

THE NATIONAL ANTI-CORRUPTION COMMISSION (NACC) & CIVIL SOCIETY DYNAMICS IN LEBANON



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BACKGROUND

This position paper constitutes a segment within a multi-partner project funded by the German Federal Foreign Office and driven by two local Lebanese based organizations: Transparency International - Lebanon (TI-LB) and the Lebanese Crisis Observatory (AUB), supported by the expertise and networks of TI-LB.

The goal of this two-year project is to ensure greater accountability and transparency of humanitarian aid and reconstruction efforts particularly for those most affected by the Beirut port explosion. To produce this change, the project is applying a multi-stakeholder approach targeting local civil society including journalist networks, Lebanese state actors and citizens, particularly those most affected by the port explosion.

Given the capacity shown by civil society in playing a watchdog role, it can also push for a further informed and empowered citizens ready to hold duty bearers accountable, while pressuring state actors to advance and implement accountability reforms. This would produce a more sustainable ecosystem of actors better able to identify, monitor and reduce the risks of corruption and ultimately nurture a stronger culture of accountability, integrity and transparency in Lebanon to avoid future tragedies similar to the port explosion.

This project is aligned with the German Federal Foreign Office's Transformation Partnerships objectives to promote a strong civil society able to both hold state accountable, as well as support state structures to implement accountability reforms.

This position paper is set to tackle the **promising role the National Anti-Corruption Committee (NACC)** can play in the present crisis situation in Lebanon, while exploring the **avenues for co-operation and collaboration** between this newly established institution and the already vibrant civil society sector in the country.

Due to the scope of the paper, only a limited number of **anti-corruption priorities** would be looked into, hence tackling a couple of NACC prerogatives under the present Lebanese legislation, such as **Access to Information, Illicit enrichment and Recovery of corruption funds**. In addition to desk research, the author conducted a couple of key informant interviews with representatives of CSOs and NACC partners presently supporting the NACC. However, no representative from the NACC could be officially reached by the time this paper was finalized.

The paper will also address the **opportunities and challenges** of bridging such two important actors working towards transparency and accountability in the face of greater corruption which has left Lebanon gravely crippled, while factoring in the complexity of the political and legal contexts. The paper will also offer concrete recommendations as to the way forward to foster such mobilization.

INTRODUCTION

In March 2023, European Union's criminal justice agency (Eurojust) announced Lebanese central bank governor Riad Salameh was a suspect in money laundering or embezzlement probes. The investigations recently led to the freezing of some 120 million euros belonging to the governor and four other suspects in the case in several European countries. Authorities in Switzerland, France, Luxembourg and Liechtenstein have launched investigations ties to suspicions of money laundering or embezzlement tied to Salameh, who was charged with “illicit enrichment” by a Lebanese judge earlier in March.

Such progress on the judiciary front came through **tenacious efforts by civil society organizations specialized in anti-corruption and focusing on the recent Lebanese economic and financial meltdown which is known to be tied to greater corruption**. In France, the judiciary was seized based on complaints presented by two CSOs, Sherpa¹ and the CPVCL (Gathering of victims of fraudulent and criminal practices in Lebanon).²

In parallel, the Lebanese National Anti-Corruption Commission (NACC), recently established to institute a specialized and independent anti-corruption agency, is still gearing up to join the corruption battlefield in the country, a calamity which has reached an unspeakable magnitude. As such, Lebanon is now regularly pointed at as a country known for the “endemic” nature of “both grand and petty corruption”³.

This ultimate catastrophe represents the third item of the “three mega-crises”⁴ which have hit Lebanon according to the World Bank, coining at the same time the expression “deliberate depression” to describe the current state of the Lebanese economy. As such, “corruption is seen as the grease of this crisis-generating engine”⁵ as explained by Guilherme France from Transparency International.

¹ Founded in September 2001 in Paris, cf <https://www.asso-sherpa.org/accueil>

² Collectif des victimes des pratiques frauduleuses et criminelles au Liban, founded in April 2021 in Paris, cf. <https://www.journal-officiel.gouv.fr/pages/associations-detail-annonce/?q.id=id:202100171530>.

³ Bertelsmann Stiftung, BTI (2022). Country Report – Lebanon, Gütersloh: Bertelsmann Stiftung, 2022, p. 13, available at https://www.ecoi.net/en/file/local/2069668/country_report_2022_LBN.pdf.

⁴ World Bank (2020). Lebanon economic monitor, The deliberate depression, Fall 2020, p. 27, available at <https://documents1.worldbank.org/curated/en/474551606779642981/pdf/Lebanon-Economic-Monitor-The-Deliberate-Depression.pdf>

⁵ Guilherme France (2022). Lebanon: Overview of corruption and anti-corruption, CMI Anti Corruption Centre, Transparency International, 8 September 2022, available at file:///C:/Users/KarimElMufti/Documents/LTA%20Research/Lebanon-overview-of-corruption-and-anticorruption_U4-reviewed_PR_19.09.2022.pdf

Confronting the multiple levels of corruption represents an enormous challenge. Ever since Lebanon became party to the United Nations Convention Against Corruption (UNCAC) in 2008 through Law 33/2008, the **authorities have caved under international pressure to legislate anti-corruption frameworks and instruments, which accelerated after 2015**, as shown in table 1 hereunder. At the same time, there has been **little accountability** as “State efforts to contain corruption are minimal. Often State agencies even obstruct attempts to investigate cases of suspected corruption”.⁶ Furthermore, “due to Lebanon’s highly nontransparent system and the prevalence of deals beyond formal institutions, specific cases of corruption are difficult to prove. This implies, however, that prosecution of corruption rarely happens in Lebanon”⁷, hence the **crucial need for an independent oversight agency such as the NACC which goes hands in hands with an independent judiciary**.

TABLE 1
Anti-Corruption Legislation recently adopted by Lebanon

Law No. 154 / 1999, amended by Law No. 189 / 2020	▶ Illicit Enrichment Law
Law No. 44 / 2015	▶ Law to Combat Money Laundering & Financing Terrorism
Law No. 28 / 2017, amended by Law No. 233 / 2021	▶ Access to Information Law
Laws No. 83 / 2018 & 182 / 2020	▶ Whistleblower Protection Law
Law No. 84 / 2018	▶ Promoting Transparency in Petroleum Sector
Law No. 175 / 2020	▶ Combatting Corruption in The Public Sector and the Establishment of the National Anti-Corruption Institution
Law No. 189 / 2020	▶ Financial Disclosure and the Punishment of Illicit Enrichment Law
Law No. 214 / 2021	▶ Law For Recovery of Corruption Funds
Law No. 244 / 2021	▶ Law on Public Procurement

⁶ Bertelsmann Stiftung, BTI 2022 Country Report – Lebanon. Gütersloh: Bertelsmann Stiftung, 2022, p. 34, available at https://www.ecoi.net/en/file/local/2069668/country_report_2022_LBN.pdf.

⁷ Bertelsmann Stiftung, BTI 2022 Country Report – Lebanon. Gütersloh: Bertelsmann Stiftung, 2022, p. 13, available at https://www.ecoi.net/en/file/local/2069668/country_report_2022_LBN.pdf.

The NACC was originally mentioned in the 2017 Access Information Law, as the relevant agency to receive complaints pertaining to the application of the law and investigating them. This early legislation grants it the power of issuing binding decisions on the disclosure of documents requested by citizens and CSOs. The NACC was only formally established through Law 175 in 2020 and handed a wide array of responsibilities and prerogatives.

It is composed of six members, appointed by the Council of Ministers for six-year non-renewable terms, on the suggestion of lists presented by different relevant sectors: the Bar Association, the Lebanese Association of Certified Public Accountants, the Banking Control Commission and the minister of state for administrative reform present a list of three possible candidates for the Council of Ministers to pick one lawyer, one accountant, one expert on banking or economics and one expert on governance, public budgeting or anti-corruption. Only the two retired judges among the NACC members are elected by all administrative and judicial judges on the invite of the High Judicial Council.

In January 2022, the six members of the Commission were appointed, hence starting a long journey setting up the agency's infrastructure and by-laws in order to become fully functional. At the time of the issuing of this position paper, the NACC is still non functional and lacks staff and standard operating procedures to carry out its large and promising mandate. The institution is presently finalizing the development of its by-laws, which involves receiving the approval of the State Council, the Civil Service Board and the Ministry of Finance. At the time of this position paper, 14 months after their appointment, the NACC members had reached the stage of the Ministry of Finance review, despite the legislation stipulating the by-laws be adopted in a period of three months, as per art. 9 of Law No. 175 / 2020.

This position paper aims at exploring the promising outlooks based on the NACC potential, set to anchor itself as an oversight agency against acts of corruption, and the type of relationship it can develop with the already vibrant civil society organizations at both local and international levels.



THE NACC, AN **OVERSIGHT AUTHORITY** WITH LARGE BUT LOCKED JAWS

On paper, the powers bestowed to the newly established NACC in Lebanon are **impressive**. First, through its particular status given the independence it is granted as an oversight agency. It stands as an institution close to the French concept of “*Autorité Administrative Indépendante*”, considered by the French State Council as “*administrative bodies that act on behalf of the State, invested with real power, yet that do not fall under the authority of the government*”.⁸

As described by Guilherme France from TI, the Lebanese legislation “establishes that the NACC is also responsible for: monitoring corruption costs, statuses, causes and efforts to prevent and counter corruption; for implementing relevant international conventions to which Lebanon is a party; and for conducting studies and research in the areas of transparency, integrity and anti-corruption. NACC was also entrusted with the authority to submit for prosecution any violation committed by public officials and to impose restrictions on them, such as travel bans and lifting financial privacy”.⁹

On paper, the **NACC was granted a large jaw with substantial teeth**, notably the power of filing criminal charges against wrongdoers in the various fields it oversees. The NACC is also in charge of protecting whistleblowers and providing protective measures against professional retaliation or discharge, whether employed in the private or the public spheres, in addition to determining the allocation of financial rewards for the recovery or the prevention of public funds. It can also file charges to disciplinary or judicial bodies directly against any offender seeking reprisal against whistleblowers or extending harm to them or their family.

With such prerogatives, the NACC is not just any oversight agency with monitoring, reporting and recommending functions, but can directly interfere, investigate, name and shame, report offenses and ultimately take up plaintiff’s capacity before all relevant courts and disciplinary bodies, through which it can request restrictions, travel bans and the lifting of bank secrecy.

Compared to the scope of CSOs, the NACC displays a tremendous toolbox to combat and prevent corruption. However, **in the context of today’s Lebanon, these large and powerful jaws remain locked** due to the delays in setting up the commission’s infrastructure, by-laws, staff and operating procedures.

⁸ Conseil d’Etat (2021). Les autorités administratives indépendantes - Rapport public 2001, 30 November 2000, available at <https://www.conseil-etat.fr/publications-colloques/etudes/les-autorites-administratives-independantes-rapport-public-2001> [translation by author]

⁹ Guilherme France (2022). Lebanon: Overview of corruption and anti-corruption, CMI Anti-Corruption Centre, Transparency International, 8 September 2022, p. 15, available at https://knowledgehub.transparency.org/assets/uploads/kproducts/Lebanon-overview-of-corruption-and-anticorruption_U4-reviewed_PR_19.09.2022.pdf

More than one year into the appointment of the NACC members, the TV channel LBCI sent a crew to the NACC empty and non-functional offices filming a report in which journalists were “*searching for the NACC*”¹⁰, thus criticizing the “*lack of supervision into the right to access information*”, which falls upon the NACC prerogative.

As such, the **NACC is still presently undergoing an inception phase**, during which much has been done regarding the preparations to set up its basic structuring. The process is being heavily supported by the UNDP¹¹ and other partners, such as Expertise France under its “*Anti-Corruption and Transparency Project in Lebanon*”¹², aiming among other objectives to “*strengthen control bodies’ capacities to prevent and fight corruption*”. The slow evolution is mainly attached to the massive needs an agency the scope of the NACC has to cover, from furnishing and servicing the new offices located in Verdun, providing basic equipment, a generator for electric power etc. in the context where it cannot count on State resources or assets due to the financial meltdown of the public treasury.

If the NACC can escape the scarcity of State support thanks to generous partners, it **cannot circumvent the legal and administrative formalities that are needed to initiate its operational mandate**. Despite its independence status, **it still needs to interact with State apparatus which is presently crumbling in the country**. For instance, the NACC by-laws need to be adopted by the Council of Ministers, which is presently a caretaker government that might not be able to fulfill this important task, thus withholding even longer the lock mode of the agency’s jaws.

Given the scope of its missions, the NACC will also **need a consistent budget and a large staff**. It has the possibility of relying on civil servants’ transfers from various public administrations to cover some basic positions (with already three presently in place), and the possibility of recruiting new public agents remains open thanks to an exception the agency benefits from pertaining to the present hold on public recruitment. In addition, the recruitment will need to include specialized and qualified profiles to ensure the ability and efficiency of its actions, given the various missions it is commissioned with.

It will also need to train the staff, which can be provided through various present and future partnerships with international organizations and specialized agencies, but this shall entail an **even longer inception phase before the NACC can be fully activate its strong jaws**.

Once the institution starts to deploy, it will **most certainly be stepping into an unfriendly and hostile environment**, where it shall be met with resistance from State and non-State actors. It would be unwise to add civil society actors to the antagonism list.

¹⁰ LBCI Report, 1 March 2023, available at

<https://www.lbcgroup.tv/news/news-reports/689802/%D8%A7%D9%84%D9%80lbc-%D8%AA%D8%A8%D8%AD%D8%AB-%D8%B9%D9%86-%D8%A7%D9%84%D9%87%D9%8A%D8%A6%D8%A9-%D8%A7%D9%84%D9%88%D8%B7%D9%86%D9%8A%D8%A9-%D9%84%D9%85%D9%83%D8%A7%D9%81%D8%AD%D8%A9-%D8%A7%D9%84%D9%81%D8%B3%D8%A7%D8%AF-%D8%AD%D9%82-%D8%A7/ar>

¹¹ Cf. <https://www.undp.org/ar/lebanon/projects/alhyyt-alwtnyt-lmkafht-alfsad>

¹² Project sheet available at <https://www.expertisefrance.fr/en/fiche-projet?id=735063>

NACC-CSOs: COOPERATION OR COMPETITION?

On the other hand, the landscape of the Lebanese civil society offers a much different display, being considered as **“the most vibrant in the Arab world”**.¹³ The fundamental guarantees for a free and open civil society stem from both constitutional provisions (Article 13 of the constitution explicitly guarantees freedom of assembly and association) and a liberal legislation inherited from Ottoman times. Law 1909 on Associations and Political Parties allows for the establishment of non-profit organizations by simple declaration, unlike other Arab regimes, which condition the creation of NGOs to prior authorization. Neither the French Mandate nor independent Lebanon ever amended these **dispositions which structurally favored the emergence of a strong civil society nexus in the country.**

The funding of CSOs in Lebanon is also **free and open with little oversight leverage from the government**, leading to a particularly dynamic civil society matrix which is historically active in the country.

The **scope of action of local and national CSOs is so widespread that many observed the emergence in Lebanon of a “Republic of NGOs”**, recently raised among others by Olivier De Schutter, the UN Special Rapporteur on Poverty.¹⁴ By taking over substantial welfare programs and support missions usually bestowed to State authorities, many **regional and international donors prefer to channel the aid through more efficient and effective NGOs rather than State institutions, considered as corruption pits.**

Also, the UNCAC explicitly acknowledges a role for civil society in fighting corruption, inclusive of associating it within the convention’s work, as per articles, 5, 13 and 63 (4) (c).¹⁵ As such, the role of CSOs is paramount. According to the UNODC, CSOs have the means and experience to access, create and use information to engender greater levels of accountability, engage in advocacy, education and awareness raising around the issues of corruption; support the development of anti-corruption laws, policies and programs by offering expert and local knowledge and by coordinating and cooperating with governments; give advice to whistleblowers; produce research into various areas of anti-corruption work; and can even contribute to anti-corruption enforcement.¹⁶

¹³ Bertelsmann Stiftung, BTI (2022). Country Report – Lebanon, Gütersloh: Bertelsmann Stiftung, p. 11, available at https://www.ecoi.net/en/file/local/2069668/country_report_2022_LBN.pdf.

¹⁴ Ismaeel Naar and Talal Alhaj, Lebanon risks becoming a republic of NGOs: UN Special Rapporteur on Poverty, Al Arabiya News, 27 November 2021, available at <https://english.alarabiya.net/News/middle-east/2021/11/27/Lebanon-risks-becoming-a-republic-of-NGOs-UN-Special-Rapporteur-on-Poverty#:~:text=Lebanon%20risks%20becoming%20a%20republic%20of%20NGOs%3A%20UN%20Special%20Rapporteur%20on%20Poverty,-Lebanon&text=There%20is%20a%20crisis%20of,Special%20Rapporteur%20on%20Poverty%20warned>.

¹⁵ See UNODC (2019). Civil Society for Development Opportunities through the United Nations Convention against Corruption, available at https://www.unodc.org/documents/NGO/Fast-tracking/18-06316_eBook.pdf

¹⁶ UNODC (2015). UNCAC and Civil Society Participation in Anti-Corruption Efforts, available at https://www.unodc.org/documents/treaties/UNCAC/COSP/session6/SpecialEvents/UNCAC_and_Civil_Society_Participation.pdf

When dealing with transparency and corruption, **many specialized NGOs were created in Lebanon to denounce and counter the growing post-war corruption practices**, facilitated by the tutelage of the Syrian regime as of 1992 over the Lebanese State apparatus. In 1999 was established the Lebanese Transparency Association (which became recently Transparency International – Lebanon, TI-LB), one of the initial post-war watchdogs to point to corruption offenses. Many non-profit organizations, from the past and present, also included policy components to their campaigns and actions, such as working on public budgetary tools (LPHU), policy development (Youth Economic Forum, Nahnoo), public procurement (LTA), access to information (Transparency International – Lebanon, Gherbal Initiative, ShinMimLam, Open Data Lebanon), taxation ethics (ALDIC), collecting data on bribery to name and shame (Sakker el Dekkene) etc., while others have been targeting the endemic impunity over corruption acts and calling for an independent and functional judiciary (Legal Agenda).

Next to civil society movements tackling anti-corruption can be found scholars, think tanks and many media platforms which have ventured into investigative journalism to uncover acts of corruptions, illicit enrichment or money laundering schemes. Even international NGOs such as Human Rights Watch have been pointing to endemic corruption and how the catastrophic situation led to grave human rights violations.¹⁷

CSOs play a key role in generating political will and fostering an agenda aligned with the preservation of public interest. As such, NGOs in Lebanon have been successfully pushing for anti-corruption legislation to align the country with requirements set forth by UNCAC.

Moreover, CSOs have also **managed to block inappropriate and preposterous regulations**, for instance when the parliament attempted in November 2019 to pass an amnesty law pardoning serious misconduct committed by public officials. Both lobbying and demonstration efforts as protestors had blocked the entrance to parliament back then to avoid the passing of a legislation which, according to HRW, “*would likely have further entrenched impunity, including for corruption, in the country*”.¹⁸

In more recent corruption affairs pertaining to alleged illicit enrichment by BDL governor Riad Salameh through his brother Raja and close collaborators, **CSOs established by the Lebanese diaspora in Europe have been playing a key role**, namely in uncovering many threads of the alleged wrongdoings and pressing charges before French, German and Swiss courts. Zeina Wakim from Accountability Now, stated to Le Monde that “civil society and whistleblowers are getting involved like never before. The political class understands that despite their obstructions, there will always be ways to obtain information”.¹⁹

¹⁷ Human Rights Watch (2021). “They killed us from inside”: an investigation into the August 4 Beirut Blast, available at <https://www.hrw.org/report/2021/08/03/they-killed-us-inside/investigation-august-4-beirut-blast>

¹⁸ Aya Majzoub (2019). Problematic Bills on Lebanon Parliament’s Agenda, Human Rights Watch, 19 November 2019, available at <https://www.hrw.org/news/2019/11/19/problematic-bills-lebanon-parliaments-agenda>.

¹⁹ Quoted in H el ene Sallon, Lebanese and European judges begin cooperation on central banker Salameh case, Le Monde, 22 January 2023, available at https://www.lemonde.fr/en/international/article/2023/01/22/lebanese-and-european-judges-begin-cooperation-on-central-banker-salameh-case_6012581_4.html.

Yet, despite an outstanding portfolio of achievements in monitoring and reporting, fostering social accountability and awareness raising, strengthening capacity building and lobbying, **CSOs are not armed with the same competence as vested in the NACC.**

As such, **the NACC appears as the most perfect and natural ally for civil society actors, driven by the same goal of combating systemic and endemic corruption.** The very existence of the NACC, despite its slow setting up, can be **considered a victory by anti-corruption activists** and it **is paramount for the NACC to build bridges with the CSOs, eventually leading to a strong nexus to firmly stand against corruption offenses.**

The mistaken direction would be for the main stakeholders to mutually view each other as competitors, competing for policymakers' time and attention, for funding and resources, for media coverage and for influence over public opinion. This scenario is likely to materialize should no clear signs of mutual reassurance are presented during the inception phase.

A second object of reassurance, mainly from the civil society side this time, concerns **guarantee of independence from political intervention.** The appointment method of the NACC, despite partly based on the preselection of specialized bodies, is not free from political and sectarian considerations and it is very likely many CSOs will require from the NACC it provides strong indications of political independence and sectarian neutrality.

Moreover, it is likely many among **NGOs will initially be cautious and display suspicion. Many activists will most likely be testing the resolve and efficiency of the NACC** as soon as it launches its formal activities in the future, with the risk of expecting unreasonable or speedy outcomes. Some might decide to publicly disprove of the NACC should it fall short from these expectations, which would be weakening not just the members, but the oversight institution entirely. At the same time, any inside attempt to openly cripple or paralyze the work of the institution, or fail to distinguish itself from governmental agendas, would ultimately draw great criticism and discredit by activists.

At the same time, **the NACC needs to also be independent from civil society, seeking its own identity and mark in the battlefield against corruption,** in which both spheres can **complement each other's efforts and actions.**



TOWARDS CONSOLIDATING A PATHWAY TO AN EFFECTIVE **ANTI-CORRUPTION** STRUGGLE

Reaching a point where both spheres understand that none want to take the place of the other would mean “*covering half the distance already*”, considers Assaad Thebian from the Gherbal Initiative.

Planning a Kick-off Workshop to start raising the bridge

At the time of this position paper, no formal workshop nor seminar has gathered the NACC members and representatives of the relevant CSOs, only a few NGOs having initiated individual meetings with the Commission.

As such, **both spheres are open to initiate a greater bridge that would lead to deeper cooperation in the anti-corruption struggle. A mistaken direction here would be for the NACC to favor some NGOs over others**, which would not be well received in the overall transparency and good governance sector, hence the need to **arrange as early as possible a sort of kick-off workshop bringing all relevant stakeholders to the table to initiate a formal dialogue and draw the collaboration path forward together**. In addition to local and national NGOs, the gathering could include those specialized groups from the Lebanese Diaspora which have become much involved with addressing corruption offenses. . TI-LB has already been active in order to initiate a structural dialogue between its fellow CSOs representatives and NACC members.

Complementing agendas

Once a formal rapprochement between the NACC and CSOs is on track, both can explore the endless potentiality of a rich mutual support. According to Gillian Dell from Transparency International, one of the CSOs main added value in combating corruption is their ability to “*complement the work of accountability institutions, such as anti-corruption agencies and supreme audit institutions. Such institutions regularly suffer from a lack of funding and resources to carry out their work, and CSOs with anti-corruption expertise can assist by partnering with these institutions and sharing their knowledge and expertise*”.²⁰

As expressed by Assaad Thebian from the Gherbal Initiative, “*CSOs have proven how much of their work can be done much quicker than State bureaucracies and the NACC will be able to benefit and use the produced material and results. Much of our work is actually the NACC’s work and we are open to support it fully*”.

²⁰ Gillian Dell (2015). Civil Society Participation, Public Accountability and the UN Convention Against Corruption, Transparency International, available at https://www.transparency.org/whatwedo/publication/civil_society_participation_public_accountability_and_the_uncac

On the other hand, **the NACC's prerogatives offer extensive options for NGOs to complement their own action.** In the fields of illicit enrichment and access to information, **CSOs are already covering a tremendous scope, in which the NACC can constitute the natural endpoint** as the ultimate resort to investigate suspected offenders, protect whistleblowers and seize the judiciary. **Working together to uncover the gravest offenses of corruption in Lebanon would ultimately plant the seeds of a genuine accountability system which no NGO can bare alone.**

Additionally, **by feeding the NACC its striking force in monitoring and documenting wrongdoings, the NGOs could help the NACC concentrate on developing and optimizing resources in other crucial areas,** as it won't be able to fully attain all the required capacities in its early initiation phase. This is a small part of the needed dialogue among both spheres to finetune each other's agendas and work methods, without infringing in each other's autonomous action modalities.

Moreover, CSOs activists, among whom many shall come forward as future whistleblowers based on their monitoring activity, will need to be able to **count on the NACC to provide the adequate protection** as their disclosures make their way into the relevant judiciary body. The same goes for whistleblowers from both the public or private sector whom NGOs will be encouraging to step forward in disclosing corruption reports, further nourishing the activity of the NACC.

Consolidating NACC institutionalization

The **empowering of a strong jawed and fully functional NACC lies in the core interest of local and international civil society** to combat the corruption calamity in Lebanon, through joining the ongoing efforts provided by the UNDP and Expertise France in supporting the NACC.

On the other hand, donors could be more transparent with the CSOs on the work done with the NACC and more inclusive in order to widen the scope of the NACC partners to offer additional capacity-building. Since CSOs can also contribute in accelerating the transfer of knowledge and expertise for the NACC staff, they can be further associated in consolidating the institutionalization of the Commission and ensure the channeling of good practices and upholding international standards. The NACC can draw great value from the professionalism and expertise of specialized CSOs, among which many are eager to contribute in empowering the oversight agency.



Moreover, **specialized digital civil society portals can support in the digitalization effort and the development of online data portals.** Experience can be drawn from recent initiatives such as the Inter-Ministerial and Municipal Platform for Assessment, Coordination and Tracking (IMPACT)²¹. IMPACT is supervised by another oversight agency, the Central Inspection Board, which is already fully functional and can constitute a source of inspiration to reproduce necessary digital platforms to secure public officials financial disclosures, whistleblowers' reports or complaints related to the right to access to information.

Last but not least, CSOs can contribute in shedding public light onto the NACC, by **spreading awareness over its mission among public opinion and lend it a necessary credibility regarding its role.**

As raised by the Arab Reform Initiative in a 2019 report, *“anti-corruption groups should seek to build an environment that is favorable to change through training, informing, and accountability efforts”*²², and the NACC constitutes a core element of this particular environment. **A strong nexus bringing together the NACC and civil society can lead the way in breaking the vicious cycle of endemic corruption which continues to cripple the country.**



²¹ Cf. <https://impact.gov.lb/home>

²² Brent McCann (2019). Models for Successful MENA Anti-corruption Strategies, Arab Reform Initiative, 9 December 2019, available at <https://www.arab-reform.net/publication/models-for-successful-mena-anti-corruption-strategies/>

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