



International
Labour
Organization

► ILO Brief

► Policy brief

February 2025

Policy Brief on Enabling Formal Employment: Work Permit Solutions for Syrian Refugees in Lebanon



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First published 2025



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ISBN: 9789220418109 (web PDF)

DOI: <https://doi.org/10.54394/KOAD9172>

Also available in Arabic: ورقة سياسات بشأن تمكين العمل المنظم: حلول لإصدار إجازات العمل للنازحين السوريين في لبنان

ISBN: 9789220418116 (web PDF)

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Acknowledgements

This policy paper was developed under the overall guidance of Peter Rademaker, Deputy Regional Director, and the technical supervision of Shaza Ghaleb Jondi, Regional Chief Technical Adviser for PROSPECTS, Arab States. The preparation of this paper was made possible through the collaborative efforts of Gizem Karsli Varol, Technical Policy Officer for Decent Work for Refugees, and Luis Cotinguiba, Regional Monitoring, Reporting, and Knowledge Management Officer, whose invaluable insights and expertise greatly contributed to the development process of this research.

Special thanks are extended to Jose Manuel Medina Checa, Senior Specialist, Employers' Activities for the Arab States; Richard Lorenz, Chief Technical Adviser EIIP; and Rita Abou Jaoudeh, Senior Environmental and Social Safeguard Coordinator, for their detailed reviews and constructive feedback, which significantly enhanced the quality of the analysis and recommendations.

The research also benefited from the inputs of Maha Kattaa, Regional Resilience, Crisis Response & EIIP Specialist and ILO Iraq Country Coordinator; Luca Pellerano, Senior Social Protection Specialist; and Rania Eghnatios, Programme Manager and Social Protection Specialist, whose contributions were critical in shaping the findings and proposals. Additional thanks are due to Shatha Eisouh, Skills and Job Promotion Technical Officer, and Salam Jabakhanji, Value Chains and Market Systems National Project Officer, for their instrumental support in understanding the context and coordinating the fieldwork. Special appreciation is also extended to Nadine Nasrallah, research intern, for her dedicated assistance with various research activities.

We extend our gratitude to the UNHCR Lebanon team for their invaluable inputs during the early stages of designing this research. Furthermore, we acknowledge the valuable insights and perspectives provided by the Norwegian Refugee Council (NRC) and the Danish Refugee Council (DRC), which greatly enriched this study.

The data collection for this study would not have been possible without the full support of the Ministry of Labour and its officials, whose dedication and expertise were instrumental throughout the process. The team also benefited from consultations with representatives of the Ministries of Agriculture and Industry particularly regarding the work permit pilots in both sectors. Special appreciation is extended to the Ministry of Social Affairs, especially Oula Boutros, LRP General Supervisor and Senior Advisor to the Minister of Social Affairs, officials from the National Social Security Fund (NSSF), the General Security Office, as well as other contributors, for their invaluable insights and collaboration.

Finally, we acknowledge the support and guidance of our partners, including Caritas Lebanon and the René Moawad Foundation, whose pivotal role in organizing focus group discussions significantly enriched this research. Their collective efforts inspire the ongoing pursuit of policies that promote decent work and social justice for all.

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Disclaimer

This report was prepared under the Partnership for improving prospects for forcibly displaced persons and host communities (PROSPECTS) funded by the Kingdom of the Netherlands.

This report has been prepared in the context of evolving circumstances and has not undergone comprehensive editorial review.

► Introduction¹

Lebanon's compounded economic, political and financial crisis over the past five years has severely impacted its labour market, resulting in increased poverty rates, reduced employment opportunities, wage stagnation, and deteriorating working conditions.² These challenges have heightened protection risks for refugees and vulnerable host community members. The negative rhetoric against Syrian refugees has intensified, with some political and media narratives attributing Lebanon's economic and employment difficulties to the refugee population. This has strained social stability and fuelled calls for the return of Syrian refugees. Furthermore, deportations have been on the rise, particularly in 2023, affecting those who entered the country irregularly.³

Understanding the distinctions among different categories of Syrians in Lebanon is essential for contextualizing their varied rights and access to formal work. Syrian refugees are individuals who have fled conflict and persecution, seeking protection in Lebanon. However, Lebanon does not formally recognize them as refugees under its laws, as it has not ratified the 1951 Refugee Convention or its 1967 Protocol. Until 2015, Syrians fleeing the war in Syria could register with UNHCR, granting them certain benefits. However, the Lebanese government instructed UNHCR to suspend new registrations for Syrians in that same year. Refugees who arrived before 2015 and hold UNHCR registration certificates are eligible to apply for residency permits based on these certificates and benefit from a fee waiver. Since 2015, several contradictory national policies and legislation related to access to the labour market have been announced. A more recent statement issued by the

General Security Office (GSO) on 8 May 2024, further restricted their access to formal employment by prohibiting registered refugees from engaging in paid work outside the sectors of agriculture, construction, and sanitation. This statement also tightened residency permit requirements, adding further complications. Syrian migrants, on the other hand, are individuals who moved to Lebanon primarily for economic reasons rather than to escape conflict. They are generally subject to the same legal framework as other foreign workers in Lebanon, which requires employer sponsorship and the acquisition of work permits. Many Syrian migrants face financial and bureaucratic challenges, as high fees and restrictive policies limit their ability to formalize their employment. Another distinct category includes seasonal workers, comprising both UNHCR-registered refugees and unregistered individuals. These workers typically engage in temporary jobs in agriculture and construction. Operating within the informal economy, they often lack formal work permits and legal protection, leaving them vulnerable to exploitation.

 A more recent statement issued by the General Security Office (GSO) on 8 May 2024, further restricted their access to formal employment by prohibiting registered refugees from engaging in paid work outside the sectors of agriculture, construction, and sanitation.”

¹ The data underpinning this paper were collected between April and August 2024, with the report finalized in early October. Publication was postponed as a result of intense and wide-scale hostilities affecting Lebanon, which required a focus on emergency response efforts. Following the ceasefire in late November 2024, recovery efforts began, creating a conducive environment for the findings and recommendations of this paper to inform dialogue and action. Additionally, the latest developments in Syria and the fall of the Assad regime at the beginning of December 2024 are expected to have significant impacts on the presence of Syrians in Lebanon and the dynamics of its labour market. While the conclusion has been updated to reflect these developments and evaluate their implications for recovery, the core analysis remains grounded in the data collected during the specified period, ensuring the integrity and reliability of the findings. This approach aligns with crisis-sensitive research, maintaining a balance between timeliness and methodological rigor.

² Government of Lebanon and the United Nations, 'Lebanon Crisis Response Plan 2023,' 2023. Accessed 8 March 2024. <https://reliefweb.int/report/lebanon/lebanon-crisis-response-plan-lcrp-2023>.

³ Diab, J.L., 'Selective and Strategic indifference: Lebanon's migration and refugee landscapes in the absence of inclusive legal frameworks,' 2024. <https://mixedmigration.org/lebanon-migration-and-refugee-landscapes/#:~:text=In%202022%2C%20UNHCR%20reported%20that,to%20countries%20such%20as%20Cyprus%2C>

Historically, Syrians entered Lebanon for work even before the crisis in Syria began in 2011. At the time, they could unofficially work in sectors like agriculture and construction, using either a passport or identity card to receive a renewable "entry stamp" every six months, bypassing the need for formal work permits. This precedent has contributed to the current ambiguities in employment regulations. The situation became more complex after 2015 due to the suspension of refugee registrations with UNHCR following the government's directive, when Lebanon instructed UNHCR to stop registering new refugees. Syrians arriving after this point are recorded but not registered, resulting in a lack of formal refugee status and associated protections. Aid and support for these individuals are determined based on vulnerability assessments rather than official registration. The legal environment for Syrians in Lebanon today is marked by contradictions and ambiguities. While all Syrians, regardless of refugee status, are required by law to obtain work permits as foreign workers, refugees seeking formal employment outside the sectors where they are more freely allowed to work must change their residency permit type. This change results in the loss of fee waivers previously available to UNHCR-registered individuals, further discouraging formalization. Despite theoretical provisions allowing Syrians to work in any sector not restricted to Lebanese nationals, the complexities of overlapping rules and administrative hurdles deter many from seeking formal employment. Seasonal workers, who often include refugees, occupy an especially ambiguous space, blending elements of informal labour and refugee status, which further complicates their legal standing and access to rights.



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Understanding these overlaps, ambiguities and distinctions is crucial for shaping policies that address the needs and rights of Syrians within the labour market. In addressing these challenges, the principles outlined by the ILO's normative framework are vital. ILO Conventions No. 97 on Migration for Employment and No. 143 on Migrant Workers, as well as the 2016 ILO Guiding Principles on Access of refugees and other forcibly displaced persons to the labour market, promote fair treatment and decent work for all, regardless of status. These instruments advocate for non-discrimination, equal opportunities, and safeguards against exploitation, underpinning the need for inclusive labour policies. Integrating these standards is crucial for reinforcing the rights of Syrian refugees and ensuring their access to formal employment aligns with international labour norms. Advocating for the integration of these norms into national legislation is particularly important as assistance for refugees continues to diminish and the need for self-reliance grows. In 2024, the UNHCR announced significant reductions, cutting multi-purpose cash aid for 100,000 families.⁴ This reduction is anticipated to have profound repercussions on the livelihoods of refugees, impacting their ability to meet basic needs.

⁴ Sabbagh, A., 'Decreased funding halts aid to half a million displaced Syrians [تراجع التمويل يوقف المساعدات عن نصف مليون نازح سوري]', 2024. Annahar. [Link](#).

Syrian labour has been and remains crucial for the Lebanese economy, yet Syrian refugees face numerous obstacles to securing formal employment, including legal, financial, socio-cultural, bureaucratic, and structural challenges. While Syrians in Lebanon can obtain work permits for specific sectors, the legal and regulatory framework governing their labour market participation remains ambiguous and restrictive.⁵ Consequently, most Syrians work informally: an ILO assessment in 2021 revealed that 95 per cent of Syrians surveyed were informally employed, with women being particularly vulnerable, and with a significant number employed in low-paid and insecure jobs.⁶ The same ILO report also points to alarming levels of youth unemployment, with rates as high as 49.1 per cent. Additionally, Syrian refugees experience higher NEET (Not in Education, Employment, or Training) rates compared to other groups. Informal work exposes refugees to exploitative conditions, such as excessive working hours and low wages, and denies them legal protection. Data from the Ministry of Labour (MOL) show that only 621 new work permits were issued and 2,155 were renewed for Syrians in 2023.⁷ By contrast, 39 per cent of working-age Syrian refugees were employed that same year.⁸

This policy paper is based on an in-depth ILO assessment of the work permit process for Syrian refugees in Lebanon. The assessment included a comprehensive review of the legal and regulatory framework, supplemented by in-depth interviews (IDIs) and focus group discussions (FGDs) with Syrian refugees. Key informant interviews (KIIs) were also conducted with stakeholders, including representatives from relevant ministries and government entities, such as the MoL, the Syrian Workers' Affairs Department at the MoL, the Ministry of Social Affairs, the National Social Security Fund, and the GSO, as well as international and local organizations, including refugee-led groups, that provide protection services or livelihoods programming. This paper outlines the main challenges and bottlenecks identified, including legal, administrative, financial, and informational barriers, and proposes potential measures to facilitate the formal employment of Syrian refugees in permitted sectors, with a focus on the agricultural and industrial sector and the introduction of a flexible work permit scheme.



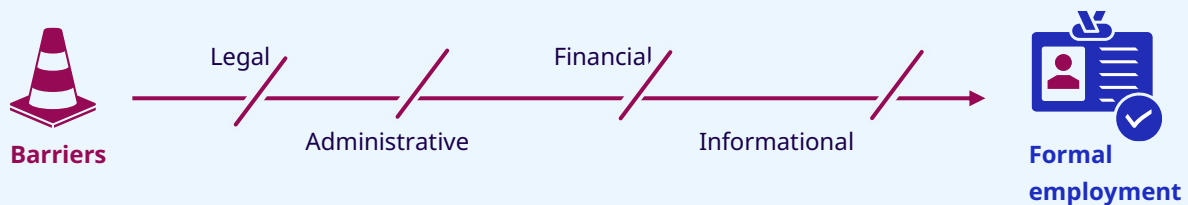
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⁵ Sabbagh, A., 'Decreased funding halts aid to half a million displaced Syrians [سوريان نصف مليون نازح سوري]', 2024. Annahar. [Link](#).

⁶ International Labour Organization (ILO), 'Assessing informality and vulnerability among disadvantaged groups in Lebanon: A survey of Lebanese, and Syrian and Palestinian Refugees,' 2021. Beirut: International Labour Organization. https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_816649.pdf

⁷ Based on data provided to the ILO for this study by the MOL.

⁸ UNHCR, UNICEF, WFP, 'VASyR 2023: Vulnerability Assessment of Syrian Refugees in Lebanon' [PPT], 2024. Accessed on 8 March 2024. <https://ialebanon.unhcr.org/vasyr/#/>

► **Figure 1.** Key barriers to formal employment for Syrian refugees in Lebanon

As noted earlier, this policy paper was prepared following months of data collection and consultations, which were concluded prior to the escalation of hostilities in Lebanon and the most recent developments in Syria that led to the toppling of the Syrian regime. These events will have significant implications for the presence of Syrians in Lebanon and the policies that govern their access to the labour market. According to the latest data, around 350,000 Syrians have returned to their country as a result of the war inside Lebanon.⁹ Yet, with the ceasefire in Lebanon and the fast-paced developments inside Syria, it remains difficult to predict the direction and scale of movements from either side. Despite these uncertainties, the importance of robust labour market governance in Lebanon cannot be overstated.

Lebanon has traditionally relied on an unregulated presence of Syrian workers, which has contributed to informality and associated vulnerabilities. A work permit solution for Syrians can play a key role in strengthening labour market governance, ensuring transparency, compliance, and protection for all workers. Despite these uncertainties, the ILO believes that the findings and recommendations of this report remain largely valid and can serve as a foundation for dialogue with tripartite constituents on policies needed to improve labour market governance. The report highlights the importance of transitioning towards formalization and ensuring the protection of all workers, regardless of their nationality. This approach not only contributes to inclusive socio-economic development but also strengthens stability, which is critical in the context of Lebanon's ongoing recovery efforts.

⁹ United Nations Office for the Coordination of Humanitarian Affairs (OCHA), 'Lebanon: Flash Update #49 - Escalation of Hostilities,' 28 November 2024.

► Key Findings: Navigating Legal, Regulatory, and Procedural Barriers to Work Permits for Syrian Refugees in Lebanon

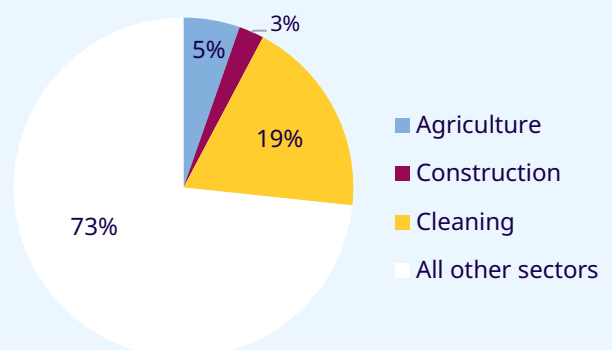
A Snapshot of Work Permit Data¹⁰

Between January 1, 2012, and May 27, 2024, a total of 9,703 work permits were issued to first-time Syrian applicants. This represents 2.4 to 3.2 per cent of the estimated Syrian workforce in Lebanon, which is believed to be between 300,000 and 400,000 workers. In 2015, the ILO estimated the Syrian labour force in Lebanon at approximately 384,000 workers, while the GSO placed the figure at around 400,000 in 2024.¹¹ The total number of work permits issued to Syrians—including permits issued to first-time applicants and work permit renewals—has fluctuated significantly from year to year, reaching a peak of 5,124 work permits in 2019, compared to just 948 work permits issued in 2012. Zooming into specific sectors, between January 1, 2012, and May 27, 2024, a total of 520 work permits were issued to first-time applicants in the agricultural sector. A total of 232 work permits were issued to first-time Syrian applicants in the construction sector during this same period, while a total of 1,837 work permits were issued to first-time Syrian applicants as cleaners. The data highlights the limited access of Syrian workers into Lebanon's formal labour market. This limited formalisation reflects significant barriers, including restrictive policies, high fees, and bureaucratic inefficiencies, which push the vast majority of Syrians into informal employment. Approximately 95 per cent of Syrian refugees in Lebanon are engaged in the informal sector, exposing them to exploitative working conditions, long working hours, low wages, and a lack of social and legal protections.¹² The concentration of work permits in low-

skilled sectors such as cleaning and agriculture further points to the restrictions related to formal opportunities that are available to Syrians under current policies.

The fluctuation in permit issuance, peaking in 2019, suggests sporadic policy changes or external interventions but fails to address the systemic challenges of formalisation. Formalising Syrian workers would not only enhance their access to rights and protections but also increase government revenue through taxation. Furthermore, it would help reduce competition in the informal economy, benefiting both Lebanese workers and the broader economy while promoting social and economic stability.

► **Figure 2.** Work permit issued in different sectors between 2012 and 2024



¹⁰ The data included here was shared by the SWAD at the MOL. Reports were shared for work permits issued to first time Syrian applicants and renewed permits by occupation, category, and year. Due to discrepancies in the data, these numbers should be interpreted with care. Still, the data provides an overall picture of work permits issued to Syrians in Lebanon since the onset of the Syrian refugee crisis, pointing to a significantly low number of work permits issued relative to the size of the labour force. Data on work permits issued to all foreigners can be found on the MoL website at this link: <https://www.labor.gov.lb/StatList.aspx>

¹¹ Petra Abou Haidar, 'Syrian Workers in Lebanon: Legal Status and Deportation Challenges,' 2024, LBC Group. <https://www.lbcgroup.tv/news/news-bulletin-reports/771621/syrian-workers-in-lebanon-legal-status-and-deportation-challenges/en>

¹² International Labour Organization (ILO), 'Assessing informality and vulnerability among disadvantaged groups in Lebanon: A survey of Lebanese, and Syrian and Palestinian Refugees,' 2021. Beirut: International Labour Organization. https://www.ilo.org/wcmsp5/groups/public/---arabstates/---ro-beirut/documents/publication/wcms_816649.pdf

Legal Status and Employment Framework

The participation of Syrian refugees in Lebanon's labour market is governed by a complex and unclear legal framework. Lebanon has not ratified the 1951 Refugee Convention or its 1967 Additional Protocol, nor has it established specific legislation defining refugee status, aside from regulations for Palestinian refugees registered with the Ministry of Interior. As a result, Syrian refugees are classified as "migrants" or "foreigners" and must apply for work permits through the Syrian Workers Affairs Department (SWAD) at the MoL. The 1946 Lebanese Labour Code, while applying to private sector workers (both national and non-national), excludes certain categories such as agricultural workers, farmers, and farm workers through articles 2 and 7, thus depriving them of their labour rights.



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Employment Restrictions and Quota Systems

Decree No. 17561 (1964), the Foreign Workers Regulation, regulates foreign employment, setting out the criteria for legal work, including the principle of preference for Lebanese nationals and exemptions for certain foreign workers, such as those married to a Lebanese woman or with a Lebanese mother. Ministerial Decision No. 1/96 (2021) outlines the occupations restricted to Lebanese nationals and allows the Minister of Labour to make exceptions under specific conditions.¹³ While Syrians are allowed to work in sectors not exclusively reserved for Lebanese, the decision's use of broad terms like "and similar work" or "in all forms" creates ambiguity around restricted occupations and facilitates subjective interpretation. Examples of occupations not restricted to Lebanese nationals, and thus, in which foreigners can work (albeit, with a work permit), include agricultural work and related farm work, and construction work—though it should be noted that several occupations within the construction sector are restricted to Lebanese nationals only. Other examples of occupations in which Syrians (as foreigners) can work include cleaner (environment and sanitation) and porter. Additionally, quota systems require at least one Lebanese worker for every three foreign workers, with stricter or more lenient ratios in sectors such as construction and the services (and restaurant) sector. The final decision to issue a work permit in restricted professions is based on recommendations from SWAD, the Director General of the MOL, and other MOL departments.

¹³ The list of professions restricted to Lebanese can be reviewed in the Ministerial Decision No. 1/96 issued in 2021, which is available at this link (as of December 6, 2024): <https://www.labor.gov.lb/Temp/Files/631f133d-0614-4163-ad3e-973299f589d9.pdf>

Residency Permits and Legal Challenges

Syrian refugees in Lebanon face a precarious legal landscape where maintaining valid residency permits is essential for accessing basic rights and services, yet increasingly unattainable due to restrictive policies and administrative complexities. This environment not only undermines their ability to formalize employment but also leaves them vulnerable to exploitation, legal penalties, and social exclusion.

Difficulties in Renewing Residency

There are several categories of residency permits available to Syrians in Lebanon. Applications must be submitted either through LibanPost, or directly at a local GSO by the employer/sponsor, or by a legal representative/authorized signatory, along with the employee. Syrian refugees can apply for a work permit even if they do not hold a valid residency permit; however, they must obtain a residency permit before the work permit expires, as failure to do so will prevent the renewal of the work permit. Even with a work permit, there is no guarantee that the residency permit will be approved. High fees, extensive documentation requirements, and bureaucratic delays make the process burdensome, with fees ranging from USD 145 to USD 916 for different residency categories.¹⁴ If a permit expires, refugees must pay fines to regularize their status. Without valid residency, refugees face significant risks, including detention, deportation, and restricted movement, which limit their ability to obtain necessary documentation and access basic services such as healthcare. In 2023, the majority of Syrian refugees in Lebanon struggled to renew their residency permits, with only 20 per cent of those over the age of 15 holding a valid permit that year.¹⁵

Uncertain and Changing Policies

Residency policies for Syrian refugees have been subject to frequent changes, contributing to confusion. The most recent GSO memo, issued on May 8, 2024, suspended previously allowed residency categories, affecting Syrians with sponsorship-based permits and revoking valid statuses. This uncertainty complicates compliance and application processes, especially at local GSO offices where inconsistent regulation enforcement has been reported by stakeholders.



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¹⁴ USD fees rounded to the nearest digit and calculated based on the Sayrafa exchange rate of LBP89,500 on September 15, 2024.

¹⁵ UNHCR, UNICER, & WFP, 'VASyR 2023: Vulnerability Assessment of Syrian Refugees in Lebanon' [PPT], 2024. Accessed on 8 March 2024. <https://ialebanon.unhcr.org/vasyr/#/>

Legal Challenges and Access to Social Protection

Syrian workers in Lebanon face a complex intersection of legal and social protection challenges, where existing regulations often undermine their ability to secure fair and equitable benefits. Despite contributing to Lebanon's economy, these workers are frequently excluded from the protections afforded to others, highlighting systemic barriers that perpetuate their vulnerability.

National Social Security Law

Syrian workers in Lebanon face significant regulatory challenges that impact their access to the labour market and social protection. Under the National Social Security Fund (NSSF) Law, Syrian workers, whether holding a work permit or not, and their employers are required to contribute to the fund. These contributions are mandatory even for workers engaged in seasonal or temporary employment, adding to the financial burdens faced by refugees. However, due to the principle of reciprocity, Syrian workers who are registered with and contribute to the NSSF do not benefit from the fund's provisions. The principle of reciprocity is often interpreted to mean that only nationals from countries with bilateral social security agreements with Lebanon qualify for benefits. A notable change came with Law No. 319, published in the Official Gazette on December 28, 2023, which introduced a new pension scheme under the NSSF, significantly reforming the social security law. This reform allows foreigners to voluntarily participate in the pension scheme. Nevertheless, without a reciprocity agreement between Lebanon and Syria, Syrian workers who hold regular work permits are only eligible for lump-sum payments upon permanently leaving Lebanon, rather than ongoing benefits.¹⁶

The system possesses inherent contradictions, as workers who lack work permits, essentially announcing their informality, are still required to contribute to the NSSF. This not only highlights a disconnect between labour market regulations and social protection systems but also suggests a lack of communication between different units. Addressing this issue through digitalisation efforts could improve coordination and oversight, reducing gaps and inefficiencies. Furthermore, the inability of Syrian workers to benefit from the NSSF despite their contributions acts as a significant disincentive for both workers and employers to pursue formalisation. The high costs of contributions, combined with the absence of tangible returns, discourage compliance with formal requirements, perpetuating informality and undermining the effectiveness of the system. To address these challenges, the ILO highlights the importance of bilateral social security agreements, as outlined in Convention No. 157 (Maintenance of Social Security Rights) and Recommendation No. 167 (Portability of Social Security Benefits). These agreements facilitate the coordination of national social security systems, enabling workers to retain their rights, such as pensions and health benefits, across borders. By adopting such agreements, Lebanon could ensure equal treatment for Syrian workers and foster greater incentives for formalisation, aligning



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¹⁶ ILO 'Extending Social Health Protection in Lebanon: The role of the National Social Security Fund (NSSF) in achieving Universal Health Coverage,' 2020.

contributions with tangible benefits and reducing informality in the labour market.

Documentation, Financial, and Administrative Barriers

Syrian refugees in Lebanon face significant challenges in obtaining work permits due to bureaucratic complexities, strict documentation requirements, high fees, and employer-specific sponsorship. The process remains largely manual, leading to long processing times and administrative burdens, while the removal of previous fee waivers has intensified financial strain. Many refugees also lack awareness of the system, further limiting their access to formal employment. Addressing these barriers through streamlined procedures, cost reductions, and improved outreach could enhance work permit accessibility and promote labour market formalisation.

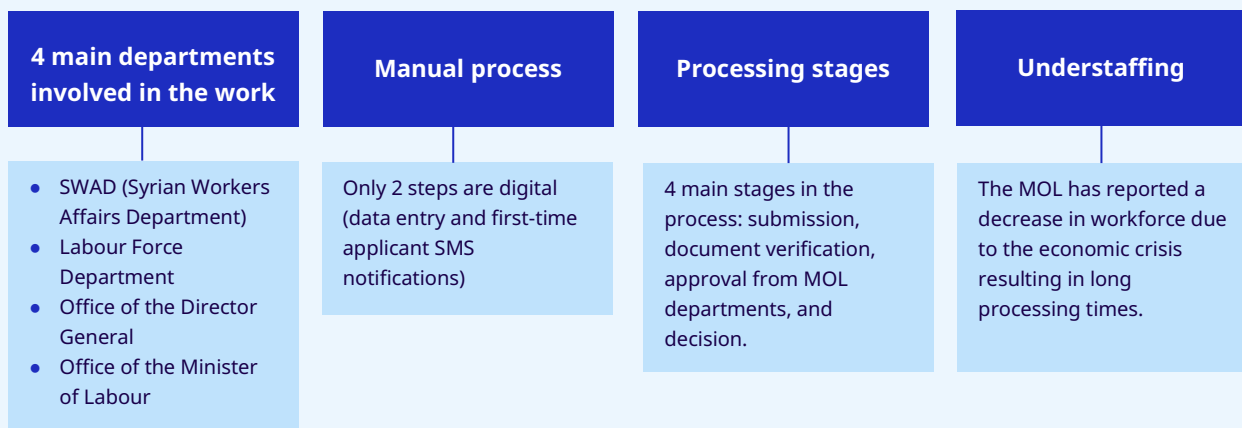
Highly Bureaucratic Process

The work permit process for Syrian refugees in Lebanon is marked by high levels of bureaucracy and complexity. This process involves multiple steps, strict documentation requirements, and relatively high fees, which collectively hinder Syrian refugees' access to formal labour market participation. Applications must be submitted in person at the SWAD within the MOL in Chiyah, Beirut, along with all required documentation in hard copy. The MOL has reported a decrease in its workforce due to the ongoing economic and social crises, which has exacerbated understaffing at SWAD. Other departments involved in the work permit process include the Labour Force Department, the office of the Director General, and the office of the Minister of Labour.

Long Processing Times

Despite efforts by the MOL to introduce a digital and automated system for non-Syrian foreign worker applications, the work permit process for Syrians remains predominantly manual, with only limited digital features. Currently, the digital steps include data entry upon application submission and notifying first-time applicants of the work permit decision via SMS. The remainder of the process is conducted manually and involves multiple approvals across various MOL departments, depending on whether the application is for a first-time permit or a renewal and the category of the permit. The review process at SWAD is notably the most time-consuming, requiring verification of documentation, sometimes through coordination with other governmental entities or inspections.

► **Figure 3.** Complexities of the work permit process for Syrian refugees



Strict Documentation Requirements

This ILO assessment identified an extensive list of documents required for Syrian work permit applications, which vary based on the type of occupation but must be submitted for both first-time and renewal applications. While medical tests are required exclusively for first-time applicants, all other documents must also be submitted for renewals, adding to the administrative burden. Many of these documents carry additional fees, compounding the financial burden on applicants. For example, a Syrian passport or identity document with a validity of no less than seven months is required as part of the work permit application. However, Syrian refugees without personal identification documents—for instance, those who left Syria without them or those who came to Lebanon as children—face significant challenges in obtaining these documents. Securing an identity card is particularly difficult for Syrians who arrived as children, as IDs are only issued in Syria once a child turns 14. Furthermore, a standard passport from the Syrian embassy in Lebanon costs USD 300, while an expedited passport costs USD 800, in addition to transportation costs to the embassy located in Baabda, Mount Lebanon. Identity cards, meanwhile, can only be issued in Syria. Syrians without proper paperwork or those in vulnerable situations also face severe restrictions on their movement.

High Fees and Financial Strain

Historically, Syrians benefited from a 75 per cent waiver on work permit fees, but this was effectively discontinued with the enactment of the 2024 Budget Law. There are four categories of work permits issued to foreigners, including Syrians, by the MoL, depending on the salary in the employment contract (in relation to the minimum wage) and the type of occupation. Current fees range from approximately USD 89 for a fourth-category permit to USD 704 for a first-category permit for first-time applicants, with renewal fees ranging from USD 67 to USD 536, depending on the category (see Table 1). In addition to permit fees, there are associated costs for required documentation and clearance certificates, often shouldered by the worker. These direct expenses, coupled with indirect costs such as transportation and time away from work, exacerbate the financial strain on Syrian refugees.

► **Table 1. Work permit fees (2024)**¹⁷

Category	First-time Applicant	WP Renewal Fee
First	USD 704 / LBP 63,000,000	USD 536 / LBP 48,000,000
Second	USD 536 / LBP 48,000,000	USD 369 / LBP 33,000,000
Third	USD 218 / LBP 19,500,000	USD 168 / LBP 15,000,000
Fourth	USD 89 / LBP 8,000,000	USD 67 / LBP 6,000,000

¹⁷ USD fees rounded to the nearest digit and calculated based on the Sayrafa exchange rate of LBP89,500 on September 15, 2024.

Sponsorship Tied to Employment

Work permits for Syrian refugees are employer-specific, meaning that workers cannot change jobs or employers without obtaining a new work permit reflecting the new occupation or sector. Additionally, this change must be reported to the GSO, which requires an additional fee. This regulation poses particular challenges in sectors such as agriculture, where work is often seasonal and temporary, and in other short-term employment such as construction. For example, workers engaged in short-term employment interventions, such as cash for work programmes, are typically employed for around 40 days (or up to 60 days in exceptional cases requiring critical skills). Once the intervention is completed, these workers cannot transfer their work permit to future jobs, rendering it effectively unusable and limiting its value to future employers. Addressing this challenge by enabling workers to retain their work permits for use with different employers could incentivize future hiring, particularly for workers who have already obtained permits through other projects. This flexibility would enhance the utility of work permits, promoting formal employment and reducing administrative hurdles for both workers and employers. It should also be noted that, such measures would not impact the employment prospects of Lebanese nationals, as Syrian workers are only employed in sectors permitted by law, ensuring compliance with existing regulations. This flexibility would enhance the utility of work permits, promoting formal employment and reducing administrative hurdles for both workers and employers.

Knowledge Gaps in Work Permit Processes Among Syrian Refugees

There is a significant gap in understanding the work permit process among Syrian refugees and other stakeholders, which hinders their access to formal employment and protections. The majority of FGD participants were unaware of the distinctions between work permits and residency permits, leading to confusion about their respective purposes and requirements. Even among those working in sectors like agriculture and construction—where work permits are often required—

many lacked clarity about the legal obligations and processes. While some participants recognized that having a work permit could offer legal protections and reduce exploitation, their willingness to apply was largely contingent on securing stable employment. For many refugees, economic hardships and immediate priorities, such as securing housing and food, overshadowed the perceived benefits of obtaining a work permit. This reflects a broader challenge in aligning refugee awareness with formalisation goals, as the costs and complexity of the process often outweigh its perceived advantages. Addressing these gaps through targeted outreach, simplified procedures, and economic incentives could significantly enhance compliance and formal employment uptake among Syrian refugees.



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► Recommendations

As presented in this paper, the work permit process for Syrian refugees in Lebanon is characterized by a complex legal and regulatory framework, as well as significant bureaucratic, structural, and financial obstacles and bottlenecks. Enhanced coordination among relevant entities, simplified procedures, digitization, and fee adjustments are essential for improving access to work permits for Syrian refugees. Addressing these challenges will not only facilitate refugees' entry into formal employment but also support their access to decent work, aligning with the ILO's guiding principles and conventions. By overcoming these barriers, Lebanon can leverage the economic potential of a formalized workforce, contributing to economic growth, social stability, recovery and sustainable development. This section presents key recommendations to advance these reforms and foster a more inclusive and resilient labour market.

Enhancing Legal and Regulatory Frameworks

- It would be beneficial to clarify the current legal structure and requirements for obtaining work permits and raise awareness among refugee populations and employers. This effort should be facilitated through employers' organizations that have the capacity to effectively communicate and explain these requirements to the private sector and employers. Supporting and building the capacity of organizations such as the Association of Lebanese Industrialists (ALI) and private sector bodies to establish information and helpdesk services would play a critical role. These services should provide accurate, clear information to their members and liaise with the MoL and other relevant agencies to help expedite the process and address any procedural challenges.
- Reviewing and potentially amending the Lebanese Labour Code to include agricultural workers as well as other excluded categories could contribute to a more inclusive framework. Extending mechanisms that ensure workers' protection, such as formal contracts, fair wages, and decent working conditions (e.g., regulated working hours and, sick leave) to include previously excluded workers would align with the

principles of decent work and social dialogue. Additionally, provisions should be made for the compensation of workdays lost, particularly in cases of force majeure, to ensure that workers are not unduly disadvantaged during unexpected disruptions.

- Exploring options for waiving or subsidizing some of the fees associated with work permits for Syrian refugees could help reduce financial barriers to obtaining work permits and enhance access to formal employment. By waiving or subsidizing these fees, it would be more feasible for the Syrians to enter the formal labour market, leading to increased compliance with social security contributions. This shift would not only provide workers with essential protections but also generate additional revenue for the government through premiums paid into the NSSF and other formal systems, thereby compensating for any reduction in income from work permit fees.



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- Efforts to extend NSSF coverage to Syrian workers who contribute to the system could benefit from a thorough examination of the principle of reciprocity between Lebanon and Syria. Addressing this principle would aim to establish agreements or mechanisms ensuring that contributing Syrian workers can access appropriate social protection benefits, aligning their contributions with tangible returns and promoting fairness within the system.
- Expanding the ILO's "Rights at Work" programming across the country could further raise awareness about workers' rights among Syrian refugees and promote better compliance with labour standards through enhanced knowledge and engagement. Employers' organizations and trade unions play a crucial role in this effort, as emphasized by the ILO's principle of tripartism, which advocates for the collaboration of governments, employers, and workers' organizations. Strengthening the capacity of employers—some of whom may not fully understand the complexities of the legal system—can be supported through these organizations.
- Comprehensive awareness campaigns should be launched to inform Syrian refugees about the permitted sectors, required documentation, associated fees, and steps for formalizing employment. These campaigns could be conducted at community development centres that are well-known and frequently visited by Syrian refugees, in collaboration with implementing partners. They should include the development of an information guide distributed through the MoL and UNHCR websites, as well as via commonly used messaging platforms like WhatsApp and social media. Local authorities, such as municipalities, should also be engaged to encourage businesses to comply with MoL policies and regulation.
- In addition, the participation of trade unions such as General Confederation of Lebanese Workers (CGTL) and FENASOL and employers' organizations in raising awareness among Syrian workers about their rights should be ensured, and their capacities should be supported to foster a more sustainable approach. This is essential to alleviate the fear many refugees have of declaring their work status, thus encouraging them to participate in the formal labour market without apprehension. Such efforts align with the ILO's focus on fostering inclusive and informed labour practices, supported by frameworks like Convention No. 144 (Tripartite Consultation) and Convention No. 87 (Freedom of Association and Protection of the Right to Organise).

Expanding Opportunities within Employment Regulations

- It would be beneficial to support the MoL and other relevant government entities, such as the Central Administration for Statistics and the National Employment Office, in establishing mechanisms for conducting regular, gender-sensitive labour market analyses. These analyses should focus on assessing skills gaps and identifying sectors where Syrian refugees can fill labour market needs, to the local or governorate level. Providing MoL with accurate, reliable, and up-to-date data on market needs and economic trends, in coordination with employers' organizations and other relevant ministries such as Agriculture and Industry, will help ensure that work permit processes and related services are evidence-based, transparent, and fair.
- Promoting and facilitating social dialogue and consultations at national, governorate, and sectoral levels would be instrumental in identifying labour market needs, building mutual trust, and enhancing cooperation. These dialogues should involve the MoL, relevant government entities, employers, employers' organizations, trade unions, and workers' representatives. Such engagement aligns with the ILO's tripartite approach, fostering shared responsibility for integrating Syrian refugees into the workforce and addressing labour market challenges effectively. To ensure that revisions to the list of restricted occupations are evidence-based, these dialogues should be informed by studies conducted in collaboration with the Association of Lebanese Industrialists and the Ministry of Industry (MoI) to identify skills gaps filled by Syrian refugees in the industrial sector. Similar assessments would be valuable for other sectors to create a comprehensive understanding of labour market dynamics and inform policy adjustments accordingly.
- Encouraging and supporting social dialogue between the MoL, employers' organizations, and workers' organizations could be instrumental in addressing the participation of Syrians in the labour market. Such discussions would foster mutual understanding, identify shared challenges, and create collaborative strategies to integrate Syrian refugees in ways that align with Lebanon's labour market needs. This approach would ensure that policies are developed transparently and inclusively, promoting balanced economic growth while upholding labour standards and social cohesion.
- Based on insights from the existing labour market assessments, it would be advantageous for the MoL to review the quota system and expand the list of sectors and occupations open to Syrian refugees. This approach would address labour market gaps, particularly in critical sectors such as agriculture and industry, while ensuring Syrian refugees contribute to economic needs. Revising the 2021 decision on restricted occupations based on market demand and skill shortages could help achieve a more inclusive and responsive employment framework.
- Collaborating with the donor community to examine the feasibility of subsidizing part of the work permit fees through international aid could support the review of permissible occupations and quota systems. Linking international financial assistance to evidence-based reforms would enhance the inclusivity of Lebanon's labour market while addressing labour shortages in critical sectors.
- Publishing and regularly updating an official list of occupations open to all foreign workers, including Syrians, on the MoL's website would improve transparency. This measure would ensure clarity for employers and refugees alike, reinforcing a fair and accessible pathway to formal employment.
- It would be beneficial to facilitate in-depth discussions among the MoL, Ministry of Agriculture (MoA), Ministry of Public Works (MOPW), Ministry of Environment (MOE), GSO, and other relevant institutions to explore the feasibility of introducing flexible work permits for Syrians that are not tied to a single employer. These discussions should go beyond agriculture to include other main sectors of employment where exemptions currently allow

Syrians to work, such as construction and the environment and sanitation sector. Coordination with the Livelihoods Working Group¹⁸ would be valuable for informed recommendations and alignment with ongoing efforts. Developing flexible work permits for these sectors could enhance mobility for workers, align with sectoral labour needs, and support formal employment, contributing to both the economic resilience of Syrian refugees and Lebanon's labour market stability.

Streamlining Work Permit Processing

- Developing a unified digital platform that integrates data across key institutions, such as the MoL, GSO, and NSSF, is essential to streamline the work permit process for Syrian refugees. This platform should consolidate information on work permits, residency status, and social security contributions, enabling real-time data sharing and updates across agencies. It should include an accessible online portal for workers and employers, designed with features such as prompts, validation rules, and detailed checklists of required documents and fee structures to improve accuracy and transparency. Ensuring inclusivity by making the portal accessible to Syrian workers with disabilities is critical, as is implementing robust data protection measures to safeguard sensitive information. By reducing administrative redundancies, enhancing coordination, and addressing data confidentiality concerns, such a platform would improve efficiency, foster trust, and align labour market regulations with social protection systems.

- Reviewing fee structures based on regional experiences, such as Jordan's and Türkiye's approaches to refugee work permits and Egypt's fee-waiver practices, could provide useful insights for making Lebanon's work permit process more accessible and sustainable. Drawing from these examples would help reduce financial barriers while fostering formal employment for Syrian refugees.
- Streamlining the work permit approval process within the MoL should begin with a comprehensive assessment of human resources and capacities at the Ministry and its local offices. This review would identify gaps and inform targeted capacity-building initiatives to handle high volumes of applications more efficiently. To further enhance transparency and reduce processing times, the MoL should consider automating the approval process, incorporating an integrated notification system, and enabling real-time status updates for applicants. Delegating specific responsibilities, such as the approval of work permit renewals for permitted sectors, to SWAD could also be explored to optimize resource allocation and improve efficiency.



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¹⁸ The Livelihood Working Group in Lebanon are collaborative platforms that bring together various stakeholders, including UN agencies, NGOs, and government bodies, to coordinate efforts aimed at enhancing economic opportunities and livelihoods for vulnerable populations.

- To ensure effective implementation and compliance with work permit regulations, it is essential to strengthen the labour inspectorate function of the MoL. This can be achieved by addressing the understaffing of the SWAD and enhancing the resources and capacity of the labour inspectorate. Such measures would enable the MoL to monitor work permit issuance, enforce labour standards, and support fair employment practices for Syrian refugees. Strengthening the inspectorate will contribute to formalizing the workforce, mitigating informality, and improving protection for both Syrian refugees and vulnerable Lebanese workers. Strengthening the labour inspectorate function within the MoL could also ensure effective oversight and enforcement of labour standards. Enhancing the capacity of the labour inspectorate would help monitor compliance with work permit regulations, protect workers' rights, and address issues related to occupational safety and health (OSH). This could include providing targeted training for inspectors, equipping them with necessary resources, and fostering collaboration with employers' organizations and trade unions to support adherence to fair employment practices. Strengthening the inspectorate function aligns with international labour standards and contributes to creating a more transparent and equitable labour market for all workers, including Syrian refugees.

Addressing Documentation Barriers and Accessibility

- It may be beneficial to engage in in-depth discussions with MoL and the GSO to review the list of documentation required for obtaining work and residency permits. Through these consultations, it would be possible to identify documents that are readily accessible to applicants and those that may be more challenging to obtain. Where feasible, alternative forms of identification could be considered, such as accepting civil extracts or UNHCR registration certificates. The experience of other countries, such as Jordan's use of the Ministry of Interior card, could serve as a useful reference for introducing flexible identification systems.
- Exploring options to waive certain documentation requirements for renewing work permits, particularly if there have been no changes in the applicant's place of work, occupation, or permit category, could be valuable. Simplifying the renewal process in this way would reduce the cost and administrative burden associated with work permit applications, supporting a more accessible and sustainable system. Additionally, consideration should be given to accommodating workers who frequently change their addresses due to the current socio-economic situation, rising tensions, and other factors. This approach would ensure that the renewal process is responsive to the realities faced by workers and supports their ability to maintain legal work status without added barriers.

- Given the overlap in documentation requirements for work and residency permits, it may be helpful to initiate discussions with the MoL and GSO on the feasibility of integrating these processes into a unified application procedure. Such a streamlined process could be facilitated by a shared digital platform accessible to both entities, simplifying documentation requirements, reducing processing times, and minimizing overall costs associated with the process. Additionally, reviewing practices from other countries as well as Lebanon's own experiences with Palestinian refugees and migrant workers, could provide valuable insights for developing an effective model tailored to Lebanon's context.
- Exploring the feasibility of delegating the authority to issue flexible work permits to regional and local entities, such as MoA agricultural centres, could enhance the efficiency and accessibility of the work permit process. These centres, which already serve as points of registration for farmers, could be empowered to issue work permits on behalf of the MoL. This approach would not only streamline the process for workers in the agricultural sector but also facilitate the delivery of additional services, such as OSH training and awareness-raising sessions on workers' rights, in collaboration with the MoL and workers' organizations. Such a model could strengthen local capacity and support the access of Syrian refugees into the formal labour market while ensuring comprehensive worker protection and compliance with labour standards.
- Creating comprehensive, informational and procedural guides for the issuance of flexible work permits to Syrian workers could greatly enhance the process. These guides should not only outline all issuing centres, involved stakeholders, steps in the process, required documentation, and related fees but also include essential information on OSH, labour rights, and social insurance. Such an integrated resource would serve as a centralized tool for both employers and workers, ensuring they have access to clear, comprehensive information to navigate the work permit system and understand associated rights and obligations.

Regional Experience Sharing and Dialogue

- Organizing regional workshops and dialogue platforms can promote the exchange of experiences and best practices in refugee work permit systems. Highlighting successful examples from countries like Jordan and Türkiye can foster collaboration and address common challenges in ensuring refugee's access to labour markets.
- Examining Jordan's implementation of flexible work permits, despite recent setbacks, in sectors, such as agriculture and construction, which allow mobility within permitted sectors, can provide valuable insights. Understanding the regulatory adjustments and stakeholder engagement involved can inform similar initiatives.
- Reviewing Türkiye's approach to integrating Syrian refugees into the formal labour market through regulated work permits and sector-specific employment quotas can offer important lessons. Additionally, analysing Egypt's policies on work permit fees for foreign workers can help identify strategies to reduce financial barriers and encourage formal employment.
- Partnering with neighbouring countries to conduct joint studies on work permit fee structures, and sector-specific employment needs, can provide evidence-based recommendations for policymaking. Organising knowledge exchange visits for policymakers and practitioners to observe successful refugee employment initiatives can offer practical insights for adapting effective practices.
- Engaging in bilateral agreements with regional countries to align policies on refugee work permits and social protection can facilitate cross-border learning and ensure consistency in addressing refugee employment challenges.

Sector-Specific Recommendations: Evaluating Possibility of a Pilot

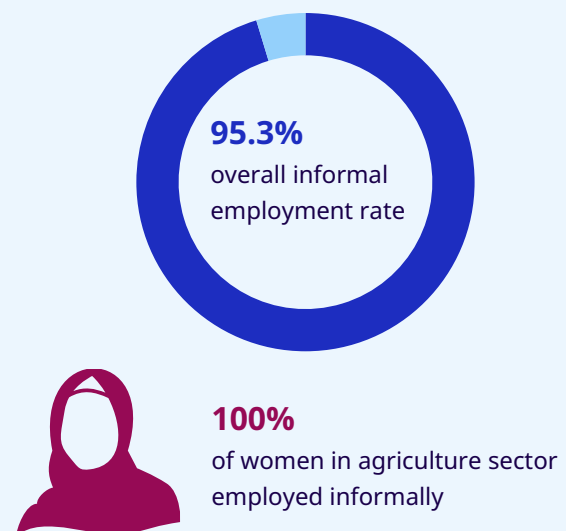
Work Permit Scheme in the Agricultural and Industrial sectors

An Overview of the Agricultural Sector

The agriculture sector has historically been a facilitated sector of employment for Syrian nationals, with work within the sector often being informal and seasonal. Previous decisions have explicitly included the agriculture sector as a permitted sector for Syrians. For example, Decisions No. 1/197 dated 2014, No. 1/218 dated 2015, and No. 1/41 dated 2017, exempted Syrians from restrictions on permitted sectors in the following sectors: agriculture, construction, and sanitation. The agriculture sector continues to be recognized as a permitted sector for Syrian refugees, as indicated by Ministerial Decision No. 1/96 (2021). In 2022, it was the primary employment sector for Syrian refugees,¹⁹ and by 2023, approximately 12 per cent of Syrian refugee households reported it as their main source of income.²⁰ A more recent assessment by the World Bank assessing poverty and inequity in five Lebanese governorates reiterates this, finding that 25 per cent of Syrians were working in the agriculture sector; highlighting also that the poor tend to be employed in this sector.²¹ However, despite its importance, the agriculture sector is marked by high informality, with an ILO assessment in 2021 showing that 95.3 per cent of agricultural workers in Lebanon were employed informally, and this rate reached 100 per cent for women.²²

The significant level of informal employment among Syrian refugees in the agriculture sector highlights the need for formal mechanisms to improve their working conditions and legal status. One important step taken in the direction of formalizing the sector is the Farmers' Registry²³, which was put in place by the MoA with the support of the Food and Agriculture Organization (FAO) and funds from the European Union. Based on close coordination between the MoA and MoL, registration in the farmers registry has become a prerequisite for obtaining work permits for agricultural workers.

► **Figure 4.** Informal employment rates in the agriculture sector (2021)



¹⁹ UNHCR, UNICEF, WFP, 'VASyR 2022: Vulnerability Assessment of Syrian Refugees in Lebanon,' 2023. Accessed on 8 March 2024. <https://iালেbanon.unhcr.org/vasyr/#/>

²⁰ UNHCR, UNICEF, WFP, 'VASyR 2023: Vulnerability Assessment of Syrian Refugees in Lebanon' [PPT], 2024. Accessed on 8 March 2024. <https://iালেbanon.unhcr.org/vasyr/#/>

²¹ World Bank, 'Lebanon Poverty and Equity Assessment 2024 – Weathering a Protracted Crisis,' 2024. <https://documents1.worldbank.org/curated/en/099052224104516741/pdf/P1766511325da10a71ab6b1ae97816dd20c.pdf>

²² ILO, 'Assessing Informality and Vulnerability among Disadvantaged Groups in Lebanon: A Survey of Lebanese, and Syrian and Palestinian Refugees,' 2021.

²³ <https://lebanon.un.org/en/221940-register-your-farm-protect-your-rights-launching-farmers%E2%80%9999-registry>

Building on the Farmers' Registry, implementing a pilot work permit scheme tailored to agricultural jobs could address worker vulnerabilities within the sector and provide protections aligned with ILO standards. This approach would promote self-reliance and enhance economic contributions while complementing Lebanon's efforts to regulate refugee labour. By supporting the economic stability of both refugees and host communities, this initiative would serve as a crucial step toward inclusive recovery. Notably, the current work permit issuance process for Syrian agricultural workers has been significantly limited, with annual permits (including first-time applications and renewals) not exceeding 205 over the past decade.²⁴ Lebanon's experience with other migrant workers, such as Egyptians who already benefit from a fee waiver, or Palestinian refugees, who also benefit from some facilitations, supported by systems established by the MoL and combined with practices from countries like Jordan where flexible work permits for self-employed refugees have been successfully implemented, offers valuable insights that could inform and enhance the proposed pilot initiative.²⁵ Jordan's program, which permits workers to move between seasonal jobs without being restricted to a single employer, presents a promising model that Lebanon could adapt to address its own labour market challenges.

An Overview of the Industrial Sector

The industrial sector in Lebanon, though not currently recognized as open for large-scale employment for Syrian refugees, is facing critical skills gaps. The GSO announcements of May 8, 2024, highlighted that these gaps cannot be adequately filled by the Lebanese workforce.²⁶ The industrial sector contributes significantly to the Lebanese economy, employing a considerable portion of the workforce and driving growth in various sub-sectors such as manufacturing, textiles, and processing. Despite its importance, the sector encounters structural and operational challenges, with employers often resorting to informal hires due to restrictive work permit regulations. Informal employment among Syrians in non-agricultural sectors, including industry, is

widespread, contributing to their vulnerability and limited social protection. A pilot work permit scheme that includes the industrial sector could help bridge these skills gaps and formalize employment for Syrian refugees, aligning with both humanitarian and economic objectives.

To implement such a scheme effectively, it is important to facilitate in-depth discussions between MoL, MoI, and ALI to evaluate skills gaps and explore potential revisions to the existing 2021 MOL decision outlining the occupations restricted to Lebanese nationals. Local-level, gender-sensitive labour market analyses and reliable, up-to-date data on market needs, economic trends, and social indicators would be critical to underpinning this dialogue. Drawing from practices in Jordan, Lebanon could explore flexible, sector-specific work permit systems that allow mobility and adaptability for workers within the industrial sector. A new service could be developed under the ALI framework, distinct from the existing support for business registration and formalization, as the beneficiaries and nature of support differ. This new service should focus on raising awareness among employers and supporting industrialists on formal recruitment practices while ensuring respect for fundamental labour rights. An ALI-run responsible recruitment support programme could be created to provide guidance without differentiating between Syrian and non-Syrian workers. Furthermore, discussions on granting authority to regional Chambers of Commerce, Industry, and Agriculture to issue work permits on behalf of the MOL should be considered, with prior consultation and validation from all relevant constituents to enhance accessibility and streamline regulation.

²⁴ Ministry of Labor Lebanon, 'Statistics,' n.d. <<https://www.labor.gov.lb/StatList.aspx>>

²⁵ In Jordan, the Ministry of Labour issued MOUs with Cooperatives and the General Federation of Jordanian Trade Unions to issue on its behalf work permits in the agricultural and construction sectors, respectively.

²⁶ UNHCR, Protection Monitoring Q2 2024: Situation of Forcibly Displaced Syrians in Lebanon

Key Elements for a Combined Pilot Scheme

- The pilot scheme would be open to Syrian refugees currently engaged in or seeking employment in the agriculture or industrial sector, with streamlined documentation requirements; this could include certain waivers or subsidies for specific documentation and fees, as well as the facilitation of residency permit renewals.
- The first step should involve tripartite consultations to agree on a simplified documentation system with key authorities. The feasibility of a one-year permit that is automatically renewable, contingent on the submission of a renewal form without requiring resubmission of documentation, should be assessed as part of the pilot.
- Clear guidelines for these simplified procedures should be developed to inform and guide employers and refugees. Relevant staff at community development centres or one-stop shops, known and trusted as information hubs for refugees, should be trained on the pilot system and the simplified procedures.
- In the agriculture sector, the permit would not be tied to a single employer, granting workers the flexibility to move between seasonal and temporary jobs without requiring prior approval from the employer. Following a proposed agreement or a Memorandum of Understanding (MoU) between the MoL and MoA, the former can delegate the issuance of work permits to the local MoA centres, which already function as registration points for farmers who wish to register with the Farmers' Registry. A new module on work permits can be integrated into the registry system. For permits in the industrial sector, these could be issued at regional-level Chambers of Commerce, Industry, and Agriculture.
- Effective coordination between the MoL, GSO, and the MoA is crucial to operationalize the pilot scheme within the agriculture sector, while coordination with the MoI and regional-level Chambers of Commerce, Industry, and Agriculture are crucial to operationalize the pilot scheme in the industrial sector.
- Establishing key performance indicators (KPIs) to evaluate the scheme's effectiveness, such as the number of permits issued, work permit renewal rates, worker retention rates, and feedback from stakeholders, would allow monitoring and continuous improvement.
- If successful, the pilot could be expanded to other sectors where Syrian refugees are allowed to work, such as construction and the environment and sanitation. This would align with findings from other contexts, which have shown that addressing informal employment through formal mechanisms can enhance social protection and promote economic resilience. A pilot work permit scheme for the agricultural sector could be a critical step in transitioning Syrian refugees into formal employment, supporting their economic resilience, and contributing to Lebanon's overall economic stability. This initiative aligns with ILO principles, emphasising decent work, social protection, and the sustainable development of both refugee and host communities.

Potential Challenges and Mitigation Strategies

Implementing a pilot work permit scheme for Syrian refugees in the selected sectors, while promising, may face several challenges. It is essential to anticipate these issues and establish mitigation strategies to enhance the likelihood of success. Below are the key potential challenges and recommended approaches for addressing them:

Complex Legal and Regulatory Frameworks

The intricate and restrictive legal frameworks governing work permits in Lebanon pose significant obstacles to Syrian refugees, particularly regarding permitted sectors and quota regulations. The pilot schemes would serve as an evidence-based advocacy tool for a review of existing legal provisions through a consultative process involving tripartite constituents and other key stakeholders.

Administrative and Bureaucratic Barriers

Lengthy and manual processes, coupled with understaffed government offices, can lead to delays and hinder access to work permits. Within selected departments and provincial directorates, a model for the digitisation of work permit applications can be integrated into the existing systems of the involved ministries to streamline procedures. Provide training and capacity-building programs for relevant ministry staff to ensure smooth and efficient processing.

High Fees and Financial Constraint

High fees associated with obtaining and renewing work permits remain prohibitive for many refugees, limiting their participation in the formal economy. The provision of certain incentives/subsidies or fee waivers for work permit applications could be implemented during the pilot.

Awareness and Information Gaps

Refugees and employers often lack knowledge of work permit procedures, leading to low uptake and informal employment practices. To address this information gap, guidelines on work permit processes, tailored to the needs of both the agricultural and industrial sectors can be developed and disseminated through trusted community development centres and one-stop shops to ensure that refugees and employers are well informed.

Employer Hesitation and Host Community Concerns

Employers may be reluctant to formalise Syrian workers due to misconceptions or perceived risks, while host communities may express concerns over job competition. A national level awareness campaign may be implemented highlighting the economic benefits of formal employment for both refugees and host communities. This can be complemented/integrated with ALI's Responsible Recruitment Support Programme to support employers in adopting fair hiring practices and respecting labour rights, without discrimination between Syrian and non-Syrian workers.

Residency Status Stability

Maintaining valid residency status is crucial but can be difficult for refugees due to financial and documentation challenges. In complementarity with the facilitation efforts of the work permit processes, policy adjustments to safeguard the residency status of permit holders, even if their employment situation changes can be developed. This includes collaborating with MoL and GSO to enable more flexible residency conditions.



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Sector-Specific Challenges

The seasonal nature of agricultural work complicates the issuance of standard work permits tied to specific employers. As discussed earlier, flexible, sector-based permits allowing mobility within the agricultural sector and supporting seasonal and temporary employment needs can offer a solution. For the industrial sector, the need for specific skill sets can restrict job opportunities if permits are tied to a single employer. Similarly, a sector-specific permit system that enables workers to shift between employers in the industrial sector while maintaining work permit validity can be implemented, engaging ALI to facilitate this through targeted employer training and support.

Coordination Among Government Entities

Effective implementation requires coordination between MoL, MoA, MoI, and GSO, which can be hampered by overlapping responsibilities and resource limitations. To mitigate such risks, an inter-ministerial task force to oversee the pilot's implementation can be established. Coupled with the introduction of a unified digital platform that integrates data across key institutions this can ensure regular communication, role clarity, and aligned objectives across relevant institutes. In parallel, it is important to conduct quarterly progress reviews to address emerging challenges promptly.

► Conclusion

Facilitating access to work permits for Syrian refugees in Lebanon is vital as the country faces ongoing socio-economic challenges and seeks to rebuild amid recovery efforts. Lebanon's persistent economic and humanitarian crises, compounded by intense hostilities, have severely strained its socio-economic fabric, affecting both vulnerable host communities and Syrian refugees. These crises have deepened vulnerabilities, increased unemployment, and disrupted livelihoods, making the formalisation of refugee work essential for stabilising the labour market and promoting socio-economic recovery. Ensuring access of Syrians into the formal economy through simplified and accessible work permit systems aligns with the ILO's Guiding Principles on the Access of Refugees and Other Forcibly Displaced Persons to the Labour Market and Recommendation No. 205 on Employment and Decent Work for Peace and Resilience. These frameworks emphasise the importance of removing barriers that hinder refugee participation, ensuring non-discriminatory access to decent work opportunities, and fostering economic inclusion to promote peace and resilience.

The fall of the Assad regime introduces an additional layer of complexity, reshaping mobility patterns and labour market dynamics in Lebanon. Historically, Syrian workers have played a crucial role in Lebanon's economy, particularly in the agriculture and construction sectors. More than 350,000 Syrians have returned to their country since the beginning of the hostilities in Lebanon, and many more are expected to return as a result of the developments inside Syria. Yet, there is still uncertainty with regards to the scale and direction of further movements. Many Syrians may hesitate to return due to economic instability and infrastructural challenges in Syria, while others may remain in Lebanon or new movements from Syria to Lebanon may occur. The evolving situation points to the urgency of and presents an opportunity for robust labour market governance in Lebanon as part of much needed broader reforms: formalising employment through flexible and sector-specific work permit systems would address critical labour market gaps and decent work deficits, while supporting socio-economic stability.

The potential departure of Syrian workers could pose challenges for Lebanon, while also necessitating a re-evaluation of labour market dynamics and policies. Sectors heavily reliant on Syrian labour, such as agriculture and construction, may face skills shortages. At the same time, the changing landscape offers an opportunity to implement policies that formalise the employment of those who remain. These measures would ensure legal protection, foster social security contributions, and promote economic stability, benefiting both refugees and host communities. It may also improve the working conditions for Syrians who continue to come to Lebanon to work in the agriculture sector on a seasonal basis, as they have done historically. Streamlining work permit processes and reducing associated costs can further encourage compliance, addressing barriers such as high fees, complex regulations, and fragmented administrative systems that currently drive many refugees into informal employment.

Formalising refugee employment also offers significant fiscal benefits. Additional revenue generated through payroll taxes and employer contributions to the NSSF can support essential public services and infrastructure investments. This revenue stream would ease fiscal pressures and create opportunities to reinvest in programs promoting social cohesion, job creation, and economic recovery. Programs like the Employment Intensive Infrastructure Programme (EIIP) and targeted initiatives in agriculture and industry demonstrate the potential for formalized labour to contribute to food security, shelter rehabilitation, and sustainable income generation.



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solutions that Lebanon can adapt to address its unique challenges. By learning from these models and fostering regional cooperation, Lebanon can ensure labour market policies align with international labour standards and its recovery strategy. Bilateral agreements with Syria on voluntary returns and cross-border labour mobility will also be essential in navigating these changes.

Facilitating access to work permits represents a critical step in Lebanon's recovery efforts. This approach not only supports Syrian refugees but also strengthens Lebanon's labour market, promotes social cohesion, and enhances socio-economic stability. As the ILO continues its collaboration with local authorities, social partners, and international donors, it emphasises the importance of inclusive and resilient labour market governance that aligns with the Humanitarian-Development-Peace Nexus principles, ensuring a sustainable path forward for Lebanon and its communities.

Regional experience, including flexible work permit schemes in Jordan and Türkiye, highlights practical