanon.

The Ministry of Foreign Affairs (MFA) was responsible for the organisation of the OCV, in coordination with the MoIM. Lebanese citizens could register to vote abroad via an MFA website until 20 November, more than a month before the call for elections. The final number of voters was 225,624, corresponding to 5.68 per cent of the total voter register, and a notable increase from 2018.<sup>115</sup> OCV took place on 6 May in 10 Middle Eastern countries and on 8 May in 48 other countries.

In the run-up to the OCV election days, public scrutiny was high as the OCV could potentially impact the results in some districts.<sup>116</sup> A group of Lebanese diplomats went on strike from 8 to 13 April, but the MFA stated that this had no impact on the OCV preparations. EU EOM interlocutors expressed concern about the transportation of the OCV ballot boxes, as in 2018 some boxes were allegedly lost. Another concern raised by the Lebanese Forces (LF) was the alleged allocation of opposition voters to remote polling centres, particularly in Australia. The LF did not provide any evidence of such a large-scale manipulation. The MFA declared that all complaints received in this regard were due to registration errors, where voters had provided the wrong postal code.

The EU EOM deployed 16 observer teams to 12 EU countries and Switzerland.<sup>117</sup> No logistical issues were noted during the voting process, and none of the essential material was missing in the observed polling stations. Procedures were mostly followed, with minor deviations that did not affect the process. Long queues of voters were noted around noon and in the afternoon. Party agents were present in all polling stations observed, mainly from FPM, LF, and Amal, wearing clothes with party symbols and keeping lists to control voters' attendance. In Paris and Berlin, party agents were observed putting pressure on voters outside of polling centres by intimidating them or suggesting how to vote.

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<sup>114</sup> Law 8/2021 that amends Law 44/2017.

<sup>115</sup> For the 2018 elections, 82,965 voters were registered to vote in 39 countries.

<sup>116</sup> In particular, in North 3 district, out-of-country voters made up 10.45 per cent of all registered voters.

<sup>117</sup> Opening and closing were observed in 16 PS, whereas voting was observed in 62 PS during the day.

The MFA set up an operations room and hired students to monitor the voting process, which was streamed live from each PS. Any problems identified were reported to diplomatic staff, who then contacted the relevant embassy abroad to resolve the issue. Domestic observers also monitored the OCV and expressed satisfaction with the responsiveness of the MFA to deal with reported issues.

After the closing of the PS, the ballots were packed, the boxes sealed and placed in pouches with a GPS tracker from DHL, the company contracted to transport them. According to the MFA, all the pouches arrived in Lebanon on schedule by 13 May. They were stored at the Banque de Liban until 15 May, when they were taken to the Justice Palace in Beirut. There the ballot envelopes were sorted by minor district and dispatched, several hours later than planned. The late delivery, as well as the fact that the OCV ballots still had to be counted by the registration committee judges, led to delays at the tabulation centres (see *XVII. Polling, Counting and Tabulation*).

*Recommendation: If no specific OCV district is created, consideration could be given for OCV ballots to be counted centrally in Beirut by dedicated High and Primary Registration Committees in sufficient numbers and adequately trained for this task.*

## **XVII. VOTING, COUNTING AND TABULATION OF RESULTS**

**Election day was marked by localised tensions, the intrusive behaviour of candidate agents, and a disorganised tabulation process.**

### **Overview of Voting**

On election day, the EU EOM deployed 167 observers to all 26 minor districts of Lebanon. Overall, the EU EOM observed in 798 polling stations (PS). The opening was observed in 73 PS, voting in 658 PS, and closing and counting in 67 PS.

The PS observed by the EU EOM in the morning opened on time (42 PS) or within 30 minutes (31 PS), this minor delay being mostly due to the unpreparedness of the polling staff. In 15 PS, there was a large queue of voters waiting to vote. In nine PS, the staff did not have all the essential materials. While the ballot box was shown to be empty and properly sealed in almost all PS, in 46 of the 73 observed stations the polling staff did not count the received ballots and envelopes before the opening. The transparency of the opening process was good, observers and candidate agents could observe the process without undue restrictions, and no official complaints were lodged during the opening.

During the voting, EU observers reported problems in the vicinity of 14.4 per cent of PS, in most cases campaign activities (10.5 per cent) or campaign material (6.2 per cent). Out of the 658 PS observed during the voting, 11.8 per cent were overcrowded, in 9.3 per cent there were campaign material or activities, and in 3.5 per cent tension. In 9.8 per cent of PS, some of the essential material was missing, mostly tally sheets, seals, or result protocols. In 57.6 per cent of PS, the

polling staff had not recorded the number of ballots and ballot envelopes received in the morning.

The secrecy of the vote was not always guaranteed. In 12.3 per cent of PS, the layout did not sufficiently protect the secrecy of the vote, and in 13.8 per cent the voters did not always mark their ballot in secrecy. Voting procedures were almost always followed, even if the polling staff did not consistently check whether the voters' fingers were inked before handing them a ballot. In 12 per cent of PS, observers witnessed assisted voting, in most cases family members accompanying elderly voters or PWD within the polling booth. The EU EOM was able to observe the voting without restrictions in 97.4 per cent of observed PS. In 12.56 per cent of PS, the EU observed voters who were turned away and could not vote, mostly because their name was not on the voter list. Only three official complaints were filed in the PS observed during the voting (0.45 per cent).<sup>118</sup>

Throughout the day, most polling stations (70 per cent) were only staffed with two members (the head officer and the clerk appointed by the MoIM) and lacked the assistants that should be chosen among voters. There were unauthorised persons in 16.5 per cent of the observed PS, in most cases ISF agents. Still, most EU EOM observers assessed the performance of ISF and LAF as professional and not interfering. Candidate agents were present in large numbers in all PS observed from the opening to the closing, mostly representing the LF, independent candidates, FPM, candidates representing new political forces, Hezbollah, Kataeb, and Amal.<sup>119</sup> Candidate agents, wearing clothes with party symbols, were controlling voter attendance with their own voter lists and with the help of the polling staff, who read out loud the name of each voter. There were also cases in which agents interfered with the work of the polling staff (3.5 per cent of PS during voting). In 10 per cent of PS, observers saw people, mostly candidate agents, attempting to influence voters. At least five cases of abuse of assisted voting by candidate agents were observed, and cases of agents intimidating or putting pressure on voters were reported from at least nine minor districts.<sup>120</sup>

*Recommendation: Enforce the legal provisions limiting the number of agents per polling station, and prohibit the display of any party symbols inside the polling centres in order to avoid interference with the work of the polling staff and the intimidation of voters.*

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<sup>118</sup> In Beirut 1 (Laure Moghaizel School, PS 88) and in Metn (Masrobian College, PS 117), voters filed a complaint because they were denied the right to vote. In Saida Villages (Ghaziye, PS 405), an agent representing an independent candidate filed a complaint related to the expired identification document of a voter.

<sup>119</sup> Lebanese Forces were present in 60.5 per cent of all observed PS during the day, Free Patriotic Movement in 48.30 per cent, Hezbollah 34.47 per cent, Kataeb 30.31 per cent, Amal Movement 27.92 per cent, Progressive Socialist Party 10.94 per cent, Syrian Socialist National Party 6.92 per cent, Marada 5.91 per cent, Tashnag 4.53 per cent, and Citizens in a State 3.27 per cent. Independent candidates had agents in 54.72 per cent of all observed PS, lists representing new political forces in 35.47 per cent, and other parties in 33.71 per cent.

<sup>120</sup> Baalbek-Hermel, Beirut 2, Chouf, Jezzine, Marjayoun, Metn, Nabatieh, Tyre, and West Bekaa.

LADE observers were present in 18.6 per cent of PS visited throughout the day. Their behaviour was assessed as professional and knowledgeable by the EU EOM observers. According to LADE, around 40 of their observers were threatened or harassed by Amal and Hezbollah agents, mostly in the Saida Villages district, or even physically aggressed, as in Saida and Baalbek.

Throughout the day, localised cases of tension and intimidation were reported. In 10 minor districts,<sup>121</sup> the EU EOM observed large numbers of Hezbollah and Amal agents in Shia PCs, which had an intimidating effect on voters. The situation was particularly tense in Baalbek-Hermel, where Hezbollah agents outnumbered other agents by many times, controlling voters' access to the PC, preventing opposition agents from entering, and instructing voters within the PS. Security forces and polling staff were passive in face of these intimidations and threats. The EU EOM received credible reports on ballot box stuffing and carousel voting in Baalbek-Hermel. In this district, the extent of the intimidation might have affected the integrity of the voting process.

### **Counting**

At 19:00, the time of closing of PS, voters were still waiting to vote at seven out of 67 PS, and in all but one case the voting was extended to allow them to vote. Same as during the opening and voting, the closing and counting was marked by insufficiently trained polling staff who committed procedural errors. In 15 cases, the polling staff did not count the number of signatures on the voter list. In 10 cases, no reconciliation was done between the number of cast ballots and the number of voters who signed the voter lists. In 12 cases, the head officer had difficulties to fill out the PS report, and in nine cases, there were other significant procedural errors or omissions.

*Priority Recommendation: The MoIM to organise comprehensive and compulsory in-person training sessions for polling staff, to avoid procedural errors, which affect the integrity of the voting.*

In Kfar Sheila, Dinnieh, the EU EOM observed at the time of closing fighting and unrest within a PS which could not be controlled by the security forces. All but one EU EOM teams were able to observe the closing and counting without restrictions. The observer team in Rashaya was expelled from a polling centre by the LAF and only allowed back in when the counting process had finished. On a positive note, the EU EOM observed only one case in which electricity cuts hampered the closing and counting process.

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<sup>121</sup> Baalbek-Hermel, Beirut 2, Jbeil, Jezzine, Nabatieh, Rashaya, Saida villages, Tyre, West Bekaa, and Zahle.

## **Tabulation of Results**

The EU EOM visited 27 out of 29 tabulation centres across the country and observers sent 63 observation forms about the tabulation process at different Primary Registration Committees (PRC). Often, the premises for the tabulation were not adequate, with small and overcrowded rooms, and poorly organised workflows. In 24 out of 63 cases, observers were not able to observe the tabulation sheets closely enough to view the figures filled in.

Due to the lack of clear procedures for the tabulation, the organisation of the work depended on the High Registration Committee (HRC) judges. While some HRC judges allocated certain PRCs exclusively to count OCV ballots, others distributed the incoming protocols and OCV ballot boxes on a first-come, first-served basis. The EU EOM observed that there was often a lack of coordination and progress reporting in the tabulation centres. Many judges and other staff members had to work extremely long shifts. Overall, the performance of the PRC judges was assessed as professional and committed, despite the difficult work environment.

*Recommendation: Adopt clear procedures for the tabulation of results, including the reasons for cancellations and recounts, and train judges accordingly.*

While the first districts finished results tabulation on 16 May around noon, others, like Beirut 2 or Tripoli, took until the early morning of the 17 May to finish. The overall low quality of result protocols, filled out by the insufficiently trained polling staff, led to recounts.<sup>122</sup> Due to vague legal provisions,<sup>123</sup> PRC judges took different approaches regarding recounts. While some judges, in agreement with candidate agents, avoided recounts by adding or removing blank votes to make the numbers match, others ordered recounts in similar cases. The EU EOM observed recounts in 30 out of 63 cases. However, the delays in the tabulation process in some districts was mainly caused by the fact that PRCs, besides tabulating results, also had to count OCV votes. As for the HRC, in at least half of the observed districts, the judges operated behind closed doors, excluding or limiting the presence of candidate agents (at least nine HRC) or even observers (at least four HRC).<sup>124</sup>

## **XVIII. RESULTS**

Around 17:00 on 16 May, the MoIM announced the results for seven out of 15 major districts on a press conference. All district level results were published on 17 May around noon, including

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<sup>122</sup> For example, some PRC in Beirut 1 had to correct 30-40% of the results protocols.

<sup>123</sup> Article 106 of the election law only states that “A manual re-count shall be made if the polling station report results are found inconsistent with the computer-based results.”

<sup>124</sup> In Beirut 1, the head of the HRC asked EU observers, agents, and journalists to leave the room for 10 minutes, stating that he needed time, space, and silence to print out and sign the protocols. In Bekaa 2, all observers and agents were expelled from the HRC by the judge two hours before the announcement of the results. In Mount Lebanon 2 and 4, EU observers were not able to observe the process as the HRC worked behind closed doors.

the seat allocation calculations. Later that day, the MoIM published the results of the preferential votes for all candidates. On 18 May, the MoIM uploaded new documents under the existing links on their website without providing an explanation. The new data corrected the total number of registered voters, and the turnout had to be adjusted from initially 40.38 per cent to 49.19 per cent. On 20 May, the MoIM published the results per polling station (PS), grouped by the PRC which tabulated them. The results were not made available in a user-friendly (machine-readable) format that would have allowed an audit.

A manual partial results analysis showed that at the national level, in 20 per cent of all in-country PS, over 90 per cent of the valid votes went to only one of the competing lists. There are, however, sharp differences between the districts. In Baalbek-Hermel, South 2, and South 3, in at least 66 per cent of the PS, the Hezbollah-Amal list received more than 90 per cent of the valid votes.

**XIX. RECOMMENDATIONS**

NO.	FR page #	CONTEXT	RECOMMENDATION	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE INSTITUTION	RELEVANT INTERNATIONAL / REGIONAL PRINCIPLE / COMMITMENT
<b>ELECTORAL ADMINISTRATION</b>						
1.	14	<p>While the election law qualifies the SCE as independent, it also sets its dependence on the MoIM for financial and administrative resources.</p> <p>The SCE lacked funds, as well as qualified human resources, like auditors.</p>	<p><b>Establish the SCE as a separate legal entity that is fully independent from the MoIM, including in financial and administrative terms.</b></p> <p><i>(Priority recommendation)</i></p>	<p>Amend the election law, foresee a decree establishing an independent SCE</p>	<p>Parliament</p> <p>Council of Ministers</p>	<p><b>Genuine elections that reflect the free expression of the will of the people</b></p> <p>United Nations (UN), International Covenant on Civil and Political Rights (ICCPR), GC 25, art. 20. “<i>An independent electoral authority should be established to supervise the electoral process and to ensure that it is conducted fairly, impartially and in accordance with established laws which are compatible with the Covenant</i>”.</p>

2.	14	<p>Insufficient communication from the MoIM resulted in governors and sub-governors lacking essential information, like a timeline for election preparations or the final voter lists. The MoIM overall showed a lack of transparency and did not publish important election-related information.</p> <p>The SCE showed a restrained attitude towards stakeholders, which resulted in a difficult access to information, although some members in their individual capacity shared important updates on the commission's work with the EU EOM.</p>	<p>The election administration, including both the MoIM and the SCE, to publish relevant election-related information in a timely, comprehensive, and machine-readable manner so that citizens and all stakeholders are better informed about election processes. This includes, for the MoIM, decisions and their justifications, supplier contracts, details on the election budget and calendar, and for the SCE, campaign finance reporting.</p>	<p>No legal change. Administrative measures</p>	<p>SCE  MoIM</p>	<p><b>Transparency and access to information</b></p> <p>Access to Information Law No. 28/2017 amended by Law No. 233/2021, art. 7. <i>Public institutions and administrations "shall automatically publish on its websites the following documents in a searchable, copiable and downloadable format: Decrees, Decisions, instructions, circulars and warrants which contain an interpretation of laws, regulations or documents of regulatory nature, within 15 days from its issue date."</i></p> <p>ICCPR,GC 34, para. 19. <i>"To give effect to the right of access to information, States parties should proactively put in the public domain Government information of public interest. States parties should make every</i></p>
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						<p><i>effort to ensure easy, prompt, effective and practical access to such information (...).”</i></p> <p>United Nations Convention Against Corruption (UNCAC), art. 10. <i>“Each State Party shall, in accordance with the fundamental principles of its domestic law, take such measures as may be necessary to enhance transparency in its public administration, including with regard to its organization, functioning and decision-making processes, where appropriate (...).”</i></p>
3.	17	<p>Overall, the quality of the UNDP voter education material was good, but the campaign started late.</p> <p>Although the election law requires the broadcasters to allocate at least three hours per week and per television channel during the whole campaign for official voter education programmes, under</p>	<p>Increase the duration and frequency of the dissemination of the official voter education campaign and enforce the corresponding media obligations.</p>	<p>No legal change.</p> <p>Administrative measures</p>	<p>SCE</p> <p>MoIM</p>	<p><b>Transparency and access to information</b></p> <p><b>Right and opportunity to vote</b></p> <p>ICCPR, art. 25. <i>“Every citizen shall have the right and the opportunity (...) To vote and to be elected</i></p>

		<p>SCE supervision, this obligation was not respected by the public television channel and the three main private television channels.</p> <p>The late start of the posting did not allow for a timely voter education campaign on social media.</p>				<p><i>at genuine periodic elections ...”</i></p> <p>CCPR GC 25, para. 11 <i>“Voter education and registration campaigns are necessary to ensure the effective exercise of article 25 rights by an informed community.”</i></p> <p>ICCPR,GC 34, para. 19. <i>“To give effect to the right of access to information, States parties should proactively put in the public domain Government information of public interest. States parties should make every effort to ensure easy, prompt, effective and practical access to such information (...).”</i></p>
<b>VOTER REGISTRATION</b>						
4.	17	<p>The voting age is set to 21 years (whereas the age of majority is 18, the world’s most common age of suffrage), which excludes certain young citizens and is contrary to international common practice.</p>	<p>Lower the voting age from 21 to 18, the age of majority.</p>	<p>Amend art. 21 of the Constitution</p>	<p>Parliament Council of Ministers</p>	<p><b>Universal suffrage</b></p> <p>United Nations (UN), International Covenant on Civil and Political Rights (ICCPR), art. 25(b). <i>“Every citizen shall have the right and the opportunity, without</i></p>

						<p><i>unreasonable restrictions: (b)To vote and to be elected.”</i> UN Human Rights Committee HRC, CCPR, General Comment (GC) No. 25, para. 4. <i>“Any conditions which apply to the exercise of the rights protected by article 25 should be based on objective and reasonable criteria.”</i></p>
5.	18	<p>In Lebanon, voters are registered to vote in their paternal ancestral village. Changing the place of registration is possible but requires a lengthy procedure and is rarely undertaken. Many voters do not live where they are registered and have to travel to their electoral district on election day, which was even more difficult this year in the context of the economic crisis and higher transport costs.</p>	<p><b>Establish mega centres based on voter pre-registration, in order to facilitate the participation of voters. This process requires regulation, sufficient time for technical preparations, as well as broad voter information campaigns.</b></p> <p><i>(Priority recommendation)</i></p>	<p>Amend the election law.</p> <p>Administrative measures.</p>	<p>Parliament</p> <p>Council of Ministers</p> <p>MoIM</p>	<p><b>Right and opportunity to vote</b></p> <p>HRC, CCPR, GC No. 25, para. 12. <i>“Positive measures should be taken to overcome specific difficulties, such as ...impediments to freedom of movements which prevent persons entitled to vote from exercising their rights effectively.”</i></p>
CAMPAIGN ENVIRONMENT						
6.	19	<p>There is no explicit ban on electoral campaigning on election day for candidates and lists. The law provides</p>	<p>Stipulate, in the election law, the electoral silence period 24 hours before and on general election day, and the total prohibition of any campaign activities for candidates, lists or parties during this period, as</p>	<p>Amend art. 78 of the election law</p>	<p>Parliament</p> <p>Council of Ministers</p>	<p><b>Genuine elections that reflect the free expression of the will of</b></p>

		<p>for an electoral silence period only for the media, 24h before election day until the closing of the ballot boxes.</p>	<p>well as define sanctions for related violations to be imposed by the SCE.</p>			<p><b>voters</b> <b>Fairness in the election campaign</b></p> <p>ICCPR, GC 25, para19 <i>“Persons entitled to vote must be free to vote. Without undue influence or coercion of any kind which may distort or inhibit the free expression of the elector’s will. Voters should be able to form opinions independently, free of compulsion, inducement or manipulative interference of any kind.”</i></p>
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CAMPAIGN FINANCE						
7.	23	The monitoring of campaign finance is limited to the electoral campaign bank account that the candidates and lists have to open when registering, with total bank secrecy on other personal accounts of the candidates or of their close relatives.	<p><b>Give the SCE the mandate and capacity to check and audit all personal accounts of the candidates and their children and spouse, by lifting the bank secrecy on these accounts and creating a dedicated unit within the SCE for this purpose.</b></p> <p><i>(Priority recommendation)</i></p>	Amend the election law and bank secrecy law of 3 September 1956	<p>Parliament</p> <p>Council of Ministers</p>	<p><b>Transparency and accountability of funding / Prevention of corruption / Fairness in the election campaign</b></p> <p>UNCAC, art.7.3 “Each State Party shall also consider taking appropriate legislative and administrative measures...to enhance transparency in the funding of candidatures”.</p> <p>UNCAC, art.6.2 “Each State Party shall grant the body or bodies [...]the necessary independence [...] to enable the body or bodies to carry out its or their functions effectively and free from any undue influence. The necessary material resources and specialized staff, as well as the training that such staff may require to carry out their functions, should be provided.”</p>

8.	24	<p>According to the law, the distribution of services and payments during the campaign period are not subject to the spending ceilings and do not fall under the control of SCE if the same have been provided for three years prior to the elections. The candidates are not obliged to report these payments to the SCE, which thus has no control over such practices. This enables the bypassing of campaign finance prohibitions by wealthy parties and candidates.</p>	<p><b>Strictly regulate the provision of goods, services or payments by institutions owned or managed by candidates or parties (including companies, foundations and charities) during the electoral campaign period, to avoid being used for electoral purposes.</b></p> <p><i>(Priority recommendation)</i></p>	<p>Amend art. 62.2 of the election law</p>	<p>Parliament  Council of Ministers</p>	<p><b>Transparency and accountability of funding Prevention of corruption / Fairness in the election campaign</b></p> <p>United Nations Convention Against Corruption (UNCAC), art.7.3 “Each State Party shall also consider taking appropriate legislative and administrative measures...to enhance transparency in the funding of candidatures”.</p> <p>HRC, CCPR, GC No. 25, para. 19. “Reasonable limitations on campaign expenditure may be justified where this is necessary to ensure that the free choice of voters is not undermined or the democratic process distorted by the disproportionate expenditure on behalf of any candidate or party.”</p>
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9.	24	<p>According to the law, the MoIM should impose a fine of LBP 1,000,000 per day of delay, for the late submission of the overall campaign finance reports (approx. EUR 27 at the free market rate 28 May). This minimum amount (that has not been updated to reflect the current devaluation of the LBP) does not constitute a deterrent and has in fact never been applied. For exceeding the spending ceiling, there is also a fine equivalent to three times the amount of the excess: this also has never been applied. In practice, the lack of sanctions allows candidates to ignore the already scarce legal provisions concerning campaign finance.</p>	<p><b>Empower the SCE to impose dissuasive fines on candidates and lists that do not submit on time the mandatory campaign finance reports or violate campaign spending ceilings. This should be accompanied by enforcement measures, for example the prohibition to run in future elections in case of non-payment of these fines.</b> <i>(Priority recommendation)</i></p>	<p>Amend Chapter V of the election law</p>	<p>Parliament  Council of Ministers</p>	<p><b>Transparency and accountability of funding</b></p> <p>UNCAC, art.7.3 “Each State Party shall also consider taking appropriate legislative and administrative measures...to enhance transparency in the funding of candidatures”.</p> <p>UNCAC, art. 26.1 “Each State Party shall adopt such measures as may be necessary, consistent with its legal principles, to establish the liability of legal persons for participation in the offences established in accordance with this Convention.”</p> <p>UNCAC, art. 30.7 “Where warranted by the gravity of the offence, each State Party, to the extent consistent with the fundamental principles of its legal system, shall consider establishing procedures for the disqualification, by court order or any other appropriate means, for a period of time determined by its domestic law, of persons convicted of offences established in accordance with this Convention from: (a) Holding public office.”</p>
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10.	25	Overall financial reports should be submitted 30 days after the elections. The SCE has only 30 days to examine and audit them, otherwise the reports are considered approved, allowing thus for violations in campaign finance to be left unsanctioned.	Provide for an adequate timeframe for the SCE to audit the overall financial reports submitted by candidates and lists.	Amend Chapter V of the election law	Parliament  Council of Ministers	<p><b>Transparency and accountability of funding</b> <b>Prevention of corruption / Fairness in the election campaign</b></p> <p>UNCAC, art.1.c “<i>The purposes of this Convention are: (c)To promote integrity, accountability and proper management of public affairs and public property.</i>” UNCAC, art.7.3 “<i>Each State Party shall also consider taking appropriate legislative and administrative measures...to enhance transparency in the funding of candidatures for elected public office</i>”. UNCAC, art.26.4 “<i>Each State Party shall, in particular, ensure that legal persons held liable in accordance with this article are subject to effective, proportionate and dissuasive criminal or non criminal sanctions, including monetary sanctions.</i>”</p>
<b>MEDIA</b>						
11.	26	The Penal Code and Military Code still criminalizes freedom of expression offences, with negative impact on media coverage of elections.	Supress imprisonment penalties for defamation, libel, offences against religion and legitimate information actions, and withdraw media-related offences and crimes from military courts” jurisdiction.	Amend the Penal Code: art. 385 to 389, 473 to 475, 582 to 584; Military Code of Justice: art. 157.	Parliament  Council of Ministers	<p><b>Freedom of opinion and expression</b></p> <p>ICCPR, General Comment (GC) 34, para. 47 “<i>States parties should consider the decriminalization of defamation, and, in any case, the application of the criminal law</i></p>



						<p><i>should only be countenanced in the most serious of cases and imprisonment is never an appropriate penalty.”</i> ICCPR, art. 19.2 “<i>Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.”</i> ICCPR, GC 34, para. 33 “<i>Restrictions must be necessary for a legitimate purpose”.</i></p>
12.	27	<p>The state-run <i>Tele Liban</i> had only one election programme that offered free access to candidates with very few of them participating. <i>Tele Liban</i> mainly covered the activities of the president, the government, the speaker of parliament, as well as of the ruling political parties in its news programmes.</p>	<p>Free and equal access of candidates and candidates’ lists to the state-run media, including broadcasters <i>Tele Liban</i> and <i>Radio Liban</i>, to be granted and organized consistently, under SCE oversight.</p>	<p>Amend the election law, art. 73</p>	<p>Parliament  Council of Ministers  SCE</p>	<p><b>Freedom of opinion and expression,</b> <b>Right and opportunity to vote</b></p> <p>ICCPR, art. 19.2 “<i>Everyone shall have the right to freedom of expression; this right shall include freedom to seek, receive and impart information and ideas of all kinds, regardless of frontiers, either orally, in writing or in print, in the form of art, or through any other media of his choice.”</i> ICCPR, art.25: “<i>Every citizen shall have the right and the opportunity, without any of the distinctions mentioned in article 2 and without unreasonable restrictions (...) (b) To vote and to be elected at genuine periodic</i></p>

						<p><i>elections which shall be by universal and equal suffrage and shall be held by secret ballot, guaranteeing the free expression of the will of the electors.”</i></p>
13.	28	<p>The SCE did not act in an effective way to ensure compliance by the media with relevant regulations. In general, the SCE has not shared sufficient information on media related violations with the public or with the EU EOM.</p>	<p>The SCE to be given sanctioning powers to directly impose timely fines and/or suspension of programmes to the media, including on television channels, when violating their obligations during the campaign.</p>	<p>Amend art. 81 and 19 of the election law.</p>	<p>Parliament  Council of Ministers  SCE</p>	<p><b>Transparency and access to information</b>  <b>Right and opportunity to vote</b></p> <p>ICCPR art. 25 (<i>see above</i>) ICCPR, art. 19.2 (<i>see above</i>) ICCPR, GC 34, para. 13 “<i>A free, uncensored and unhindered press or other media is essential in any society to ensure freedom of opinion and expression and the enjoyment of other Covenant rights (...). The free communication of information and ideas about public and political issues between citizens, candidates and elected representatives is essential.</i>” ICCPR, GC 34, para.18 “<i>Article 19, paragraph 2 embraces a right of access to information held by public bodies. Such information includes records held by a public body, regardless of the form in which the information is stored, its source and the date of</i></p>

						<p><i>production.”</i></p> <p>ICCPR, GC 34, para.19 <i>“To give effect to the right of access to information, States parties should proactively put in the public domain Government information of public interest.”</i></p>
14.	28	<p>Journalists and media were barred from accessing counting and tabulation centres, limiting transparency and affecting credibility. The election law article 80 does not include explicitly the word “tabulation” and <i>de facto</i> restricts the media coverage to the “voting and counting processes”</p>	<p>Accredited media to be granted access to information in order to enhance transparency and credibility in the process. Explicitly include access to tabulation in the law.</p>	<p>Amend art. 80 of the election law</p>	<p>Parliament</p> <p>Council of Ministers</p>	<p><b>Freedom of opinion and expression</b></p> <p><b>Right and opportunity to vote</b></p> <p>ICCPR, art. 19.2 (<i>see above</i>)</p> <p>ICCPR, art. 25 (<i>see above</i>)</p>
15.	32	<p>The election law does not reflect the increased use and specificity of social media, nor does it give the SCE an explicit mandate over violations on social media. For the first time, the commission monitored the campaign online. However, violations could not be sanctioned, nor did they lead to early warnings.</p>	<p>Include explicit provisions on campaign on social media in the election law and give the SCE powers to effectively sanction violations.</p>	<p>Amend the election law</p>	<p>Parliament</p> <p>Council of Ministers</p> <p>SCE</p>	<p><b>Transparency and access to information</b></p> <p><b>Rule of law</b></p> <p>ICCPR, art. 2.2 <i>“Each State Party to the present Covenant undertakes to take the necessary steps, in accordance with its constitutional processes and with the provisions of the present Covenant, to adopt such laws or other measures as may be necessary to give effect to the rights recognized in the present</i></p>

						<p><i>Covenant.”</i></p> <p>ICCPR, GC 34, para. 25 “<i>A norm, to be characterized as a “law”, must be formulated with sufficient precision to enable an individual to regulate his or her conduct accordingly and it must be made accessible to the public.</i>”</p>
16.	33	<p>The 2018 law on Electronic Transactions and Personal Data does not sufficiently protect privacy and user data. This has resulted in personal data being over-collected, exposed, heavily circulated, and used without users’ knowledge nor consent, including during the campaign period. Candidates, lists, and parties used voters’ personal data up until election day to circulate surveys and campaign messages, at times through repeated, targeted, and unsolicited messages by SMS, phone calls, and WhatsApp.</p> <p>Additionally, the law does not establish an independent oversight body.</p>	<p>Amend the data protection law to effectively ensure the protection of personal data and establish an independent oversight body to oversee the collection and processing of personal data. Guarantee citizens protection against unsolicited information, including political propaganda during the election campaign.</p>	<p>Amend the Electronic Transactions and Personal Data law (E-Transactions Law)</p>	<p>Parliament</p> <p>Council of Ministers</p>	<p><b>Right to privacy</b></p> <p>ICCPR, GC 34, para. 18: “<i>... every individual should have the right to ascertain in an intelligible form, whether, and if so, what personal data is stored in automatic data files, and for what purposes.</i>”</p> <p>ICCPR, article 17: “<i>No one shall be subjected to arbitrary or unlawful interference with his privacy... Everyone has the right to the protection of the law against such interference or attacks.</i>”</p> <p>ICCPR, GC 16, para. 10: “<i>The gathering and holding of personal information on computers, data banks and other devices, whether by public authorities or private individuals or bodies, must be regulated by law.</i>”</p>

PARTICIPATION OF WOMEN						
17.	36	<p>Only 8 women (6,25 per cent) were elected in the new Parliament, which maintains Lebanon at the near bottom of women's parliamentary representation in the Middle East and worldwide. The parliament did not include in the legal framework positive measures to accelerate equality between men and women and encourage women's representation in the decision-making bodies, in line with Lebanon's international commitments.</p>	<p><b>Adopt temporary special measures to increase women's representation in the Parliament.</b> <i>(priority recommendation)</i></p>	<p>Amend the election law.</p>	<p>Parliament  Council of Ministers</p>	<p><b>Equality Between Men and Women. Non-discrimination.</b></p> <p>UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), art.7 "<i>Parties shall take all appropriate measures to eliminate discrimination against women in the political and public life and shall ensure to women, on equal terms with men, the right: (a) To vote and to be eligible for election to all publicly elected bodies</i>"; art.4.1. "<i>Adoption by State Parties of temporary special measures aimed at accelerating de facto equality between men and women</i>"</p> <p>UN, CEDAW, General Recommendation (GR) No. 23, para. 5. "<i>Article 7 obliges States parties to take all appropriate measures to eliminate discrimination against women in political and public life and to ensure that they enjoy equality with men in political and public life. The obligation specified in article 7 extends to all areas of public and political life.</i>"</p>

ELECTORAL DISPUTES					
18.	39	<p>The right to file an appeal against election results is not mentioned at all in the election law, but only in the law on the establishment of the CC, which does not have clear updated provisions in this regard. This should be clearly stated by the law and not be left at the interpretation of the CC, in order to guarantee an effective remedy to all candidates and lists, in line with international commitments and good practices.</p>	<p>The election law to clearly regulate the right of appeal against the election results for all losing candidates against any candidate that competed in that district.</p>	<p>Amend the law on the establishment of the CC and the election law.</p>	<p>Parliament  Council of Ministers</p> <p><b>Right to an effective remedy</b> <b>Rule of law</b> ICCPR, art. 2.3 (a) <i>“To ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy{..}.”</i>  ICCPR, GC 25 para. 20 <i>“There should be independent scrutiny of the voting and counting process and access to judicial review or other equivalent process so that electors have confidence in the security of the ballot and the counting of the votes”</i>  ICCPR GC 34, para. 25: <i>“A norm, to be characterized as a “law”, must be formulated with sufficient precision to enable an individual to regulate his or her conduct accordingly and it must be made accessible to the public.”</i></p>

19.	40	<p>Currently, the deadline for submitting the appeal is 30 days from the official announcement of the results, and the CC has four months to rule on the appeal. These deadlines are excessively long and against good practices, permitting potential uncertainty over the electoral results while cases are being determined, as the Parliament members whose election is being contested remain in function until a final CC decision.</p>	<p>Shorten the timeframe for lodging and deciding on an appeal against the election results. Provide adequate human resources for the CC, to allow for thorough investigation and quick decisions on the appeals.</p>	<p>Amend the law on the establishment of the CC</p>	<p>Parliament  Council of Ministers</p>	<p><b>Right to effective remedy</b></p> <p>ICCPR art. 2.3 “<i>Each State Party to the present Covenant undertakes: (a) To ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy</i>”</p> <p>Universal Declaration of Human Rights (UDHR) Art. 8 “<i>everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.</i>”</p> <p><b>Good practice</b></p> <p>Venice Commission, Code of Good Practice in Electoral Matters, 2002, para. 95 “<i>In addition, decisions on the results of elections must also not take too long, especially where the political climate is tense. { }Time limits must, however, be long enough to make an appeal possible, to guarantee the exercise of rights of defence and a reflected decision. A time limit of three to five days at first instance (both for lodging appeals and making rulings) seems reasonable for decisions to be taken before the elections. It is, however, permissible to grant a link to the State Supreme and Constitutional Courts for their rulings.</i>”</p>
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OUT-OF-COUNTRY VOTING						
20.	41	<p>The ballot envelopes were sorted by minor district at the Justice Palace in Beirut, and dispatched several hours later than planned. The late delivery, as well as the fact that the OCV ballots still had to be counted by the registration committee judges, led to delays at the tabulation centres.</p> <p>However, the delays in the tabulation process in some districts was mainly caused by the fact that PRCs, besides tabulating results, also had to count OCV votes. There is a need for the general review of the out-of-country voting procedures.</p>	<p>If no specific OCV district is created, consideration could be given for OCV ballots to be counted centrally in Beirut by dedicated High and Primary Registration Committees in sufficient numbers and adequately trained for this task.</p>	<p>Amend the election law.</p> <p>Administrative measures</p>	<p>Parliament Council of Ministers</p> <p>MoIM</p> <p>MoJ</p>	<p><b>State must take necessary steps to give effect to rights</b></p> <p>CCPR GC 25, para. 20 “<i>There should be independent scrutiny of the voting and counting process and access to judicial review or other equivalent process so that electors have confidence in the security of the ballot and the counting of the votes.</i>”</p>



POLLING, COUNTING AND TABULATION						
21.	42	<p>Candidate agents were massively present in all PS observed from the opening to the closing. Candidate agents, wearing clothes with party symbols, were controlling voter attendance with their own voter lists and with the help of the polling staff, who read out loud the name of each voter. There were also cases in which agents interfered with the work of the polling staff. In some PS, observers saw people, mostly candidate agents, attempting to influence voters. At least five cases of abuse of assisted voting by candidate agents were observed, and cases of agents intimidating were reported from at least nine minor districts.</p>	<p>Enforce the legal provisions limiting the number of agents per polling station, and prohibit the display of any party symbols inside the polling centres in order to avoid interference with the work of the polling staff and the intimidation of voters.</p>	<p>Amend the election law.</p>	<p>Parliament  Council of Ministers</p>	<p><b>Genuine elections that reflect the free expression of the will of the people</b> <b>State must take necessary steps to give effect to rights</b></p> <p>CCPR GC 25, para. 20 <i>“{.}voters should be protected from any form of coercion or compulsion to disclose how they intend to vote or how they voted, and from any unlawful or arbitrary interference with the voting process.”</i></p>

22. 43	<p>The closing and counting was marked by insufficiently trained polling staff, who committed procedural errors. In some cases, the polling staff did not count the number of signatures on the voter list. In other cases, no reconciliation was done between the number of cast ballots and the number of voters who signed the voter lists. Sometimes, the head officer had difficulties to fill out the PS report, and in nine cases, there were other significant procedural errors or omissions.</p>	<p>The MoIM to organise comprehensive and compulsory in-person training sessions for polling staff, to avoid procedural errors, which affect the integrity of the voting.</p>	none	MoIM	<p><b>State must take necessary steps to give effect to rights</b> ICCPR, art. 2(2) <i>“Where not already provided for by existing legislative or other measures, each State Party to the present Covenant undertakes to take the necessary steps, in accordance with its constitutional processes and with the provisions of the present Covenant, to adopt such laws or other measures as may be necessary to give effect to the rights recognized in the present Covenant.”</i></p>
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23. 44	<p>Due to the lack of clear procedures for the tabulation, the organisation of the work depended on the High Registration Committee (HRC) judges. While some HRC judges allocated certain PRCs exclusively to count OCV ballots, others distributed the incoming protocols and OCV ballot boxes on a first-come, first-served basis. The EU EOM observed that there was often a lack of coordination and progress reporting in the tabulation centres.</p>	<p>Adopt clear procedures for the tabulation of results, including the reasons for cancellations and recounts, and train judges accordingly.</p>	Procedures	MoIM	<p><b>State must take necessary steps to give effect to rights Genuine elections that reflect the free expression of the will of the people</b>          ICCPR, art. 2(2) ( see above)          CCPR GC 25, para. 20 <i>“There should be independent scrutiny of the voting and counting process and access to judicial review or other equivalent process so that electors have confidence in the security of the ballot and the counting of the votes.”</i></p>
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**ANNEX 1 - DISTRIBUTION OF SEATS PER DISTRICT AND CONFESSION**

Major Districts	Minor Districts	Seats	Sunni	Shiaa	Druze	Maronite	Greek Catholic	Greek Orthodox	Evangelical	Armenian Catholic	Armenian Orthodox	Minorities	Alawite
Beirut 1	Ashrafieh, Rmeil, Saifi, Medawar	8				1	1	1		1	3	1	
Beirut 2	Ras Beirut, Mina El Hosn, Ain El Mreisseh, Mazraa, Mseitbeh, Zkak El Blat, Bashoura, Marfaa	11	6	2	1			1	1				
Mount Lebanon 1	Jbeil	3		1		2							
	Kesserwan	5				5							
Mount Lebanon 2	Metn	8				4	1	2			1		
Mount Lebanon 3	Baabda	6		2	1	3							
Mount Lebanon 4	Chouf	8	2		2	3	1						
	Aley	5			2	2		1					
South Lebanon 1	Saida	2	2										
	Jezzine	3				2	1						
South Lebanon 2	Tyre	4		4									
	Saida Villages	3		2			1						
South Lebanon 3	Bint Jbeil	3		3									
	Nabatieh	3		3									
	Marjayoun Hasbaya	5	1	2	1			1					
Bekaa 1	Zahle	7	1	1		1	2	1			1		
Bekaa 2	West Bekaa, Rashaya	6	2	1	1	1		1					

Bekaa 3	Baalbek, Hermel	<b>10</b>	2	6		1	1						
North Lebanon 1	Akkar	<b>7</b>	3			1		2					1
North Lebanon 2	Tripoli	<b>8</b>	5			1		1					1
	Minnieh	<b>1</b>	1										
	Dinnieh	<b>2</b>	2										
North Lebanon 3	Zgharta	<b>3</b>				3							
	Bcharreh	<b>2</b>				2							
	Koura	<b>3</b>						3					
	Batroun	<b>2</b>				2							
<b>Total</b>		<b>128</b>	<b>27</b>	<b>27</b>	<b>8</b>	<b>34</b>	<b>8</b>	<b>14</b>	<b>1</b>	<b>1</b>	<b>5</b>	<b>1</b>	<b>2</b>

**ANNEX 2 – VOTER-PER-SEAT RATIO**

Major Districts	Registered voters	Seats	Voters/seat
Beirut 1	134,825	8	16,853
Beirut 2	370,862	11	33,715
Mount Lebanon 1	182,103	8	22,763
Mount Lebanon 2	183,441	8	22,930
Mount Lebanon 3	171,746	6	28,624
Mount Lebanon 4	346,451	13	26,650
South Lebanon 1	129,229	5	25,846
South Lebanon 2	328,064	7	46,866
South Lebanon 3	497,531	11	45,230
Bekaa 1	183,425	7	26,204
Bekaa 2	153,975	6	25,663
Bekaa 3	341,263	10	34,126
North Lebanon 1	309,517	7	44,217
North Lebanon 2	377,111	11	34,283
North Lebanon 3	257,964	10	25,796
<b>Total</b>	<b>3,967,507</b>	<b>128</b>	<b>30,996</b>

**ANNEX 3 – WASTED VOTES**

Major Districts	Registered voters	Seats	Valid votes	Wasted votes	Wasted votes %
Beirut 1	134,825	8	46,696	2,599	5.57%
Beirut 2	370,862	11	148,926	4,792	3.22%
Bekaa 1	183,425	7	92,691	22,865	24.67%
Bekaa 2	153,975	6	66,148	6,161	9.31%
Bekaa 3	341,263	10	191,139	11,880	6.22%
Mount Lebanon 1	182,103	8	118,379	14,899	12.59%
Mount Lebanon 2	183,441	8	93,149	12,222	13.12%
Mount Lebanon 3	171,746	6	84,728	20,346	24.01%
Mount Lebanon 4	346,451	13	179,976	11,607	6.45%
North Lebanon 1	309,517	7	148,626	63,508	42.73%
North Lebanon 2	377,111	11	144,641	7,214	4.99%
North Lebanon 3	257,964	10	122,311	1,204	0.98%
South Lebanon 1	129,229	5	61,290	27,936	45.58%
South Lebanon 2	328,064	7	163,083	22,706	13.92%
South Lebanon 3	497,531	11	232,200	952	0.41%
<b>Total</b>	<b>3,967,507</b>	<b>128</b>	<b>1,893,983</b>	<b>230,891</b>	<b>12.19%</b>

ANNEX 4 – ELECTION RESULTS

District	List	Registered Voters	Voters	Turnout %	Invalid Votes	Blank Votes	Vote for list	Seats
Beirut 1		134,825	48,311	34.6	1,615	395	46,696	8
	Kataeb						11,271	2
	FPM / Tashnag						10,950	2
	LF						13,220	2
	Newly Emerging Forces						8,261	2
	Kadireen						1,510	
	Newly Emerging Forces						1,089	
Beirut 2		370,862	154,721	38.09	5,795	1,498	148,926	11
	Independent						19,421	1
	Independent						20,439	2
	Independent						18,060	1
	Hezbollah / Amal / FPM / SSNP						36,962	3
	Independent						14,931	1
	Newly Emerging Forces						32,823	3
	Independent						2,387	
	Kadireen						1,797	
	Newly Emerging Forces						250	
	Newly Emerging Forces						358	
Mt-Lebanon 1		182,103	121,693	63.4	3,314	657	118,379	8
	LF						27,939	2
	Independent						14,979	1
	Kataeb						25,713	2
	Independent						11,292	
	Kadireen						1,926	

	FPM / Hezbollah						34,192	3
	Newly Emerging Forces						1,681	
<b>Mt-Lebanon 2</b>		<b>183,441</b>	<b>95,853</b>	<b>48.6</b>	<b>2,704</b>	<b>573</b>	<b>93,149</b>	<b>8</b>
	LF						21,301	2
	Independent						667	
	Tashnag / SSNP						15,997	2
	Kataeb						22,523	2
	Kadireen						11,555	
	FPM						20,533	2
<b>Mt-Lebanon 3</b>		<b>171,746</b>	<b>87,114</b>	<b>47.39</b>	<b>2,386</b>	<b>619</b>	<b>84,728</b>	<b>6</b>
	Independent						417	
	LF / PSP						29,801	3
	Independent						5,010	
	Newly Emerging Forces						13,201	
	Newly Emerging Forces						766	
	Kadireen						952	
	FPM / Hezbollah / Amal						33,962	3
<b>Mt-Lebanon 4</b>		<b>346,451</b>	<b>184,202</b>	<b>49.3</b>	<b>4,226</b>	<b>1,358</b>	<b>179,976</b>	<b>13</b>
	PSP / LF						83,389	7
	Newly Emerging Forces						3,438	
	FPM						41,545	3
	Kadireen						1,596	
	Newly Emerging Forces						42,077	3
	Newly Emerging Forces						6,082	
	Newly Emerging Forces						491	
<b>North 1</b>		<b>309,517</b>	<b>153,878</b>	<b>48.1</b>	<b>5,252</b>	<b>1,509</b>	<b>148,626</b>	<b>7</b>



	Independent						13,619	
	Independent						41,848	4
	LF						19,334	
	Kadireen						3,154	
	Newly Emerging Forces						1,371	
	Newly Emerging Forces						14,145	
	Newly Emerging Forces						11,885	
	FPM / SSNP						41,761	3
<b>North 2</b>		<b>377,111</b>	<b>151,521</b>	<b>38.05</b>	<b>6,880</b>	<b>2,882</b>	<b>144,641</b>	<b>11</b>
	Marada						29,277	2
	Newly Emerging Forces						3,318	
	Newly Emerging Forces						79	
	LF						30,006	3
	Newly Emerging Forces						16,215	1
	Independent						28,041	2
	Newly Emerging Forces						14,181	1
	Newly Emerging Forces						16,825	2
	Independent						672	
	Newly Emerging Forces						1,306	
	Kadireen						1,839	
<b>North 3</b>		<b>257,964</b>	<b>126,018</b>	<b>44.2</b>	<b>3,707</b>	<b>977</b>	<b>122,311</b>	<b>10</b>
	Newly Emerging Forces						14,121	1
	LF						39,844	3
	Kataeb						22,613	2
	Kadireen						974	
	Newly Emerging Forces						230	

	Marada / SSNP						26,475	2
	FPM / SSNP						17,077	2
<b>South 1</b>		<b>129,229</b>	<b>63,366</b>	<b>46.6</b>	<b>2,076</b>	<b>623</b>	<b>61,290</b>	<b>5</b>
	Amal						11,719	
	Independent						18,783	3
	Newly Emerging Forces						4,919	
	LF						13,948	2
	Newly Emerging Forces						324	
	Kadireen						128,1	
	FPM						846,9	
<b>South 2</b>		<b>328,064</b>	<b>167,557</b>	<b>48.8</b>	<b>4,474</b>	<b>2,135</b>	<b>163,083</b>	<b>7</b>
	Amal / Hezbollah						138,242	7
	Independent						7,405	
	Kadireen						10,061	
	LF						5,240	
<b>South 3</b>		<b>497,531</b>	<b>238,610</b>	<b>45.7</b>	<b>6,410</b>	<b>3,042</b>	<b>232,200</b>	<b>11</b>
	Hezbollah / Amal / SSNP						197,822	9
	Kadireen / Newly Emerging Forces						30,384	2
	Newly Emerging Forces						952	
<b>Bekaa 1</b>		<b>183,425</b>	<b>95,377</b>	<b>49.5</b>	<b>2,686</b>	<b>831</b>	<b>92,691</b>	<b>7</b>
	Independent						15,477	1
	LF						25,646	3
	Newly Emerging Forces						7,713	
	Newly Emerging Forces						332	
	FPM / Hezbollah / Amal / Tashnag						27,872	3
	Newly Emerging Forces						1,440	

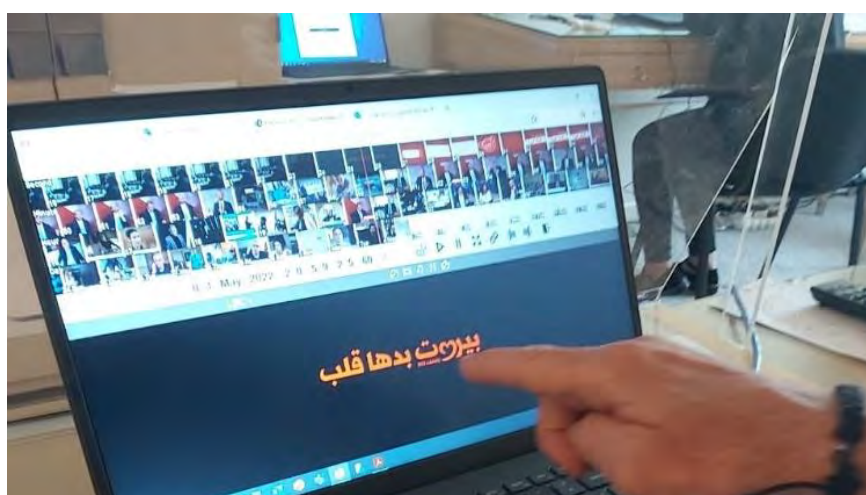
	Kadireen						1,316	
	Independent						12,064	
<b>Bekaa 2</b>		<b>153,975</b>	<b>68,346</b>	<b>42.47</b>	<b>2,198</b>	<b>616</b>	<b>66,148</b>	<b>6</b>
	FPM / Amal						28,920	3
	LF						5,316	
	Newly Emerging Forces						11,397	1
	PSP						19,054	2
	Kataeb						192	
	Kadireen						653	
<b>Bekaa 3</b>		<b>341,263</b>	<b>195,116</b>	<b>53.24</b>	<b>3,977</b>	<b>1,593</b>	<b>191,139</b>	<b>10</b>
	Newly Emerging Forces						2,819	
	Hezbollah / Amal / FPM						143,358	9
	Newly Emerging Forces						1,491	
	Kadireen						1,937	
	LF						23,308	1
	Newly Emerging Forces						5,633	
<b>Total</b>		<b>3,697,507</b>	<b>1,951,683</b>	<b>41.04</b>	<b>57,700</b>	<b>19,308</b>	<b>1,893,983</b>	<b>128</b>

ANNEX 5 – MEDIA MONITORING FINDINGS



*Coverage of the elections campaign on the Lebanese television channels  
on 10 May 2022 - ©EU EOM Lebanon 2022*

The EU EOM conducted a quantitative media monitoring of all election-related programmes (news, interviews, debates, free airtime, paid-for content including paid political ads, voter education, other) on four television channels (public: *Tele Liban*; private: *Al Jadeed*, *LBCI*, *MTV*), during the last month of the elections campaign, from 13 April to 13 May. The media monitoring was conducted by a team of six Lebanese Arabic-speaking media monitors, including a media assistant, headed by the EU EOM media analyst.



*EU EOM media monitors performing quantitative monitoring of television channels  
during the elections campaign - ©EU EOM Lebanon 2022*

The media monitoring provided data on the media coverage of the elections to assess: the access granted to the political parties, candidates and independent candidates, candidates' lists in the media, and whether this coverage was in line with the Lebanese legal framework and Lebanon's international commitments; the tone of media coverage towards the political entities and candidates, including possible use of inflammatory speech and misinformation/disinformation; whether the electoral process was covered in an unbiased and equitable manner in the public and private media monitored; whether the voters received pluralistic and comprehensive information in order to make an informed choice on election days, especially from the public media.

The programmes of the state-run television channel, *Tele Liban*, and the three major private and „non-affiliated“ television channels, *Al Jadeed*, LBCI and MTV, which are credited with an estimated 75 per cent of the total television audience share by media experts, were recorded daily from 18:00 to 24:00, from 13 April to 13 May, and analysed, using dedicated media monitoring tools and software, and following the EU EOM media monitoring methodology.<sup>125</sup>

<b>Quantitative media monitoring - television channels (13 April to 13 May)</b>				
<b>Television channels</b>	<i>Tele Liban</i>	<i>Al Jadeed</i>	LBCI	MTV
<b>Public/private media</b>	Public	Private, commercial	Private, commercial	Private, commercial
<b>Location</b>	Beirut	Beirut	Beirut	Beirut
<b>Main language</b>	Arabic	Arabic	Arabic	Arabic
<b>Daily time slot</b>	6 pm – 12 am	6 pm – 12 am	6 pm – 12 am	6 pm – 12 am

As for qualitative analysis of broadcast media, the sample included the four broadcasters above, plus all three „politically affiliated“ television channels:

<b>Qualitative media monitoring - television channels (13 April to 15 May)</b>			
<b>Television channels</b>	<i>Al Manar</i>	NBN	OTV
<b>Public/private media</b>	Private, Hezbollah affiliated	Private, affiliated to Amal Movement	Private, FPM affiliated
<b>Location</b>	Beirut	Beirut	Beirut
<b>Main language</b>	Arabic	Arabic	Arabic
<b>Daily time slot</b>	24/7	24/7	24/7

<sup>125</sup> See section 4.8 Media, p.78-84, *Handbook for European Union Election Observation*, third edition, 2016, EODS [https://www.eods.eu/library/EUEOM\\_Handbook\\_2016.pdf](https://www.eods.eu/library/EUEOM_Handbook_2016.pdf)

Also, the Facebook pages or news website of the above-mentioned television channels were monitored randomly on a rolling basis during the period of observation, plus the news website of *Annahar*, a major online newspaper, and the Instagram page of *Megaphone*, an alternative news platform,

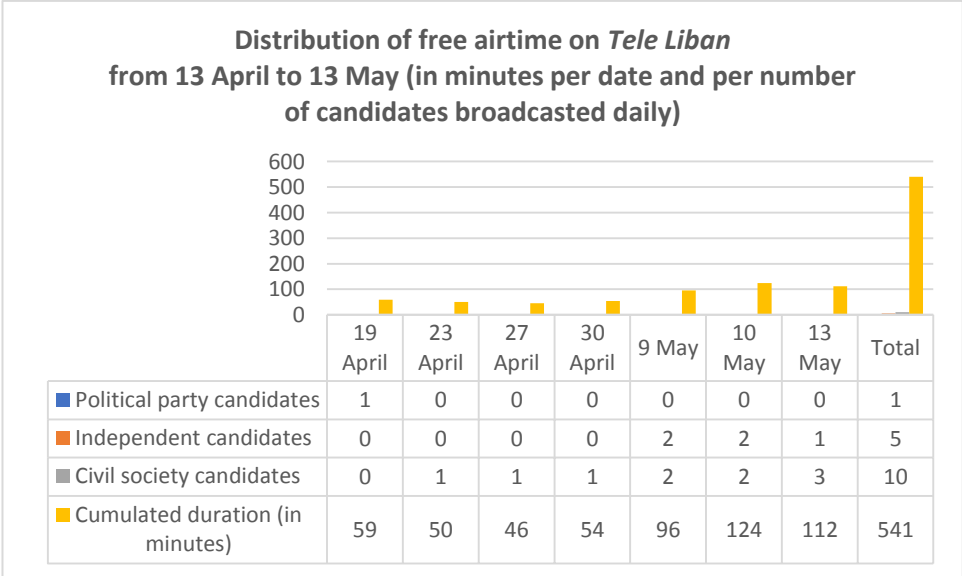
<b>Qualitative media monitoring - online media (13 April to 15 May)</b>		
<b>Private television channels Facebook pages</b>	NBN	<a href="http://www.facebook.com/NBN-lebanon-101884124847789/">www.facebook.com/NBN-lebanon-101884124847789/</a>
	OTV	<a href="http://www.facebook.com/otv.com.lb/">www.facebook.com/otv.com.lb/</a>
<b>Private television channel news website</b>	<i>Al Manar</i>	<a href="http://www.almanar.com.lb/">www.almanar.com.lb/</a>
<b>Newspaper news website</b>	<i>Annahar</i>	<a href="http://www.annahar.com">www.annahar.com</a>
<b>Alternative news platform</b>	<i>Megaphone</i>	<a href="http://www.instagram.com/megaphonenews/">www.instagram.com/megaphonenews/</a>

## **Media monitoring findings**

In total, the EU EOM media monitoring team produced a data base containing 5,241 lines of information, covering all election-related content broadcasted by the state-run *Tele Liban* and the private commercial television channels *Al Jadeed*, LBCI and MTV, daily from 13 April to 13 May (plus 14 and 15 May), mostly during the 18:00 to 24:00 time slot.

### ***Free airtime on Tele Liban:***

As per election law article 73, the state broadcaster *Tele Liban* has an obligation to offer free airtime to the candidates willing to do so, who shall request permission to the SCE. The SCE shall then prepare a schedule for all candidates and lists of candidates, “maintaining balanced broadcasting times, to ensure fair and equal opportunities” for all.



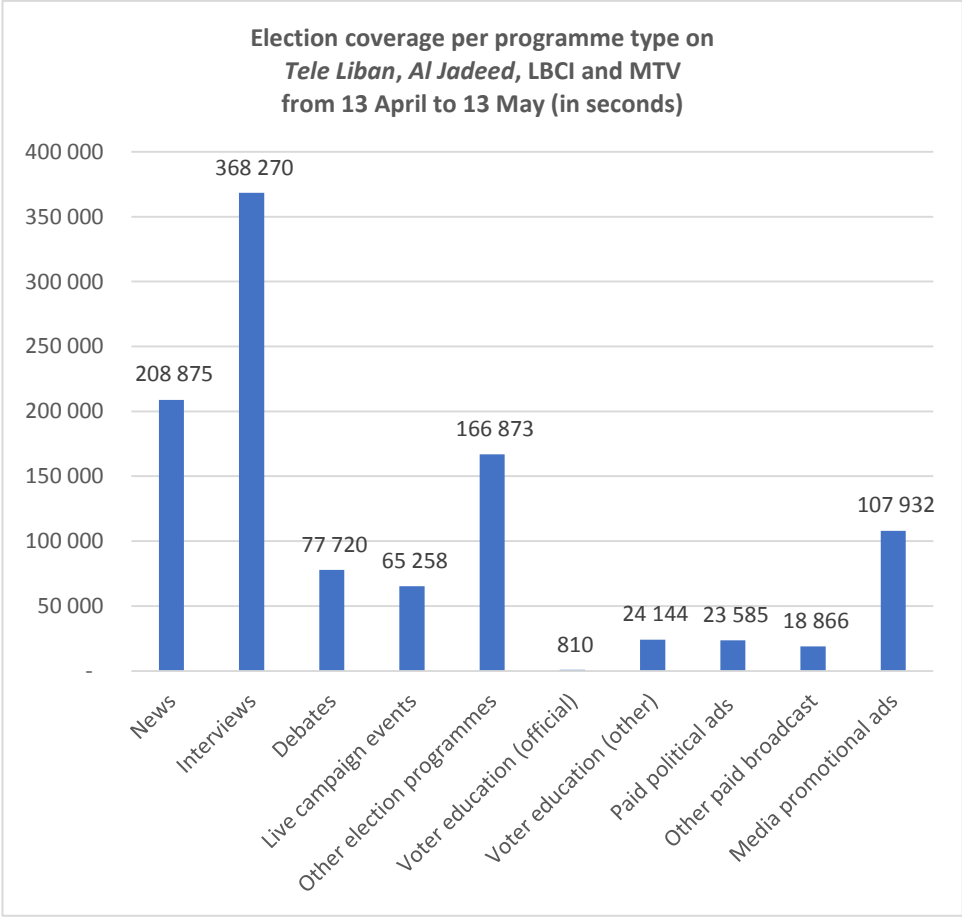
**Figure 1**

The EU EOM media monitoring (see *figure 1*) showed that only 16 candidates, out of a total of 718 candidates running for elections, representing 2 per cent of them, were given free airtime on *Tele Liban* in the dedicated *Lebanon Today* interview programme during the last month of the campaign, from 13 April to 13 May, for an average duration of 35 minutes each.<sup>126</sup> Also, no related broadcasting schedule was published by the SCE on their website nor communicated to the EU EOM.

***Election related coverage:***

The total time devoted to all election-related content on the four monitored television channels from 13 April to 13 May (18:00 to 24:00) was **295 hours 5 minutes 33 seconds (1.062.333 seconds)**. According to the breakdown per programme type (see *figure 2*), it is striking that the interview programmes rank first by large, not only because this type of programme usually attracts large audiences in the election campaign, but also most probably because they are associated on the three commercial television channels with paid-for access financed by political actors, which incited the broadcasters to develop their interviews slots in exchange for financial resources in a period of dire economic situation for the media.

<sup>126</sup> Out of 16 candidates who were given free airtime on *Tele Liban*, one was a political party candidate (National Bloc, allied with independent candidates in Mount Lebanon 3), 10 were civil society candidates, three were independent candidates and two were independent pro-8 March candidates.



**Figure 2**

Another significant finding is the very low volume of official voter education, produced by the ministry of Interior and Municipalities (MoIM), which totalled only 13 minutes 30 seconds, although the election law requires the broadcasters to allocate at least three hours per week and per television channel during the whole campaign for official voter education programmes, under SCE supervision. In fact, MTV was the only television channel to broadcast official voter education spots, with the logo of the MoIM from 22 April to 8 May, with an average duration of five minutes per week over three weeks, far from the minimum requirement.<sup>127</sup>

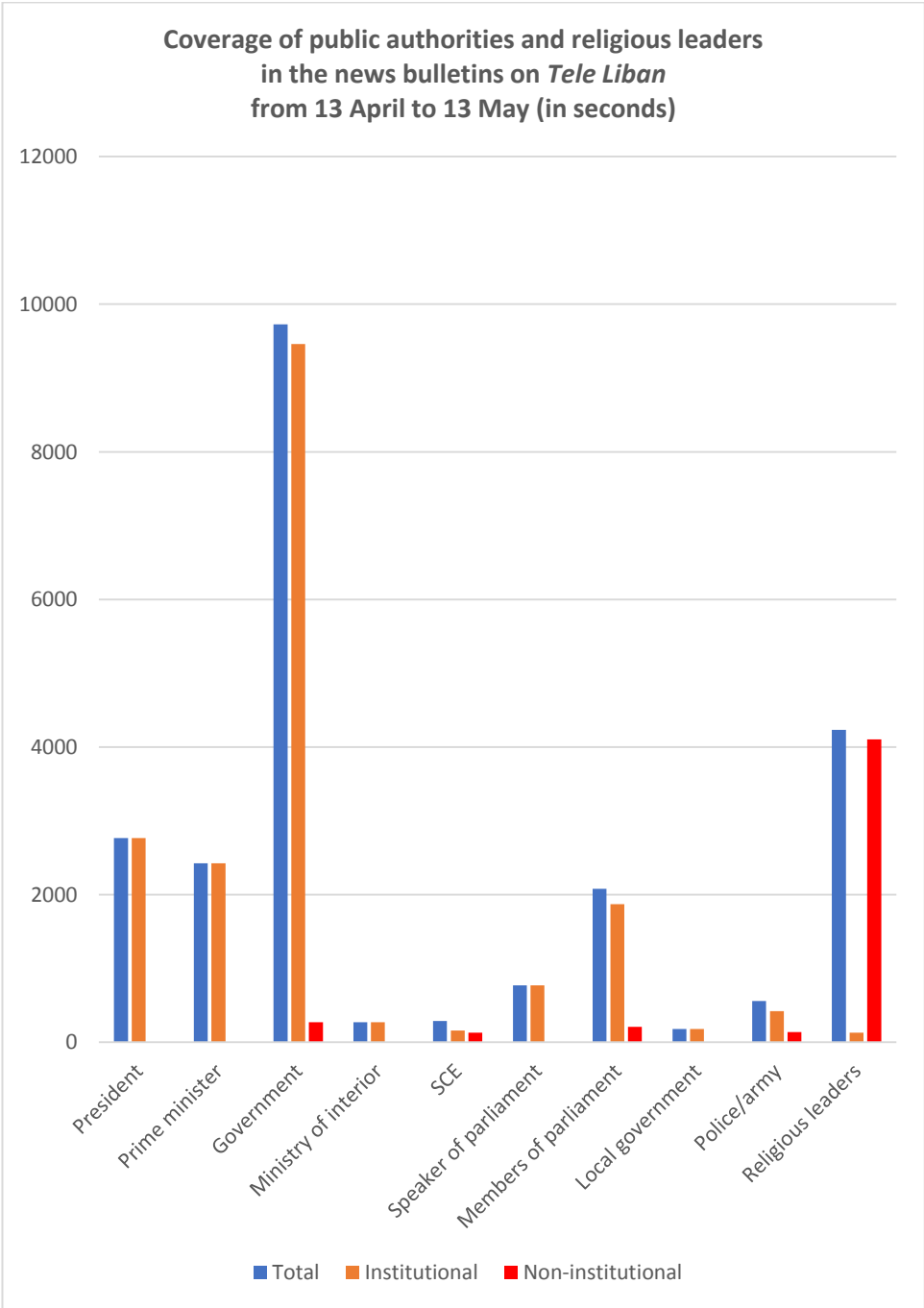
The state-run *Tele Liban* deceptively did not air any official nor unofficial voter education spots, whereas all commercial channels, *Al Jadeed*, LBCI and MTV, broadcasted voter education content produced either by themselves or by civil society organisations.

<sup>127</sup> According to EU EOM quantitative monitoring, from 18:00 to 24:00 daily from 13 April to 13 May.



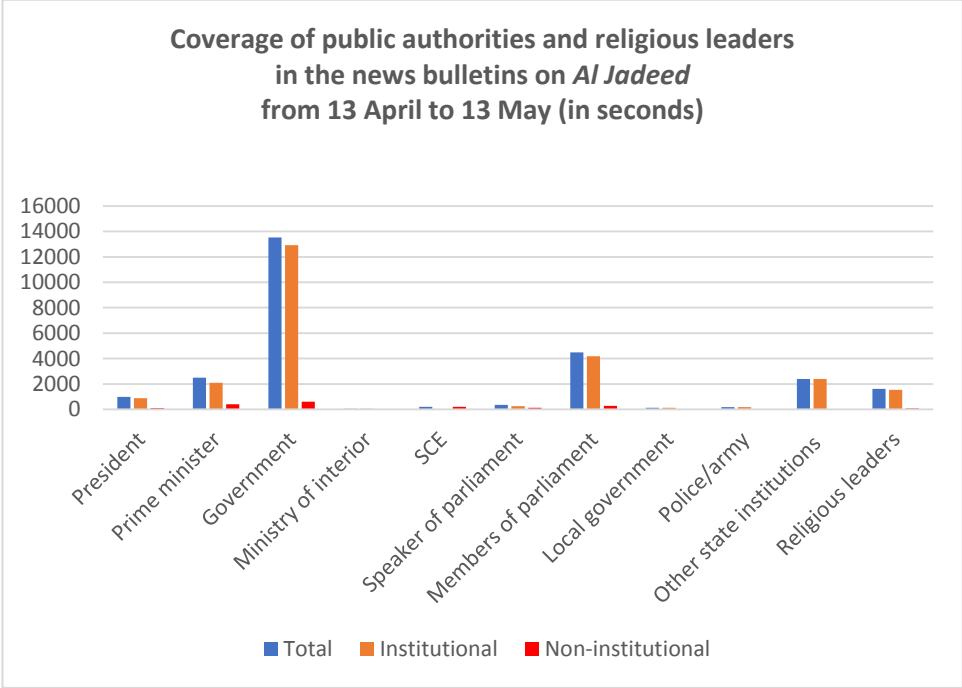
*Coverage of public authorities and religious leaders in the news programmes*

The balance between institutional (when the authority expresses itself in an official and non-partisan way) and non-institutional (when the authority expresses itself in a partisan mode) coverage of the public and religious authorities in the news programmes on *Tele Liban*, *Al Jadeed*, *LBCI* and *MTV* monitored daily from 13 April to 13 May in the 18:00 to 24:00 timeslot is shown in the charts below (see figures 3 to 6).



**Figure 3**

On *Tele Liban* (see *figure 3*), all public authorities were mostly covered in an institutional way and neutral tone. The religious leaders stood out as the main exception, with most of their coverage identified as non-institutional (97 per cent), yet neutral in tone (factual). This is explained by the significant level of political content in the speeches of most religious leaders during the election campaign.



**Figure 4**

On *Al Jadeed* commercial television channel (see *figure 4*), most public authorities and religious leaders are covered in an institutional way, mostly in a neutral tone, with the notable exception of the religious leaders who are significantly depicted in a negative tone (49 per cent).

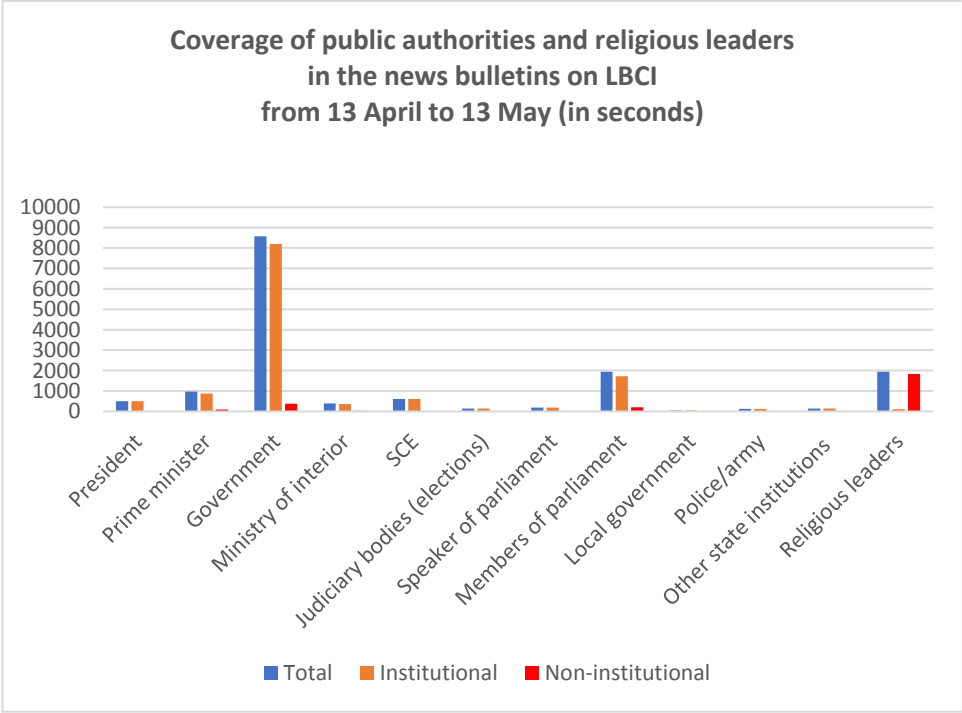


Figure 5

On LBCI commercial broadcaster (see figure 5), the coverage of the public authorities is predominantly institutional, also with the notable exception of the religious leaders who are by far (94 per cent) covered in a non-institutional and partisan way, yet in a neutral tone.

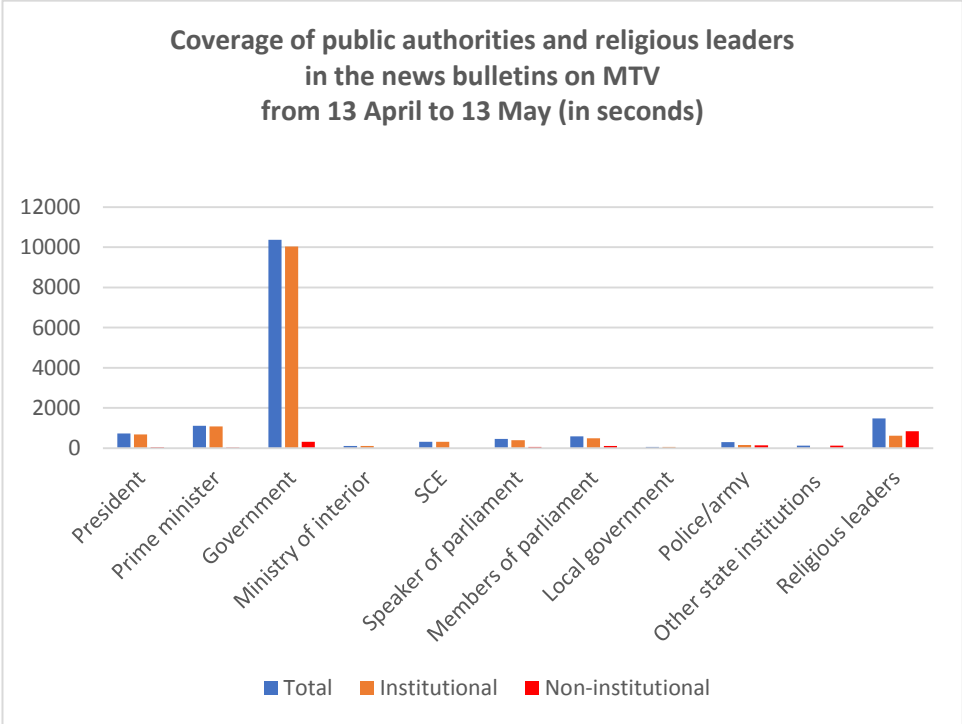
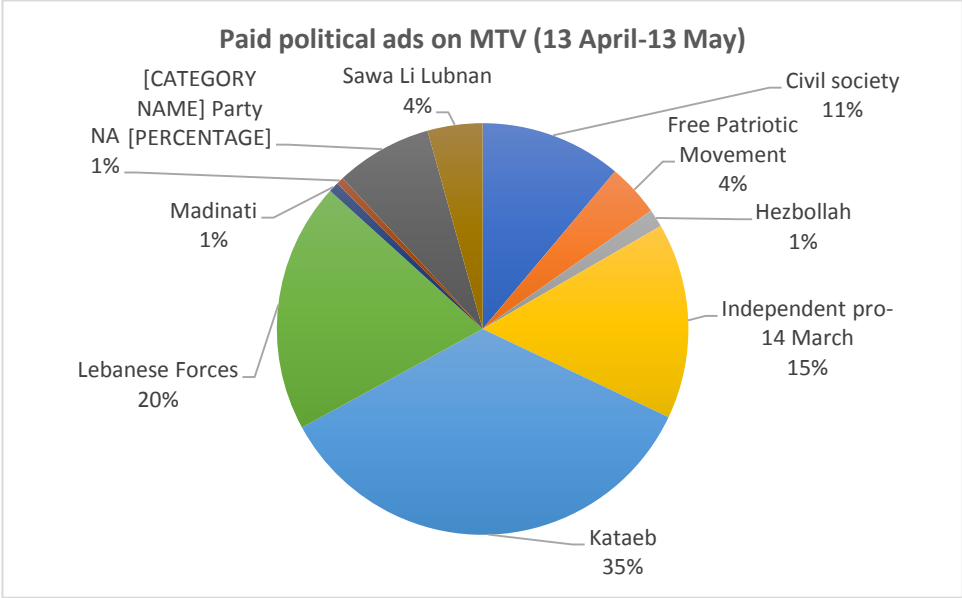


Figure 6

On MTV commercial broadcaster (see *figure 6*), the coverage of the public authorities is also predominantly institutional, again with the notable exception of the religious leaders who are in majority (58 per cent) covered in a non-institutional and partisan way, yet in a neutral tone.

***Paid political ads on the monitored private television channels:***



***Figure 7***

On MTV (see *figure 7*), Kataeb (35 per cent) and Lebanese Forces (20 per cent) represent together more than the half of the total volume of paid political ads, with independent pro-14 March (15 per cent) and civil society (11 per cent) lists both enjoying a fair share. With four per cent, FPM can only afford a rather low profile, while Hezbollah, one per cent, is negatively advertised for by an anonymous political entity most probably supported by opposition forces.

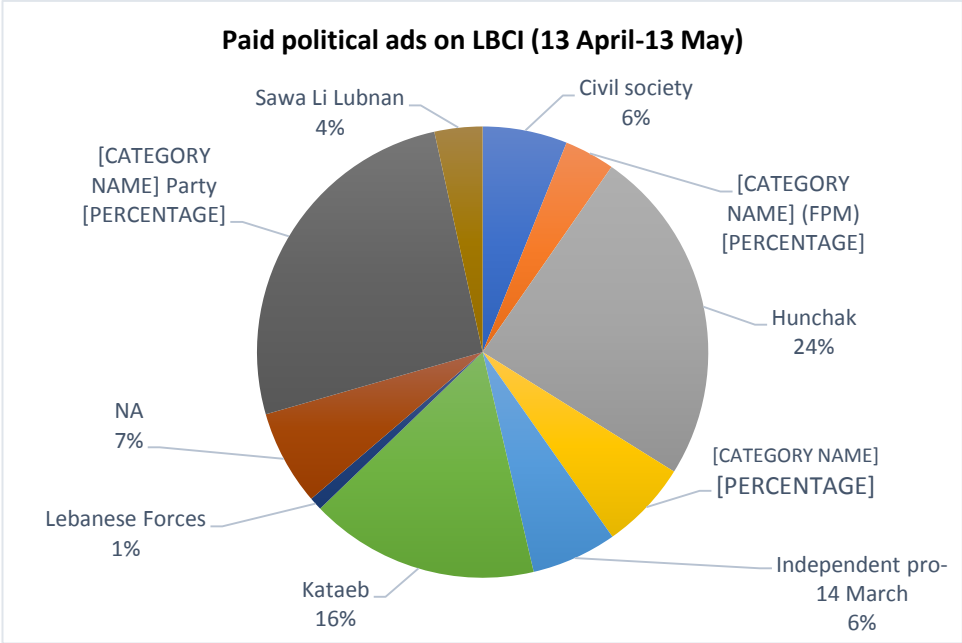


Figure 8

On LBCI (see figure 8), Hunchak (24 per cent), National Dialogue Party (26 per cent) and Kataeb (16 per cent) are leading the paid political advertisements ranking, with FPM (four per cent) and LF (one per cent) far behind. Independent, independent pro-14 March and civil society (six per cent each) also gain significant level of visibility through paid political ads.

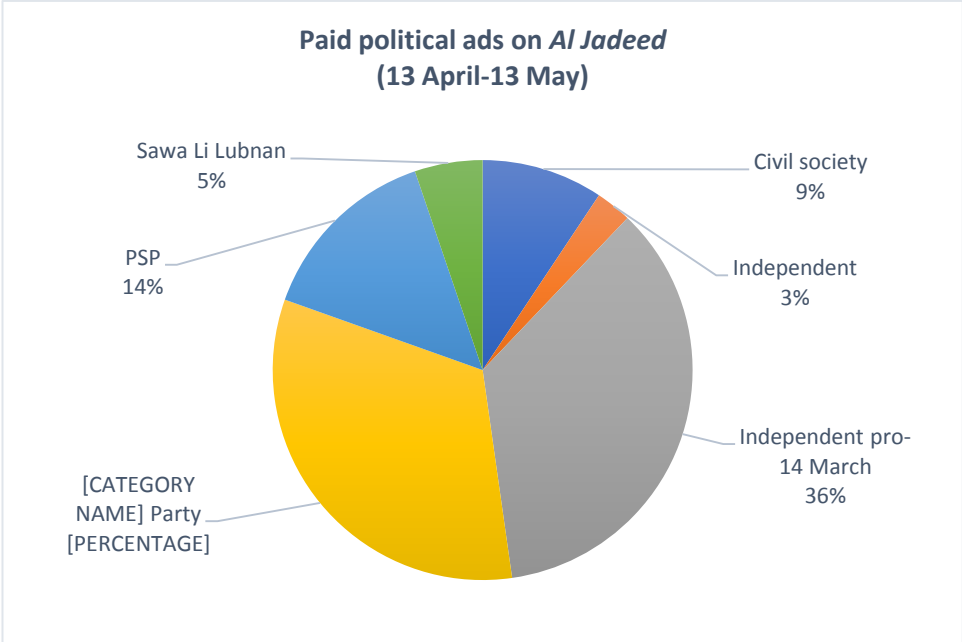


Figure 9

On Al Jadeed (see figure 9), the leading political actors in paid political ads are the following: independent pro-14 March (36 per cent), National Dialogue Party (33 per cent), PSP (14 per cent), civil society (nine per cent) and independent (three per cent).

**Media violations identified by EU EOM media monitoring on Al Jadeed, LBCI, MTV and Tele Liban:**

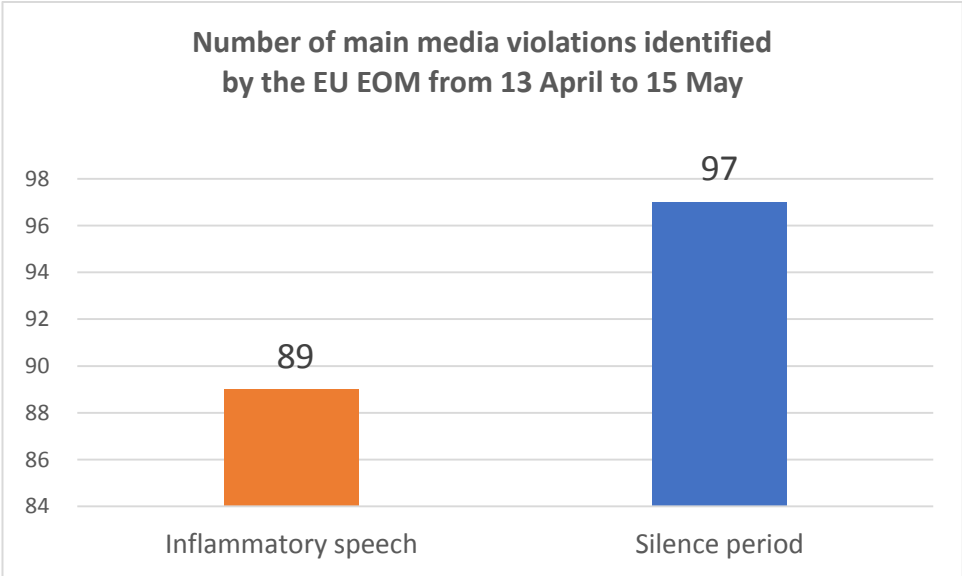


Figure 10

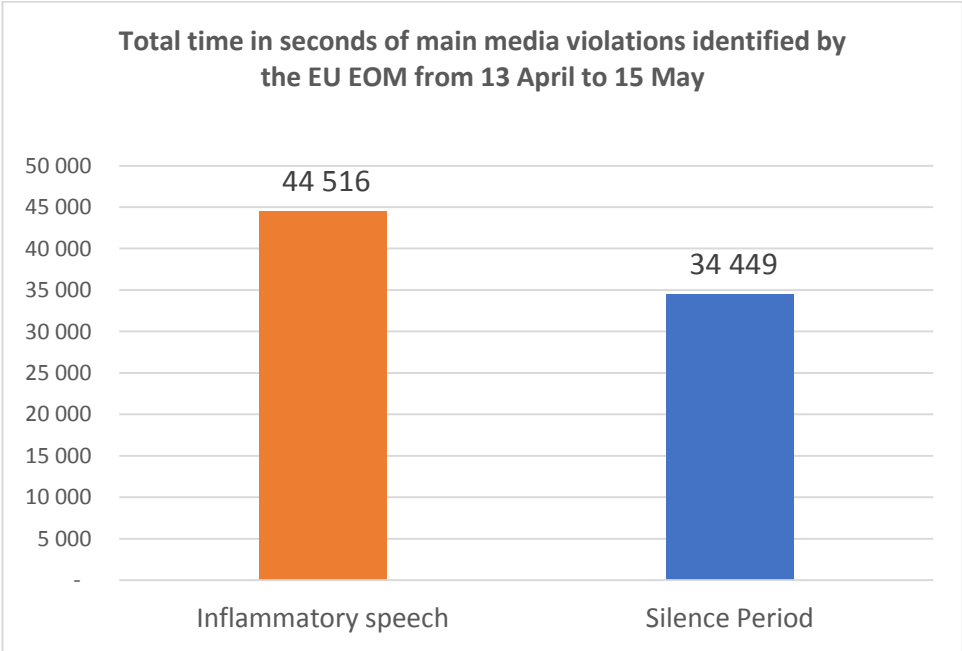


Figure 11

*Political coverage in all election programmes per television channels:*

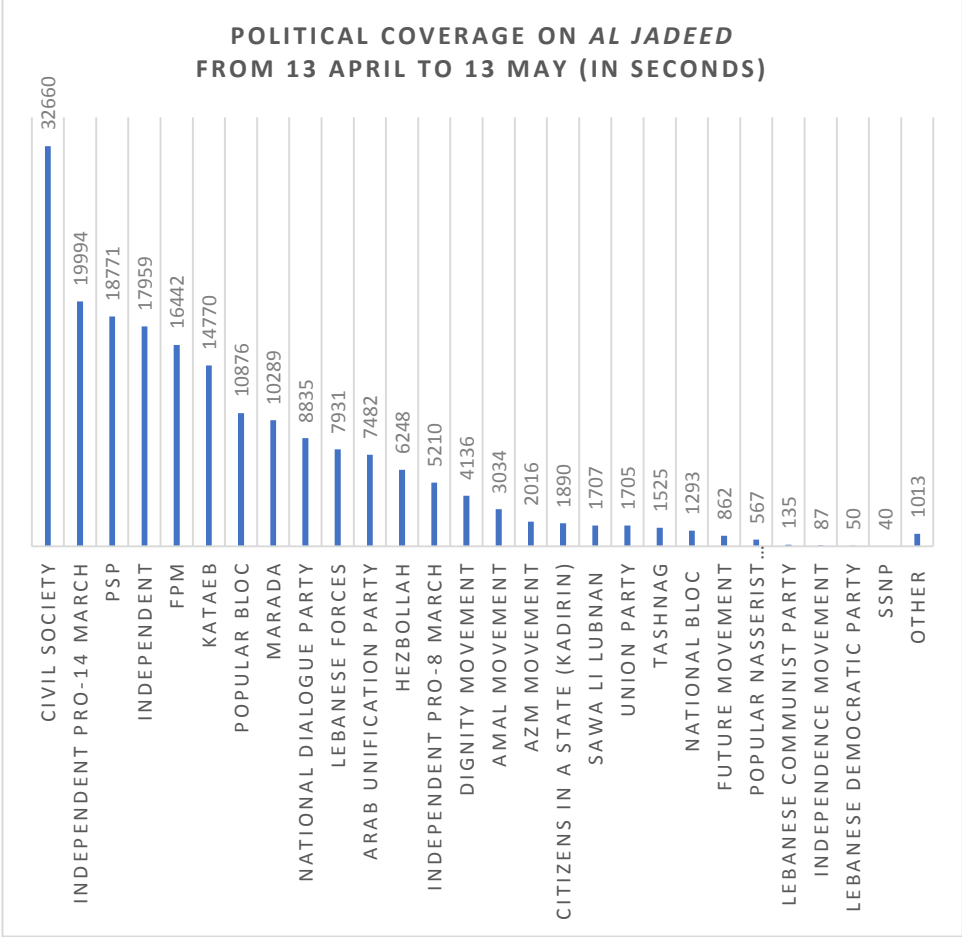


Figure 12

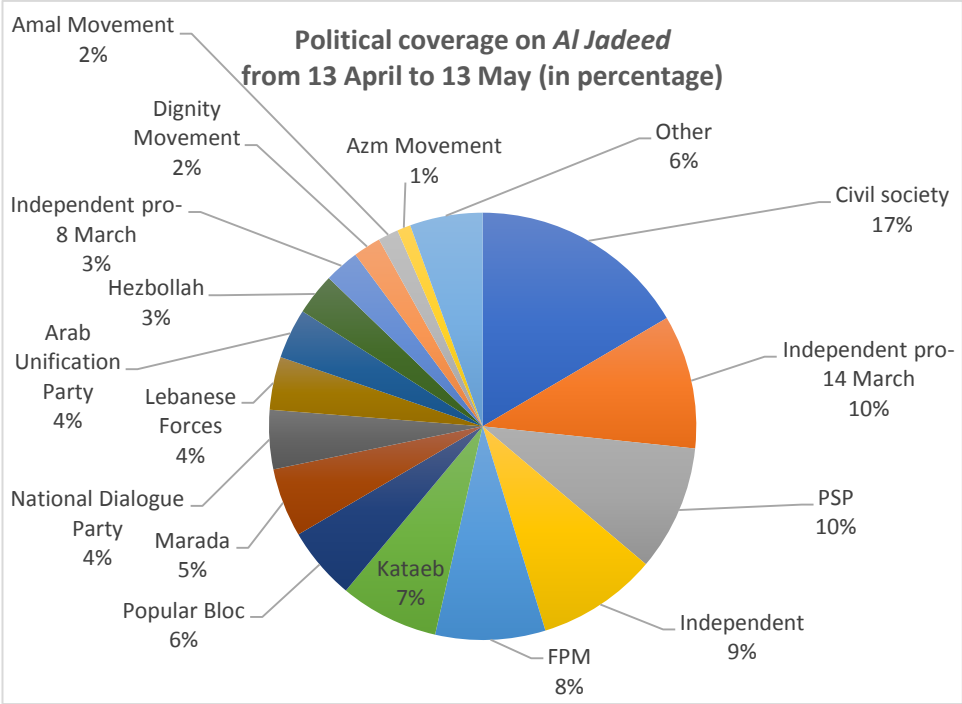
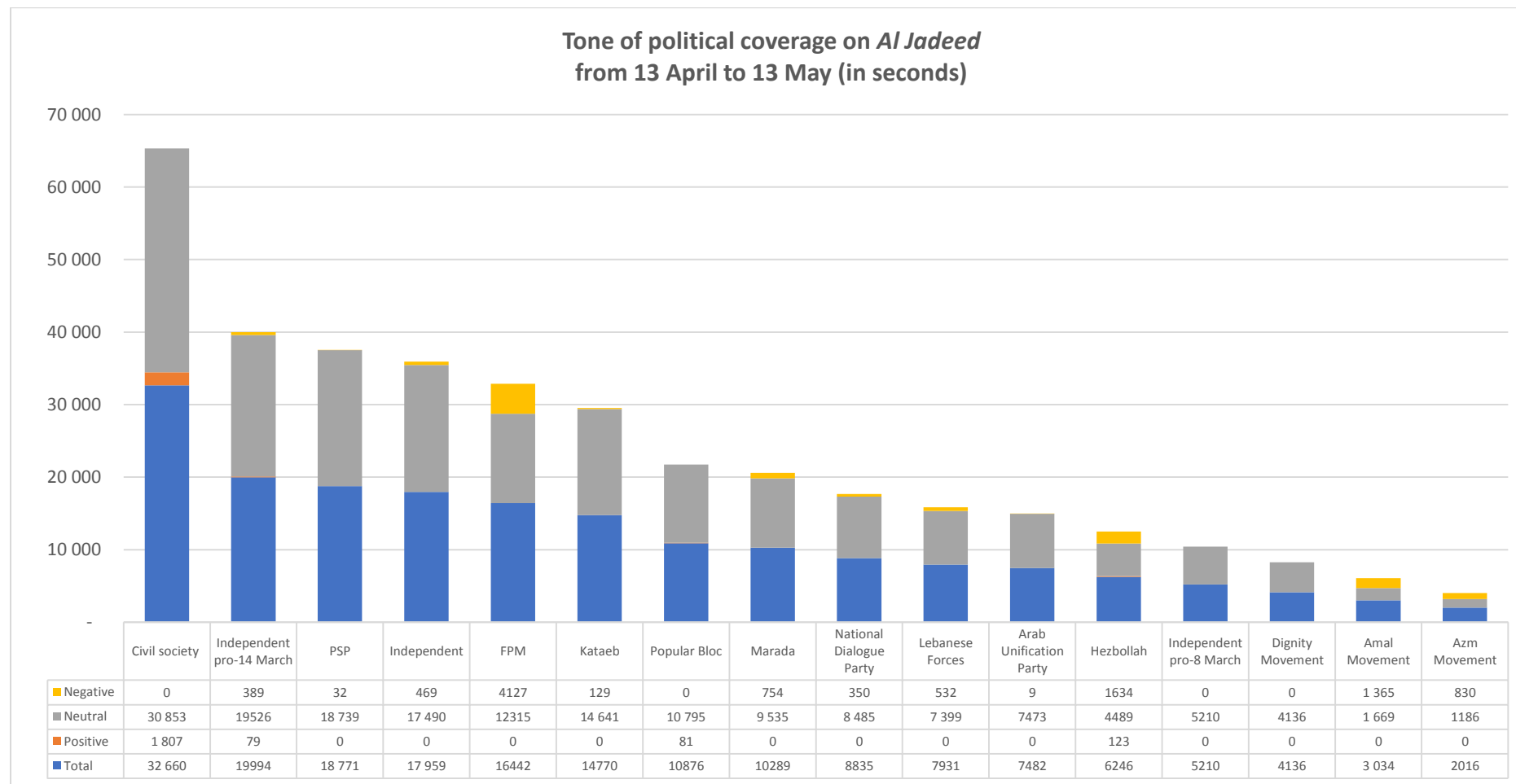


Figure 13





**Figure 14**

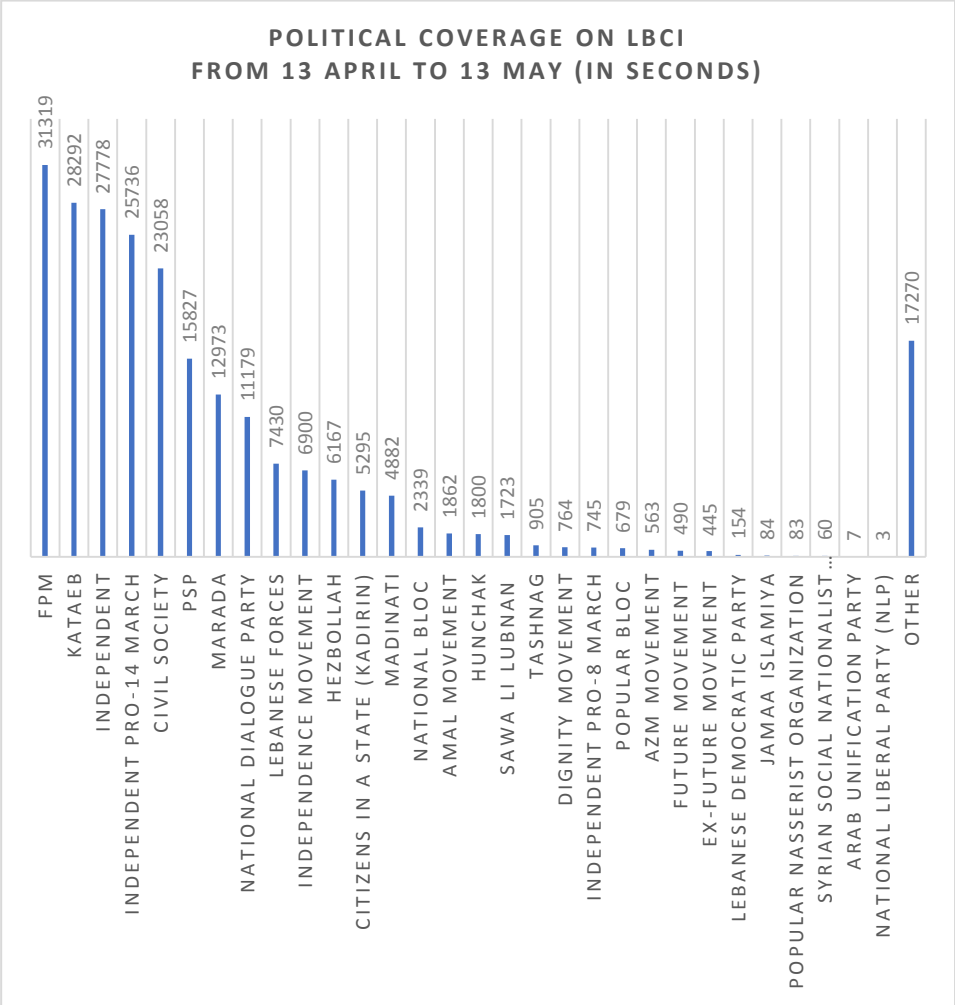
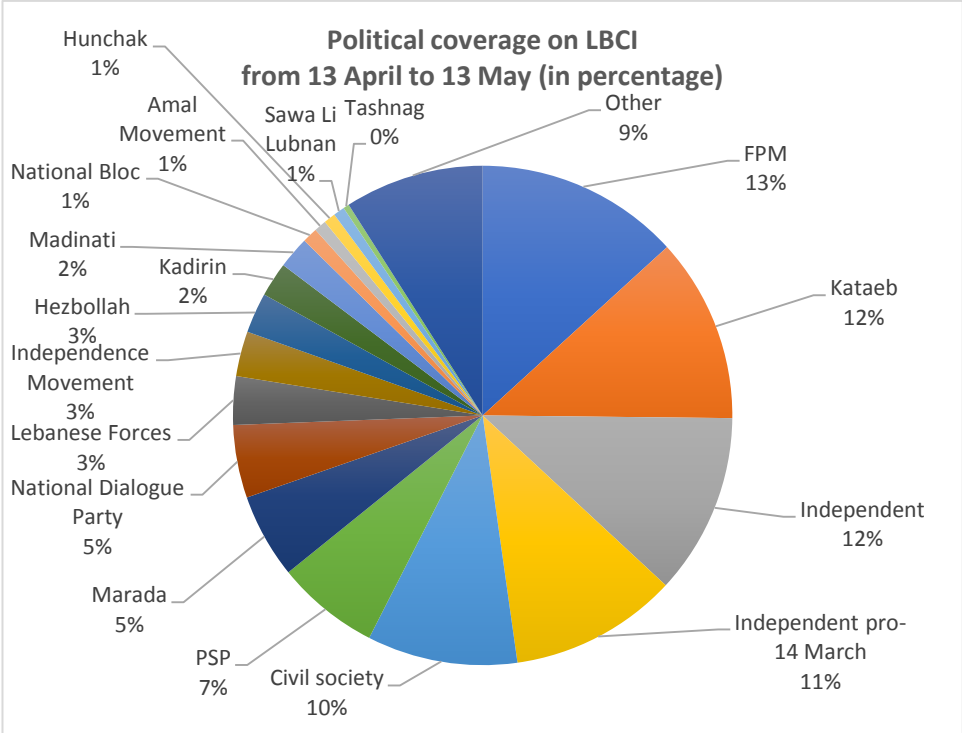
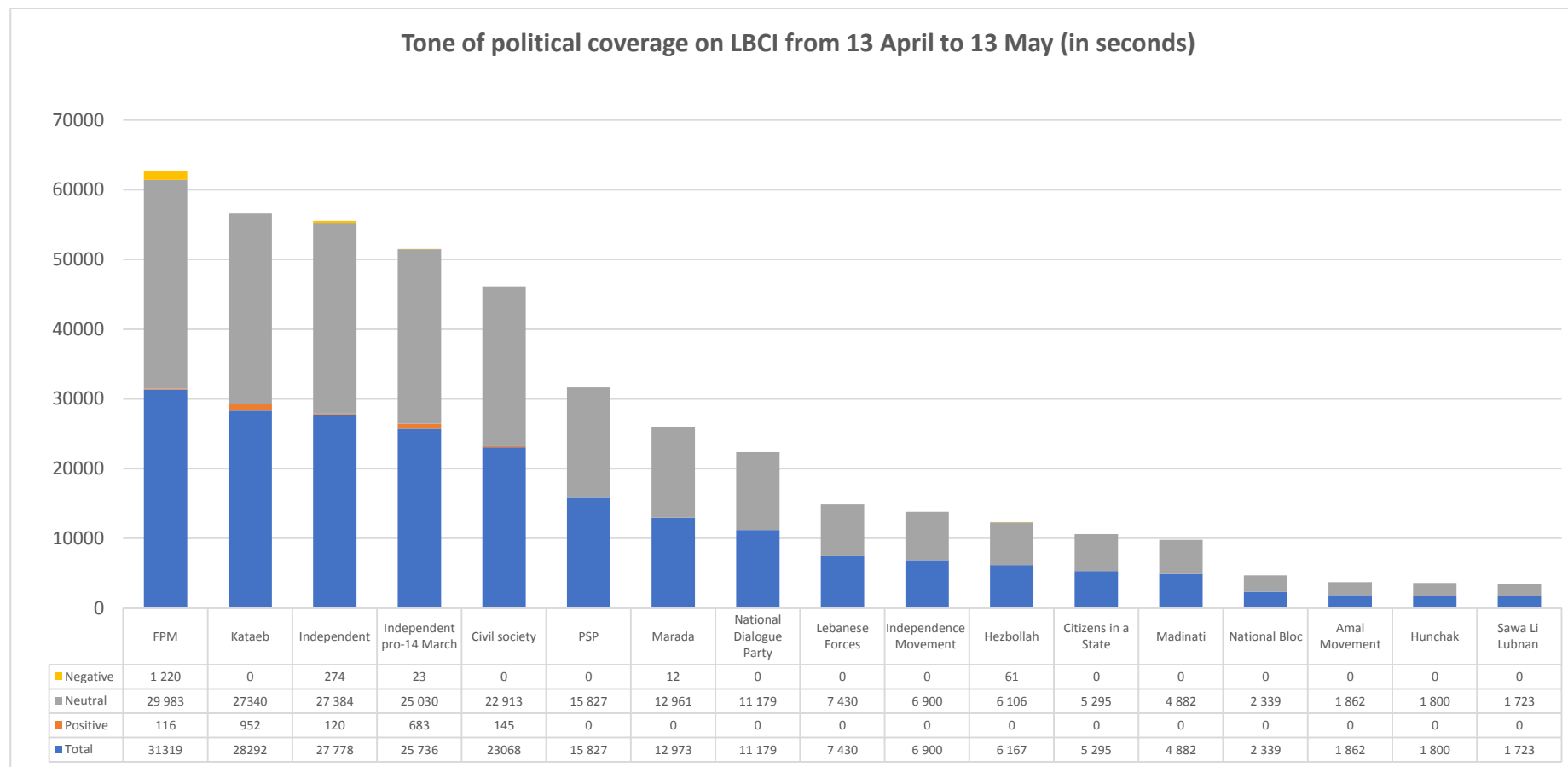


Figure 15



*Figure 16*



**Figure 17**

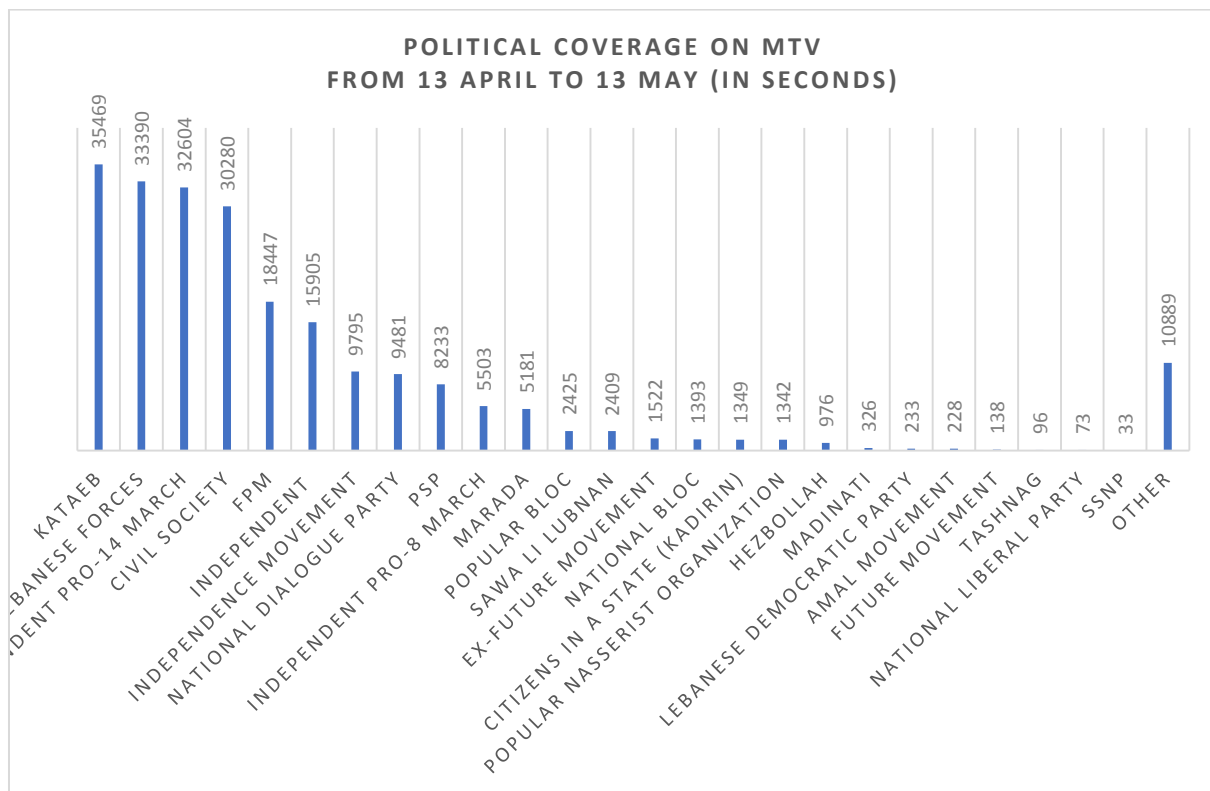
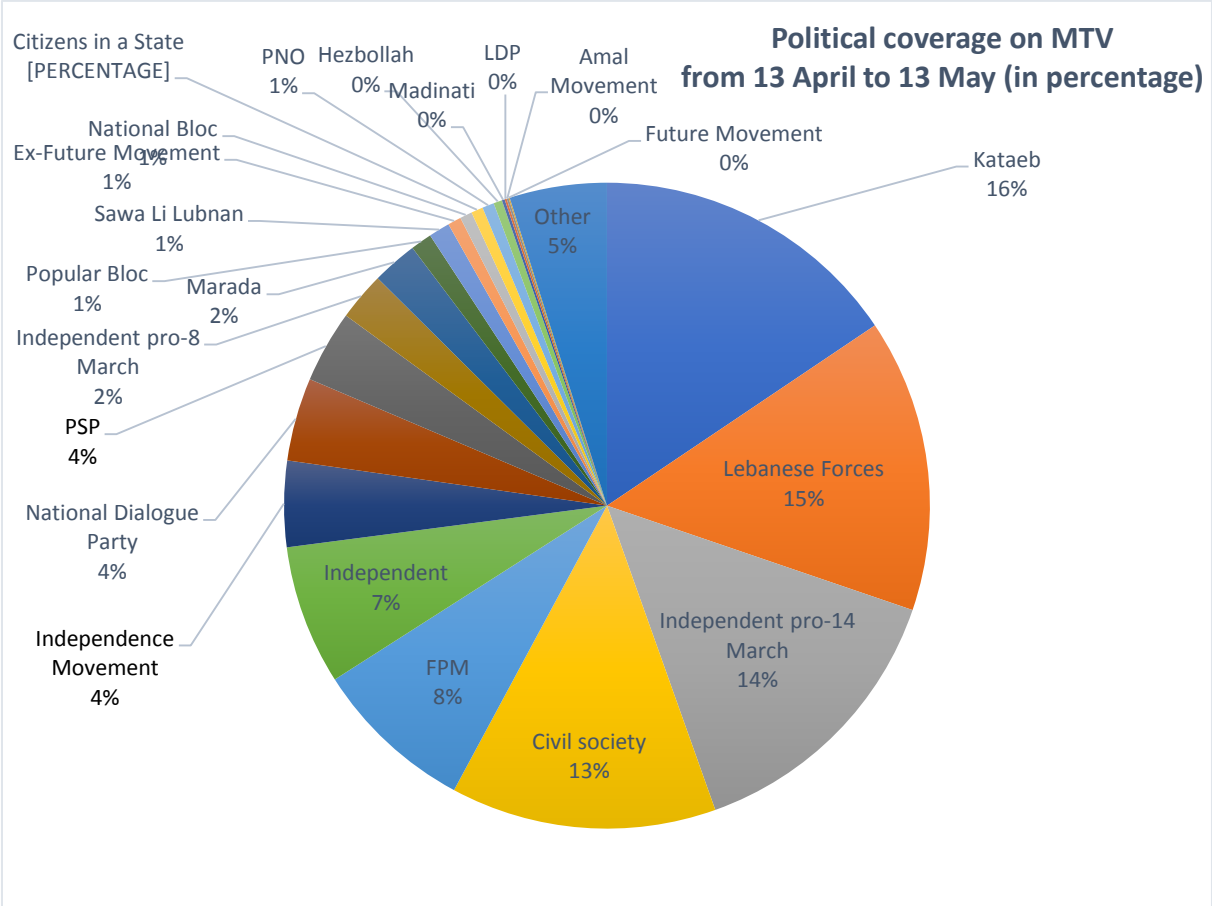
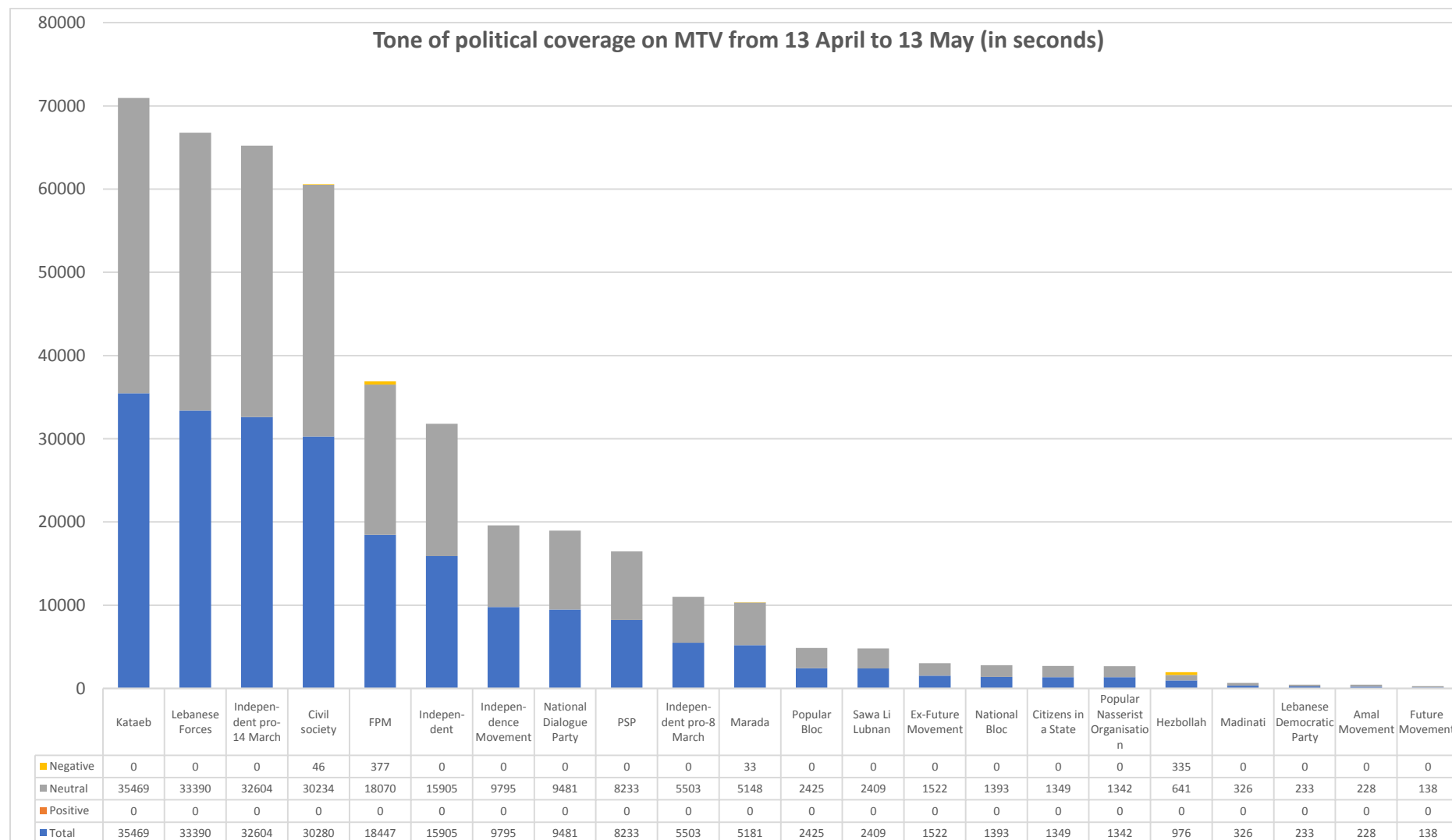


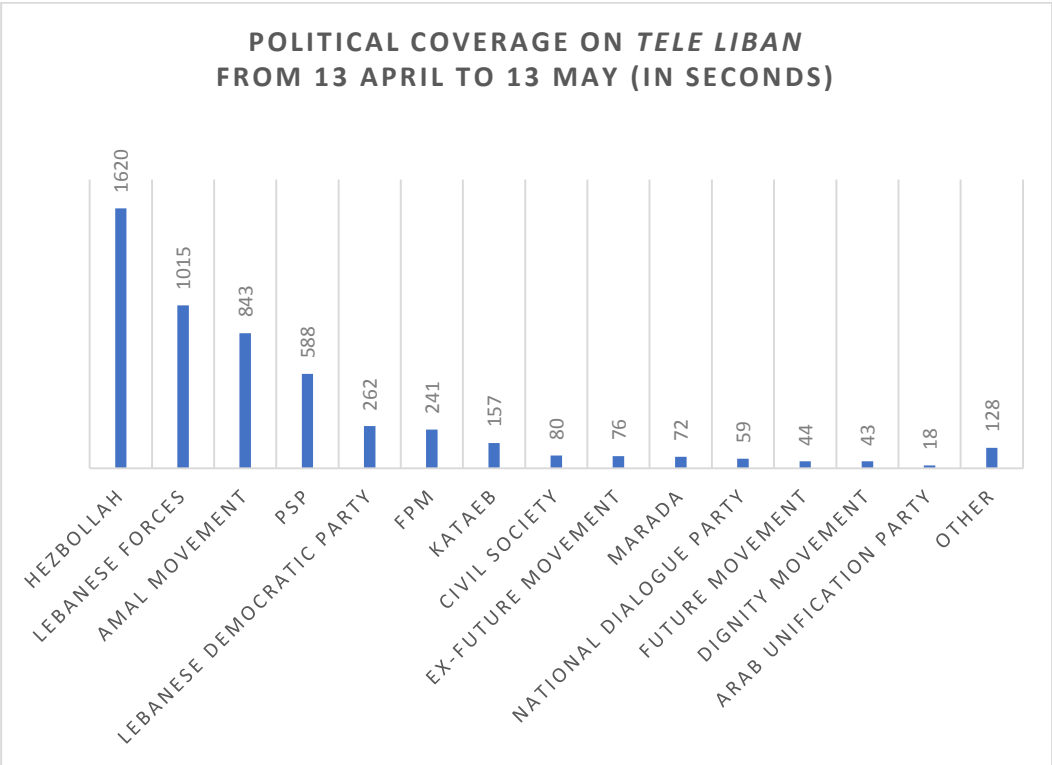
Figure 18



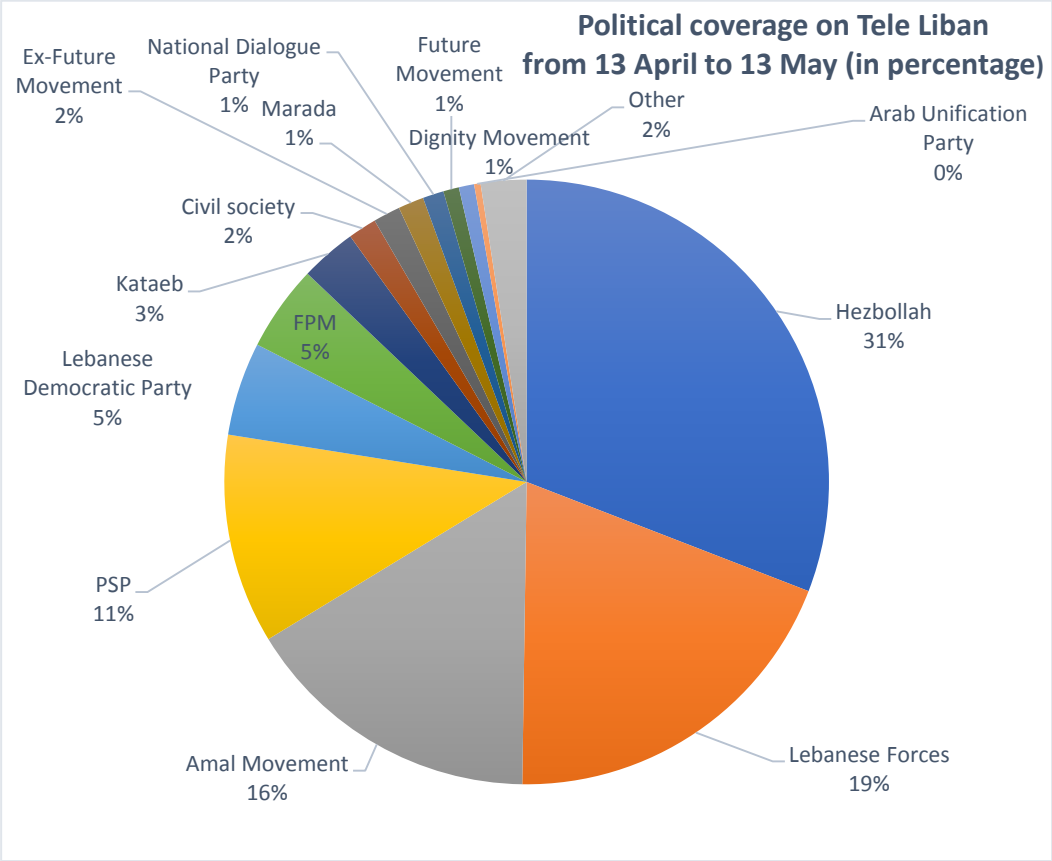
*Figure 19*



*Figure 20*



**Figure 21**



**Figure 22**



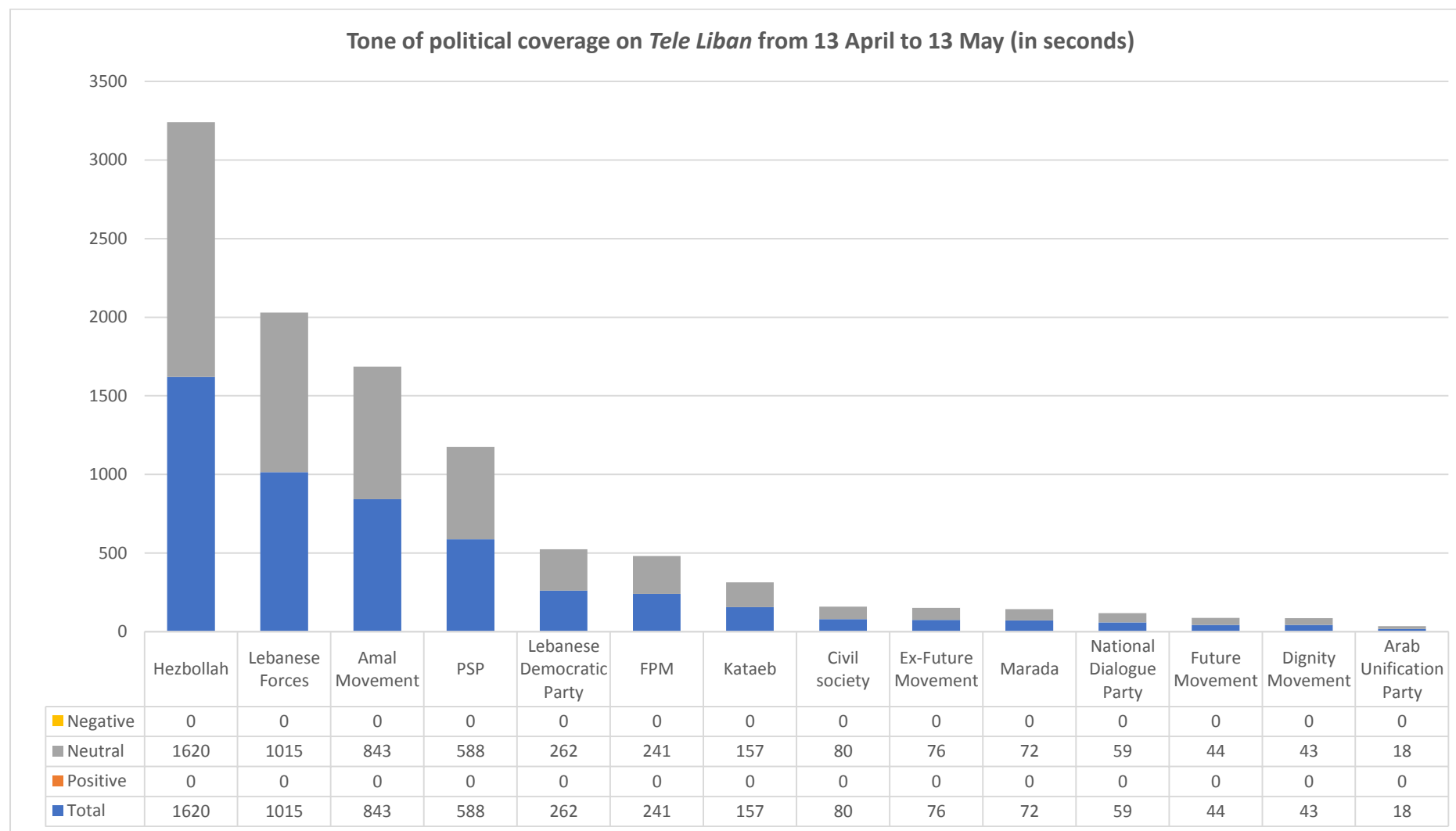


Figure 23

*EU EOM and other observers' coverage on Al Jadeed, LBCI, MTV and Tele Liban:*

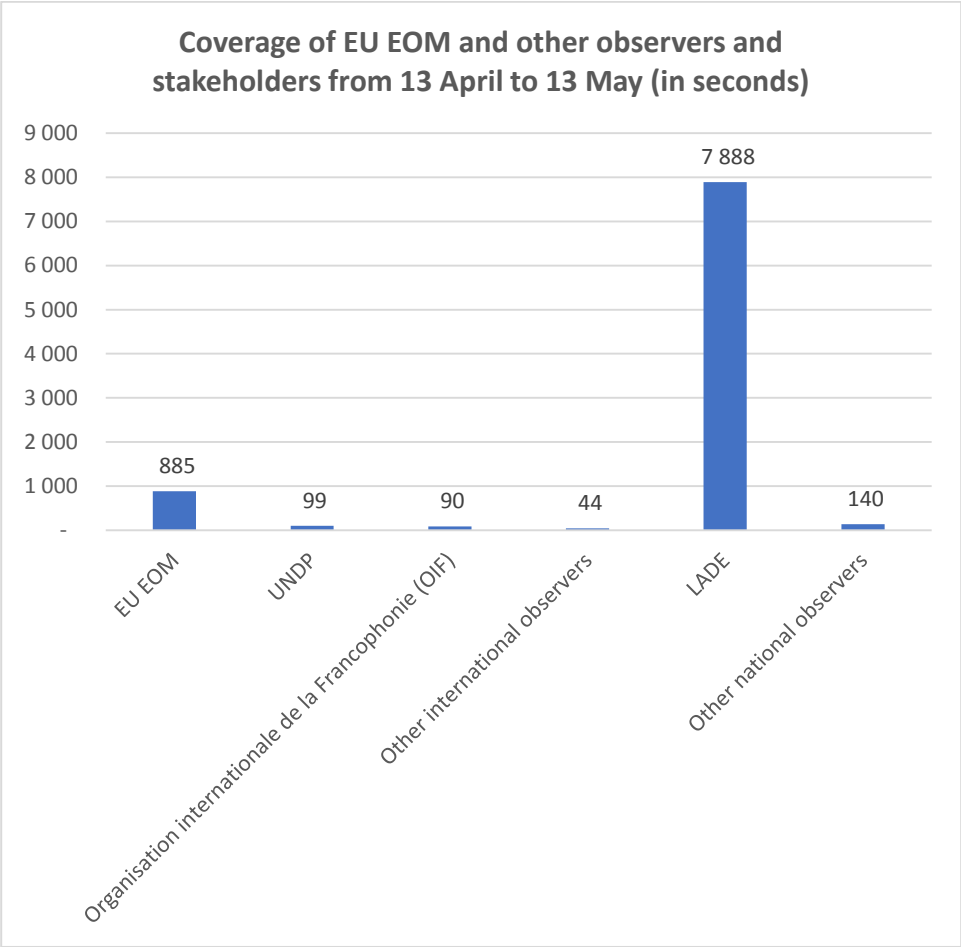


Figure 24

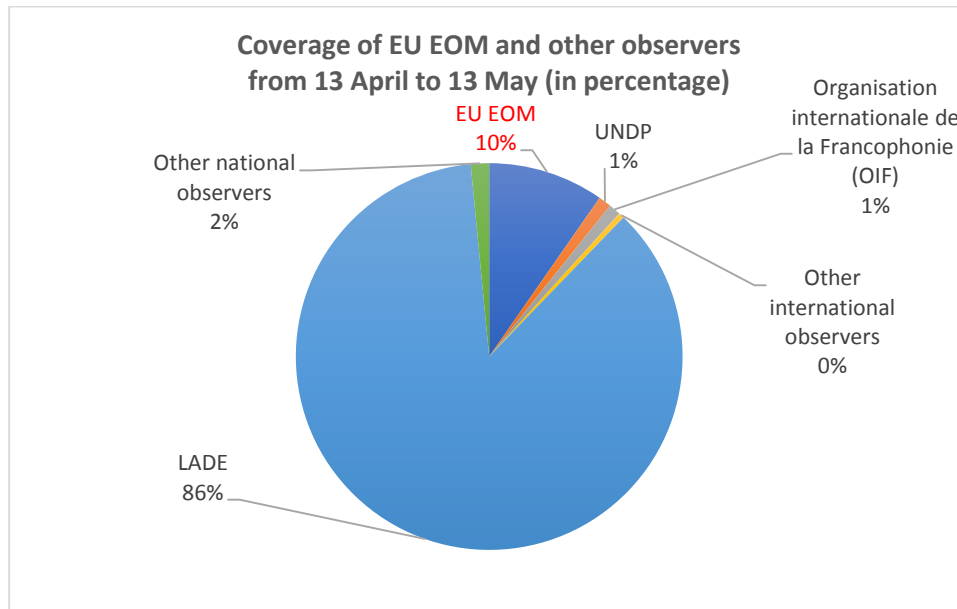


Figure 25

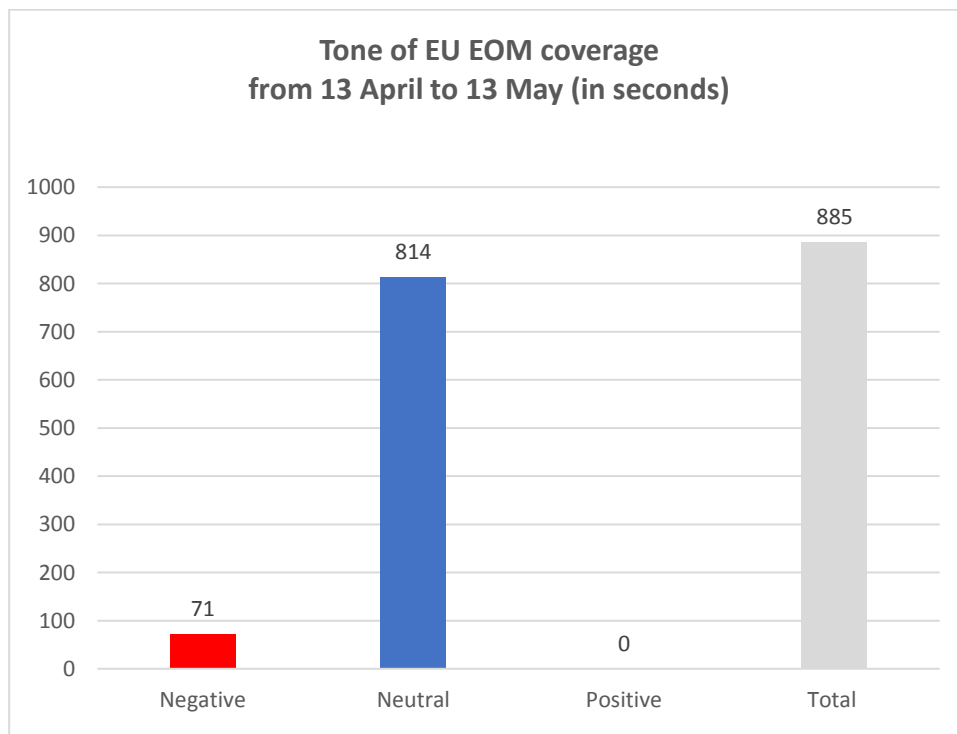
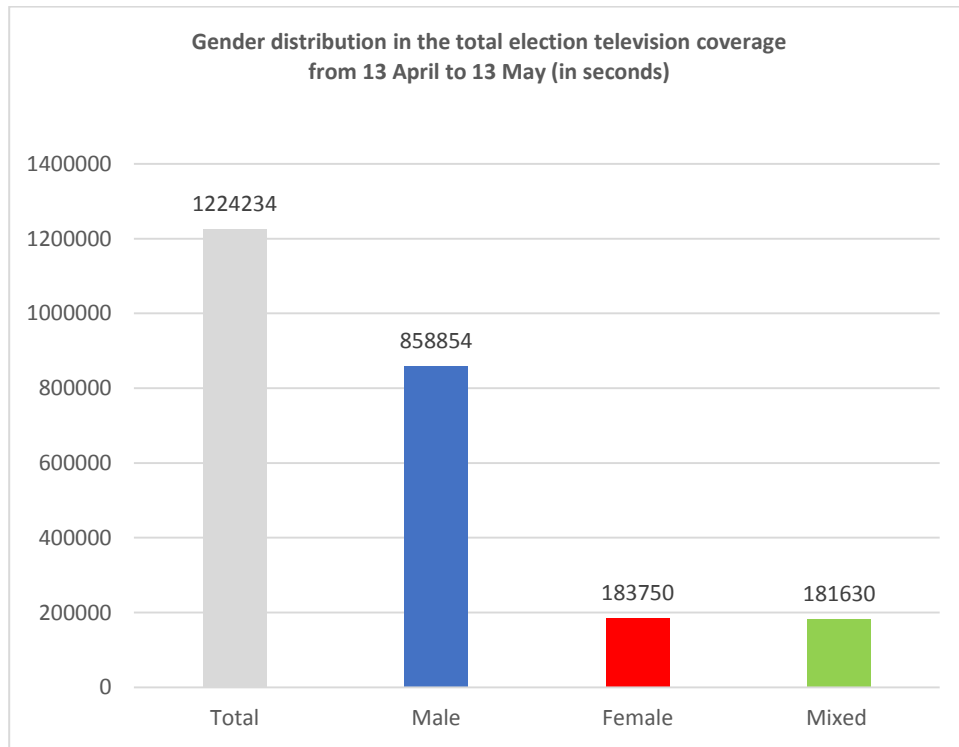


Figure 26

*Gender balance in direct speech on Al Jadeed, LBCI, MTV and Tele Liban:*



*Figure 27*

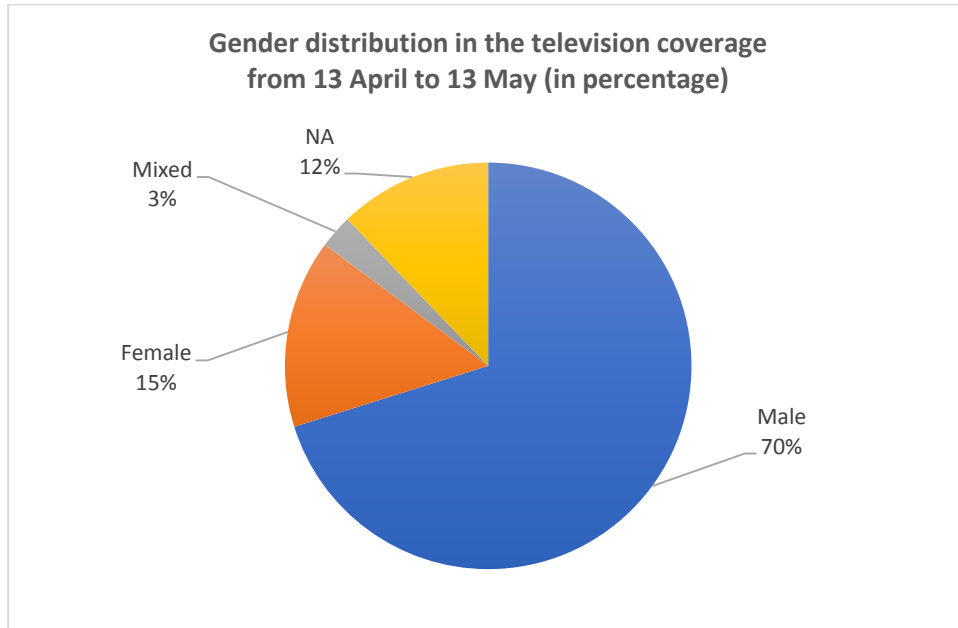


Figure 28



ANNEX 6 – SOCIAL MEDIA MONITORING FINDINGS

Methodology

The EU EOM monitored Facebook public pages and groups, and Twitter accounts from 27 March till 15 May 2022, using primarily CrowdTangle, SentiOne, and scrapped data from Twitter through the API.

Some 3,584 posts and 2,299 tweets in total were coded and analysed by a team of five monitors. The monitoring selected posts and tweets either by pages or accounts, focusing on the messenger (MoIM, political contestants), or by keywords, focusing on the message (election-related information received by voters, divisive political messages shared, coverage of the EU EOM, derogatory speech, etc.).

	Facebook			Twitter			Total relevant	Selection by
	Pages	Posts analysed	Relevant	Accounts	Tweets analysed	Relevant		
<b>Lebanon Elections</b>	1	78	78	0	0	0	78	Pages/accounts
<b>Supervisory Commission for Elections</b>	1	33	33	1	28	28	61	Pages/accounts
<b>Institutional actors</b>	58	991	904	29	776	546	1,450	Pages/accounts
<b>Third parties</b>	18	396	183	24	299	179	362	Pages/accounts
<b>Electoral information</b>	110	347	193	72	169	76	269	Keywords
<b>Political information</b>	181	581	464	282	305	138	602	Keywords
<b>Media</b>	4	140	7	0	0	0	7	Pages/accounts
<b>Other*</b>	227	1,018	357	37	722	163	520	Pages/accounts, keywords
<b>Total</b>	600	3,584	2,219	445	2,299	1,130	3,349	

\* *Women, EU EOM, derogatory speech, incitement to religious strife*

In addition, the SMMU scrapped more than 6,500 comments both on Twitter and Facebook to assess the use of derogatory speech, including gender-based derogatory speech.

### **Campaign online**

Some 958 posts and 722 tweets generating high numbers of interactions were analysed, extracted from 56 Facebook public Pages, and 28 Twitter accounts selected. Messages were exported from 37 public Facebook pages of prominent politicians/contestants, five pages of parties, and 14 pages party leaders, as well as 16 accounts of prominent politicians/contestants, one party account, and 11 party leaders' accounts on Twitter.

	Facebook			Twitter			Total relevant
	Pages	Posts analysed	Relevant	Accounts	Tweets analysed	Relevant	
<b>Parties</b>	5	49	41	1	2	2	43
<b>Candidates/politicians</b>	37	632	605	16	215	147	752
<b>Party Leaders</b>	14	277	231	11	505	372	603
<b>Total</b>	56	958	877	28	722	521	1398

Pages and accounts were selected according to their impact on the political agenda (number of followers, activity, interactions, etc), and their political affiliation, to cover all the political spectrum. However, not all the pages selected by the SMMU appeared in the monitoring. Indeed, some posts and tweets with less engagement might have generated an interest but fell short of the necessary threshold to be manually coded by the EU EOM Social Media Unit.

### **Electoral and political information shared on Facebook and Twitter**

Searches by keywords were launched over all Facebook public content relevant in Lebanon, and over and Twitter to identify electoral and political information.

Some 928 posts and 474 tweets were scrapped, of which 657 and 214 were relevant. Posts were scrapped from a total of 244 public pages and 47 public groups. Tweets were scrapped on 354 different accounts in total.

Topic	Facebook			Topic	Twitter		
	Posts scrapped	Relevant	Pages/Groups		Tweets scrapped	Relevant	Accounts
Electoral	347	193	110	Electoral	169	76	72
Political	581	464	134/47	Political	305	138	282
<b>Total</b>	<b>928</b>	<b>657</b>	<b>291</b>	<b>Total</b>	<b>474</b>	<b>214</b>	<b>354</b>

## Social media environment

There were 25 million social media users by January 2022 in Lebanon, or 75 per cent of the population.

Video is the preferred content and YouTube the most popular platform. (Figure 1) However, Facebook was the most popular platform for news sharing, while Twitter was an agenda setter for politicians and legacy media.

Men formed the majority of the social media users and were overrepresented on Twitter (Figure 2).

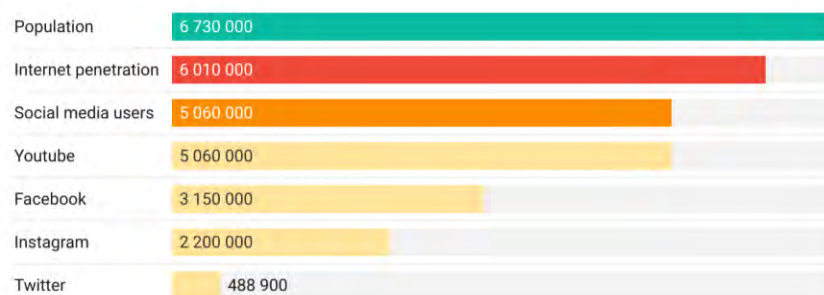


Figure 1. Social Media users by platform, January 2022

Source: We are Social | Hootsuite Digital Report Lebanon 2022

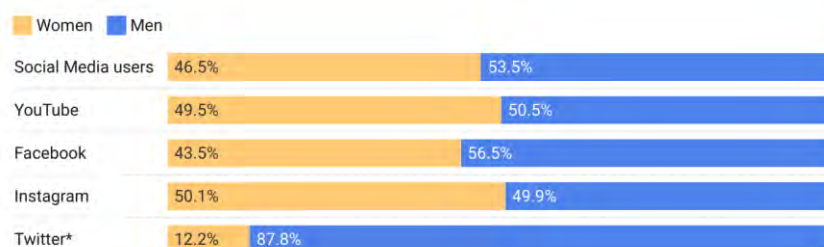


Figure 2. Share of women and men users by platform, January 2022

Source: We are Social | Hootsuite Digital Report Lebanon 2022

\*Digital report Lebanon 2021



### Lebanon Elections Facebook Page – the MoIM public outreach

Official election-related information was shared by the „Lebanon Elections Facebook page, operated by the Ministry of Interior and Municipalities (MoIM). The Facebook page and Twitter account of the Supervisory Commission for Elections (SCE) itself were activated by the end of March only. They gathered few followers (respectively 25 and 95), and generated few interactions. The Lebanon Elections Facebook page was reactivated by the MoIM on 9 November. It regularly lost followers until a few days before the elections. It notably gained followers when it posted information about verification of voters’ data on 20 December, and when it scaled up its postings, sharing especially voter education material, in the lead up to the elections. (Figure 3)

The page shared only 102 posts over a period of six months and one week. (Figure 4) It posted more frequently in the two weeks ahead of the elections, although insufficiently to create a dynamic on the page and generate significant interactions.

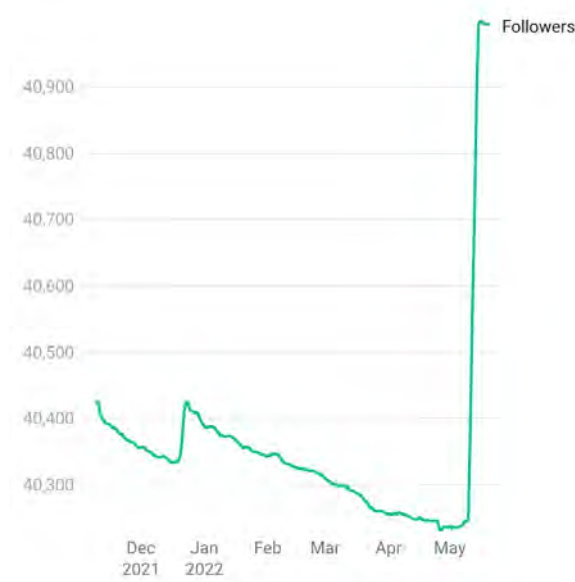


Figure 3. Followers’ evolution from 9 November 2021 till 20 May 2022 | Source: CrowdTangle

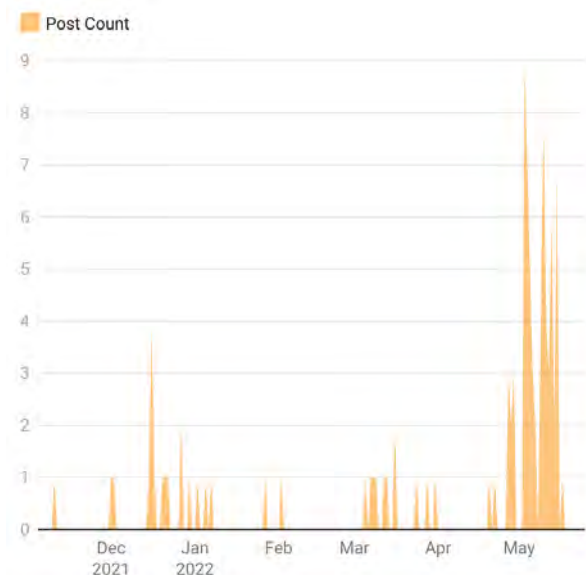


Figure 4. Total posts shared from 9 November 2021 till 20 May 2022 | Source: CrowdTangle

The mission analysed the 78 posts shared on the page from 27 March till 15 May.

One third of the postings was voter information and voter education material, while 44 per cent of it was statements of the MoIM and the SCE for candidates, for the polling staff, or regarding the organisation of the elections and election days. The page conducted a noticeable information campaign for candidates in March and April. (Figure 5)

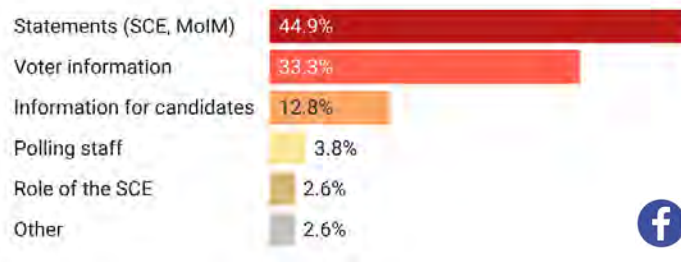


Figure 5. Topics of the 78 posts shared from 27/03 till 15/05/2022

Boosted videos (nine) generated a significantly higher number of views than videos that were not boosted (nine).

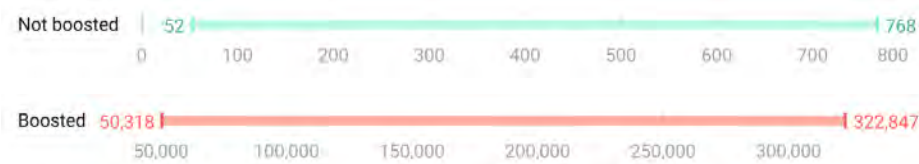


Figure 6. Minimal and maximal number of views of boosted v. not boosted videos from 27/03 till 15/05/2022 | Source: CrowdTangle

## Political and electoral information circulated

### Methodology

The EOM launched searches on CrowdTangle and Twitter to identify the electoral and political information that was circulated on the two platforms from 27 March till 15 May 2022. Using CrowdTangle, searches were launched on Facebook public pages that were considered by Facebook as highly relevant for the Lebanese audience. Searches on Twitter were launched via the API. Posts and tweets with the highest engagement were manually coded and analysed on a weekly basis. (20 posts with the highest engagement for the electoral searches and 30 posts for the political searches).

### Keywords

Electoral | Elections, parliamentary elections, candidate list, distribution of seats, election law, confessional system, confessional seat, minor district, sectarian system,

Political

sectarian seat, judges, polling station, polling centre, voter card, SCE

Hezbollah, era of humiliation, Iranian occupation, everyone means everyone, port explosion, corruption, militia, terrorism, system, your leader, electricity, smugglers, garbage, decentralization, vote buying, clientelism, sectarian dictatorship, external money

N.B.: Not all public pages and post were included in the search by CrowdTangle. Furthermore, some posts with less engagement might have generated an interest but fell short of the necessary threshold to be manually coded by the EU EOM Social Media Unit. Therefore, this is a snapshot of the information shared on Facebook on the electoral process and not a comprehensive report.

Some 928 posts and 474 tweets were scrapped, of which 657 and 214 were relevant. Posts were scrapped from a total of 244 public pages and 47 public groups. Tweets were scrapped on 354 different accounts in total.

**Election-information shared on Facebook and Twitter**

**Pages and accounts that shared election-related information**

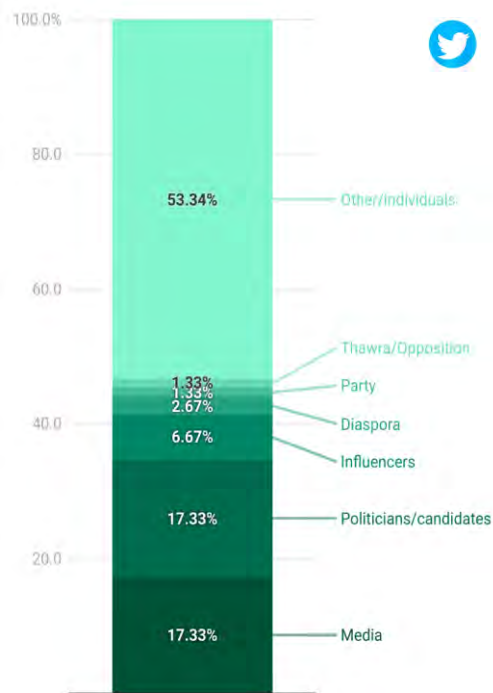
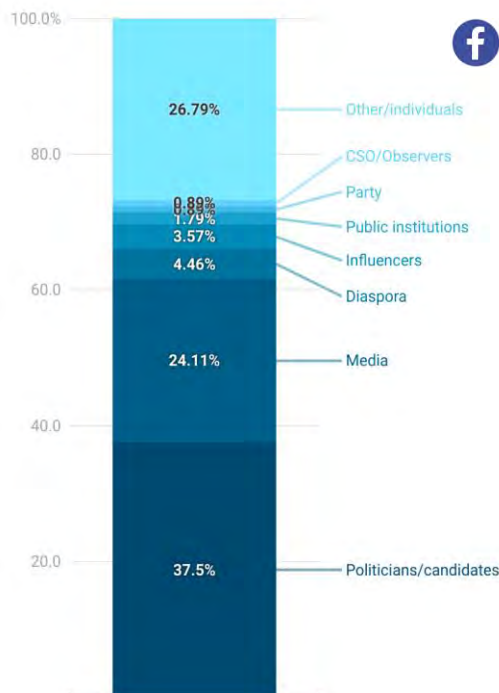
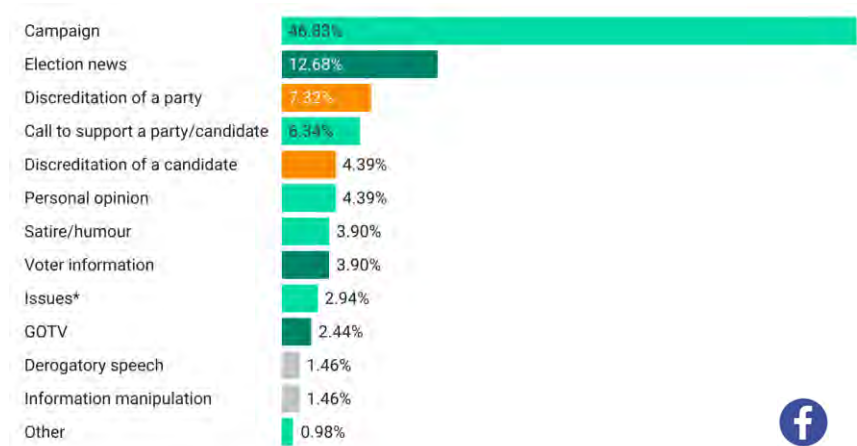


Figure 6. Facebook pages that shared electoral information

Figure 7. Twitter accounts that shared electoral information

While electoral information analysed by the EU EOM was mostly shared by politicians/candidates and media pages on Facebook (Figure 6), more than half of the election-related information was shared by accounts of individuals on Twitter, and one in six such tweets was shared by politicians or media pages (Figure 7).

**Topics of the election-related posts and tweets analysed by the EU EOM**

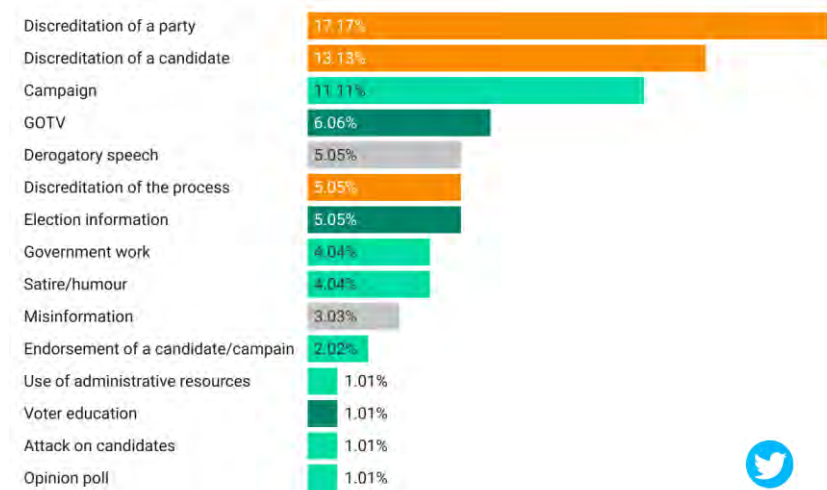


\*Use of administrative resources, bad logistics in centers, vote buying, clashes

Figure 8. Topics covered by the Facebook pages that shared electoral information

Pages and accounts that shared electoral keywords that were analysed by the EU EOM, shared few information on the electoral process, the procedures, the election administration, voter education material, or get out the vote messages (dark green, 19,02 per cent on Facebook and 11,01 per cent on Twitter).

Most of the Facebook posts analysed were campaign postings.



On Twitter, the messages analysed contained mostly negative campaign and discreditation of parties and candidates (30,30 per cent).

The process itself was also discredited at times on Twitter, by messages pointing out shortcomings and/or questioning the SCE. (Figure 9)

Figure 9. Topics covered by the Twitter accounts that shared electoral information

Some eight per cent of the tweets analysed contained either misinformation, misanalysis, or derogatory speech. (Figure 9)

### Political information shared on Facebook and Twitter

Messages containing political keywords shared on Facebook and analysed by the EU EOM were shared almost equally by politicians/candidates’ pages, media pages, and pages of politicians’ supporters, while other pages (i.e. individuals, or pages without clear identification or affiliation) shared only 18 per cent of these messages. (Figure 10)

On Twitter, on the contrary, individual accounts were the most active, sharing 65 per cent of the messages analysed, while politicians/candidates, and media accounts, shared 11 to 12 per cent of those messages. (Figure 11)

Pages and accounts that shared election-related information

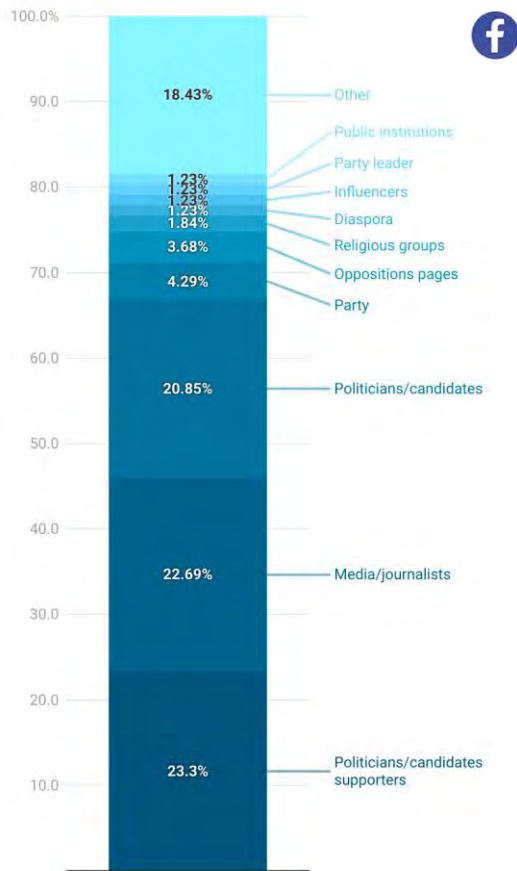


Figure 10. Facebook pages that shared political information

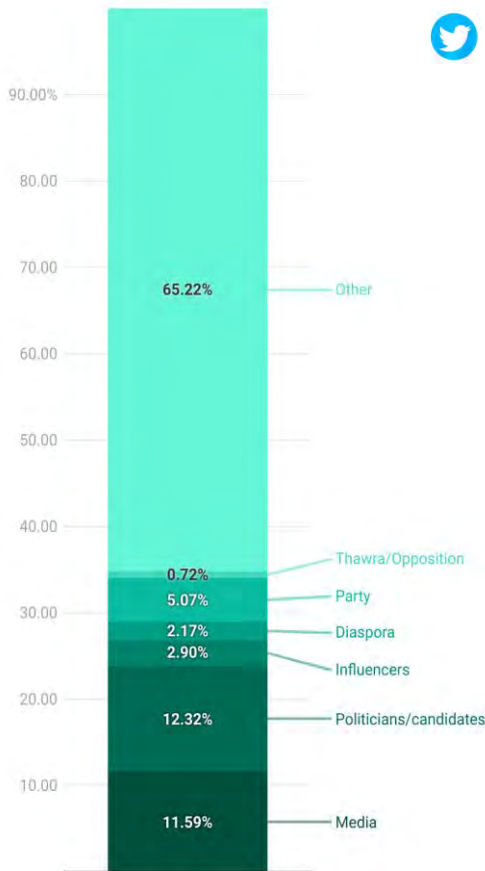


Figure 11. Twitter accounts that shared political information

Topics of the political posts and tweets analysed by the EU EOM

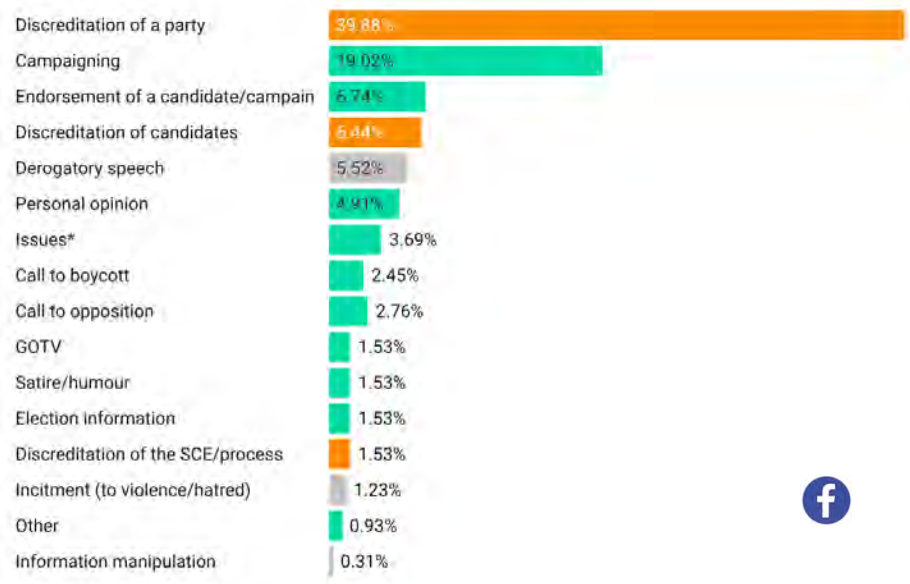


Figure 12. Topics covered by the Facebook pages that shared political information

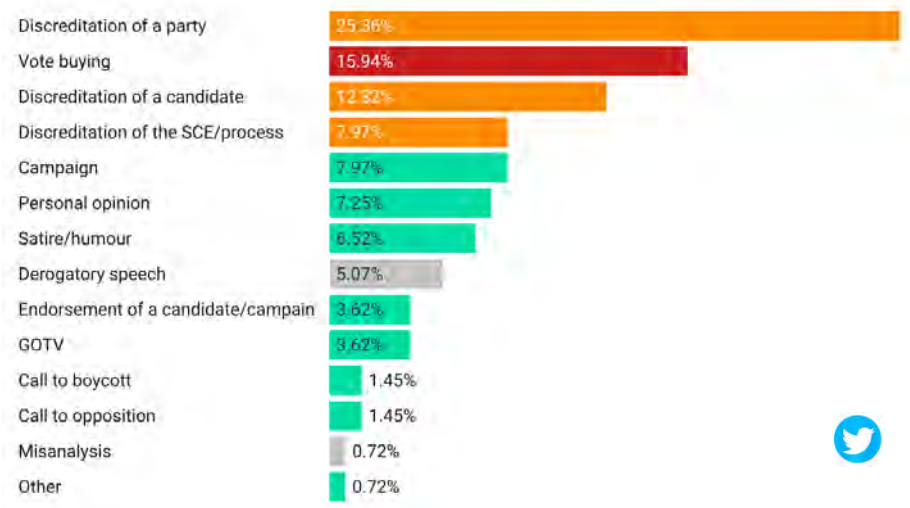


Figure 13. Topics covered by the Twitter accounts that shared political information

Most of the messages analysed by the EU EOM containing political information were discreditation messages, targeting candidates, political parties, or the electoral process (Figures 12 and 13). They formed respectively 47,85 per cent and 45,65 per cent of the postings on Facebook and Twitter.

In other words, one in two messages was a negative message, discrediting part of the contestants or the process.

In addition, one in six tweets analysed contained allegations of vote buying, at times with pictures. Derogatory speech was also widespread and formed over five per cent of the messages on the two platforms.

**Focus on media, politicians/candidates, and supporters/’other’ pages and accounts**

**What did media pages and accounts share?**

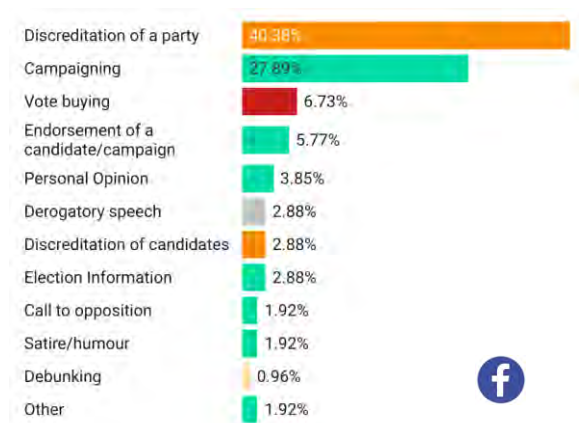


Figure 14. Political topics covered by media pages on Facebook

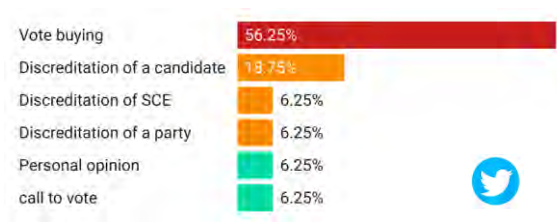


Figure 15. Political topics covered by media pages on Twitter

(Online media, legacy media, and pages/accounts that declared themselves as „media“ on Facebook but don’t have other online or offline presence)



What did politicians/candidates share?

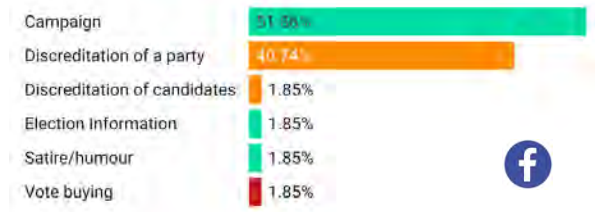


Figure 16. Political topics covered by politicians/candidates' pages on Facebook

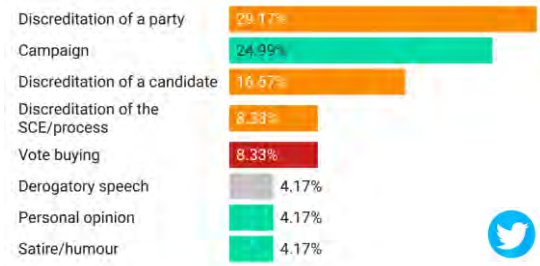


Figure 17. Political topics covered by politicians/candidates' pages on Twitter

What did supporters' pages share?

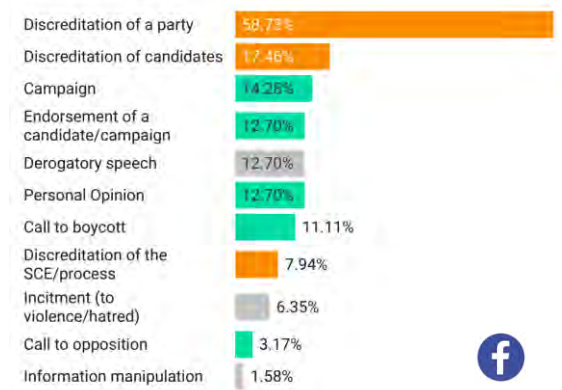


Figure 18. Political topics covered by supporters' pages on Facebook

What did 'other' accounts share?

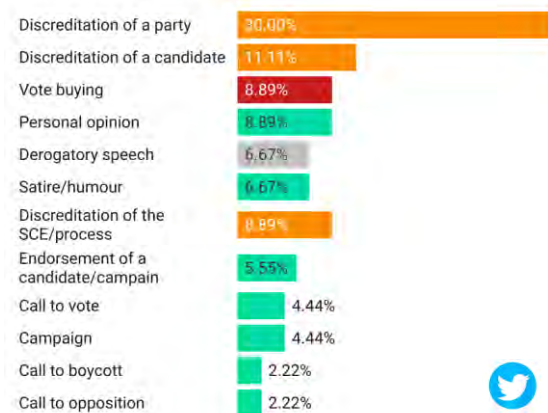


Figure 19. Political topics covered by other pages on Twitter

Campaign online

The EU EOM analysed 958 posts and 722 tweets shared by a selection of major parties, candidates, and political leaders on Facebook and Twitter from 27 March till 15 May 2022, that generated more high engagement (the 100 posts and tweets with the highest engagement per week). Once exported, the posts were manually coded to identify the type of post, the affiliation, and the campaign topics. In total 81 posts and 201 tweets were categorised as not campaign related; the remaining 877 and 521 are presented in the charts.

Most active and interacted with political stakeholders

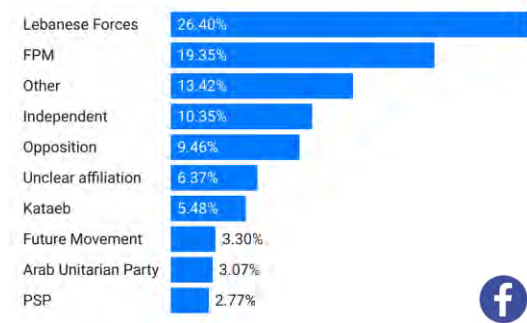


Figure 20. Most active and interacted with political pages by affiliation on Facebook

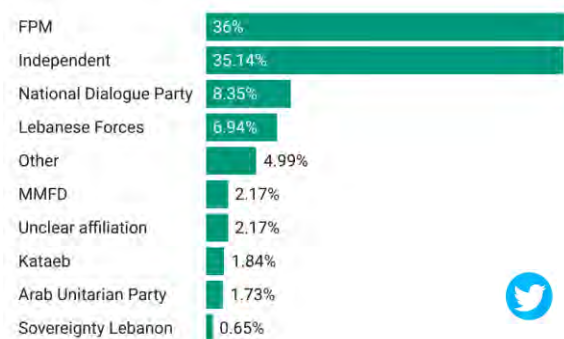


Figure 21. Most active and interacted with political accounts by affiliation on Twitter

The campaign posts and tweets analysed by the EOM were mostly shared by the Lebanese Forces, the FPM, as well as independent or opposition candidates. These were the most interacted with posts and tweets. However, some other parties, including Kataeb and Marada, were especially active on Twitter and/or Facebook, but generated few interactions.

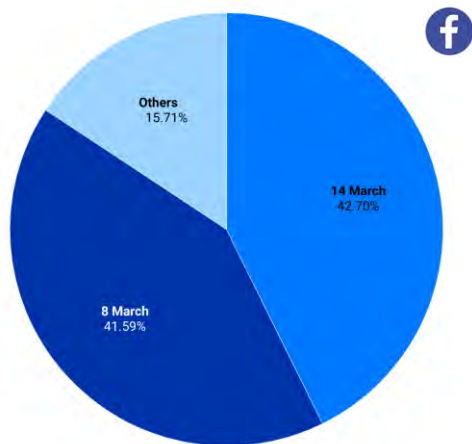


Figure 22. Most active and interacted with political pages by alliance on Facebook

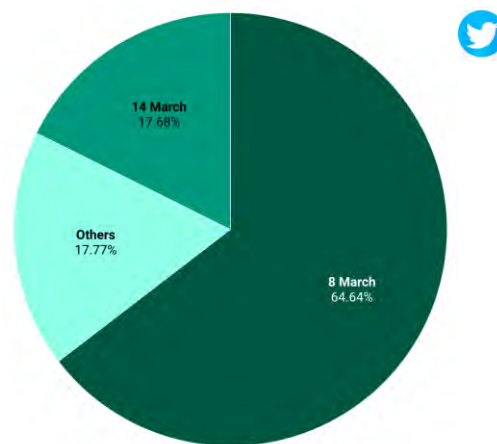
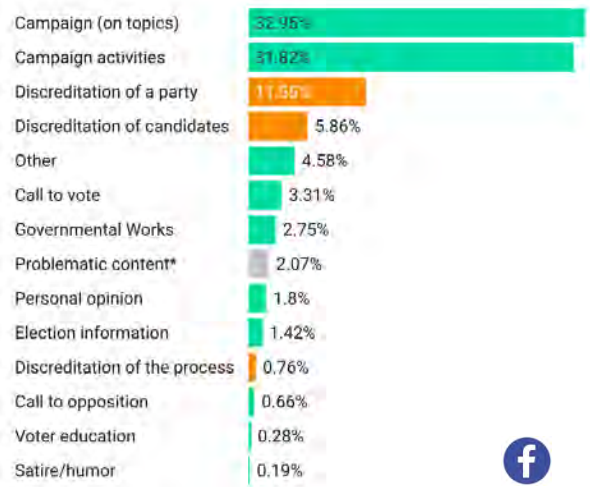


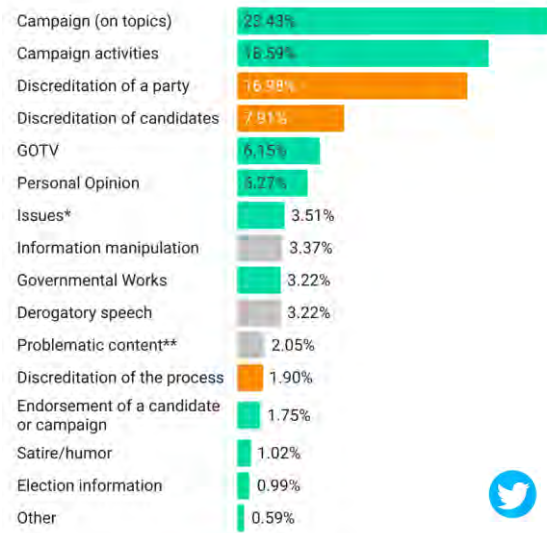
Figure 23. Most active and interacted with political accounts by alliance on Twitter

### Type of posts shared



\* Incitement to violence/hatred, information manipulation, derogatory speech, women harassment, threats

Figure 24. Type of posts shared by the political stakeholders and analysed by the EU EOM on Facebook



\* Condemning of abusive practices, use of administrative resources, vote buying

\*\* Incitement to violence/hatred, mis/disinformation

Figure 25. Type of tweets shared by the political stakeholders and analysed by the

EU EOM on Twitter

While campaign posts and tweets formed most of the messages shared, discreditation of parties, candidates, and the process remained widespread in the postings of the political stakeholders, reaching 18,18 per cent on Facebook, and 26,79 per cent on Twitter.

Campaign topics

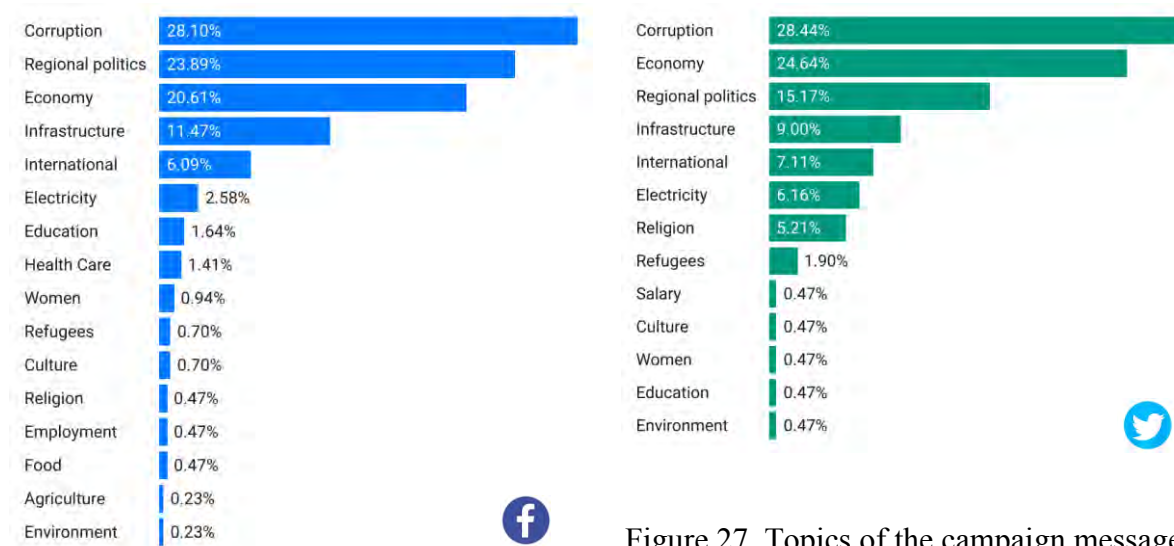


Figure 27. Topics of the campaign messages shared by the political stakeholders on Twitter

Figure 26. Topics of the campaign messages shared by the political stakeholders on Facebook

The campaign topics, and their share, were almost similar on Facebook and Twitter. Corruption, the economy, regional policies, infrastructure, and international policies formed respectively 90,26 per cent and 84,36 per cent of the postings on Facebook and Twitter.

Information manipulation

*The EU EOM analysed and documented cases on information manipulation both on Twitter and Facebook. The three cases were identified from the regular monitoring of the EU EOM, the analysis of the daily trending hashtags, and the election-day monitoring of social media. These three cases show how pages and accounts affiliated or leaning to some political groups occupy the online space to set trends on Twitter, launch coordinated attacks on their opponents,*

*manipulate the titles and content of articles to catch their audience and fit their agenda, and use sets of real or fake accounts to amplify their narratives.*

## Setting the trend and amplifying hashtags on Twitter

### FPM/Hezbollah vs. 14 March/Lebanese Forces - 14 March 2022



Figure 28. Scheme of the trending hashtags on 14 March, by supportive accounts

Setting the trend on Twitter has proved important for parties to occupy the online space, be seen, and benefit from the circulation of information between platforms and between social media and legacy media. Thus, major parties put a lot of efforts in controlling the trending hashtags and pushing their own, through real or fake accounts.

The chart 28 shows the trending tweets on 14 March, from midnight till 23:00, and how accounts supportive of different parties pushed their own narratives/attacked each other to set the trends.

#### Context:

- International: On 13 March, Iran launched missile attacks targeting Iraq's Erbil in warning of the US and its allies.

- National: On 13 March, in a speech Gebran Bassil attacked the Lebanese Forces and called them the “chameleon party”. The 14 March is the commemoration day of anti-Syrian cedar revolution.

From early morning up until 17:00, FPM, Hezbollah, Amal, The Lebanese Forces, and pages supportive of the 14 March alliance have battled to impose hashtags, first based on events that took place offline, before becoming emotional hashtags attacking the LF and counterattacking.

On 14 March, from midnight till 7:00, FPM and Hezbollah were trending, with the hashtags #chameleon\_party and #Erbil, based on the events that took place on 13 March and during the night (Gebran Bassil speech and Iranian attack on Erbil).

At 8:00, pages supportive of the 14 March broke the trend with the hashtag “#14\_March”. FPM and Hezbollah hashtags declined at the same time.

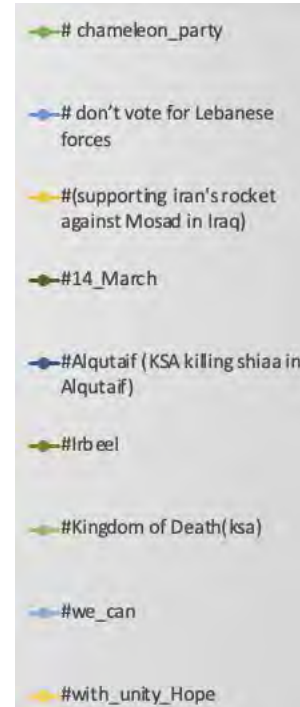
It lasted a couple of hours only. By 11:00, the hashtag “#don’t vote for Lebanese Forces” started trending and took the lead. It was shared by accounts supportive of Hezbollah and FPM.

The LF responded within the hour, pushing the hashtag “#we\_can”, that took the lead by 16:00.

The two hashtags temporarily lost the lead to Amal’s hashtags “#with\_unity\_hope”, that was quickly outperformed by the LF and Hezbollah-FPM hashtags, battling for the lead.

From 17:00, FPM/Hezbollah kept the lead for the rest of the day.

Those hashtags did not reflect the news of the day but a hashtag-contest between supportive groups, that distorted the debate on Twitter.



## **Manipulating content to fit one’s agenda**

### **The circulation of Sheikh Ahmad Kabalan statement on the election law and external money - 9 April 2022**

On 9 April, following a meeting with the EU EOM Chief Observer, the Shia religious leader Sheikh Ahmad Kabalan gave a statement about the election law and “external money” in the

elections. Within 90 minutes several pages supportive of antagonistic groups (Hezbollah and the revolution) shared the statement, changing the title, the focus, and at times paraphrasing the article to catch their own audience.

According to the statement, the Shia leader declared that the election law is more sectarian than national but is the best possible for now. He also warned against foreign money being used by different political stakeholders during the elections, a narrative that has been regularly mentioned by Shia political leaders or supportive pages, more or less close to the Shia tandem.

On 9 April, at 16:45, the Facebook page of the online outlet Daily Beirut released the statement of Sheikh Ahmad Kabalan. Since there is no source mentioned, no copyright, the EU EOM was unable to identify the origin of the statement and where was it posted first. The article's title quote part of the statement, about the election law ("the election law is more sectarian than national, but it is the best possible for now"). The article presents the full statement. Some 13 minutes later, another page posted the exact same content, with the same title (pages in blue on the chart). The articles remained neutral.

Within a few minutes, two pages supportive of the Hezbollah (pages in yellow on the chart) posted the article. They published the full article. However, they changed the title ("Mufti Kabalan warns against "external money" because the mills of the region and the world live only in ruin!"), reorienting the it towards a rhetoric and narrative familiar on Hezbollah pages.

At the same time, three revolution pages (Thawra pages, in white on the chart) also released the article, sharing a modified version: they changed the title, and two pages paraphrased the article, although without cutting off information, to fit their own agenda and audience. The title was changed into "Kabalan: there is no salvation for Lebanon except by getting rid of political sectarianism" and "Kabalan: The Lebanese regime is nothing but a ,sectarian dictatorship!"

The circulation of Sheikh Ahmad Kabalan statement shows how the title and content of the statement has been manipulated to fit opposite political agendas. It also shows some interdependence or coordination pages supportive of a similar group, that share the exact same content, including manipulated and/or misleading content, in a short time span.

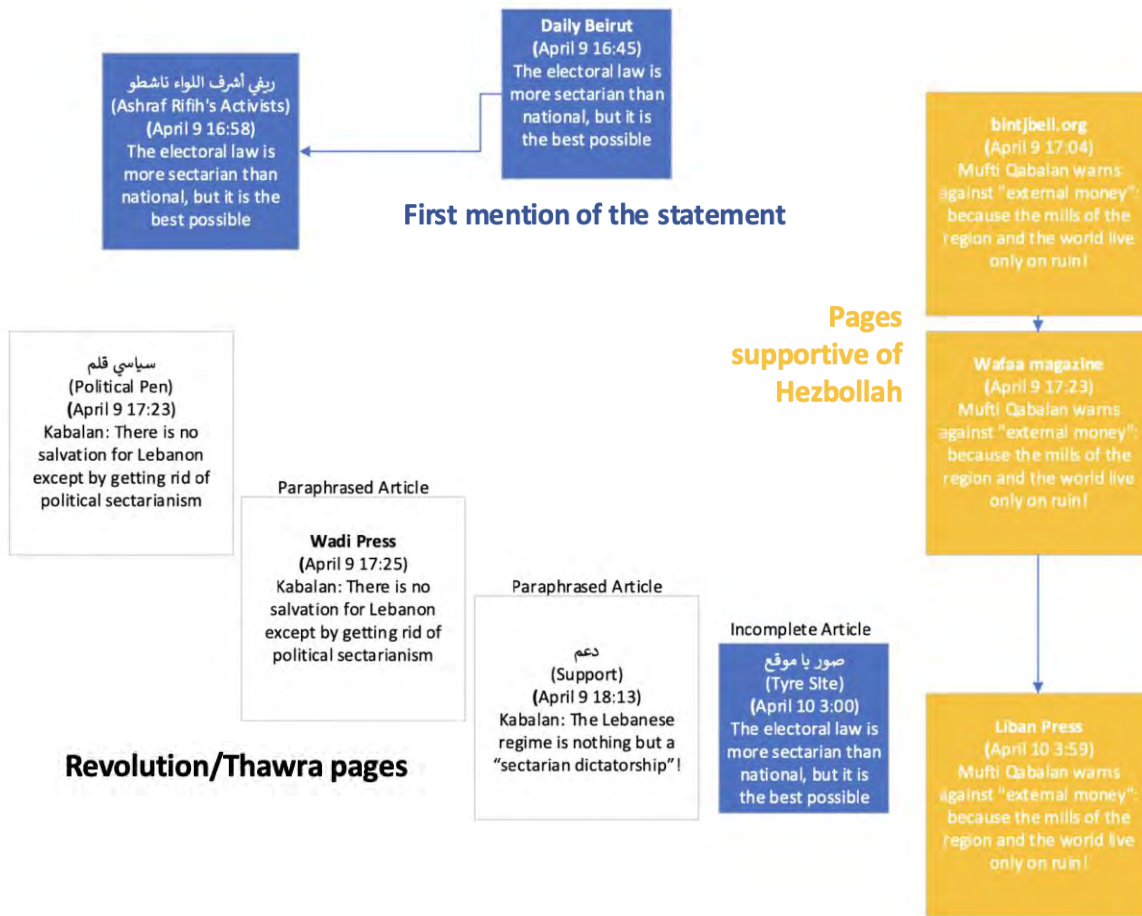


Figure 29. Circulation of the statement of the Shia religious leader Sheikh Ahmad Kabalan on Facebook, 9 April 2022

Attacking opponents and deceiving users on Twitter

#The Failure of the Lebanese Forces is a Sunni Duty - Hezbollah electronic armies - 15 May 2022





On 15 May (election day), the mission analysed the hashtag #The Failure of the Lebanese Forces is a Sunni Duty.

The hashtag was shared by 948 users that showed features of electronic armies. Out of them, 861 user accounts were created in the two weeks leading up to the elections. (Figure 30) In other words, 91 per cent were newly created accounts, acting in coordinated way.

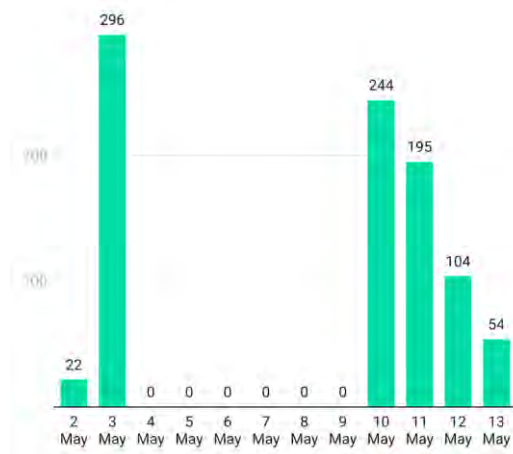


Figure 30. Date of creation of the accounts using the hashtag #The Failure of the Lebanese Forces is a Sunni Duty

Contrarily to previous groups of accounts identified that retweeted messages to amplify them, those newly created accounts replied to older random tweets, and shared hashtags attacking their opponents, the Lebanese Forces. (Figure 31)

To put in place such technique, the group had to rely on human activity to create replies, and associate hashtags.



Figure 31. Activity of the 861 new accounts identified

In the case of the hashtag #The Failure of the Lebanese Forces is a Sunni Duty, the users posed as Sunni users, while the analysis showed that these accounts are seemingly part of the Hezbollah digital armies, for they used technics characteristics of them.

The EU EOM identified several other hashtags used by those accounts: #Lebanese forces treachery, #Geagea is a traitor, #The killer of Rachid Karame, #Crimes of Geagea, #Samir Geagea, #Don't vote for LF, including hashtags obviously targeting Sunni audience, copying Sunni users: #Boycotting for you (Saad Hariri), #Beirut #Saida #Tripoli #Aarsal (Sunni districts).<sup>128</sup> These hashtags, in addition to attacking part of the political spectrum were used to deceive Sunni followers.

<sup>128</sup> [#قوات الغدر](#) [#ججججج الغدر](#) [#تبتل شيد كرامى](#) [#جرمام جججج](#) [#سهد جججج](#) [#اسقاط القوات واجب سرنى](#) [#بقاطعنى عيونك](#) [#قوات الغدر](#) [#طيدا](#) [#طبالس](#) [#عسال](#) [#بيروت](#) [#ماتصوت قوات](#)

**ANNEX 7: APPEAL SUBMITTED TO THE CONSTITUTIONAL COUNCIL AGAINST  
THE ELECTION'S RESULTS**

<b>Date of submission</b>	<b>Claimant</b>	<b>No. of votes obtained</b>	<b>Defender</b>	<b>No. of votes obtained</b>	<b>District</b>	<b>Confessional seat</b>
31-05-2022	Paul Hamod	15	Elias Foud el Khoury	3426	North 2 Tripoli	Maronite
08-06-2022	Mohamad Chafik Hammoud	5869	Bilal Hocheimy	3865	Bekaa 1 Zahle	Sunni
13-06-2022	Josephine Zogheib	1303	Farik Haykal el Khazen	9056	Mount Lebanon1 Keserwen	Maronite
14-06-2022	Haydar Zaherleddine issa	3948	Ahmad Mohamad Rustom	324	North 1 Akkar	Alaouite
14-06-2022	Elias Khalil Chrabachi	727	Cynthia Fadi Zarazir	486	Beirut 1	Minorities
14-06-2022	Faycal Omar Karame	6494	Ihab Mohamad Matar Firas Ahmad Salloum Ramy Saadallah Fanj	6518 370 5009	North 2 Tripoli	Sunni
15-06-2022	Amal Hekmat About Zeid	5184	Said Sleiman el Asmar	1102	South1 Jezzine	Maronite
15-06-2022	Zeina Kamal Mounzer	308	Faycal el Sayegh, Waddah el Sadek	2565 3760	Beirut 2	Druze
15-06-2022	Ibrahim Samir Azar	7894	Charbel Maroun Massaad Said Sleimen el Asmar	984 1102	South 1 Jezzine	Maronite

<i>15-06-2022</i>	Mohamad Hassan Raad Hani Hassan Kobeissy Nasser Fawzi Jaber Ali Hassan Khalil Ali Rachid Fayad Kassem Omar Hachem Marwan Salim Kheireddine Assaad Halim Hardan Hassan Nizameddine Fadlallah Ayoub Fahed Hamid Ashraf Nazih Hachem Baydoun	48543 20195 6236 13155 37047 1215 2634 1859 43324 6745 10540	Firas Ismail Hamdan	4859	South 3 Marjeyoun Hasbaya	Druze
<i>16-06-2022</i>	Jad Emile Ghosn	8526	Razi Wadih el Hage Hagop Bakradonian	3459 4973	Mount Lebanon 2 Metn	Maronite
<i>16-06-2022</i>	Haidar Assef Nasser	313	Ihab Mattar Firas Salloum Rami Fanj	6518 370 5009	North 2 Tripoli	Alaouite
<i>16-06-2022</i>	Simon Habib Sfeir	142	Neemat Frem, Farid Haykal Khazen	10743 9056	Mount Lebanon 1 Keserwen	Maronite
<i>16-06-2022</i>	Wassef Habib al Harake	4092	Fadi Fakhri Alameh	4862	Mount Lebanon 3 Baabda	Shia
<i>16-06-2022</i>	Mtarios Issa Nicolas Mahfoud	250	Jamil Abboud Abboud	79	North 2 Tripoli	Orthodox

