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Update of Comparative Analysis Study on Civil Registration for Syrian Refugees in Mount Lebanon, Beirut, North Lebanon, and Beqaa

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INTRODUCTION:

Legal existence constitutes a foundational element for the enjoyment of fundamental human rights and access to essential services. Civil registration systems, through the documentation of life events such as birth, marriage, and death, provide individuals with legal recognition by the State and facilitate access to healthcare, education, legal protection, freedom of movement, inheritance rights, and family unity. The preamble of the Lebanese Constitution affirms Lebanon's commitment to the Universal Declaration of Human Rights. Together with the International Covenant on Civil and Political Rights and the Convention on the Rights of the Child, both binding on Lebanon, these instruments guarantee the right to recognition before the law, which encompasses the right to civil registration.

The preamble of the Lebanese Constitution affirms Lebanon's commitment to the Universal Declaration of Human Rights. This Declaration, together with the International Covenant on Civil and Political Rights and the Convention on the Rights of the Child, both of which are binding on Lebanon, guarantees the right to recognition before the law, which encompasses the right to civil registration.

The right to recognition before the law is primarily enabled through civil registration processes of vital events such as birth, marriage, and death.

Refugees, in particular, face significant challenges in accessing civil registration systems when residing in a host country. This is notably the case in Lebanon, which has hosted a large number of Syrian refugees, approximately 1.5 million refugees¹, since the outbreak of the Syrian war in 2011.

The vulnerability assessment of Syrian refugees in Lebanon showed that the rates of birth registration reached 50% in 2025 compared to 31% in 2022. The completion of civil registration procedures was challenged by financial barriers and relatively complex administrative procedures that were reinforced by the economic crisis that hit its peak in late 2021. Similarly, marriage registration was also higher in 2025 (41%) than in 2022 (33%). While these figures still remain low, they nevertheless reflect a notable improvement resulting from relatively clearer procedures, increased awareness, and the efforts led by humanitarian organizations, legal aid actors, and community leaders to support refugees in navigating the registration process.

However, despite this progress, civil registration procedures in Lebanon are regarded as relatively challenging and difficult to navigate for many Syrian refugees. Birth and marriage registration often require refugees to complete several sequential administrative and legal steps involving multiple institutions; mukhtars, hospitals, Personal Status Departments, Foreigners' Registry offices, and at times the courts.

¹ https://www.unhcr.org/where-we-work/countries/lebanon?dataset=POP&yearsMode=range&selectedYears=%5B2012%2C2026%5D&level=OPR&category=PTY&fundingSource=ALS&compareBy=%5B%22category%22%5D&levelCompare=%5B%5B%22OLBN_ABC%22%5D%5D&viewType=chart&chartType=bar&contextualDataset=BUD&tableDataView=absolute&strategyYear=2025

Refugees are frequently required to present valid residency documents, certified marriage certificates, identification papers, and supporting documentation that many no longer possess or are unable to renew. Delays in completing one step can prevent access to subsequent procedures, while transportation costs, legal fees, translation and notarization expenses, and fear of arrest or movement restrictions further discourage many families from pursuing registration. The economic crisis has further increased administrative and transportation costs while simultaneously weakening the operational capacity of courts and civil registry offices due to understaffing, limited resources, and periodic service disruptions.

The complexity of the process is further exacerbated by Lebanon's evolving political, economic, and security context. More recently, regional instability and developments, specifically the fall of the Assad regime while Lebanon is under Israeli military attacks, have also contributed to increased insecurity and hesitation among some refugees regarding engagement with official authorities and administrative systems.

In some regions, registration percentages remain low. For example, Rates were highest in Beirut at 79%, following by Mount Lebanon at 62%. The lowest rates were found in Akkar at 30%. Among female headed households, the proportion of births registered with the foreigner's registry was lower than their male counterparts (42% compared to 51% among male headed households). Similar to birth registration, rates in Akkar in particular remain extremely low compared to other areas at only 15%. This can be attributed to several factors including the disparity in access to services, information, and institutional support. Refugees residing in urban centers or areas with a stronger presence of humanitarian organizations, legal aid providers, and awareness campaigns are generally more likely to receive guidance and assistance throughout the registration process. In contrast, refugees living in remote or underserved regions often face greater transportation barriers, reduced access to legal support, and limited awareness of procedural requirements. Regional variations may also be influenced by differing local administrative practices, levels of coordination between authorities, socioeconomic conditions, and the degree of security restrictions or mobility limitations experienced by refugee populations.

Civil registration in Lebanon, particularly the procedures and fees associated with marriage, birth, and death documentation, has been the subject of several studies and reports, especially in the context of displacement, legal identity, and access to rights. Organizations and researchers have contributed to the understanding of civil registration in Lebanon, including UNFPA and ESCWA, who conducted a Situational Analysis of the Civil Registration and Vital Statistics (CRVS) System in Lebanon, emphasizing the need for systemic reform, improved coordination among stakeholders, and integration of civil registration into broader development frameworks.

Lebanon has continued to experience a severe socio-economic collapse, compounded by political paralysis, the deterioration of public institutions, and the impact of recurrent security incidents along its southern border. These developments have severely weakened the capacity of civil registries and local administrations, further complicating refugees' access to documentation and essential legal services. Simultaneously, regional instability – including the fall of the Assad regime, renewed attacks on certain communities in Syria, and ongoing Israeli strikes on Lebanon – has driven new waves of displacement and heightened refugees' vulnerability.

Civil registration in Lebanon is governed by the Lebanese Civil and Personal Status Law. Under the Law of 7 December 1951², civil documentation is required for all life events occurring on Lebanese territory. However, in light of the aforementioned developments, several decrees and administrative circulars have been issued that amend, suspend, or modify certain documentation requirements and procedures related to civil registration. These changes have resulted in a fragmented and inconsistent regulatory framework, creating a patchwork of applicable rules that further complicates civil registration procedures, particularly for refugees.

Thus, in the light of post-2023 sociopolitical and security developments, the current research aims to update and compare the procedures, required documents, and fees for marriage, birth, and death registration across Mount Lebanon, Beirut, North Lebanon, and North Bekaa. As well as to examine the main challenges and barriers faced by refugees and host communities in accessing civil documentation, to develop actionable recommendations for policymakers, practitioners, and humanitarian actors addressing identified gaps and challenges.

METHODOLOGY:

This paper uses a qualitative research design applying multiple data collection tools to examine 3 main categories under civil registration; birth, marriage, and death, among Syrian refugees and across different regions in Lebanon; Beirut and Mount Lebanon, North Lebanon, and Beqaa. The research adopted legal desk review, focus group discussions (FGD's), and key informant interviews (KII's). All of these were conducted between October and December 2025 targeting legal practitioners and Syrian refugees relevant to the examined areas.

The paper adopts a qualitative thematic analysis where the data collected and extracted from qualitative dominant data collection tools; Desk Review, Focus Group Discussions, and Key Informant Interviews, were coded into themes reflecting recurring patterns and context specific barriers and challenges.

This study constitutes an update to a research paper conducted in 2022 and aims to reassess civil registration procedures in light of significant local, political, and security developments that have occurred since then.

While Lebanese civil registration procedures are referenced where relevant for comparative and legal contextualization purposes, this study primarily focuses on the experiences and challenges faced by Syrian refugees in Lebanon.

The study applied triangulation across the three tools to enhance data accuracy and validation.

² <http://77.42.251.205/LawView.aspx?opt=view&LawID=197742>

DESK REVIEW:

An in-depth desk review was conducted to identify the relevant legal framework, where the birth, death, and marriage registration procedures, fees, documents, and relevant authorities were mapped.

Key legal documents reviewed for this study include:

- Law concerning the registration of civil status documents issued in 1951.
- Law No.324, issued in 2024, concerning the general budget for the year 2024.
- Decree No.56, 11/03/2025, to deem the draft State Budget for the year 2025 valid and enforceable.
- Universal Declaration of Human Rights (UDHR)
- International Covenant on Civil and Political Rights (ICCPR)
- Convention on the Rights of the Child (CRC)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)

Regarding fees charged at the Mukhtar level, the following legal and administrative documents were reviewed:

- Decree number 9771 published in the official gazette on 4 August 2022 by the Ministry of Interior and municipalities.
- Decree number 1390 issued in the official gazette number 43 on 9 October 2025.

Regarding fees charged at the Nofous level, the following legal and administrative documents were reviewed:

- Circular No.12, 4/03/2025 issued by the Directorate General of Personal Status.

Concerning delayed birth registration (up to one-year), the following legal and administrative documents were reviewed:

- Law No.160 and Law No.185, 18/08/2020, concerning the extension of deadlines and the granting of certain exemptions from taxes and fees, which provided for the extension of the application of the provisions of Law No. 160/2020.
- Decision by the council of ministers, No/28, 08/02/2022.
- Circular No.13, 21/02/2022, concerning the extension of the deadline for the registration of births of Syrians and Palestinians registered in Syria
- Circular No. 16, 24/3/2025, concerning the extension of the deadline for the registration of births of Syrians and Palestinians registered in Syria

Concerning birth registration before the foreigner's registry, the following legal and administrative documents were reviewed:

- Circular No 43/02, 12/9/2017, issued by the Directorate General of Personal Status.

FOCUS GROUP DISCUSSIONS (FGD'S):

The main intended outcome out of the FGD's was to collect firsthand experiences that would lead in assessing the applications of the legal framework, the challenges, and participants' feedback on procedural steps and recommendations to enhance the process.

One focus group discussion was held with 8 Syrian refugees who have undergone birth, death, or marriage registration. The participants were both females and males and distributed among different geographical areas relevant to the examined areas; Beirut and Mount Lebanon, North Lebanon, and Beqaa.

The identification of the participants was through applying a semi-random sampling method for data extraction using CLDH's database. However, the sampling was targeting refugees with firsthand experiences.

The session was facilitated by a team of social workers, center coordinator, and one researcher. It followed a semi-structured format, including an introduction, confidentiality and consent induction, an overview of the topic, and guided discussion questions.

KEY INFORMANT INTERVIEWS (KII'S):

KII's were conducted to further establish an in-depth legal practice regarding registration procedures shedding the light on inconsistencies and variations specifically among different geographical areas. The interviews were instrumental in assessing the administrative and legal changes and their impact on the target communities.

CLDH conducted 3 interviews with 4 CLDH lawyers who specifically focused on civil registration.

DATA FINDINGS:

This chapter is a presentation of the findings from data collected for the study examining marriage, birth, and death within the broader civil registration system for Syrian refugees in Lebanon.

The data presented below are the extracted input collected through legal desk review, FGD's, and KII's. It reflects legal and administrative insights on civil registration. The data is presented by type of registration; marriage, birth, and death, and by geographical region; Beirut and Mount Lebanon, North Lebanon, and Bekaa.

The findings will reflect upon the legal official procedures and the challenges faced by the target communities throughout real life experiences. This will look into potential regional variations, disparities in access, and the impact of the local and regional contextual changes on these procedures.

Where applicable, legal provisions are referenced to contextualize observed gaps between law and practice and to underscore the human rights implications of non-registration.

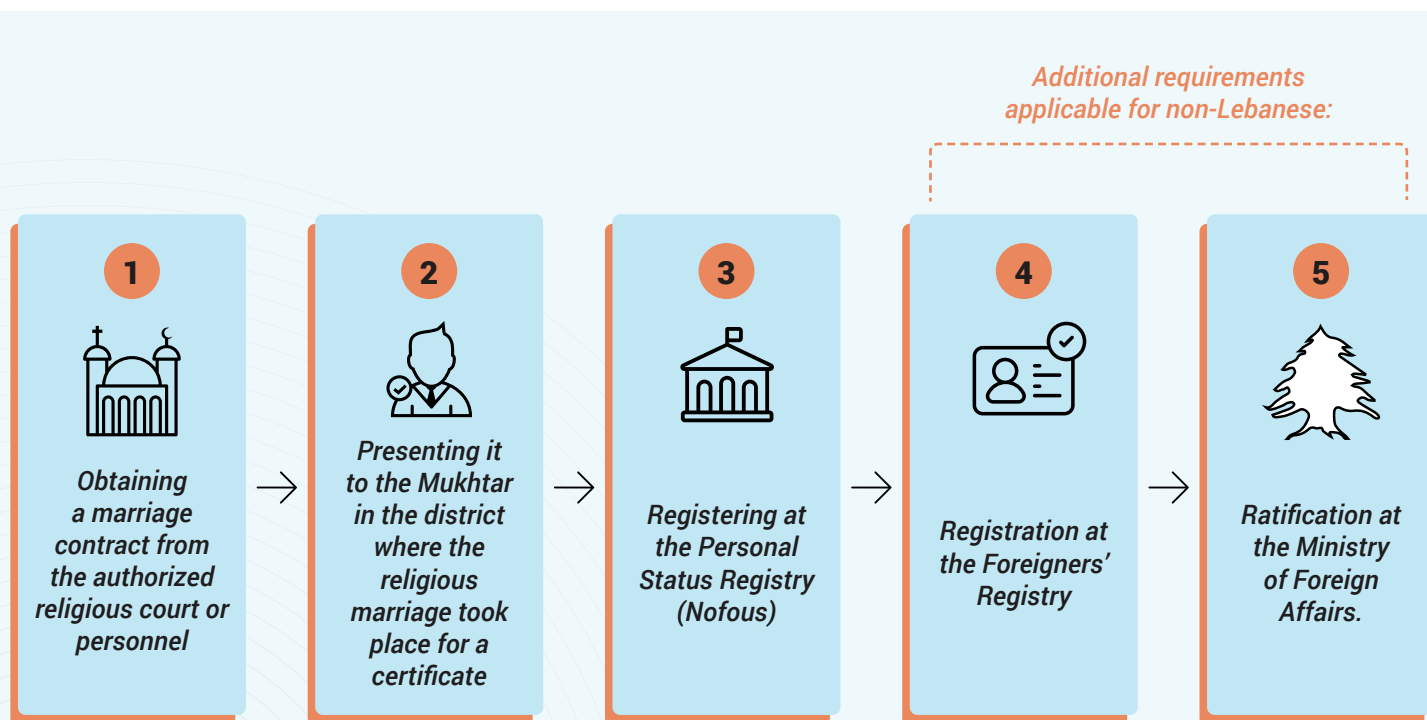
1. MARRIAGE REGISTRATION:

1.1 Legal and Administrative Framework:

Marriage registration in Lebanon is governed by both international human rights law and national legislation. Internationally, the right to marry is recognized under Article 16 of the Universal Declaration of Human Rights, and conventions such as CEDAW emphasize mandatory marriage registration to protect women's rights and prevent child marriage, as well to ensure child's protection. On a national level, the Lebanese constitution- Law of 12 December 1951- requires marriages, whether between Lebanese nationals or non-Lebanese, to undergo marriage registration at the Directorate General of Personal Status (DGPS) within 30 days of the date of marriage at religious court or with religious personnel. Administrative penalties are applied to late registration, in the form of additional fees and stamps. The law places primary responsibility for completing registration on the husband, while allowing the wife or the DGPS to intervene if registration is refused.

A. Administrative Procedure:

The marriage registration process involves multi- administrative steps:



B. Required documentation and associated fees:

The documentation requirements vary among different official personnel and institutes. Below, we present a summary of the required documentation and associated fees per administrative authority.

1. Religious court:

The outline presents the required documents that need to be submitted to the religious court to obtain a marriage contract:

- Individual civil extracts issued within the last 3 months for both spouses. For non-Lebanese applicants, civil extracts must be certified by their relevant embassy or ministry of foreign affair (MoFA).
- Medical report confirming that both spouses meet medical requirements for marriage, issued by a doctor registered at the Order of Physicians in Lebanon³.
- Proof of husband's⁴ affiliation to Islam. In cases where the spouse is of different religion, a statement issued by the Mukhtar, stating the religion of each spouse and their intended marriage is to be provided⁵.
- In cases involving a Lebanese male spouse and non-Lebanese female spouse, a security screening by the General Security might be requested.
- Once these procedures are completed, the marriage contract is then issued and authenticated by the religious authority.

Once these procedures are completed, the marriage contract is then issued and authenticated by the religious authority.

If the marriage was conducted with an unauthorized Sheikh, whether verbally or in writing, the spouses have to undergo a judicial procedure to obtain proof of marriage. The procedure includes filing a case law named "Proof of Marriage" at the Shariaa court with one of the spouses as a plaintiff and the other as a defendant. Documents required for the case of law are similar to the marriage contract except for the medical report. The law of civil court procedure applies to such cases.

Under the applicable legal framework, proof of valid legal stay is not generally required by religious courts for the conclusion or proof of marriage involving non-Lebanese spouses. However, interviews with legal practitioners revealed that the implementation of these provisions is not always consistent in practice. In some regions, particularly before certain Sharia courts, refugees may still be requested to provide proof of legal residency or valid stay documentation as part of marriage or proof of marriage procedures, creating additional barriers for individuals with irregular status.

³ Medical tests are required to show genetic diseases or sexually transmitted diseases in order to see if the couple fit for marriage.

⁴ Shariaa court stopped asking for this document, since the individual extract mentions the religion of the spouses.

⁵ This document is required for Muslim Sunnites

For marriages involving minors, additional judicial authorization may be required before the marriage can be concluded and registered. The applicable requirements and supporting documentation may vary depending on the competent religious court and the age of the individuals concerned. In practice, legal practitioners reported that such cases are subject to heightened scrutiny and may require supplementary assessments, authorizations, or supporting evidence before approval is granted.

Moreover, measures aimed at combatting and restricting early marriage constitute an important child protection and human rights safeguard, legal practitioners highlighted that restrictive procedures related to the recognition and proof of early marriages may also generate unintended protection outcomes. In practice, women already living in informal or early marriages, particularly those who already have children, may face significant difficulties in completing marriage recognition procedures, which consequently affects their ability to register the births of their children and access related civil documentation. This creates a situation in which children born from unrecognized or informal marriages may themselves face heightened risks of lacking legal documentation, despite the administrative restrictions originally intending to enhance protection standards and prevent child marriage practices.

2. The Mukhtar⁶ (of the court's neighborhood where the marriage contract was issued):

To obtain a marriage certificate from a Mukhtar, the listed documents are required:

- The marriage contract is authenticated by the religious authority.
- Identity documents of each of the spouses: Identification cards, passports, individual extracts issued within the preceding year.
- The marriage certificate must be signed by two witnesses.
- Once these procedures are completed, the marriage contract is then issued and authenticated by the religious authority.

The Mukhtar completes the certificate; after which both spouses sign, subsequently concluded by the Mukhtar signing and stamping the certificate.

Fees:

- In 2022, the fees of the Mukhtars were at 25,000LBP for marriage certificates⁷.
- As of September 29, 2025, a decree⁸ amended the fees that the Mukhtar can demand for certificates they issue. The fees according to the recent decree are 400,000LBP.
- Mukhtar stamp⁹ of 50,000LBP and a financial stamp of 50,000LBP.

⁶ by the people every 6 years. Each Mukhtar keeps life records on the individuals in the village/town/city. These records, that include birth marriage and death registration, are kept with the Mukhtar and copies are also maintained in the Civil Status Directorates and the Ministry of Interior.

⁷ Decree number 9771 publishes in the official gazette on 4 August 2022 by the Ministry of Interior and municipalities.

⁸ Decree number 1390 issued in the official gazette number 43 on 9 October 2025.

⁹ Law No.273, 5/1/2001, concerning the Mukhtar stamp.

3.The Nofous¹⁰ Registry of the Shariaa Court where the marriage took place:

To register the marriage at the Nofous these documents must be provided:

- The Mukhtar's marriage certificate.
- The marriage contract.
- Identity documents of each of the spouses: Identification cards, passports or individual civil extracts.
- If one of the spouses is Lebanese, the authorization of the General Security is needed.
- The Nofous completes category 22-23 of the marriage certificate by issuing a registration number and date.
- Once these procedures are completed, the marriage contract is then issued and authenticated by the religious authority.

Fees:

- The fees required are four stamps costing 100,000 LBP each posted at the back of the certificate. These stamps constitute the standard registration fees and may be affixed during different stages of the registration process.
- The fees that must be paid to the Nofous have changed since 2022.

In 2025, pursuant to Circular No.12 issued on 14/3/2025¹¹, an additional administrative stamp fee of 50,000 LBP became applicable at the Nofous level, in addition to a 400,000 LBP fee¹².

Where the marriage certificate is submitted after one month of the date of marriage, additional late registration fees may apply, including fees payable to the relevant financial authority in accordance with applicable administrative and financial regulations. Depending on the duration of the delay and the applicable procedures, these fees may reach up to 1,100,000 LBP.

It is worth noting that, in practice, General Security authorization for mixed-nationality marriages is often a complicated and costly process. Legal practitioners identified this requirement as one of the principal obstacles affecting mixed-nationality couples, as obtaining the authorization frequently requires the foreign spouse to regularize their legal status and provide supporting documentation.

¹⁰ The Nofous is an official State institution responsible for documenting the civil registry of Lebanese citizens and foreign residents.

¹¹ Circular No.12, 14/03/2025, issued by the Directorate General of Civil Status.

¹² <https://www.dgcs.gov.lb/arabic/applicationmechanisms/mechanism4>.

For Non-Lebanese:

The foreigner's registry at the governorate's center of the court where the marriage contract was ratified:

- The marriage certificate registered at the Nofous.
- Evidence of legal residency status in Lebanon for both spouses you (valid residency or valid entry coupon¹³). Exceptionally, legal residency status is not required if one of the spouses is Lebanese.
- Either valid passport for both spouses with proof of the wife's civil status issued in Syria, or individual civil extracts for both spouses certified by the Ministry of Foreign Affairs of Lebanon and of Syria and issued within the last three months.

Fees:

- The ratification fee is 1,000,000LBP (stamp fee) .

While this applies for marriage registration, exceptionally, early marriage registration follows different requirements and procedures.

1.2 Marriage Registration in Practice:

The data collected from interviews with key legal practitioners at CLDH and from focus group discussions with Syrian refugees indicate lack of alignment between the legal framework and the practical procedures with notable regional variations.

In **Beirut and Mount Lebanon**, lawyers reported that the 30-day registration deadline is rarely feasible for Syrian refugees due to challenges in acquiring the required documents, security approvals, and court delays. A number of administrative steps required by law, such as taking the marriage certificate issued by the Mukhtar back to the religious court for approval, is not, in practice, a consistent step. Registration procedures are dependent on whether the marriage was before a Sharia court or through a recognized Sheikh outside the court.

In **North Lebanon**, particularly in Tripoli, the religious court often directly issues marriage certificates rather than the Mukhtar, where the religious court often directly issues marriage certificates, while the Mukhtar remains responsible for completing the certificate, verifying witness information, signing and stamping the document, and forwarding documentation to the Nofous. If marriages were conducted outside the court, legal practitioners confirmed that the procedures differ depending on whether the married couple has children or not.

For instance, some Sharia courts in North Lebanon apply relatively simplified procedures requiring fewer supporting documents and lower associated costs, while others impose additional requirements and fees. Legal practitioners reported that the Bireh Sharia Court generally applies simplified procedures requiring recent individual civil registry extracts, blood tests, and, where applicable, children's birth certificates, with comparatively limited fees.

¹³ Internal memo number 43/3 dated 12/09/2017, a conditional residency permit granted by the GSO at the border points in Lebanon to a foreigner who is allowed to enter its territory. It usually includes restrictions on the length of stay of the foreigner, the date of entry, the number of visits allowed, and whether the individual has the ability to work in the country.

In contrast, the Halba Sharia Court requires additional documentation, including a reserve marriage contract (Aqd Ihtiyati), which significantly increases the overall cost of the procedure. Similarly, the Jaafari Court requires recent civil extracts and an external religious marriage contract, while demonstrating greater flexibility regarding blood test requirements for couples who already have children. These variations in procedural requirements, documentation, and associated costs contribute to inconsistencies in practice and create uncertainty among beneficiaries regarding the applicable requirements.

In **North Bekaa**, the data showed increasing pressure on religious courts due to population movements and post-2024 changes in political and security context, though procedural descriptions were less standardized. In Baalbek specifically, legal practitioners reported stricter procedural requirements introduced by certain judges, including mandatory presence and approval of the bride's father in marriage proceedings.

Legal practitioners also identified procedural differences between Sunni and Jaafari courts. While both courts generally require recent identification documents and the approval and presence of the bride's father, Jaafari courts were reported to impose additional requirements, including medical examination reports and supplementary documentation proving that the woman is not already married.

FGD participants expressed that marriage registration is a challenging procedure as it is complex, and costly, requiring several visits to authorities and often relying on intermediaries to navigate bureaucratic requirements.

Although valid legal stay is not formally required under the applicable legal framework for certain procedures, legal practitioners reported that some religious courts and administrative authorities continue in practice to request proof of legal residency or valid stay documentation, creating additional barriers for refugees with irregular status.

1.3 Challenges:

While several challenges were common across all regions, interviews and FGDs revealed notable regional variations in administrative practices, documentation requirements, and access to procedures: **Beirut & Mount Lebanon:**

1



**Delays linked to
GSO approval**

2



**Higher
procedural
costs**

3



**Movement
restrictions**

4



**Dependency on
lawyers/
intermediaries**

North Lebanon: In North Lebanon, challenges were further exacerbated by inconsistent administrative practices and varying interpretations of applicable procedures. Beneficiaries frequently faced additional documentation requests and procedural ambiguity, often requiring multiple visits to different authorities. These inconsistencies increased reliance on intermediaries and contributed to higher financial and administrative burdens.

Bekaa:



Challenges across regions:

- General Security approvals for marriages involving Lebanese nationals were described as time-consuming and unpredictable and costly.
- Disrupted access to courts due to closures and restrictions following security incidents significantly delayed registration processes.
- Incomplete documentation, particularly the absence of civil documentation from Syria, either delayed or prevented registration.
- Informal fees and variable Mukhtar charges created uncertainty and financial strains.

FGD's discussions reflected that delays in marriage registration frequently had consequences specifically for birth registration of children born under unregistered marriages.

2. BIRTH REGISTRATION:

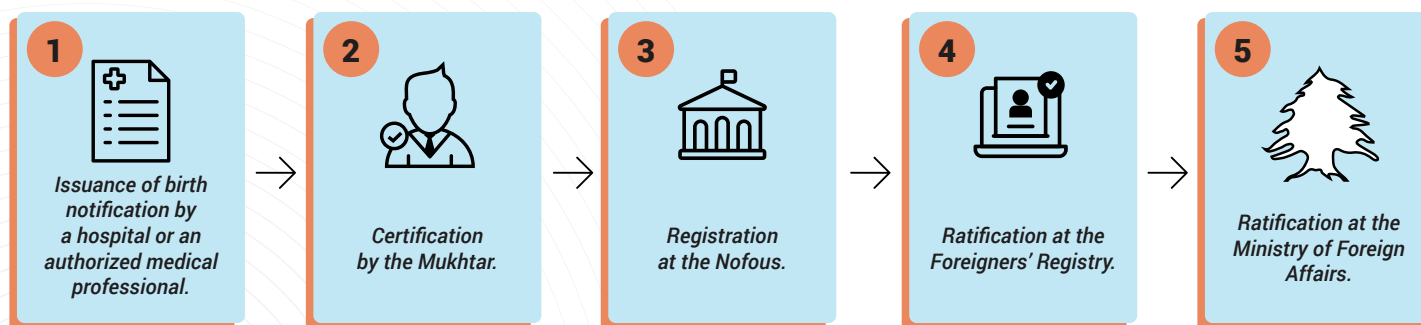
2.1 Legal and Administrative Framework:

Birth registration is recognized as a foundational human right under Article 7 of the CRC and Article 24 of the ICCPR¹⁴. requires birth registration within 30 days from birth date.

Late registrations exceeding one-year require court decision unless exemptions apply. Since 2011, a series of temporary exemptions and circulars have suspended the one-year deadline for Syrian refugees during specific periods. The most recent circular, issued in March 2025, extended the suspension for births occurring between May 2023 and March 2025.

A. Administrative Procedure:

The marriage registration process involves multi-administrative steps:



¹⁴ Article 12 of the Law on Documenting Personal Status Records dated December 7, 1951 (as amended).

B. Required Documents and Associated Fees:

1. Place of Delivery, or Hospital: In order to receive a birth notification, parents should present:

- Identification of cards or passports.

2. The Mukhtar.

In order to receive a birth certificate, parents should present:

- The birth notification.
- Passports or identification cards, and/or family booklet or family civil extract of the parents to be verified and used to complete the required information.
- Proof of marriage, including a family booklet, family civil extract, or marriage certificate where applicable.

Fees:

- In 2022, the fees were 25,000LBP and 1,000LBP stamp per document.
- In 2025, a decree¹⁵ has been issued amending the fees that the Mukhtar can demand for certificates they issue. The fees according to the recent decree are 400,000LBP.
- An additional fee is required: Mukhtar stamp¹⁶ of 50,000LBP and a financial stamp of 50,000LBP.

3. The Nofous – Nofous office closest to the place of birth:

To register the birth certificate, parents should present:

- The birth certificate
- Copy of Passports, identification cards and proof of marriage, and/or family booklet or family civil extract of both parents. **These documents can be attached to the birth certificate at this level or requested at the Foreigners' registry for non-Lebanese.*
- Upon completion of the process, the Nofous should complete boxes 14 and 15 of the birth certificate.

Fees:

All fees related to Nofous underwent changes since 2022.

In 2025, circular 14/3/2025 stated that the fees paid to the Nofous are 50,000LBP. If the registration request is submitted more than 30 days after birth, an additional fee is required. An additional fee of 400,000LBP is also required¹⁷.

¹⁵ Decree number 1390 issued in the official gazette number 43 on 9 October 2025.

¹⁶ Law No.273, 5/1/2001, concerning the Mukhtar stamp.

¹⁷ <https://www.dgcs.gov.lb/arabic/applicationmechanisms/mechanism4>

For Non-Lebanese:

The Foreigners' Registry at the Governorate of the place of birth:

To validate the certificate parents should present:

- A registered birth certificate at the Nofous.
- Passports or identification cards for both parents, or family booklet for Syrian refugees.
- Proof of marriage including family booklet, or family civil extract stamped at the Syrian and Lebanese Ministry of Foreign Affairs and valid passports of both parents, or Syrian marriage certificate stamped at the Syrian and Lebanese Ministry of Foreign Affairs, or Lebanese marriage certificate signed by the Mukhtar in addition to the marriage contract for marriages conducted in Lebanon.

Fees:

- The ratification fee is 1,000,000LBP (stamp fee) .

In March 2019, the Directorate General for Personal Status (DGPS) issued a memo allowing Syrian parents married in Lebanon to register the birth of their children by presenting a marriage certificate executed in Lebanon and registered at the Syrian embassy instead of the family booklet that was required. However, despite the issuance of this memo, interviews and FGDs revealed that implementation remains inconsistent across regions, with some administrative offices continuing to request family booklets in practice.

At the end of the process, the Foreigners' Registry should complete box 16 of the certificate. Since September 2017, Syrian parents no longer need to have legal stay to ratify the birth of their children with the Foreigners' Registry. Additionally, only one spouse, instead of both, needs to have legal stay to register a marriage celebrated in Lebanon with the Foreigners' Registry¹⁸.

Fees:

- The ratification fees paid to the ministry of foreign affairs is 1,000,000LBP covering stamp fees.

2.2 Birth Registration in Practice:

Although the official procedural guidelines are well framed, the interviews with legal practitioners and the FGDs reveal variations in how birth registration procedures are applied across regions.

In **Beirut and Mount Lebanon**, circulars removing residency requirements and allowing alternative marriage documentation are mostly applied. Lawyers confirmed that for the completion of this administrative process only one parent is required to hold legal residency status.

¹⁸ Circular No 43/02, 12/9/2017, issued by the Directorate General of Personal Status.

In **North Lebanon**, despite the existence of circulars introducing flexibility in documentation requirements, legal practitioners and FGD participants reported continued inconsistencies in implementation, particularly at the level of the Foreigners' Registry in Tripoli. While directives issued by the Directorate General of Personal Status permit more flexible approaches, including the acceptance of alternative documentation and the registration of births concurrently with the validation and execution of marriage certificates, these provisions are not systematically applied in practice. Interviewees reported that authorities frequently continue to require a Syrian family booklet or a family civil registry extract legalized by both the Syrian Embassy and the Lebanese Ministry of Foreign Affairs, even in cases where alternative documentation should be accepted. In addition, operational constraints further limit access to services, as only one day per week is reportedly allocated for receiving Syrian refugees at the Foreigners' Registry, while the processing of civil registration documents may take no less than two weeks. These factors collectively create additional procedural and time barriers for refugees and contribute to unequal implementation of applicable regulations across regions.

In **North Bekaa**, similar inconsistencies were also observed by legal practitioners, though residency requirements were reportedly less strictly enforced. Interviewees nevertheless reported variations in documentation requirements, procedural flexibility between courts and administrative offices, and differing interpretations of applicable regulations, contributing to uncertainty among beneficiaries seeking to complete birth registration procedures.

2.3 Challenges:

The key challenges for birth registration, while broadly similar across regions, still reflect context-specific regional factors as presented below:

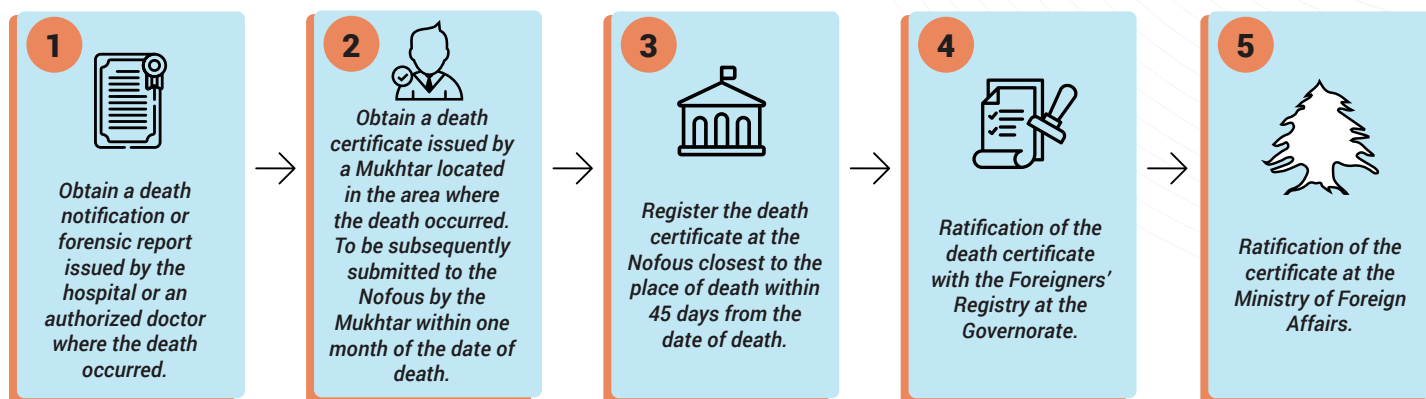
- Dependency on marriage registration often delays birth registration, particularly where marriage certificates remain unregistered, unrecognized, or subject to lengthy validation procedures.
- Inconsistent application of exemptions for late registration, resulting in unequal implementation of registration procedures across regions. Legal practitioners reported variations in documentation requirements and inconsistent application of circulars intended to facilitate birth registration, particularly in North Lebanon.
- Financial barriers, including high and variable Mukhtar fees, administrative costs, transportation expenses, and penalties for delayed birth registration, may reach up to 1,000,000 LBP.
- Additional costs imposed by service providers, including reports of hospitals, midwives, and doctors charging extra fees to issue birth notifications or sign birth certificates, further increasing the financial burden on refugee households.
- Document legalization requirements, particularly the requirement by the Ministry of Foreign Affairs and Emigrants for Syrian refugees' documents to be submitted in person by the concerned individual or a first-degree relative, creating additional barriers for individuals facing movement restrictions or irregular legal status.
- Complex and inconsistent legalization procedures, including reported practices whereby document legalization requests submitted through LibanPost are not processed unless prior stamping by the Ministry of Public Health has been completed, resulting in additional costs, delays, and administrative burdens.
- Administrative and operational constraints, including delays in document processing, limited-service availability, and lengthy waiting periods, which collectively hinder timely access to birth registration services.

3. DEATH REGISTRATION:

3.1 Legal and Administrative Framework:

The Lebanese law requires death registration within 45 days of the date of death, involving notification by a medical authority, certification by a Mukhtar, registration at the Nofous, ratification at the Foreigners' Registry, and ratification by the Ministry of Foreign Affairs.

A. Administrative Procedure:



B. Documents and Fees:

1. The Mukhtar:

- Identification card of the deceased.
- Medical report issued by the examining physician indicating the cause of death.

Fees:

- Fees were previously set in 2022 at 25,000LBP and 1,000LBP stamp per document, that was later amended under a decree¹⁹ issued in 2025 increasing the Mukhtar certificate fees. The fees according to the here mentioned decree are 400,000LBP.
- An additional fee is required covering Mukhtar stamp²⁰ of 50,000LBP and a financial stamp of 50,000LBP.

2. The Nofous:

- A death certificate signed by the Mukhtar, two witnesses, and the licensed examining physician.
- A copy of the deceased's passport or identification card.
- A family booklet or extract in cases where the deceased was married, and an individual extract if unmarried.

Fees:

- In 2025, circular 14/3/2025 was issued addressing, the fees, where Nofous fees are 50,000LBP, including an additional fee of 2 000 000LBP²¹.
- An additional fee of 400,000LBP is also required²².

¹⁹ Decree number 1390 issued in the official gazette number 43 on 9 October 2025.

²⁰ Law No.273, 5/1/2001, concerning the Mukhtar stamp.

²¹ Circular No.12, 14/03/2025, issued from the Directorate General of Civil Status.

²² <https://www.dgcs.gov.lb/arabic/applicationmechanisms/mechanism4>

3.2 Death Registration in Practice:

KIs indicated fewer procedural variations in death registration compared to marriage and birth registration. However, regional differences persist.

In **North Lebanon**, lawyers noted that family booklets are often not required in practice, contrary to legal provisions. Additional medical documentation is sometimes requested at the Nofous level.

FGD participants described death registration as emotionally burdensome, particularly when compounded by administrative delays and unclear fee structures.

3.3 Challenges:

The findings highlight a number of challenges experienced under death registration which are outlined below:

- *Inconsistent documentation requirements, including variations in the supporting documents requested by administrative authorities and uncertainty regarding applicable procedures across different regions.*
- *Limited clarity regarding applicable fees, resulting in uncertainty among beneficiaries and contributing to delays in completing registration procedures.*
- *Variable Mukhtar fees, which increase the financial burden associated with death registration and may vary significantly between locations.*
- *Challenges related to deaths occurring outside healthcare facilities, particularly where no official medical death notification or death report has been issued. In such cases, refugees may face significant legal and administrative difficulties in initiating and completing the registration process, often resulting in delays or the inability to proceed with official registration. Limited access to registries during periods of insecurity or administrative disruption, affecting the timely completion of death registration procedures.*

DATA ANALYSIS AND CONCLUSION:

Regional Disparities in Access and Procedure:

The data shows differences in the implementation of civil registration procedures across examined regions; BML, North Lebanon, and Beqaa. This suggests ununiform practices across Lebanon and lack of commitment to nationwide policies, mechanisms, and regulations. Rather than a consistent standardized set of protocols and pathways, these administrative procedures are region-dependent producing uneven experiences for Syrian refugees.

In Beirut and Mount Lebanon, the data suggests a degree of alignment with formal procedures and official circulars, specifically regarding documentation, requirements, and eligibility conditions. However, access is still hindered by bureaucratic burden, a large set of administrative steps, and navigating different institutions. This reveals that the processes while hypothetically committed to regulations and laws still reflect challenges and obstacles.

In North Lebanon and the Beqaa, the data shows varying patterns in how the procedures are applied. There is a lack of consistency with regard to the role of different administrative actors and institutions, where documentation requests, cases processes, and division of tasks among relevant personnel throughout the registration stages are often unstandardized.

The data collectively indicates that civil registration is documented inconsistently across regions, where contextual administrative practices shape procedural implementation. This results in varying experiences and potential varying outputs and outcomes.

Economic Crisis: Impacts on Civil Registration

The data on registration fees across the examined regions reflect lack of consistency and in some cases create a financial burden that further hinders civil registration processes when attempted either on a personal level by beneficiaries or by organization on behalf of the beneficiary.

The fees fluctuation reflects the broader economic crisis that began in Lebanon in 2019 affecting all sectors. While civil registration processes were governed by administrative frameworks including fees, the data indicates that these fees were directly affected by the crisis. The increase in fees across multiple stages was a result of the lira devaluation by over 90% and the daily fluctuation with the absence of official exchange rate. On the other hand, where the lira devaluation significantly affected the public sector's salaries, it resulted in prolonged strikes disrupting administrative operations and services.

Consequently, the economic crisis crucially affected the Syrian refugees as a highly vulnerable population. Data shows that Lack of financial resources among beneficiaries- as an affected population- imposed a significant barrier towards completing registration of administrative processes.

The organizations responding to the Syrian refugees' crisis were also highly impacted by the crisis. On one hand, the fees' inconsistency affected institutional response capacities, while on the other hand, the donor funding fell short to address the needs in response to the scale of crisis affecting both the refugees and the host communities, in addition to administrative and auditing challenges in adaptation to lira fluctuations and its consequences mainly presented in continuous changing fees of all services and resources.

The economic burden in parallel to the paralysis of operations due to strikes disrupted civil registration, making the legal identity of individuals- including children- a shortcoming consequence of the economic crisis.

While the lira devaluation affected all sectors including food, healthcare, housing, and education, this resulted in further vulnerabilities for both the host community and the refugees. Consequently, the international donor community was incapable of responding to all needs. The majority of the incoming funds were no longer heavily concentrated around the Syrian refugee's crisis, rather being divided among a number of crises resulting in shortage in civil registration funded services. This donor fatigue contributed to the growing pressure already present within civil registration processes for Syrian refugees.

The intersecting barriers presented in Lebanese lira devaluation, public sector strikes in response to salary devaluation, and donor fatigue have generated further challenges and gaps within civil registration attempts. Consequently, this has weakened pathways to legal existence for Syrian refugees.

Chain Effect Coproducing Vulnerabilities:

While civil registration is defined as a set of administrative procedures and documents, its actual value lies in the status it upholds interconnecting a sequence of aftereffects. These aftereffects shape one's living conditions. Consequently, lack of civil registration is not limited to missing documents, where the completion of these procedures is one's "Legal Existence". The foremost consequence resulting from non-registration is the risk of detention, where lack of proof of identity or relevant documents triggers a span of outcomes ranging from administrative barriers to legal threats. This bears a direct connection to freedom of movement, where individuals without legal documents are always at high risk of detention resulting in limiting mobility. The tightened mobility can directly affect their access to various rights and opportunities.

While freedom of movement is the most direct legal threat, lack of civil registration consequences can extend reducing one's opportunity to access basic needs; housing, healthcare, education, and employment.

Access to housing is linked to one legal registration, and the lack of it often pushes one towards informal housing arrangements which might raise the possibility of compromising the legal protection, quality of living, and stability. This would extend to all family members or associated individuals.

Lack of civil registration severely constrains access to formal healthcare systems, where healthcare facilities require legal documents. As a result, individuals lacking proof of registration often resort to either avoiding healthcare services when needed or if urgent, they seek healthcare services outside official systems potentially compromising on safety, quality, and continuity and most tragically overall one's health security.

Civil registration gaps are reflected in barriers within educational systems and institutes, given that access to formal education is conditioned to verified legal documentation. This often leads to disrupted trajectories either in preventing one from enrollment in formal educational programs or a delayed one. The administrative barrier in many instances shapes long term consequences stretching beyond educational outcomes.

Employment pathways are shaped by labor law that governs the relationship between the employer and the employee. The lack of registration reshapes these frameworks, where nonregistered individuals seeking job opportunities most often resort to non-formal procedures settling for degraded wages and work conditions. Moreover, this can limit one's opportunities and stability.

While Syrian refugees' cross borders with hopes of having better futures, most of the refugees come into Lebanon with the intention of seeking asylum in a number of countries through UNHCR and other agencies. The asylum-seeking process is highly affected and disrupted by civil registration or the lack of it. This can affect refugees both as individuals and family members further reinforcing exclusion and loss of migration opportunities.

In aggregate, the effects of lack of civil registration co-produce a chain of interdependent consequences where each barrier engineers the next extending beyond administrative documents and procedures. These barriers are core to expanding layers of vulnerability mostly exposed in social and economic spectrums across multiple stages and dimensions of life.

LIMITATIONS:

The limitations of the study are detected in three main issues;

1

**Qualitative
dominant
design**

2

**Limited
qualitative
sample size**

3

**Crisis
context
effects**

First, the research adopts a qualitative-dominant design, primarily drawing on desk review, key informant interviews (KII's), and focus group discussions (FGD's). While qualitative tools facilitate an in-depth understanding of the examined through lived experiences, it eliminates quantitative measurement of the scope or prevalence of the hypothetical issues. Accordingly, the findings are context-specific with minimal to zero statistical generalizability.

Second, the study examines limited qualitative sample size, presented in 4 key informant interviews (KII's) and one focus group discussion. While restricted by a tight timeline and lack of availability of relevant personnel, the choice of KII's was limited to CLDH personnel impeding alternative perspectives, enforcing potential bias through an organizational internal hyper-focused data collection analysis.

Third, the research while it is an update of a published paper (2023), was still delivered during the long-term consequences of the ongoing economic crisis in parallel to the Israeli war on Lebanon. These factors are assessed to highly impact administrative processes and institutional capacities. The continuously changing environment in the country indicates that findings are conditioned to these changes and might be sensitive to shifts in policy and operations.

RECOMMENDATIONS:

The recommendations below are addressed to relevant government authorities, civil society organizations, and UN agencies and other institutes and initiatives involved in civil registration and refugee protection in Lebanon.

- Develop Crisis-sensitive mechanisms and procedures establishing coordination channels between relevant civil society institutes and governmental bodies to secure civil registration.
- Unify civil registration process and fees across regions through lobbying with MoIM to issue a binding circular with standardized steps, documents, fees, and guidelines to be adopted nationwide.
- Establish committees within civil society institutes and UN agencies that can support Syrian refugees in retrieving their documents in Syria or facilitate obtaining new officially verified replacement documents for individuals who failed in accessing their records.
- Introduce quarterly review process to coalition/s involving UNHCR and civil society institutes where they hold quarterly review of required documents, fees, and procedure and produce a user-friendly document including documents checklist, fees, and step-by-step registration process.
- Introduce independent birth registration mechanisms and procedures decoupled from marriage registration to reduce administrative barriers that might impact a child's access to basic rights.
- Deliver trainings to relevant official personnel and relevant civil society institutes addressing two core topics; 1- Case management of missing documentation and records, and 2- Crisis- sensitive civil registration mechanisms.

Update of Comparative Analysis Study on Civil Registration for Syrian Refugees in Mount Lebanon, Beirut, North Lebanon, and Beqaa

