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# Assessing Legal Frameworks for Refugee Issues: A Comparative Study of Jordan and Lebanon

## ABSTRACT

The study focuses on the evolution of legal framework in Jordan and Lebanon concerning asylum issues, identifies deficiencies, and proposes potential avenues for reform and improvement. The paper also explores the historical aspect of asylum within these nations, highlighting the three distinct waves of asylum that have occurred in their contemporary history. The paper further discusses the evident lack of coherence within the legal frameworks, the legal discrepancy, and the lack of a realistic approach to immigration waves. The paper also examines the role of the UN Refugee Agency (UNHCR) in facilitating the progress made by these Arab countries in addressing asylum issues. The paper concludes with a discussion of housing and mobility issues faced by refugees in both countries. The research provides valuable insights into the complexities and challenges of managing refugee populations in Jordan and Lebanon.

**Keywords:** asylum ■ legal framework ■ Jordan ■ Lebanon ■ refugee issues  
■ UNHCR ■ housing ■ mobility

## I. INTRODUCTION

This chapter aims to assess the scope and effectiveness of legal structures governing asylum-related issues in the two Arab countries. This assessment takes into account the international agreements ratified by these countries, the constitutional and legislative provisions they have adopted, and the institutions established to implement these requirements. The research, conducted in a comparative manner, focuses on the asylum domain in two Arab nations, specifically Jordan and Lebanon. The primary objective is to gauge the development of the legal framework in each country concerning asylum issues, pinpoint any deficiencies, and propose potential avenues for reform and improvement.

When examining the historical aspect of asylum within these na-

tions, two key observations emerge. Firstly, asylum is not a recent phenomenon; it has deep historical roots. Secondly, there has been a notable evolution in the concept of asylum, especially in the aftermath of the wave of unrest that swept the world, with particular emphasis on the Arab region, starting in 2011.

In their contemporary history, these nations have experienced three distinct waves of asylum. The initial wave took place in the aftermath of the 1948 Palestinian refugee crisis, compelling the countries in the region to host significant numbers of Palestinian refugees. The exact numbers varied from one country to another, depending on various factors such as social, political, and geographic considerations. The second wave emerged during the 1990s and the early 2000s, primarily driven by conflicts and internal turmoil within several Arab and African nations during that period.<sup>[1]</sup>

The third wave corresponds to the influx of Syrian refugees following the onset of the Syrian conflict in 2011. In the wake of this protracted war and the unprecedented humanitarian crisis faced by the Syrian people, a substantial number of Syrians sought refuge in various Arab nations. Jordan, in particular, emerged as a crucial host country for Syrian refugees since 2011. Lebanon, too, has witnessed a significant inflow, with over one and a half million Syrian refugees, including one million registered refugees, in addition to Palestinian refugees from Syria (30,675 refugees), existing Palestinian refugees (174,000 refugees), and Iraqi refugees (6,000). This cumulative figure constitutes approximately 30 percent of Lebanon's total population, representing one of the highest concentrations of refugees per capita globally.<sup>[2]</sup>

Despite the significant statistical data underscoring the significance of the asylum phenomenon in the countries under study, what primarily characterizes the present state of Arab legal systems when confronted with the issue of asylum is a notable lack of coherence within these legal frameworks. This inconsistency is evident in the discrepancy between the constitutional recognition of the right to asylum and the inadequate ratification of diverse international mechanisms governing this right, alongside substantial legislative gaps (First aspect). This legal scenario substantially impacts the pragmatic approach to immigration waves, rendering it subject to various policies and heavily reliant on the involvement of the UN Refugee Agency, which assumes a central role in this domain (Second aspect).

[1] Dossiê, 2021.

[2] Newland – Tanaka, 2010.

## II. THE EVIDENT LEGAL DISCREPANCY

In examining the legal landscape, a comparative analysis of the studied countries reveals a marked divergence between them. Moreover, this divergence is underscored by internal paradoxes, as evidenced by conspicuous contradictions among the constitutional obligations (1), the international commitments of the state (2), and the substantial legislative deficiencies in fulfilling these obligations (3).

### 1. Divergent Constitutional Recognition

The level of constitutional recognition of the right to asylum significantly varies among the Arab countries under examination in this study. Notably, the Jordanian constitution expressly incorporates provisions pertaining to the right to asylum. In Article 21 (i), it states that: "Political refugees shall not be extradited on account of their political beliefs or for their defense of liberty." However, it's imperative to acknowledge that the Jordanian Constitution confines the enjoyment of constitutional rights to its citizens. This delineation is clearly emphasized by the title of the constitutional chapter, which reads, "Rights and Duties of Jordanians".<sup>[3]</sup>

In stark contrast, the Lebanese constitution lacks any provisions concerning the right to asylum or the rights of foreign nationals. Furthermore, the Lebanese constitution restricts its stipulations to Lebanese nationals under the section titled, "The Lebanese: Their Rights and Duties".<sup>[4]</sup>

### 2. The international ratification

Lebanon applies its immigration laws to refugees as well, largely due to the absence of a legal distinction between irregular immigrants and asylum seekers within Lebanese legislation. Consequently, authorities have the legal recourse to detain refugees based on the provisions of the Geneva Convention if they are found in an irregular status.

This situation closely parallels the scenario in Jordan, where both refugees and asylum seekers fall under the purview of Law No. 24 of 1973 on Residence and Foreigners' Affairs. Importantly, this law does not make a clear distinction between refugees and other categories of immigrants. While it does make mention of refugees in various instances, it does not establish a distinct legal category for them. Notably, only Palestinians generally hold a recognized Refugee Status, with certain exceptional cases. For example, Syrian refugees are referred to

[3] Constitution of the Hashemite Kingdom of Jordan.

[4] Lebanon: Constitution.

by Jordanian authorities as “visitors,” “irregular guests,” “Arab brothers,” or other such designations that do not correspond to any established legal category.<sup>[5]</sup>

In 1998, the Jordanian government entered into a Memorandum of Understanding (MoU) with the United Nations High Commissioner for Refugees (UNHCR), which was subsequently amended in 2014. This MoU forms the overarching framework that regulates the treatment of refugees in Jordan. It specifies that Jordan accepts the definition of a refugee as outlined in the Geneva Convention, including the principle of non-refoulement and the application of international standards to refugee treatment. The MoU also outlines precise procedures and timelines for the UNHCR’s work with refugees in Jordan.<sup>[6]</sup>

The status of ratifications	The 1951 Convention <sup>[7]</sup>	The 1976 Protocol <sup>[8]</sup>	The 1969 OAU Convention <sup>[9]</sup>	Convention against Torture <sup>[10]</sup>
Jordan	No	No	Non-concerned	Yes
Lebanon	No	No	Non-concerned	yes

*Table 1. Entry, Residency, and Refugee Status Determination  
(Source: made by the Author)*

### 3. Rights and Liberties Enjoyment

In Lebanon, although the constitution does not explicitly mention the rights of foreigners, regulations govern the acquisition of real estate properties by foreigners through Decree No. 11614, which came into effect on January 4, 1969, and was subsequently amended by Law No. 296 on April 3, 2001. This Decree eases the conditions for property acquisition, permitting both natural persons and legal entities, who are foreigners, to own real estate properties without prior authorization, provided that the property does not exceed 3,000 square meters in size.<sup>[11]</sup>

Moreover, the right to work in Lebanon is not constitutionally guaranteed and is not a recognized right for citizens either. Consequently, refugees in Leba-

[5] Esteh, 2014.

[6] Memorandum of Understanding Between the Government of Jordan and UNHCR.

[7] UN General Assembly, Convention Relating to the Status of Refugees.

[8] UN General Assembly, Protocol Relating to the Status of Refugees.

[9] Organization of African Unity (OAU), Convention Governing the Specific Aspects of Refugee Problems in Africa.

[10] UN General Assembly, Convention Against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.

[11] Alem & Associates, Tabsh, n.d.

non are considered as foreign job seekers. They are, therefore, required to obtain a work permit as stipulated in Article 59 of the Labor Code, which places the condition of reciprocity of treatment in this context. This means that foreigners, who are citizens of a particular country, have the same rights as Lebanese citizens in Lebanon if Lebanese citizens enjoy similar rights in the foreigner's country of origin. This principle of reciprocity of treatment is also outlined in the Social Security Code. This can potentially lead to a situation where foreigners may be obligated to pay social security fees without enjoying the full spectrum of their rights if their home country does not reciprocate similar treatment. The case of Palestinians in Lebanon exemplifies this situation.

In Jordan, employment regulations dictate that foreigners must possess a legal residency permit to work, with some exceptions for humanitarian needs or political refugees. Generally, Jordan restricts refugees and irregular guests from engaging in 16 specific professions, including fields like medicine, engineering, teaching, various industrial occupations (mechanics, electricity, etc.), and services (sales, beauty salons, etc.), among others. Syrian refugees are subject to a distinct bilateral agreement on their employment, which was signed by both Jordan and Syria in 2001.<sup>[12]</sup>

A significant development occurred in February 2016 when Jordan entered into an agreement with the World Bank, the International Monetary Fund, and the European Union. This agreement provided Jordan with 747 million Euros to be disbursed over the years 2016 and 2017. Within this funding, 108 million Euros were allocated for humanitarian assistance, and 200 million Euros for support through microcredit programs. Notably, this agreement contained provisions specifically related to employment, training, and education, with the aim of enhancing employment opportunities for Syrian refugees.<sup>[13]</sup>

### III. THE EVIDENT LACK OF REALISTIC APPROACH

The approach to asylum-related issues in the countries under study is primarily characterized by a set of disjointed policies, resulting in worsening conditions for refugees (1). The policies in place in these countries have often been ineffective, exacerbating the situation for asylum seekers and refugees, rather than improving it. However, there have been some limited accomplishments, especially in collaboration with the UNHCR, which remains a beacon of hope for the overall policy landscape in these countries. It's worth noting that this cooperation, although promising, also places a significant burden on the UN Refugee Agency (2).

[12] International Labor Organization: The Syrian Refugee Crisis in Jordan Highlights the Importance of Accelerating the Address of Major Issues in the Labor Market, Regional Office - Beirut.

[13] Lipton, 2016.

## 1. The Complexity of Policies and Varied Conditions

The countries under study demonstrate a complex policy landscape marked by a lack of well-defined and comprehensive national policies concerning asylum. Jordan, in particular, notably lacks any clear policy documents outlining the state's approach in this field. Meanwhile, in countries that do have policies, these policies often apply differently to various nationalities, creating disparities in how different groups of refugees are treated. For example, in Egypt, the Sudanese population benefits from the Four Freedoms Agreement of 2004, granting them the rights of freedom of movement, residence, work, and property ownership. This agreement also ensures their access to education and public healthcare services on par with Egyptian citizens. In stark contrast, Lebanon's attempts to formulate policies regarding Palestinian refugees can be characterized as largely ineffective and unproductive. The variations in approaches to different nationalities within the region contribute to the complexity of the asylum landscape in the Arab world.

Moreover, several attempts were made to address the unique circumstances of Palestinian refugees. One such effort was the Casablanca Protocol, initiated by the League of Arab States on September 10, 1965,<sup>[14]</sup> and accepted by Egypt, Iraq, Jordan, and Syria. Kuwait and Lebanon, however, expressed reservations about certain articles within the Protocol. Despite these negotiations, the Casablanca Protocol was never effectively implemented. Consequently, in 1991, the League of Arab States issued Resolution 5093, which effectively subjected Palestinians to the prevailing rules and regulations in each individual state. This implicitly annulled the Casablanca Protocol, signifying the failure of the latter to bring about substantial changes in the treatment of Palestinian refugees.

Furthermore, in an attempt to address the unique situation of Palestinian refugees, the Lebanese Government signed the Cairo Agreement in 1969. This Agreement aimed to grant Palestinian refugees the right to work, reside, and move freely within Lebanon. It also introduced a form of administrative autonomy by establishing local committees within each refugee camp to oversee camp management and act as intermediaries between refugees and Lebanese authorities. However, the Lebanese Parliament rejected the Agreement in May 1987, thus rendering these provisions largely ineffectual. These historical agreements and their subsequent outcomes illustrate the complexities and challenges faced when attempting to establish coherent asylum policies in the Arab world, particularly in relation to Palestinian refugees.<sup>[15]</sup>

In contrast to Lebanon, Jordan has implemented specific policies to manage the influx of Syrian refugees that began in 2011. These policies involve the establishment of camps in the northern region of the country, designed to accommodate and categorize Syrian refugees based on their situation:

[14] League of Arab States, Protocol for the Treatment of Palestinians in Arab States ("Casablanca Protocol").

[15] International Crisis Group (ICG), *Nurturing Instability: Lebanon's Palestinian Refugee Camps*.

A. Transit Camps: These camps are designed to host refugees temporarily while they await deportation. An example is the King Abdullah Park.

B. Permanent Refugee Camps: These camps provide long-term shelter for refugees. Notable examples include the Za'atari refugee camp, which has been under the management of the UNHCR since its establishment in July 2012 and currently houses approximately 79,000 refugees. Another example is the Azraq camp, also managed by the UNHCR, established in 2014, and hosting around 53,500 refugees. Additionally, there is another camp funded by the United Arab Emirates, accommodating 7,000 refugees, primarily composed of families.

C. Retention Camps: These camps were created in 2014, including Hadalat and Rokban camps, specifically for refugees who enter Jordan illegally. In May 2015, refugees from the Rokban camp were relocated to the Azraq camp.

Refugees residing in these camps receive essential services such as education, healthcare, and food, as well as access to employment rehabilitation programs provided by both UN agencies and various national and international organizations. If refugees wish to live outside the camps, they are required to obtain sponsorship from a Jordanian citizen to secure a residence card. However, a significant portion of Syrian refugees, more than 80 percent, live in Jordanian cities.

To access services, including healthcare, Syrian refugees must present an asylum-seeker certificate issued by the UNHCR, along with a service card provided by the Jordanian Ministry of the Interior. Failure to adhere to official procedures when leaving the camps or returning to Jordan after returning to Syria can lead to the loss of these documents and, consequently, the right to receive public services. These policies and practices highlight Jordan's unique approach to managing the Syrian refugee crisis within its borders.<sup>[16]</sup>

In February 2015, the Jordanian government initiated an inspection process in urban areas to register Syrian refugees residing within the cities. To regain their service cards, these refugees had to visit police stations to retrieve identity documents confiscated at the border. They also needed to provide proof of a legal lease contract or a residence certificate issued by the UNHCR, along with a copy of the property owner's identity card if they were leasing a residence. Additionally, children under the age of 12 were required to present a medical certificate from the Ministry of Health confirming their lack of contagious diseases. These procedures proved to be slow, intricate, and financially burdensome for many refugees who were already facing economic hardship.<sup>[17]</sup>

By late February 2016, nearly 300,000 Syrian refugees registered with the UNHCR and living in urban areas received new service cards from the Ministry of the Interior. However, those who were unable to secure these cards faced significant challenges in accessing public services, and their efforts were frequently met with denials. Adding to the complexity, these service cards had to be renewed annually, providing only temporary access to public services.

[16] Norwegian Refugee Council/Internal Displacement Monitoring Centre (NRC/IDMC).

[17] IRIN, Jordan's refugees - a human timeline of regional crisis.

Initially, the government had allowed refugees to access services at a rate equivalent to that for insured Jordanian citizens through these cards. Nevertheless, the government's policy shifted in November 2014, requiring refugees to pay the full cost of services at the same rate as uninsured Jordanians. Those without a service card were charged what was referred to as the "irregular guests' tariff," which was 35 to 60 percent higher than what uninsured Jordanians paid for the same services. This situation exacerbated the financial strain on refugees, making it even more challenging for them to meet their basic needs.<sup>[18]</sup>

It's crucial to underscore that the financial burden on the Jordanian government due to migrants and refugees was substantial, amounting to a staggering USD 1.7 billion in 2016. This expenditure accounted for approximately 4 percent of the nation's Gross Domestic Product (GDP). Notably, the influx of refugees into Jordan persisted, particularly from Syria, despite the increased border control measures implemented since 2012 and the official closure of Jordan's borders to Syrians in most cases beginning in 2014.<sup>[19]</sup>

As of 2016, Jordan had officially declared its borders closed to Syrian refugees, leading to dire humanitarian consequences. According to Amnesty International, tens of thousands of refugees were left stranded at the border, enduring extremely harsh humanitarian conditions. The situation highlighted the challenges that both refugees and the Jordanian government faced in managing this crisis effectively.

In Lebanon, the government's stance towards refugees, particularly those from Syria, appears to be stricter. Rather than allowing the construction of refugee camps, the government has placed restrictions on this, resulting in Syrian refugees using uninhabited structures such as tents, abandoned buildings, and even stables as makeshift shelters. Consequently, many refugees lack official documents, which hinders their ability to move freely and access fundamental services, leaving them vulnerable to various risks, including harassment, exploitation, and human trafficking.<sup>[20]</sup>

Access to healthcare services is a major challenge for refugees in Lebanon. They often have to pay for medical services and, at times, even for basic needs like food and shelter. Additionally, child labor is a pressing issue among Syrian refugee families in Lebanon. Statistics from 2017 indicate that approximately 4.8 percent of Syrian refugee children between the ages of 5 and 17 are engaged in labor activities. This situation further compounds the difficulties faced by refugee families, impacting the well-being and education of these children.<sup>[21]</sup>

The government enforces a residence tax of 300 Lebanese pounds (approximately USD 200) on foreign residents. However, there are exemptions for certain

[18] Al-Fakhoury, 2018.

[19] Luck, 2016.

[20] Ajzaeera.com, Venetia, 11.03.2015.

[21] UN Educational, Scientific and Cultural Organisation (UNESCO), Report of the IBC on the Bioethical Response to the Situation of Refugees.



groups, including Syrian refugees registered with the UNHCR. Notably, this exemption does not apply to those who entered Lebanon after January 2015, those who renewed their residency based on employment, individuals with a guarantee from a Lebanese citizen, or Palestinian refugees coming from Syria.

UN statistics reveal alarming conditions for Syrian refugee families in Lebanon. A staggering 76 percent of these families live below the poverty line, and over half of them endure increasingly challenging living conditions, particularly concerning housing. Their right to movement is often subject to arbitrary restrictions, with several governorates issuing orders to prevent refugee entry and expulsion. These decisions not only curtail their freedom of movement but also limit their opportunities for housing and employment, adding to the challenges faced by Syrian refugees in Lebanon.<sup>[22]</sup>

The situation for Palestinian refugees in Lebanon has been marred by discriminatory laws that deny them property ownership and hinder their access to public education and healthcare. Disturbingly, over 3,000 Palestinian refugees, as per Amnesty International's statistics, are denied the right to register their births, marriages, and deaths. Lebanon's restrictive policies have given rise to an increasing number of refugees living in illegal status, leading to mobility restrictions and the looming threat of imprisonment due to illegal residence, as well as the risk of deportation to countries mired in severe humanitarian crises.<sup>[23]</sup>

## 2. The significant role of the UN Refugee Agency

The UN Refugee Agency (UNHCR) has played a vital role in facilitating the progress made by the Arab countries studied in addressing the asylum issue. According to the figures released by the UNHCR in 2015, notable advancements were achieved, both in terms of administrative procedures and the assurance of fundamental rights.

In terms of resettlement, there were 7,000 applicants in Egypt, 24,500 in Lebanon, and 32,000 in Jordan, underscoring the importance of this pathway for refugees seeking protection.

Furthermore, with regard to safeguarding rights, the UNHCR's efforts led to the registration of births among Syrian refugees, significantly increasing the birth registration rate in Jordan. In Lebanon, the number of registered individuals reached 19,000, emphasizing the importance of recognizing refugees' legal status and identity.

Regarding housing, the UNHCR supervised the maintenance of 10,000 homes in Jordan, significantly improving living conditions for many refugees. In Lebanon, the agency provided assistance to 182,500 Syrian refugees to enhance their

[22] UN High Commissioner for Refugees (UNHCR), *Vulnerability Assessment of Syrian Refugees in Lebanon 2016*.

[23] UN High Commissioner for Refugees (UNHCR), *The Situation of Palestinian Refugees in Lebanon*.

often-substandard housing conditions, promoting better standards of living for vulnerable populations.

The UNHCR also played a crucial role in the provision of healthcare services. In Jordan, it facilitated health consultations for 250,000 refugees, ensuring their access to essential medical care. In Lebanon, the agency delivered life-saving hospitalization services to 73,800 individuals, highlighting its contribution to maintaining and improving the health of refugee populations. These achievements underscore the positive impact of collaboration with the UNHCR in enhancing the lives of asylum seekers and refugees in these countries.<sup>[24]</sup>

In Lebanon, the UN Refugee Agency (UNHCR) has been actively engaged in supporting the authorities in the renewal of legal residence for refugees since 2017. This important initiative includes exemptions from renewal fees for specific Syrian groups. Furthermore, the UNHCR is actively advocating for the extension of these exemptions to cover a broader range of refugees who are currently not included. This collaborative effort is aimed at alleviating the financial burden on vulnerable refugee populations and ensuring that they can maintain their legal residence status in Lebanon.<sup>[25]</sup>

Despite ongoing challenges, such as restrictions on entry into the country and the pending UNHCR registration process, the UN Refugee Agency (UNHCR) has maintained its leadership role in coordinating the humanitarian response to refugees in Lebanon. This collaborative effort operates under the overarching authority of the Lebanese Government and the United Nations Resident Coordinator. The UNHCR's leadership extends to the Lebanon Crisis Response Plan 2017-2020, which serves as a unified framework for cooperation among government, humanitarian, and development organizations, all working towards common humanitarian objectives and regional stability.<sup>[26]</sup>

Within this framework, the UNHCR continues to actively lead interagency teams and cross-cutting task forces, ensuring that refugee concerns remain at the forefront of planning and implementation. This dedication to coordination and advocacy underscores the agency's pivotal role in addressing the complex challenges posed by the refugee situation in Lebanon.

In Jordan, there is a concerted effort to enhance the capacity of government agencies and support refugee communities through various programs. These initiatives are aligned with a shift from the traditional "community services" approach to the implementation of more comprehensive, community-based protection interventions. This approach recognizes the need for a holistic response to address the multifaceted challenges faced by refugee populations.

Notably, in 2017, a Task Force dedicated to permanent solutions was established. The primary objective of this task force is to explore and deliberate on

[24] UN High Commissioner for Refugees (UNHCR), Independent Programme Evaluation (IPE) of UNHCR's response to the refugee influx in Lebanon and Jordan.

[25] UN High Commissioner for Refugees (UNHCR), Fact Sheet Lebanon.

[26] UN High Commissioner for Refugees (UNHCR): Lebanon Crisis Response Plan 2017 – 2020.

durable, long-term solutions for refugees. These solutions encompass a range of options, including voluntary repatriation to their home countries, resettlement in third countries, the implementation of supplementary tracking systems, and other mechanisms to address the various issues and concerns of refugee populations. This comprehensive approach reflects Jordan's commitment to seeking lasting solutions for refugees within its borders.<sup>[27]</sup>

#### IV. HOUSING AND MOBILITY

In Jordan, official refugee camps have been established to provide accommodation for Syrian refugees. These camps offer structured living conditions and access to basic services. In contrast, Lebanon has not created formal refugee camps for Syrians. Instead, the Lebanese government has largely delegated the responsibility for the humanitarian response to various local and international organizations. The absence of formal camps is influenced by several factors.

One primary concern is security. Lebanon has historical memories of Palestinian refugee camps becoming focal points during the Lebanese civil war, which took place from 1975 to 1990. These camps were associated with conflict and instability. Lebanese officials are therefore cautious about repeating this experience with the Syrian refugee population.

Additionally, Lebanon's decision to avoid establishing refugee camps is linked to the demand for a readily available Syrian workforce. By not confining Syrians to camps, Lebanon retains a flexible labor force, allowing refugees to participate in the economy, although they often face significant challenges, such as restricted mobility and limited access to services.

This approach reflects the complex balance Lebanon is attempting to strike between humanitarian considerations, security concerns, and the economic needs of the country. It's a delicate situation, as they aim to support Syrian refugees while also managing the potential risks associated with formal refugee camps.

Lebanon's relatively hands-off approach to managing Syrian refugees has permitted those fleeing Syria to leverage their pre-existing social networks and work connections within the country. This has resulted in a dispersion of Syrian refugees across Lebanon, with significant concentrations in areas such as the Bekaa Valley, the west/central Mount Lebanon region, and the north of the country. The living conditions of these refugees exhibit a wide range of situations.

Some Syrian refugees now reside in so-called 'informal tented settlements,' which have proliferated over time. Others find shelter in abandoned buildings, including ruins, unfinished structures, and garages. Importantly, more than half

[27] Human Rights Watch, *Jordan: Syrian Refugees Being Summarily Deported*.

of Syrian refugees in Lebanon rent regular accommodations, which can include apartments or houses, contributing to the demand for housing in various parts of the country.

The diversity in living conditions highlights the complexity and challenges of managing the Syrian refugee population within Lebanon, where refugees adopt a variety of living arrangements based on their resources and connections.

Over the years, the freedom of Syrian refugees to settle and move within Lebanon has faced increasing restrictions. Starting in 2014, certain municipalities began imposing curfews on refugees, and during 2015 and 2016, an escalating number of refugees lost their mobility and regular status papers. Consequently, many refugees now confine their movements to a small radius around their living area out of fear of encountering checkpoints and potential difficulties related to their status. These limitations have added to the challenges faced by Syrian refugees in Lebanon.<sup>[28]</sup>

In Jordan, the primary obstacle for refugees is the government's attempt to direct most displaced Syrians into camps. The first and largest camp, Al-Zaatari, was established in July 2012, more than a year after a significant number of Syrian refugees had already arrived in the country. Early arrivals settled in urban areas where they could leverage their family and social networks for support. Until mid-2014, those who did enter the camp system could exit relatively easily through a sponsored bailout procedure. As a result, approximately 80% of the Syrian refugee population now resides outside the camps in the northern governorates of Mafraq, Irbid, Zarqa, and in the capital, Amman.<sup>[29]</sup>

However, control over camp residents tightened as of mid-2014, and the bailout procedure was entirely suspended in February 2015. Syrian refugees, numbering around 140,000 people, can now only leave the camps for a holiday period of up to 15 days, with very few exceptions. This has significantly constrained the movement and living conditions of Syrian refugees in Jordan.

## V. CONCLUSION

Lebanon and Jordan are unique in the sense that they host a significantly high number of refugees relative to their overall populations. In both cases, registered refugees, including those registered with UNHCR and UNRWA, constitute approximately one-third of the total population.

Jordan, with a population of roughly 9.5 million, accommodates around 2.1 million registered refugees from Palestine, including their descendants, who initially arrived in 1948, 1967, and 1990/91. Over the past 25 years, hundreds

[28] Ajzaeera.com, Venetia, 11.03.2015.

[29] Norwegian Refugee Council/Internal Displacement Monitoring Centre (NRC/IDMC), Youth Assessment, Zaatari and Azraq Camps, Jordan.

of thousands of Iraqis have sought temporary or permanent refuge in Jordan, primarily due to the Gulf wars. Furthermore, more than 650,000 Syrians have registered as refugees in Jordan since the conflict began in 2011. According to government sources, the actual number of Syrians residing in Jordan is approximately 1.4 million, considering that an estimated 750,000 Syrians were in the country when the Syrian civil war began.

Comparatively, Lebanon, with a population of around 6.2 million, is home to a diverse refugee community. Approximately 450,000 residents are Palestinian refugees, and an additional 50,000 are Palestinian refugees from Syria (PRS). An estimated 30,000 to 50,000 individuals are Iraqi refugees, and nearly 1.1 million are UNHCR-registered Syrian refugees. The number of non-registered Syrians is significant but remains uncertain. Moreover, both countries host smaller refugee communities, such as Somalis, Sudanese, and Yemenis.

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