



**Government Defence
Integrity Index**



2020

Country Brief:

LEBANON



LEBANON

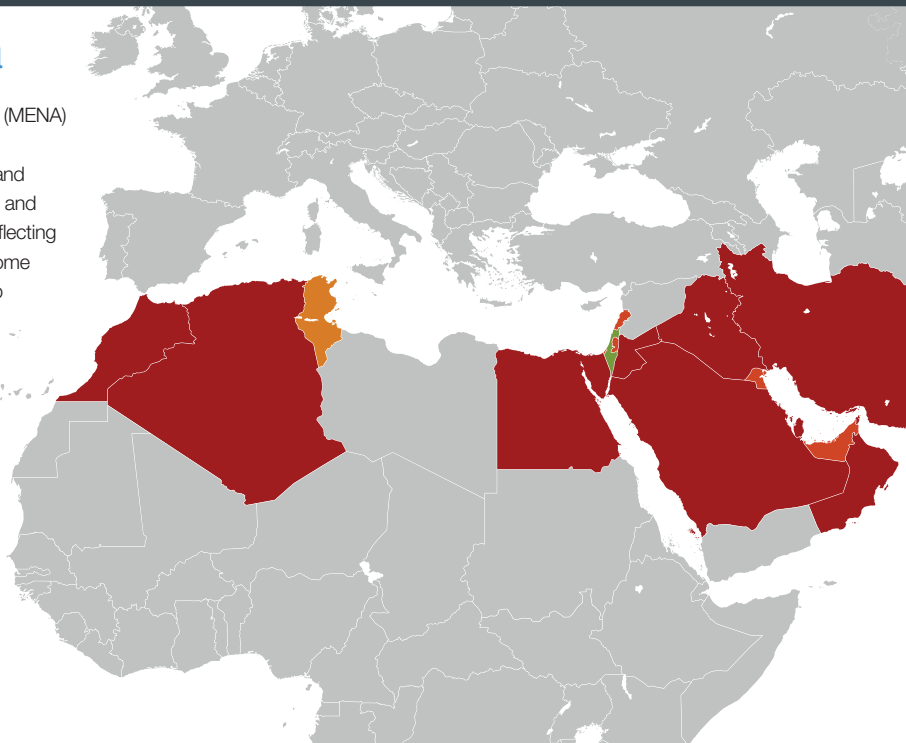
Political deadlock, financial collapse, spiralling poverty, and the COVID-19 pandemic are contributing to one of the most serious political crises in Lebanon's history. The protest movement that began in 2019 calling for the resignation of a political elite viewed as corrupt and unable to resolve structural social and economic issues,¹ has endured and channelled widespread fury towards deadly government incompetence, epitomised by the massive explosion of improperly stored chemicals at the port of Beirut that killed more than 200 people.² Successive cabinet resignations and subsequent failures to resolve political paralysis,³ have accelerated the catastrophic devaluation of the currency and economic collapse.⁴ Moreover, the security ramifications of the crisis are potentially significant.

Protest have turned violent in some major cities⁵ and the rolling blackouts and food shortages are contributing to deep feelings of insecurity.⁶ On top of this, long-standing security challenges posed by the huge number of Syrian refugees in Lebanon, regional instability and its local implications, the growth of armed militias, and the inability to adopt a central and unified defence strategy require sophisticated and coordinated responses that are beyond the current authorities' capacity. As a result, the defence and security forces are heavily engaged throughout the country and, though the military is one of the most respected institutions in the country,⁷ have been affected by corruption scandals that point to significant issues in their governance structures. External oversight, by parliament and audit bodies in particular, is weak and decision-making processes are largely opaque. Poor oversight in the procurement process and a reliance on foreign security assistance represent clear corruption risks, while military operations are also highly vulnerable to corruption-related abuses. On the other hand, defence budgeting has improved, as have integrity and transparency standards within the Armed Forces, although this would further benefit from better implementation of access to information and whistleblowing legislation.

Member of Open Government Partnership	No
UN Convention Against Corruption	Ratified in 2009.
Arms Trade Treaty	Ratified in 2019.

Middle East & North Africa

Defence sectors across the Middle East & North Africa (MENA) region continue to face a high risk of corruption. At the same time, protracted armed conflicts in Syria, Libya, and Yemen persist, while public protests against corruption and authoritarianism continue in a number of countries – reflecting an overall context of insecurity and fragility. Although some governments have publicly committed to stepping up anti-corruption efforts, there remains a gap between existing legislation and implementation in practice. Military institutions in the region are characterised by a high degree of defence exceptionalism, resulting in a lack of transparency that precludes oversight actors from effectively scrutinising defence budgets and policies at a time when defence spending and arms imports continue to surge. These concerns are further compounded by authoritarian governance systems seen in many MENA countries. Resurgent protests and uprisings in the region after the 2011 Arab Spring demonstrate that corruption is a central and persistent public grievance.



¹ Amnesty International, 'Lebanon Protests Explained', 22 September 2020.

² Jonathan Amos and Paul Rincon, 'Beirut Blast was 'Historically' Powerful', *BBC News*, 5 October 2020.

³ Maha El Dahan and Laila Bassam, 'Lebanon Crisis Escalates After Failure to Agree Government', *Reuters*, 22 March 2021.

⁴ Jennifer Holleis, 'Lebanon: Insecurity and Desperation as Crisis Worsens', *Deutsche Welle*, 11 March 2021.

⁵ International Crisis Group, 'Riots in Lebanon's Tripoli are Harbingers of Collapse', 2 February 2021.

⁶ Holleis, 'Lebanon.'

⁷ Timour Azhari, 'Lebanon Protesters Weigh Army's Role Amid Political Crisis', *Al-Jazeera*, 24 October 2019.



LEBANON

Overall scores

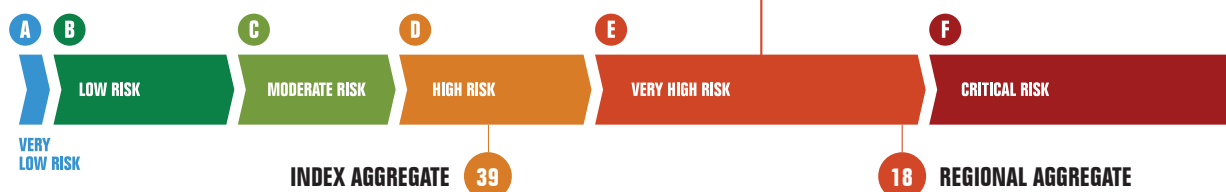
The size of the colour band corresponds to number of countries that fall into that category.

LEBANON SCORE

VERY HIGH RISK

E

30



A > 83-100 VERY LOW

B > 67-82 LOW

C > 50-66 MODERATE

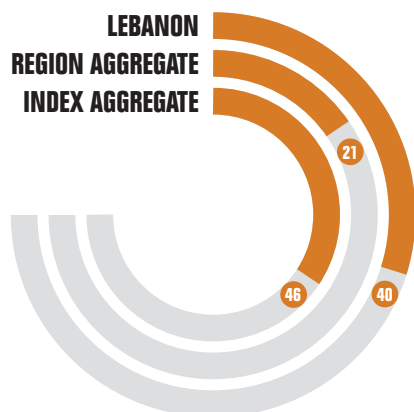
D > 33-49 HIGH

E > 17-32 VERY HIGH

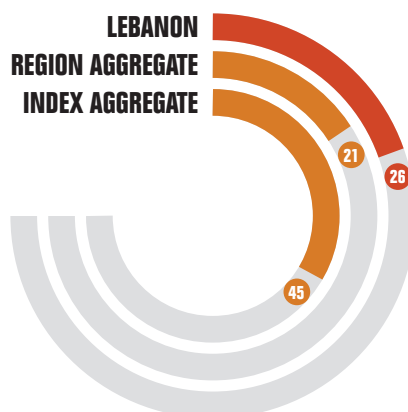
F > 0-16 CRITICAL

Risk Comparison

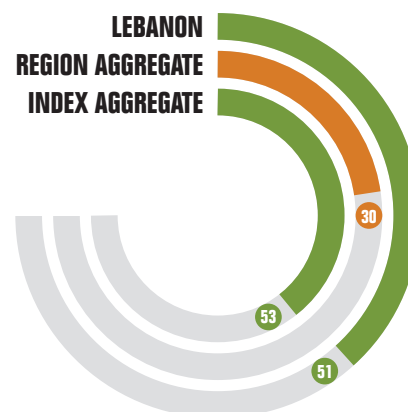
POLITICAL



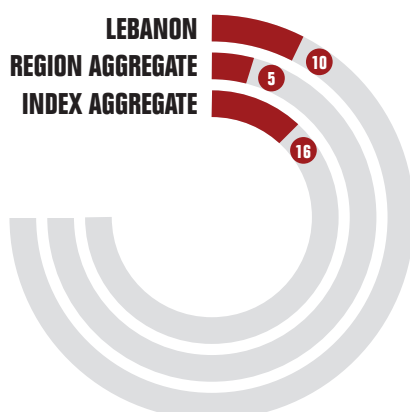
FINANCIAL



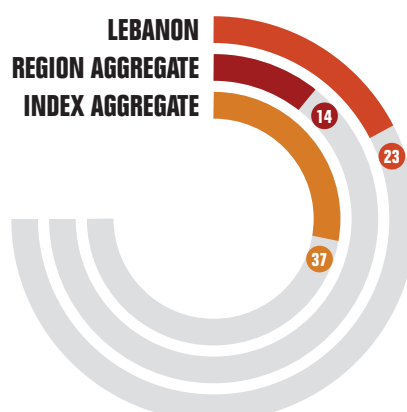
PERSONNEL



OPERATIONAL



PROCUREMENT





LEBANON

Parliamentary Oversight

Legislative oversight of budget (Open Budget Survey, 2019)	18/100
Military expenditure as a share of government spending (SIPRI, 2020)	10.8%
Committee members with defence expertise (%)	30% (5 of 17)
# of meetings/year	Data is not publicly available.
Last review of defence policy/strategy	No such strategy exists.

Lebanon's system of government aims to provide political representation for all religious groups, with the number of parliamentary seats divided between Christians and Muslims.⁸ This power-sharing agreement, designed to stave off religious and sectarian violence, has also given major political players de facto veto powers over executive decisions, resulting in gridlock whenever disagreements between the main blocs arise.⁹ As a result, democratic accountability is seriously weakened as the executive responds more to this power-sharing logic among factions than popular demands. Within this system, parliament has limited powers, as strategically important decisions bypass parliamentary procedures and public consultations and are achieved through direct deals between actors.¹⁰ This is particularly evident in relation to the defence sector, where parliament's role is limited to approving the state budget and passing legislation. Policymaking powers are instead vested with the Presidentially-led Higher Defence Council which is the main decision-making organ for defence.¹¹ The National Defence Committee is limited to issuing non-binding recommendations and amendments and does not scrutinise any performance aspect of the Ministry of Defence. There is no evidence of the committee reviewing defence policies or decisions, nor has it launched any investigations or enquiries. In practice, parliamentarians' main objective is to promote the interests of their sectarian political parties, undermining the development of independent parliamentary oversight of the sector. Further flaws in the oversight architecture exist at the auditing level. The Court of Audit is empowered to scrutinise defence spending and procurement procedures however its formal powers are undermined by operational issues. Understaffing severely undermines productivity,¹² while the Court is financially reliant on the executive, eroding its capacity to act independently. Moreover, there is little evidence that its recommendations are implemented and it suffers from a lack of transparency, failing to publish some reports and refusing requests to access others.¹³

Financial Transparency

Defence-related access to information response rates	(1) % granted full or partial access: Data is not publicly available. (2) # subject to backlog: Data is not publicly available.
Defence-related complaints to ombudsman/commissioner #	Data is not publicly available.
Does the commissioner have authority over the MoD?	Data is not publicly available.
Audit reports on defence (2015-2020) #	None.
Open Budget Index (IBP, 2019)	6/100
World Press Freedom Index (RSF, 2021)	107th out of 180

Lebanon's dysfunctional political system has facilitated a highly opaque form of governance that officials have abused to enrich themselves and their supporters.¹⁴ Some estimates put the amount of money siphoned off through corrupt practices at \$100 billion, facilitated by the weakness of transparency and accountability mechanisms.¹⁵ Defence institutions have also been embroiled in corruption scandals involving senior officials,¹⁶ which were facilitated by the sector's lack of financial transparency. Lebanon did not have a state or defence budget for 13 years between 2005 and 2017. The latest defence budgets have presented figures in a disaggregated manner, but lack justifications for expenditure and do not include information on the government's revenues. Legislative debate and influence over the budget are also weak, and the Defence Committee can only offer comments to the Finance Committee on the budget, severely limiting its power to advocate for changes.¹⁷ Moreover, off-budget military expenditure is frequent, as 80% of state funds go to salaries and personnel costs,¹⁸ rendering Lebanon heavily reliant on foreign assistance to fund expenditures relating to acquisitions. Financial transparency is also hampered by the ineffectiveness of access to information legislation. Lebanon's 2017 Right to Access Information Law¹⁹ is poorly enforced and the Ministry of Defence has great leeway in rejecting or ignoring requests. In fact, even requests to access basic administrative information from the Ministry of Defence or Higher Defence Council frequently go unanswered. Because the National Anti-corruption Commission serves as the appeals body for access to information denials, delays in its establishment have severely undermined the legislation's effectiveness.²⁰

⁸ Cristina Abellan Matamoros, 'How Does Lebanon's Government Work?', *Euronews*, 4 January 2020.

⁹ Bertelsmann Stiftung, *BTI Country Report 2020 – Lebanon*, Gutersloh, Bertelsmann Stiftung, p. 11.

¹⁰ Bertelsmann Stiftung, *Lebanon*, p. 13.

¹¹ Government of Lebanon, 'National Defence Law, legislative Decree No. 102', Articles 7 and 8, 16 September 1983.

¹² Hanan Wehbe, 'Court of Audit ... the problem is "deeper" than vacancy in its staff,' *Al Modon*, 23 June 2015.

¹³ Mohammad Al Moghabat, 'The Right to Access Information: A study on the Lebanese Government's commitment to the Right to Access Information Law (No. 2017/28),' *Gherbal Initiative*, August 2018.

¹⁴ Patricia Karam, 'Can Lebanon Rebuild Not Just Beirut, but its Broken Political System?', *World Politics Review*, 28 August 2020.

¹⁵ The Washington Post, 'The Lights Go out on Lebanon's Economy as Financial Collapse Accelerates', 19 July 2020.

¹⁶ Timour Azhari, 'Lebanon Ex-Army Boss, Intelligence Heads Charged with Corruption', *Al Jazeera*, 2 December 2020.

¹⁷ Parliament of Lebanon, 'Parliament Rules of Procedure', Article 43, 18 October 1990 (In Arabic).

¹⁸ Aram Nerguizian, 'The Lebanese Armed Forces: Challenges and Opportunities in Post-Syria Lebanon,' *Centre for Strategic and International Studies*, 10 February 2009.

¹⁹ Government of Lebanon, 'Right to Access Information Law, No. 28', 10 February 2017.

²⁰ Julien Courson, 'Brief Practical Manual On The Right of Access to Information In the Lebanese Oil & Gas Sector,' *Lebanese Oil and Gas Initiative*, March 2018.



LEBANON

Personnel Ethics Framework

Whistleblowing legislation	Law on Protecting Whistleblowers (2018)
# defence-sector whistleblower cases	Data is not publicly available.
# Code of conduct violations	Military: Data is not publicly available.
	Civilian: No such code exists.
Financial disclosure system	# submitted: Data is not publicly available.
	# of violations: Data is not publicly available.

The Armed Forces are perceived as being the least corrupt government institution and have taken steps to increase transparency and integrity in their personnel management systems, though further work remains to be done. A new code of conduct, focussing on human rights, has been implemented for all military personnel and is heavily focussed on integrity and transparency, with explicit reference to corruption-related issues.²¹ Though the code is widely disseminated within the military, it is not publicly available, making assessing its enforcement impossible, although sources have pointed to the Armed Forces' strict enforcement of penalties for rule violations. Moreover, bribery and corruption are defined offences in the Code of Military Justice and there are clear sanctions in place to punish wrongdoing, extending to dishonourable discharge.²² However, despite the new code promoting whistleblowing,²³ existing protections are weak. The implementation of the 2018 whistleblowing law has been undermined by the delay in forming the National Anti-corruption Commission, which is designated to receive whistleblowing reports. The Commission was only established in 2020, eleven years after it was proposed.²⁴ Moreover, within the defence sector, the practice has not been fully embraced and there is a general lack of faith amongst personnel that the necessary protections would be provided to whistleblowers. Finally, formal recruitment and promotion systems are undermined by political and sectarian considerations, which threaten meritocratic principles. The balancing act between different groups at upper levels of the military limits promotions and ensures that such positions are highly political and vulnerable to nepotism and patronage considerations.²⁵

Operations

Total armed forces personnel (World Bank, 2018)	80,000
Troops deployed on operations #	Data is not publicly available.

Though the Lebanese Armed Forces do not conduct regular military deployments, military personnel are actively engaged in smaller-scale operations on Lebanese territory, especially in the border area with Syria.²⁶ However, critical corruption vulnerabilities in the governance structures for operations seriously threaten mission objectives. Despite being aware of corruption as a strategic issue, the Armed Forces do not have a clear doctrine that identifies corruption as such. This strategic oversight means that anti-corruption is also not included in the forward planning for operations, nor are corruption-related training programmes available for all commanders. Some programmes have been delivered by civil society groups and the Directorate for Human Rights Law, yet such courses are not systematic and only involve a fraction of the military's personnel.²⁷ Furthermore, there is no policy of monitoring corruption in the field and no evidence that strategies are in place to identify and address corruption risks in the field.

²¹ UNSCOL, 'Lebanese Army Launches Code of Conduct on human Rights', 29 January 2019.

²² Transparency International Defence and Security, 'GDI Country Overview: Lebanon', 2019, p. 3.

²³ Government of Lebanon, 'Law No. 83 of 2018 on Protecting Whistleblowers', *Official Gazette*, vol. 45, 10 October 2018.

²⁴ Mohammad Almoghabat, 'Lebanon: Systemic Corruption Problems Require a Systemic Response', *Transparency International*, 28 January 2021.

²⁵ Al Joumhouriyah, 'This is the reason for postponing the military appointments', 22 March 2019 (In Arabic).

²⁶ See for instance, Middle-East Online, 'Lebanon Gets Tougher on Smuggling into Syria', 15 May 2020, <https://middle-east-online.com/en/lebanon-gets-tougher-smuggling-syria>

²⁷ See for instance, Terez Mansour, 'Workshop about Anti-Corruption,' *Army Magazine* Issue 393, March 2018, <https://bit.ly/2GXNDBo>. (In Arabic)



LEBANON

Defence Procurement

Military expenditure (US\$ mil) (SIPRI, 2020)	1,036
Open competition in defence procurement (%)	Data is not publicly available.
Main defence exports (to – SIPRI, 2016-20)	N/A
Main defence imports (from – SIPRI, 2016-20)	United States, Brazil, France, Italy, Canada

Lebanon's dire economic situation²⁸ has restricted investment in military hardware. Notwithstanding, military expenditure has consistently represented a significant share of government spending, with the latest figures from 2019 putting it at 10.8% of total expenditure.²⁹ Moreover, even during the current crisis, Lebanon has continued to procure hardware from partners like the United States.³⁰ Yet, procurement oversight and management processes are highly vulnerable to corruption and risk leading to the loss of scarce public funds. Procurement planning is undermined by the absence of a clearly defined defence strategy, despite progress in formalising the acquisition planning process, through the creation of Capacity Development Plans (CDPs). Nevertheless, the process remains non-transparent and external oversight is superficial, as the Defence Committee does not have full access to the documents. Moreover, Lebanon's reliance on military assistance programmes make it inherently

vulnerable to outside influence. Almost 80% of the Armed Forces' equipment comes from the United States.³¹ Nevertheless, the Armed Forces have, occasionally, shown a willingness to push back on donor suggestions that veer away from requirements outlined in the CDPs. Aside from this, further issues exist in relation to oversight and transparency. Public procurement legislation requires a public tender for all goods above \$353, however, the defence sector is exempt and subject to special procedures³² that allow military goods and services to be single-sourced.³³ In addition, a new Public Procurement Law was adopted in 2021 that exempts defence and security related contracts from the general provisions of procurement planning and announcing the contracts awards. It also allows for consensual contracts when procuring supplies, services and public works if the public safety, defence and security requires secrecy without providing any criteria to identify the latter.³⁴ Open competition is further restricted by the requirement for contractors to be registered by the Armed Forces to be allowed to bid, restricting such opportunities to a small number of connected companies.³⁵ Moreover, this legislation lacks detail on the implementation phase of the procurement cycle and provides for no external oversight of the process.³⁶ Oversight powers are entirely vested in the General Directorate of Administration, which is part of the Armed Forces chain of command, raising questions as to its independence.

²⁸ France 24, 'Freefalling Lebanon Currency Hits New Low', 16 March 2021.

²⁹ SIPRI, 'Military Expenditure as Percentage of Government Spending, 1988-2019,.

³⁰ Nicholas Blanford, 'Weapons or Food? Lebanon's Armed Forces Risk Going Hungry', *Atlantic Council*, 23 March 2021.

³¹ United States Embassy in Lebanon, 'Fact Sheet: US-Lebanon Military Assistance and Defense Cooperation', 13 February 2019.

³² Government of Lebanon, 'Decree no 11574 & 11573, General Administrative Conditions for the Undertakings Works for the Army', 30 December 1968 (in Arabic).

³³ UNDP Regional Bureau for Arab States, *Review of the Public Procurement Legal Framework in Lebanon: Possibilities for Incorporating Environmental and Social Sustainability Criteria*, 2013.

³⁴ Government of Lebanon, *Draft Public Procurement Law*, Articles 11(1), 26(2) and 46(4).

³⁵ Executive Magazine, 'The LAF budget – closed ranks,' 3 July 2012.

³⁶ Government of Lebanon, 'Decree no 11573.'

Version 1.0, October 2021

GDI data collection for **Lebanon** was conducted July 2018 to September 2019. The narrative discussion in this GDI brief was produced at a later time with the most recent information available for the country, which may not be reflected in the GDI country assessments or scores.



LEBANON 2020 GDI Scorecard

Grade Score

Political Risk		D	40
Q1	Legislative Scrutiny	E	17
Q2	Defence Committee	E	20
Q3	Defence Policy Debate	F	0
Q4	CSO Engagement	C	58
Q5	Conventions: UNCAC / OECD	C	63
Q6	Public Debate	D	38
Q7	Anticorruption Policy	C	50
Q8	Compliance and Ethics Units	D	42
Q9	Public Trust in Institutions	NS	
Q10	Risk Assessments	F	0
Q11	Acquisition Planning	D	33
Q12	Budget Transparency & Detail	C	63
Q13	Budget Scrutiny	E	25
Q14	Budget Availability	C	58
Q15	Defence Income	E	25
Q16	Internal Audit	C	50
Q17	External Audit	E	31
Q18	Natural Resources	B	67
Q19	Organised Crime Links	B	75
Q20	Organised Crime Policing	C	50
Q21	Intelligence Services Oversight	F	0
Q22	Intelligence Services Recruitment	C	50
Q23	Export Controls (ATT)	A	100
Q76	Lobbying	F	0

Financial Risk E 26

Q24	Asset Disposal Controls	F	0
Q25	Asset Disposal Scrutiny	F	0
Q26	Secret Spending	A	100
Q27	Legislative Access to Information	E	25
Q28	Secret Program Auditing	F	0
Q29	Off-budget Spending	F	0
Q30	Access to Information	E	25
Q31	Beneficial Ownership	C	50
Q32	Military-Owned Business Scrutiny	E	25
Q33	Unauthorised Private Enterprise	C	50
Q77	Defence Spending	F	13

Personnel Risk C 51

Q34	Public Commitment to Integrity	C	50
Q35	Disciplinary Measures for Personnel	C	50
Q36	Whistleblowing	D	33
Q37	High-risk Positions	D	33
Q38	Numbers of Personnel	D	33
Q39	Pay Rates and Allowances	A	100
Q40	Payment System	A	92
Q41	Objective Appointments	D	33
Q42	Objective Promotions	C	50
Q43	Bribery to Avoid Conscription	NA	
Q44	Bribery for Preferred Postings	B	67
Q45	Chains of Command and Payment	C	50
Q46	Military Code of Conduct	C	50

OVERALL COUNTRY SCORE

VERY HIGH RISK

30

RISK GRADE

A • 83-100 **VERY LOW**

B • 67-82 **LOW**

C • 50-66 **MODERATE**

D • 33-49 **HIGH**

E • 17-32 **VERY HIGH**

F • 0-16 **CRITICAL**



Grade Score

Personnel Risk		C	51
Q47	Civilian Code of Conduct	F	0
Q48	Anticorruption Training	D	42
Q49	Corruption Prosecutions	B	67
Q50	Facilitation Payments	B	67

Operational Risk		F	10
Q51	Military Doctrine	E	25
Q52	Operational Training	E	25
Q53	Forward Planning	F	0
Q54	Corruption Monitoring in Operations	F	0
Q55	Controls in Contracting	F	0
Q56	Private Military Contractors	NS	

Procurement Risk		E	23
Q57	Procurement Legislation	F	0
Q58	Procurement Cycle	D	42
Q59	Procurement Oversight Mechanisms	E	25
Q60	Potential Purchases Disclosed	D	38
Q61	Actual Purchases Disclosed	F	0
Q62	Business Compliance Standards	C	50
Q63	Procurement Requirements	B	75
Q64	Competition in Procurement	NEI	
Q65	Tender Board Controls	D	38
Q66	Anti-Collusion Controls	E	17
Q67	Contract Award / Delivery	F	6
Q68	Complaint Mechanisms	NEI	
Q69	Supplier Sanctions	D	33
Q70	Offset Contracts	F	0
Q71	Offset Contract Monitoring	F	0
Q72	Offset Competition	F	0
Q73	Agents and Intermediaries	NEI	
Q74	Financing Packages	E	25
Q75	Political Pressure in Acquisitions	NS	

KEY

NEI Not enough information to score indicator
NS Indicator is not scored for any country
NA Not applicable



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& Development Office



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Netherlands