

## INTRODUCTION

Although Lebanon was by no means immune to the winds of the Arab Spring, the response there was certainly not as dramatic. Some observers have attributed this to the sectarian nature of the governmental system, as well as the ongoing strife in that country coming from actors outside its borders, particularly Syria. Under the Lebanese constitution, the parliament must feature equal representation between Christians and Muslims, proportional representation among the confessional groups within each religious group, and proportional geographic distribution. There has been some protest against the sectarian political system, but the schisms this system has sown have made organizing any kind of unified protest activity less likely.<sup>138</sup> As NDI has described it, “Unique among Arab countries, Lebanon’s political system is characterized by a sectarian power-sharing formula that concentrates power in the hands of a small number of political and religious leaders, resulting in a weak federal government that struggles to take even the most basic actions.”<sup>139</sup>

Originally, parliamentary elections were due to be held in June 2013, when members’ four-year terms expired. However, in May of that year, the parliament voted to delay the election until November 2014 because of the political deadlock in the country and complications stemming from the civil war in neighboring Syria.<sup>140</sup> Even as some civil society organizations and elected officials continued to debate and push for reforms to the electoral law,<sup>141</sup> in early November 2014, the parliament again overwhelmingly voted to postpone the election as a result of ongoing instability.<sup>142</sup> According to the Ministry of Interior and Municipalities (MOIM), the term of the parliament is now extended to 2017.<sup>143</sup>

In the past, Lebanon held regular multi-party elections, except during its own civil war period from 1975 to 1990. Turnout in the 2009 parliamentary election was about 54 percent of registered voters, and about two-thirds of the voting age population was registered.<sup>144</sup> The most recent registration update was conducted in February and March 2014.<sup>145</sup>

138 See Somdeep Sen, “Lebanon: The ‘Lee-Side’ of the Arab Spring,” *Open Democracy*, November 15, 2011, <http://www.opendemocracy.net/somdeep-sen/lebanon-lee-side-of-arab-spring>.

139 “Lebanon,” National Democratic Institute, accessed May 8, 2015, <https://www.ndi.org/lebanon>.

140 “Lebanon’s Deadlocked Parliament Postpones June Election,” *Reuters*, May 31, 2013, <http://www.reuters.com/article/2013/05/31/us-lebanon-parliament-election-idUSBRE94U0N420130531>.

141 See Civil Campaign for Electoral Reform (CCER), <http://www.ccerlebanon.org>.

142 Hugh Naylor, “Lebanese Lawmakers Delay Elections, Sparking Dismay, Anger Among Voters,” *The Washington Post*, November 5, 2014, [http://www.washingtonpost.com/world/middle\\_east/lebanese-election-delay-sparks-dismay-anger-among-voters/2014/11/05/8bf1a5e0-8dc5-435e-bc89-ec8024861da4\\_story.html](http://www.washingtonpost.com/world/middle_east/lebanese-election-delay-sparks-dismay-anger-among-voters/2014/11/05/8bf1a5e0-8dc5-435e-bc89-ec8024861da4_story.html).

143 “قانون التمديد للمجلس النيابي كما صدر اليوم في الجريدة الرسمية” Ministry of the Interior and Municipalities, November 11, 2014, <http://www.elections.gov.lb/news/التمديد-للمجلس-النيابي-كما-صدر-اليوم-في-الجريدة-الرسمية.aspx>.

144 See “Global Database on Elections and Democracy,” International IDEA, May 18, 2015, accessed May 8, 2015, <http://www.idea.int/uid/countryview.cfm?id=128#Voter Turnout>.

145 “جهوز القوائم الانتخابية الاولى ودعوة الناخبين المقيمين وغير المقيمين الى الاطلاع عليها” Ministry of the Interior and Municipalities, accessed May 8, 2015, <http://www.elections.gov.lb/news/الجهوز-القوائم-الانتخابية-الاولية-ودعوة-الناخبين-الم-الى-الاطلاع-عليها.aspx>.

## INTERNATIONAL AND REGIONAL AGREEMENTS

Lebanon has signed on to all of the major agreements relevant to voting and elections. These include the International Covenant on Civil and Political Rights (ICCPR), the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), and the Convention on the Political Rights of Women. Lebanon is also a party member to the Arab Charter for Human Rights.

## LEGAL FRAMEWORK

Two provisions of the Lebanese Constitution apply to voter registration:

**Article 7:** All Lebanese are equal before the law. They equally enjoy civil and political rights and equally are bound by public obligations and duties without any distinction.

**Article 21:** Every Lebanese citizen who has completed his twenty-first year is an elector provided he fulfills the conditions laid down in the electoral law.

The main law governing elections in general, and voter registration in particular, is Law No. 25, passed in 2008. In addition to not allowing anyone under the age of 21 to vote (the more usual age globally is 18), the Lebanese election law excludes from registration and voting a great number of groups of citizens, including persons convicted of various transgressions. These include “burglary, fraud, issuing of uncovered checks, breach of trust, misappropriation of funds, bribery, perjury, rape, intimidation, falsification, forgery, false testimony, immoral crimes as stated in the seventh chapter of the penal code, and crimes related to the planting, production and/or trade in illicit drugs.” It also includes persons who are bankrupt.

In a rather unusual provision, under Article 5, “Naturalized Lebanese individuals may not vote before ten years after the naturalization decree is issued.” It is more common internationally for naturalized citizens to become eligible to register and vote immediately upon naturalization, and as will be discussed below, this is contemplated by international treaties to which Lebanon is a party. In another unusual twist, the provision relating to naturalized citizens does not apply to a noncitizen woman who attains Lebanese citizenship through marriage. The law is silent with respect to a foreign man who marries a Lebanese woman.

Also excluded from voting are military personnel, including members of the army, Internal Security Forces, Public Security, State Security, and Customs Police. This could potentially amount to a great number of citizens as the Lebanese Armed forces is estimated at 72,000 members and the security forces alone at 30,000.<sup>146</sup>

The 2008 law creates a commission called the Supervisory Commission on the Electoral Campaign, comprised of Lebanese citizens from various professional backgrounds—such as the media and bar associations—but overseen by the MOIM. This commission does not oversee or implement the voter

<sup>146</sup> *Thematic Information Report: Sectarian Violence in Lebanon*, Australian Government Department of Foreign Policy and Trade, December 18, 2013, 14-15, <http://www.immi-gv-au.net/media/publications/pdf/dfat-tir-lebanon.pdf>.

registration process, but rather primarily media issues and campaign financing.<sup>147</sup> Indeed, under the law the MOIM is responsible for implementing registration and elections, with the Directorate General of Political Affairs and Refugees responsible for operational and logistical preparations.

Voter registration is mandatory, but the system is passive—the government maintains the list, updating it periodically, though citizens are responsible for checking that their information is accurate. The Directorate General compiles and updates the registration list according to personal status records. According to analysis by Democracy Reporting International (DRI), “Administrative changes to people’s status are countersigned by *mukhtars* [elected village council leaders] on the basis of certificates issued by doctors (relating to death and birth) or religious authorities (marriage).”<sup>148</sup> The heads of regional MOIM offices supply information about changes to citizens’ eligibility status to the Directorate General, as do the police and the courts. A voter cannot make a voluntary change within a year of the revision of the list, except, unusually, for a woman whose status changed due to a marriage.

Under the law, the Directorate General must disseminate the registration lists to various public places in the country for voters to check for accuracy by February 10, and publish it on the Internet. Copies of the list are also available for a fee. It is during this period that voters can submit changes or corrections until March 10. It is also possible during this period to ask the registration committee<sup>149</sup> to add or delete the name of another voter from the rolls. The criteria for doing so, such as any evidentiary requirements or notice to the voter, are not explained in the law. Voters rolls are closed as of March 30 for the entire following year.

Registration committees are tasked with much of the initial decision-making, but they too are under the auspices and primarily appointed by the MOIM. Voters can file complaints with the registration committee, and appeals of their decisions can be made to the Higher Registration Committee.<sup>150</sup> There is no further legal recourse, and the law does not specify the procedures by which the Higher Registration Committee is to make its determinations.<sup>151</sup>

## 2009 ELECTION

The MOIM was responsible for preparing the voters list, training poll workers, creating elections materials, organizing the polling stations and coordinating security.<sup>152</sup> Although international law indicates that an independent election management body is preferable to executive branch control,

147 *Lebanon: Assessment of the Election Framework, Election Law of 2008*, Democracy Reporting International, 2008, 25, [http://democracy-reporting.org/files/assessment\\_lebanon.pdf](http://democracy-reporting.org/files/assessment_lebanon.pdf).

148 Democracy Reporting International, *Lebanon: Assessment*, 27.

149 Democracy Reporting International, *Lebanon: Assessment*, endnote 41. According to DRI, “Registration Committees are composed of a judge as chairperson, a member of a municipal council in the electoral district and an employee of the Personal Status Directorate as rapporteur. The number and composition of the registration committees is fixed by decree.”

150 Democracy Reporting International, *Lebanon: Assessment*, endnote 42. “Higher Registration Committees are composed of the President of an Appeal Chamber in the Muhafazat as chairperson, a judge and an inspector from the Central Inspection Bureau as members, assisted by a rapporteur from the Personal Status Directorate of the MoI.”

151 Democracy Reporting International, *Lebanon: Assessment*, 28.

152 *Final Report on the Lebanese Parliamentary Election*, National Democratic Institute, 2009, <https://www.ndi.org/node/16115>, 17.

Interlocutors from across the political and confessional divide repeatedly commended the consistent neutrality and commitment shown by the person of the Minister of the Interior and Municipalities and recognised the extent to which these elections were, in effect, impartially administered. The Ministry thus retained the confidence of the public and contending parties alike, in terms of its impartiality and its ability to administer the elections in an organised manner. Nonetheless, it is not possible to assume that this degree of neutrality could necessarily be upheld in future electoral processes in the current institutional set up, as the Minister himself has acknowledged and it therefore remains crucial that an independent election administration body be established.<sup>153</sup>

There have been questions about the MOIM's neutrality in the past,<sup>154</sup> and reformers in the country have strongly advocated for an independent, impartial commission, possibly building on the Supervisory Commission on the Electoral Campaign.<sup>155</sup>

For the 2009 election, the update of the voters roll began on December 5, 2008 with the registration committees submitting to the Directorate General of Personal Status the names of eligible voters, including those attaining the right to vote for the first time since the last update. Significantly, as in past elections, citizens registered to vote in their ancestral villages, not where they resided.<sup>156</sup> Registration is conducted this way to maintain the confessional electoral system, but it also means voters often have to travel far distances to vote.<sup>157</sup> In fact, there were concerns that traffic problems due to the volume of travelers would deter some citizens from even trying to get to their home polling place. Candidates and campaigns even resorted to arranging carpools to try to get their supporters out to vote.<sup>158</sup> Indeed, Lebanese election reformers have expressed concern that this practice has facilitated manipulation of the vote by political parties and candidates, also jeopardizing the secrecy of the vote.<sup>159</sup> It is also problematic in that it distorts the distribution of voters geographically, impacting the equality of electoral districts.<sup>160</sup>

Married women were required to register in their husband's ancestral village, not their own nor where they actually lived.<sup>161</sup> In this regard, it is also notable that women who marry foreign men cannot transfer citizenship to their husbands or children, meaning they will never be able to register to vote.<sup>162</sup>

153 *Final Report on the 7 June 2009 Parliamentary Elections*, European Union Election Observation Mission to Lebanon, 2009, 11.

154 Democracy Reporting International, *Lebanon: Assessment*, 25.

155 See *Booklet of Reforms*, Civil Campaign for Electoral Reform, accessed May 8, 2015, <http://www.ccerlebanon.org/Modules/Resources/Resources/UploadsAr/%202013%20الانتخابات%20الجملة%20تقترحها%20النبي%20الإصلاحات.pdf>.

156 This is not in the law, but is rather a longstanding administrative practice. See Democracy Reporting International, *Lebanon: Assessment*, 38.

157 European Union, *Final Report*, 14.

158 "Heavy Traffic May Keep Voters from the Polls," *NOW*, June 3, 2009, [https://now.mmedia.me/lb/en/reportsfeatures/heavy\\_traffic\\_may\\_keep\\_voters\\_from\\_polls](https://now.mmedia.me/lb/en/reportsfeatures/heavy_traffic_may_keep_voters_from_polls).

159 *Report on the 2009 Election*, Lebanese Association for Democratic Elections, 2009, 20, <http://www.lade.org.lb/getattachment/a4c92bf4-84be-42fe-bb90-57bc8c8a4a40/2009-تقرير-مراقبة-الانتخابات-النيابية.aspx>.

160 Democracy Reporting International, *Lebanon: Assessment*, 27. One scholar has observed that the Ministry of Interior clusters districts to achieve certain political ends. For example, the districting of Muslim-majority areas in Beirut, Mount Lebanon, Zahle in the Beqaa, Marjeyoun in the South, and Bsharre in the North has a decisive influence on the outcome of the Christian polls. Arda Arsenian Ekmekji, *Confessionalism and Electoral Reform in Lebanon*, The Aspen Institute, 2012, 2.

161 National Democratic Institute, *Final Report*, 17.

162 Doreen Khoury, "Women's Political Participation in Lebanon," Heinrich Böll Foundation, July 25, 2013, <https://www.boell.de/en/2013/07/25/womens-political-participation-lebanon>.

Only registration location changes made before December 7, 2007 were included in the update.<sup>163</sup> In keeping with the law, the lists were distributed for public inspection from February 10 to March 10. For the first time, the list was published on the Internet. The MOIM took a number of steps to educate the public about the need to check that the information on the lists was accurate, including sending 250,000 fliers, 2 million emails, and one million text messages. They also aired television and radio ads and held public forums. The rolls were completed and closed on March 30, also in accordance with the law.<sup>164</sup> International observers found that the MOIM performed election preparations in a transparent manner.<sup>165</sup> Data showed that at the end of the registration period, there were approximately 3,258,000 eligible voters on the list. This was an 8.5 percent increase from the 2005 election.<sup>166</sup> However, because the list is compiled by the Directorate General of Personal Status based on its records, there is some question as to whether it is fully up-to-date regarding citizens who have migrated or joined the military.<sup>167</sup>

### *Documentation*

Under the new law, the 2009 election was the first to require a national identification card or passport at the polls instead of voter cards disseminated by the MOIM. Because there were concerns about voters having the necessary identification, international organizations assisted in the issuance of additional national ID cards ahead of the election, among other tasks. The ID cost 5,000 LBP to obtain, or approximately US\$3. It was estimated that 600,000 to 700,000 Lebanese citizens did not have the requisite documentation. As with the registration process, the MOIM took a number of steps to educate the population about the need for the ID card and how to obtain it. The initial application deadline of February 29 was extended several times when it became clear that not everyone had what he or she needed to vote. There were a number of administrative problems, especially in the fingerprinting process.<sup>168</sup>

More troubling, however, were allegations that the process for dissemination of the cards was politicized. According to NDI,

NDI observers were told that *mukhtars* were intimidated by political parties, or were political themselves. There were cases of *mukhtars* or municipalities that were known to be affiliated with a particular party or to be corrupt and likely to take bribes. Furthermore, observers heard instances of “flying *mukhtars*,” *mukhtars* who were flown abroad at the behest of political parties to facilitate the processing of national ID cards for eligible voters abroad. The MOIM cancelled approximately 600 applications for the national ID card of voters in Zghorta because voters’ fingerprints were obtained abroad. . . .

Parties themselves also sometimes played a significant role in voters’ access to ID cards. In Chouf, for example, parties not only provided the application documents, but used their political connections to expedite the application and approval process ensuring that their voters received ID cards in time for election day and helping resolve any problems that would cause a delay,

163 European Union, *Final Report*, 14.

164 National Democratic Institute, *Final Report*, 21.

165 European Union, *Final Report*, 12.

166 National Democratic Institute, *Final Report*, 21.

167 European Union, *Final Report*, 15.

168 National Democratic Institute, *Final Report*, 22.

such as illegible fingerprints. A wide range of parties facilitated home delivery of ID cards. For example, NDI was informed by a credible source that Hezbollah carried out door-to-door visits in Baalbeck to assist voters with the application for the national ID. NDI observers were informed that a candidate's campaign was confiscating voters' ID cards, making a payment of \$200 for receipt of the card. On election day members of the party would return the ID to voters with a prepared ballot including the names on their list, and make a second payment of \$100 to the voters once they cast the ballot. Reports from domestic observers echoed this observation.<sup>169</sup>

On election day, not all eligible voters had the required identity card, in part due to the problems with fingerprinting. It is likely that a number of Lebanese citizens were disenfranchised as a result.<sup>170</sup>

## ISSUES UNDER INTERNATIONAL LAW

### *MOIM Authority over Elections*

General Comment 25 of the ICCPR specifically states in paragraph 20 that, "An independent electoral authority should be established to supervise the electoral process and to ensure that it is conducted fairly, impartially and in accordance with established laws which are compatible with the Covenant." Lebanon's elections have been run primarily by the government through the Ministry of Interior. Although the MOIM is considered to have done an effective job in 2009, its neutrality has been questioned in the past and it is unlikely its fairness will not face skepticism in the future. Generally, elections run by the persons in power with an interest in the outcome are not in keeping with international obligations.

### *Documentation*

The inability of thousands of Lebanese to obtain the documentation required to vote, and the political manipulation of distribution of national identification cards, are highly problematic under international law. Identification requirements that are difficult or impossible for some citizens to meet may violate international norms.

The UN Human Rights Committee's General Comment 25, explaining obligations under ICCPR Article 25, establishes that, "The right to vote may be subject only to reasonable restrictions, such as setting a minimum age limit for the right to vote. It is unreasonable to restrict the right to vote on the ground of physical disability or to impose literacy, educational or property requirements." Even more pertinent, the General Comment also says,

States must take effective measures to ensure that all persons entitled to vote are able to exercise that right. Where registration of voters is required, it should be facilitated and obstacles to such registration should not be imposed. Onerous documentation requirements can be found to be discriminatory, unreasonable and/or an obstacle to registration and thus in contradiction to Article 24 of the ICPPR, especially when such hardship falls particularly on certain groups of voters such as ethnic minorities, the poor or women.

<sup>169</sup> National Democratic Institute, *Final Report*, 23.

<sup>170</sup> European Union, *Final Report*, 15.

Further, NDI guidelines state,

The legal framework must address a myriad of issues to ensure a genuine opportunity to exercise the right to vote on the basis of equal and universal suffrage... The provisions must ensure, among other things, that: ...voter identification and related procedures that are nondiscriminatory concerning race, color, religion, language, national origin, other status or political or other opinion, that prevent disenfranchisement of eligible voters and avert illegal voting.<sup>171</sup>

If Lebanon is to meet its international obligations, the technical problems that prevented some citizens from obtaining identification, and partisan politics that may have manipulated who was able to get necessary cards, require urgent attention going forward should Lebanon maintain the existing requirements.

### Exclusions

Although it is not unheard of, it is also very unusual for the age of registration eligibility to be 21. The international norm is for the age of eligibility to be 18.<sup>172</sup> Active efforts to reduce the voting age have not met with success. Once again, sectarian interests under the confessional system seem to have blocked any progress. As the *Daily Star* reported, “Analysts estimate that lowering the voting age would add more than 50,000 Christians to the electorate, mainly Maronites, and about 175,000 Muslims, roughly equally split between Shiites and Sunnis.”<sup>173</sup>

If the voting age is...	21	18	% increase in registered voters
<b>Muslim</b>	<b>1,941,031</b>	<b>2,115,726</b>	<b>9</b>
Sunni	875,930	953,206	8.82
Shia	855,663	938,583	9.69
Druze	183,068	194,986	6.51
Alawite	26,370	28,951	9.79
<b>Christian</b>	<b>1,289,407</b>	<b>1,347,667</b>	<b>4.52</b>
Maronites	703,912	738,886	4.97
Orthodox	246,811	257,584	4.36
Catholic	163,235	170,329	4.35
Armenian Orthodox	98,849	96,478	2.8

Source: Rabih Haber

From [https://now.mmedia.me/lb/en/reportsfeatures/with\\_lower\\_age\\_how\\_many\\_new\\_voters](https://now.mmedia.me/lb/en/reportsfeatures/with_lower_age_how_many_new_voters)

171 *Promoting Legal Frameworks for Democratic Elections*, National Democratic Institute, 2008, <https://www.ndi.org/node/14905>, 50.

172 See “What Is the Legal Voting Age in the National Elections?” The ACE Project, accessed May 8, 2015, <http://aceproject.org/epic-en/CDMap?question=VR>.

173 “Parliament Fails to Lower Voting Age,” *The Daily Star*, February 23, 2010, <http://www.dailystar.com.lb/News/Lebanon-News/2010/Feb-23/55868-parliament-fails-to-lower-voting-age.ashx>.

Under Lebanese law, naturalized citizens must wait ten years to be eligible to vote. This runs contrary to Article 25 of the ICCPR as General Comment 25, paragraph 3 states, “Distinctions between those who are entitled to citizenship by birth and those who acquire it by naturalization may raise questions of compatibility with article 25.” Moreover, the ICCPR says, “any conditions which apply to the exercise of the rights protected by Article 25 should be based on objective and reasonable criteria.” It is difficult to surmise the justification for a ten-year waiting period after naturalization, making its reasonableness questionable.

Moreover, a great many groups of citizens are excluded from the franchise, more than in many countries. The Lebanese government should consider making the vote accessible to a broader range of the population to comply with international obligations. This especially applies to those who have been convicted of minor offenses and those who have been bankrupt. General Comment 25 establishes that the right to vote can only be limited by reasonable restrictions, based on objective and reasonable criteria, and specifically says, “If conviction for an offence is a basis for suspending the right to vote, the period of such suspension should be proportionate to the offence and the sentence.” The policy of excluding members of the military and police from eligibility is also increasingly considered in contradiction to Article 25’s mandate for universal suffrage and good international practice.<sup>174</sup>

### *Registering in “Ancestral Village” Rather Than Residence*

While the requirement that citizens register in their ancestral village rather than where they currently reside is problematic under principles of representation, it also presents a potentially sizable obstacle to voter registration, especially in those cases where the place of family origin is a distance away.<sup>175</sup> Requiring citizens to spend such time and resources in order to be able to register to vote can be seen as a violation of those provisions of international treaties that specifically prohibit undue obstacles to registration, and require the state to indeed facilitate the ease of registration. Specifically, General Comment 25 regarding the ICCPR says, “States must take effective measures to ensure that all persons entitled to vote are able to exercise that right. Where registration of voters is required, it should be facilitated and obstacles to such registration should not be imposed.”

### *Gender Discrimination*

In contravention to several international treaties, including CEDAW, under Lebanese election law married women are required to register in their husband’s ancestral village rather than their own.<sup>176</sup> This denies women their individual voice in their village of origin, and thus is discriminatory. Moreover, women who marry foreign men cannot transfer citizenship to their husbands or children, meaning their spouse and offspring will never be able to register to vote.<sup>177</sup> This, too, is discriminatory in that a Lebanese man can confer citizenship to his foreign wife and their children, and they will become full citizens of Lebanon able to cast a ballot.

174 *Final Report: General National Congress Elections in Libya*, The Carter Center, May 6, 2013, 27; *Free and Fair Elections: International Law and Practice*, Inter-Parliamentary Union, 128.

175 CCER has recommended voters be able to vote at the polling place of their residence for candidates in their ancestral village. See *Booklet of Reforms*, Civil Campaign for Electoral Reform, accessed May 8, 2015, <http://www.ccerlebanon.org/Modules/Resources/Resources/UploadsAr/%202013%20الانتخابات%20الجملة%20تقترحها%20التى%20الإصلاحات.pdf>.

176 National Democratic Institute, *Final Report*, 17.

177 Doreen Khoury, “Women’s Political Participation in Lebanon,” Heinrich Böll Foundation, July 25, 2013, <https://www.boell.de/en/2013/07/25/womens-political-participation-lebanon>.



### *Periodic Registration*

Although many countries have periodic rather than continuous registration, it is problematic here because of the compressed time frame for registration and the amount of time that can lapse between the registration process and an election, prohibiting citizens from making necessary changes or additions. This has become an even bigger problem given the political stalemates and security concerns that have resulted in postponements of elections. The consequence can be that people who have become eligible to vote or whose name or status has changed may end up being disenfranchised because their circumstances have changed during this gap. This is problematic under all of the international obligations that ensure the right to vote and the facilitation of voter registration under the ICCPR.

### *Complaints Procedure*

The procedure for filing and appealing complaints related to the registration process is unclear in the law. For example, the law contains no guidelines on how the Higher Registration Committees should deal with complaints, what the timeframe for decisions to be rendered should be, or how complaining citizens will be notified.<sup>178</sup>

This may be construed to be contrary to the ICCPR. In addition to generally being a barrier to exercising the right to vote, specifically under Article 2.3, each state party to the Covenant undertakes:

- a. To ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy, notwithstanding that the violation has been committed by persons acting in an official capacity;
- b. To ensure that any person claiming such a remedy shall have his right thereto determined by competent judicial, administrative or legislative authorities, or by any other competent authority provided for by the legal system of the States, and to develop the possibilities of judicial remedy.

The lack of specificity in the law about complaints also violates principles of transparency and access to information embodied in both Article 25 of the ICCPR and Article 19, regarding the need for voter education and the right to receive information, respectively.

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178 Democracy Reporting International, *Lebanon: Assessment*, 28. There is a complaints form and a directorate regarding one's own registration status on the website of the Personal Status Directorate.