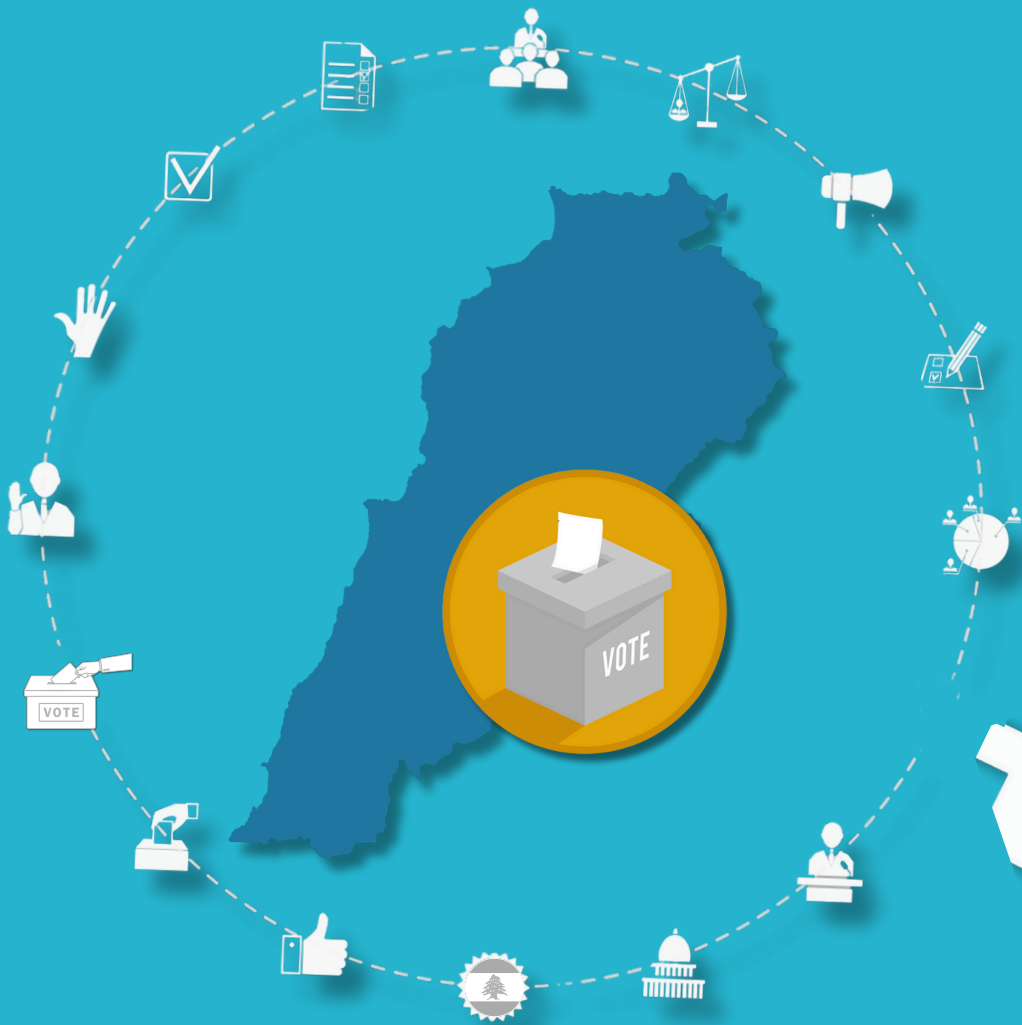


# OVERSIGHT, MEDIA, & ACCOUNTABILITY

## Challenges and Opportunities Ahead of the 2026 Elections



This report comes within the project entitled "Media Reform to Enhance Freedom of Expression in Lebanon", implemented by Maharat Foundation, Legal Agenda and the European Media and Journalism Research Center (MJRC) with the support of the Delegation of the European Union to Lebanon.

**Maharat Team and Contributors:**

Roula Mikhael, Executive Director  
Layal Bahnam, Program Manager  
Dr. Tony Mikhael, Legal Expert  
Mia Crochot, Researcher  
Habib Akiki, Media Officer

## **Oversight, Media, & Accountability: Challenges and Opportunities Ahead of the 2026 Elections**

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# KEY TAKEAWAYS

With the parliamentary elections scheduled for May 2026 approaching, there is an urgent need to establish the Supervisory Commission for Elections immediately—not later—to ensure it is ready to fulfill its critical role in monitoring campaign spending as well as electoral advertising and media. Any delay in appointing the commission or providing it with the necessary resources and legal framework will repeat the failures of the 2022 elections and undermine trust in the upcoming electoral process.

Below are the key messages highlighted in this paper:

## 1. Immediate Appointment of the Commission and a Ready Work Plan:

The government must appoint the members of the commission as soon as possible and provide them with the necessary funding and independent administrative structure, so that the commission can operate effectively before the elections. The delay in forming the commission in 2022—when it began operating three and a half months after the call for elections—weakened its ability to monitor and enforce compliance with the law.

## 2. Independence of the Commission Is Essential:

A supervisory commission cannot perform its role seriously unless it is independent. Meaningful reform requires ensuring independent legal status, administrative and financial autonomy, and a dedicated budget line within the national budget.

## 3. Real and Deterrent Powers:

The commission needs clear and direct powers to impose sanctions on violators, whether media outlets or candidates. These include imposing fines and the possibility of disqualifying candidates in cases of serious violations.

Even in the absence of comprehensive legal reform granting the commission direct executive powers, it can still play a vital role by:

- Setting clear and public standards for electoral media and advertising, including differentiating between electoral media and electoral advertising, and determining maximum airtime and space allocated for broadcasting and publishing.
- Requiring media outlets to disclose paid electoral advertisements and their funding sources, thereby enhancing transparency and preventing financial misinformation in campaigns.

## KEY TAKEAWAYS

- Issuing binding recommendations and guidelines that ensure fair access, balance, and neutrality in media coverage, to ensure equal opportunities among candidates and electoral lists.
- Promoting the representation of women and youth in media coverage, through encouraging balanced and inclusive talk shows and news reporting.
- Advocating for the use of public media to provide free and fair visibility for candidates and to ensure their right to present their platforms without discrimination or bias.
- Issuing clear instructions and guidelines to candidates and media outlets regarding complaint and objection mechanisms, including ways to demand balanced exposure and respond to biased or unlawful coverage, in accordance with what is permitted under the electoral law.

### 4. Coordination Between the Judiciary, Public Prosecution, and the Commission:

The 2022 experience demonstrated that monitoring alone is insufficient without an effective judicial process. Systematic cooperation must be strengthened between the Supervisory Commission, the Public Prosecution, and the judiciary to ensure the preparation of legally sound case files, expedite rulings on violations within legal deadlines, and prevent violators from escaping accountability on procedural grounds.

### 5. Adoption of a New Media Law and an Independent National Media Council:

Lebanon's media landscape requires regulation that enforces transparency in ownership and funding, particularly during electoral campaigns, to prevent political and financial influence from swaying election results. Reform must include the adoption of a new media law that addresses existing gaps, mandates transparency of ownership and financing, and establishes an independent national media council. This council should work in coordination with the Supervisory Commission to ensure objective and balanced oversight during electoral campaigns.

# KEY TAKEAWAYS

## 6. Prioritizing the Fight Against Disinformation and Hate Speech:

The commission's powers should be activated to implement awareness programs and combat disinformation and hate speech, including political violence against women.

## 7. An Effective Communication Strategy Is Essential to Ensure Transparency and Counter Disinformation:

The 2022 elections showed that the absence of effective and official communication from relevant authorities—especially the Ministry of Interior and the Supervisory Commission—contributed directly to the spread of disinformation and misunderstanding of the electoral law, as highlighted in Maharat's reports.

Media outlets also failed to meet their legal obligation to dedicate programming to voter education, which accounted for only 0.13% of electoral coverage—greatly weakening voters' ability to make informed decisions.

Therefore, the new commission must develop a comprehensive communication strategy based on transparency, engagement, and simplified legal interpretation. This includes updating the commission's website, publishing clear reports and awareness materials, and ensuring two-way communication with both voters and candidates.

Public communication is not a detail—it is a cornerstone for ensuring integrity, building trust, and combating disinformation in the electoral process.

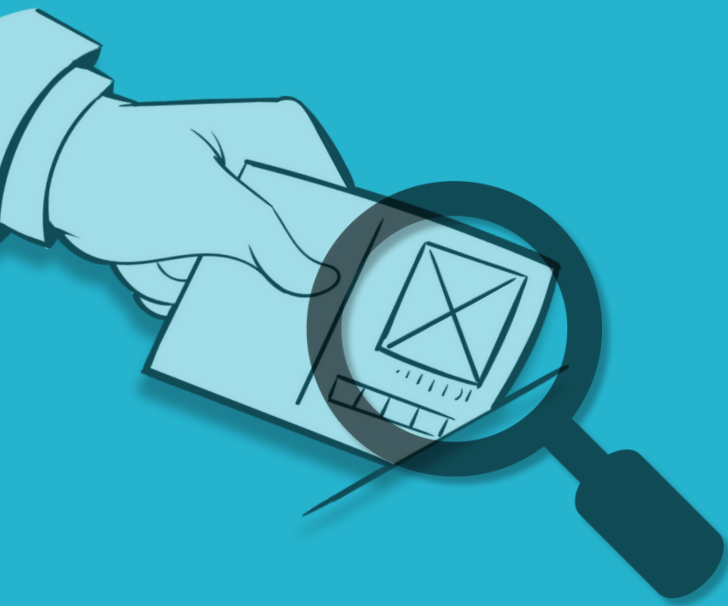
## 8. A Clear Action Plan to Prepare for the 2026 Elections:

These reforms are a practical necessity. An integrated action plan must be implemented immediately, including:

- Appointment of the Supervisory Commission and provision of its budget;
- 
- Development of its administrative and logistical structure;
- 
- Adoption of the necessary legal reforms;
- 
- Training of its staff and coordination with the judiciary and public prosecution;
- 

Engagement of civil society in monitoring and awareness efforts.

# WHY DO WE CARE ABOUT MONITORING ELECTORAL MEDIA?



# 01

Monitoring electoral media is a key component in ensuring the integrity of the electoral process and strengthening public trust in democracy. Media is the primary tool that enables voters to access the information they need to make informed choices. However, in the absence of independent and effective oversight, it can become a vehicle for disinformation, biased propaganda, and incitement.

Establishing an independent body to oversee electoral media is crucial to safeguarding the electoral process from executive control, preventing conflicts of interest, and ensuring a fair playing field among candidates. The absence or weakness of such oversight bodies leads to an erosion of public trust in elections and reinforces the perception that results do not reflect the voters' will.

International and European comparisons show that the structure and operational mechanisms of supervisory bodies directly influence the integrity of elections. While these bodies differ from one country to another, successful experiences agree on one core principle: separating those who organize elections from those who monitor them, and ensuring the independence of the body responsible for enforcing electoral laws—particularly those related to media and advertising.

In many European countries, such as France and Belgium, there are legally and administratively independent bodies tasked with overseeing media compliance during electoral campaigns. These bodies are granted broad powers to impose direct sanctions, including fines and the suspension of non-compliant campaigns, while also ensuring rapid and effective judicial involvement. Such mechanisms reduce the likelihood of impunity and ensure fair and transparent enforcement of the rules.

The report “Supervision and Oversight of the Electoral Process”, prepared by researcher Adriana Motu from the European Media and Journalism Research Center and produced in collaboration with Maharat Foundation as part of the project “Media Reform in Lebanon”, supported by the European Union, highlights that European standards emphasize four fundamental principles:



- **Independence:** The supervisory authority must be financially and administratively independent from the government.



- **Transparency:** Clear disclosure of information regarding the funding of media and advertising campaigns.



- **Accountability:** Enabling the authority to impose effective and swift sanctions.



- **Civil Society Involvement:** In monitoring, reporting, and raising awareness.

The report indicates that the absence of these components leaves electoral media without real controls, making it easier to use as a tool for disinformation and sectarian or political incitement—especially in divided contexts such as Lebanon.

One of the most critical practical aspects of enforcing laws and regulations related to elections in general—and electoral media in particular—is the authority responsible for overseeing their implementation. The bodies tasked with enforcing electoral laws and regulations, including those concerning media during election campaigns, vary significantly depending on each country's political and electoral system.

Each country enacts its own electoral laws. In some, independent bodies are responsible for managing the entire electoral process, including media oversight. In others, these bodies may be linked to the government. This institutional structure has a direct impact on the transparency and integrity of the electoral process.

The election management authority typically handles the organization of the elections, ensures transparency in their administration, and disseminates related information. While some countries explicitly activate the role of independent bodies in managing and monitoring elections, others leave this responsibility to ministries of interior or government agencies—raising the risk of conflicts of interest and undermining public trust in the democratic process.

In conclusion, ensuring the existence of an independent authority to supervise electoral media is not an administrative luxury—it is a democratic necessity. It safeguards voters' right to information and lays the foundation for elections that are fairer, more transparent, and more credible.



# WHAT IS THE REALITY IN LEBANON?



# 02

In Lebanon, the issue of electoral oversight and media regulation takes on specific dimensions due to the complexities of the political system and its direct influence on the media landscape.

Electoral Law No. 44 of 2017 established the “Supervisory Commission for Elections,” a body that is supposed to be independent in the exercise of its functions. It is composed of individuals appointed by the government, representing sectors such as retired judiciary, the Bar Association, and experts in administration, media, and civil society.

The Commission operates in coordination with the Minister of Interior and Municipalities, who provides it with office space and attends its meetings when needed, though without voting rights. However, despite being labeled “independent,” its powers remain limited to monitoring campaign financing, campaign spending, and electoral media and advertising. Meanwhile, the Ministry of Interior and Municipalities continues to manage the electoral process as a whole.

This structure clearly illustrates the overlap between governmental supervision and supposedly independent oversight, raising serious questions about the ability to ensure fair competition and transparency.

Television constitutes the most prominent and widespread form of media in Lebanon due to the variety of channels, the diversity of content, and its free accessibility across regions. These stations broadcast a wide range of general programming, including news, political talk shows, series, and entertainment, targeting all segments of society. Lebanese TV stations have kept pace with technological developments, broadcasting via satellite and offering content online and via smartphones—expanding their reach and influence. This is evident in the popularity of their programs and the public profiles of their presenters, affirming their status as the primary media platform—especially during election periods, when candidates seek visibility on TV screens to reach as many voters as possible.

However, this prominent role of television during elections is influenced by the political and sectarian structure of channel ownership. Although the media scene may appear diverse and reflective of Lebanon’s pluralism, the Audiovisual Media Law of 1994 institutionalized a system of license distribution based on sectarian and political power-sharing. This resulted in a media system dominated by privately owned channels with partisan loyalties—at the expense of Télé Liban (TL), the only public broadcaster, which suffers from chronic neglect and underfunding, leaving it unable to compete.

The current landscape of Lebanese television channels clearly reveals their political and sectarian distribution. This structure means that decisions about granting media access to candidates or political parties are subject to the interests of politically affiliated owners—at a time when Télé Liban (TL) has lost its role as a neutral public service broadcaster.

Adding to this is a severe financial crisis affecting the media sector as a whole, worsened by Lebanon's economic collapse. The advertising market—previously a source of funding for some station operations—has significantly declined, forcing channels to seek alternative funding sources. This has increased the influence of political and electoral money as a primary means for media outlets to survive.

The law addressing electoral media and advertising attempted to establish rules to regulate how TV channels cover election campaigns and manage political advertisements, with the goal of ensuring transparency, equality among candidates, and limiting discriminatory practices by private broadcasters.

Print newspapers also continue to play an important role in covering campaigns and electoral news, particularly through their affiliated online news platforms.

# WHAT IS EXPECTED FROM THE MEDIA DURING ELECTIONS?



# 03

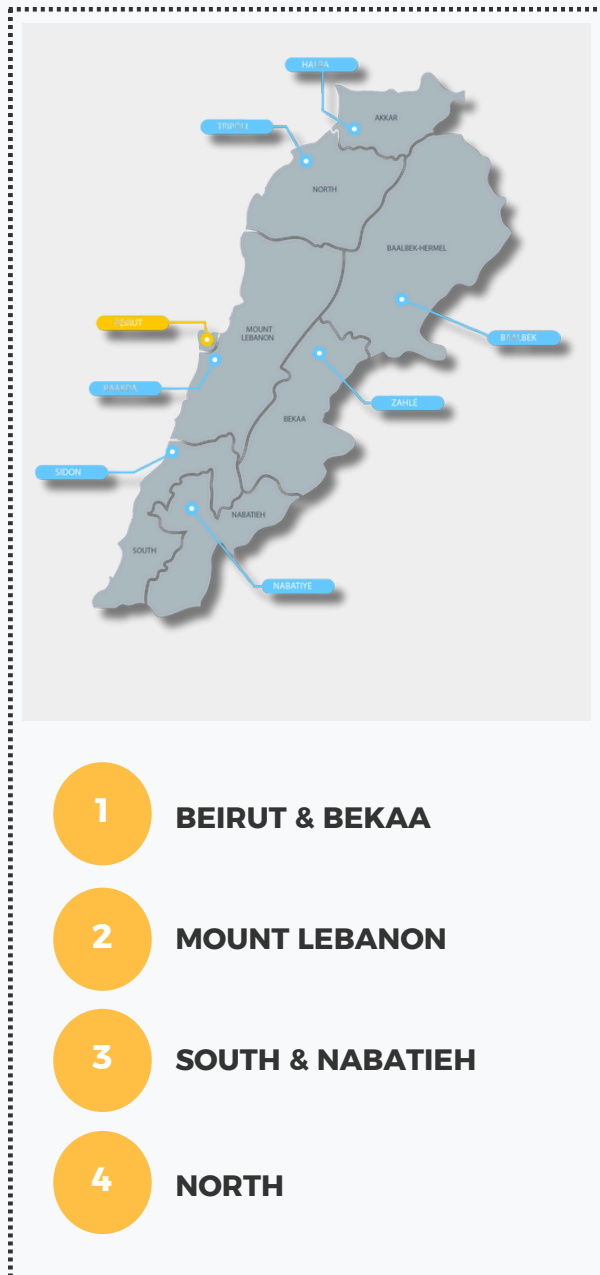
Television and radio stations, newspapers, and news websites provide extensive coverage of elections. However, they must adhere to the required legal and professional standards—many of which were found lacking during the 2022 elections. The main gaps include:

<b>Ethical and Professional Standards of Coverage</b>	Election coverage needs to be more transparent and objective to enhance voter trust. This requires setting clear ethical standards that include objectivity, neutrality, coverage priorities, and performance analysis. Often, the analysis of candidates and parties focuses on negative aspects, accompanied by defamatory content, hate speech, and disinformation.
<b>Transparency Issues</b>	<p>In terms of transparency, media outlets should commit to the following:</p> <ul style="list-style-type: none"><li>• <b>Disclosure of Funding:</b> Clearly indicate the sources of funding for political advertisements and paid content.</li><li>• <b>Monitoring Political Advertising:</b> Ensure that political ads are clearly marked, sourced, and comply with general rules governing electoral advertising to prevent voter deception.</li></ul>
<b>Diversity and Pluralism</b>	Coverage must include all social and political groups, including minorities. Media outlets should also work to improve the representation of women and youth in their electoral reporting.
<b>Accountability</b>	Ensuring that media outlets comply with these standards in their electoral coverage is vital to strengthening democracy and building voter trust. It is the responsibility of the electoral oversight body to monitor media performance during elections, assess adherence to these standards, and hold outlets accountable when required in the public interest.

# WHAT DID WE LEARN FROM THE 2022 ELECTORAL MEDIA MONITORING EXPERIENCE?



# 04



The experience of monitoring Lebanon's 2022 parliamentary elections represents a key milestone for drawing lessons on the effectiveness of electoral oversight and the regulation of electoral media and campaigning.

Reports from various monitoring missions—including the European Union Election Observation Mission, as well as reports by the Lebanese Association for Democratic Elections (LADE), Maharat, and the Organisation internationale de la Francophonie (OIF)—presented a set of observations and recommendations that now serve as an important reference in discussions on the future of electoral oversight in Lebanon.

The EU mission, in Recommendation No. 13, called for granting the Supervisory Commission for Elections clear authority to impose direct sanctions on media outlets, including television stations, when they violate legal obligations during the campaign period. This recommendation reflects the urgent need for a regulatory body capable of enforcing the law effectively, not merely reporting violations without consequences.

Reports by Maharat and LADE emphasized the need to establish an independent administrative body to manage and oversee elections—an approach supported by the Lebanese Electoral Reform Coalition. The aim is to address the persistent issue of lacking administrative and financial independence, which has long been a major obstacle to effective oversight.

Despite differences in details, all monitoring bodies identified a common set of challenges, including:



The impact of political interference in defining the body's powers and scope of work



The absence of sufficient authority to impose direct and deterrent sanctions on violators;



The lack of financial and administrative independence of the supervisory body;

These lessons are critical to opening a constructive dialogue with official and political stakeholders about the optimal structure and mandate of the supervisory authority—ensuring its acceptance across political lines while achieving the core goal of safeguarding electoral integrity.

As for the media landscape, the 2022 monitoring experience revealed deep structural challenges. Electoral media coverage in Lebanon is marked by clear bias reflecting the political leanings of media owners, resulting in unbalanced coverage that favors certain actors while excluding others.



# WHAT DID THE 2022 ELECTIONS REVEAL ABOUT LEGAL AND PRACTICAL GAPS?



# 05

The experience of the Supervisory Commission for Elections during the May 2022 elections clearly revealed the legal and operational challenges hindering effective oversight of electoral spending and media, as stipulated in Chapters 5 and 6 of Law No. 44 on the Election of Members of Parliament, issued on June 17, 2017.

**First: Legal Challenges**

- The Commission lacks independent legal personality, and it does not enjoy administrative and financial autonomy.
- The formation of the Commission and the exercise of its functions are tied to the government, which limits its independence.
- The Commission does not have a permanent headquarters or sufficient staff to effectively carry out its duties.
- It has no power to impose direct and deterrent sanctions on violating media outlets.
- Its role is limited to referring violations to the Publications Court, without the ability to follow up or expedite rulings.
- It lacks specific authority to combat hate speech and disinformation that may affect the elections.
- It is not granted the legal means to engage state enforcement bodies, such as the judicial police, inspection bodies, and the Court of Audit.

**Second: Practical Challenges**

- The Commission began its work more than three and a half months after the issuance of the decree calling for elections (December 29, 2021) and the opening of candidate nominations (January 10, 2022), only completing the appointment of its members by Decree No. 8949 on March 16, 2022.
- The Commission was not informed in advance of its allocated budget and received its first advance from the Ministry of Interior only a few days before the elections on May 15, 2022.
- The Publications Court dismissed many referrals from the Commission against media outlets on procedural grounds—most notably, the referral of websites by name without identifying a natural or legal person who could be prosecuted.
- Coordination between the Commission and the Ministry of Interior was weak.

**Third: Additional Observations from the Commission's Report**

According to its official report, the Commission observed the following during the campaign period:

- Lack of cooperation from media outlets with the Commission.
- Media outlets failed to disclose programming dedicated to paid political advertising and the actual rates applied.
- Media did not adhere to the principles of fairness and balance in candidate and list appearances, including for paid political advertising.
- Escalation of inflammatory electoral and political rhetoric, including hate speech exchanged between candidates and lists on social media platforms.
- Increase in media violations, particularly breaches of electoral silence.
- The relationship between the Commission and civil society was marked by attempts at control and restriction.
- Candidates failed to submit campaign spending reports within the legally prescribed deadlines.
- The negative impact of the banking crisis, which led to the expansion of the cash economy, thereby hindering effective control over campaign spending.

**In Summary:**

These legal and practical gaps reveal the weakness of the current framework for monitoring media and electoral spending, underscoring the urgent need for legislative and administrative reforms that ensure the independence of the supervisory authority, grant it effective sanctioning powers, and provide it with adequate human and financial resources—enabling it to genuinely safeguard the integrity of elections.

## PUBLIC COMMUNICATION GAPS DURING THE 2022 ELECTIONS

The 2022 elections highlighted major deficiencies in public communication by official bodies, which deepened the gap between electoral administration and the public, contributed to the spread of misinformation, and eroded trust in the electoral process. Media monitoring reports by Maharat Foundation, along with fact-checking conducted by the “Fact-o-meter” unit, revealed that a significant portion of the rumors and misinformation circulated during the elections stemmed directly from misunderstandings of the electoral law and its mechanisms—misunderstandings that could have been avoided through the adoption of an effective and transparent communication strategy by the Ministry of Interior and the Supervisory Commission for Elections.

Maharat’s report issued on February 16, 2022, titled “TV coverage report for the parliamentary elections” , noted the near-total absence of election officials—especially the Ministry of Interior—from media appearances, which contributed significantly to voter confusion and left an information vacuum filled by fabricated news.

On another front, Maharat’s media monitoring between February 1 and May 15, 2022, showed that voter education received insufficient attention in the media. Although the electoral law requires media outlets to allocate no less than three hours per week to voter awareness and education programs during the campaign period, the actual coverage fell far short: only 0.13% of the total political election-related coverage on Lebanese TV channels was dedicated to such programming.

This shortcoming was also highlighted in Maharat’s recent report on “Information Integrity,” which emphasized that the absence of effective public communication leaves the Lebanese public more vulnerable to disinformation and undermines voters’ ability to make informed decisions based on reliable information.



**VOTER EDUCATION RECEIVED  
INSUFFICIENT ATTENTION IN THE  
MEDIA.**

**0.13 %** ↓

**The percentage of coverage allocated to this type of program out of the total political election-related coverage on Lebanese television channels.**

**2022** ●

## A DEEPER LOOK INTO THE FATE OF DOCUMENTED VIOLATIONS

A deeper examination of what Legal Agenda documented reveals a fundamental problem regarding the fate of media violations recorded during the 2022 elections, shedding light on a real crisis in accountability and deterrence.

According to the report by the Supervisory Commission for Elections, 592 violations were referred to the Publications Court, categorized into four main groups: defamation, violations related to opinion polls, hate speech (including intimidation, exaggeration, and accusations of treason), and breaches of electoral silence. Notably, most of these violations took the form of “covert electoral media or advertising,” reflecting attempts to manipulate public opinion and conceal the promotional nature of paid content.

Additionally, around 80% of the documented hate speech during campaigns targeted religious affiliation, highlighting sectarian rhetoric as a central tactic in electoral polarization strategies.



↑  
592

Violation referred to the Print Court,  
categorized into four main types:

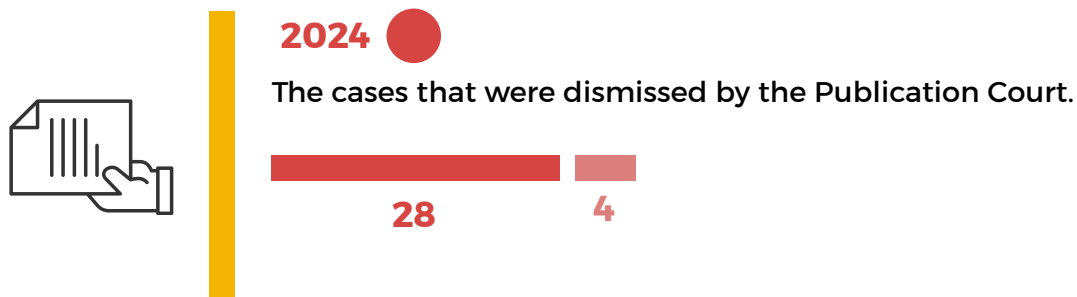
- Defamation, slander, and libel
- Violations related to opinion polls
- Hate speech
- Breach of electoral silence

80%

From the documented hate speech during  
the electoral campaigns.

2022 ●

Even more concerning was the judicial outcome of these referrals. In early 2024, the Publications Court dismissed dozens of cases (including 28 in one batch and 4 others later) on the grounds of procedural flaws. The Commission had failed to identify a clear legal entity (natural or legal person) to be prosecuted in its referrals, merely citing the names of websites or newspapers—an approach the court found insufficient to meet legal standards for filing lawsuits.



Legal Agenda's analysis further showed that the Public Prosecution Office, which is legally required to review the referrals before submitting them to court, failed to fulfill its role and forwarded the files as received from the Commission without any investigation or verification of the defendants' legal identities. The court also accepted these procedural gaps and chose to dismiss the cases without urging the prosecution to rectify them—resulting in de facto impunity for the violating media outlets.

The electoral law also requires the court to rule on such cases within a short timeframe to ensure that monitoring efforts have an impact during the campaign period. However, in reality, the files were not forwarded by the Public Prosecution until more than three months after the elections had ended, and the rulings were issued nearly two years later—rendering them devoid of any real deterrent effect.

Furthermore, the Commission did not exercise the only power that the law directly grants it—specifically concerning opinion polls. It mostly limited its actions to sending warning letters, rather than imposing the direct fines allowed by law. This occurred within what Legal Agenda described as the phenomenon of a “poll war” between political forces through media outlets, where undeclared polls were used as tools of mobilization and disinformation. The Commission failed to put an effective end to these practices.

In summary, this paralyzed judicial process reveals a structural dysfunction: a supervisory commission lacking independence and sufficient legal authority, a public prosecution that failed to investigate and verify, and a court that applied the law procedurally without striving for substantive justice. All of this led to a squandering of monitoring and documentation efforts, stripping oversight of its meaning and leaving electoral media practically unregulated and unaccountable.

# ADDITIONAL CHALLENGE: MONITORING MUNICIPAL ELECTIONS AND ELECTORAL SILENCE



06

Municipal elections in Lebanon present an additional challenge when it comes to regulating electoral campaigns and monitoring media and political advertising.

Monitoring campaigns during municipal elections is a vital tool to ensure the integrity of the electoral process and to strengthen local democracy. It is essential to securing a fair competitive environment among candidates, preventing violations such as misleading propaganda or the misuse of public resources in campaigns, and ensuring equality and a level playing field.

Legally, the Municipal Law states that “the provisions of the parliamentary electoral law shall apply to municipal elections in all matters not in conflict with the provisions of this law.” The same electoral rolls are used, and municipal council members are elected by direct public vote in accordance with the procedures outlined in the parliamentary law.

However, this general reference to the parliamentary electoral law raises an important question: **is this reference sufficient to grant the Supervisory Commission for Elections actual oversight powers over campaigns, media, and advertising in municipal elections?**

In reality, the legal framework does not explicitly assign the Commission any effective role in monitoring municipal and local elections. This responsibility currently falls exclusively within the authority of the Ministry of Interior and Municipalities. Moreover, the legal provisions related to spending caps, campaign financing, and electoral advertising are tailored to parliamentary elections. There is no explicit text applying these rules to municipal elections, making the regulation of spending and financing in this context nearly impossible from a legal standpoint.



For comparison, in France, for municipalities with more than 2,500 inhabitants, the prefect appoints a committee to oversee the conditions of electoral advertising—ensuring the presence of a relatively independent and specialized local oversight mechanism.

**2500**  
**inhabitants**



**The governor forms a committee to monitor the conditions of electoral campaigning.**



## NUMBER OF PARLIAMENTARY CANDIDATES

## COMPARISON OF THE NUMBER OF CANDIDATES IN MUNICIPAL ELECTIONS BETWEEN 2016 AND 2025

Even if the Supervisory Commission were granted oversight powers, there would still be significant practical difficulties

2025 ● 2022 ● 2016 ●



2022 Parliamentary elections:

1050



In the 2022 parliamentary elections, the Commission monitored around 1,050 candidates during a candidacy period of no more than two months.



Around 21,000

Around 30,000



By contrast, the number of candidates in the 2016 municipal elections reached approximately 21,000, and in the most recent 2025 municipal elections, it reached about 30,000, according to UNDP statistics. The candidacy period for municipal elections is also very short, ending just ten days before election day, with many municipalities settled by acclamation without a vote.

Another issue is electoral silence, which is currently expected to be enforced by the Ministry of Interior in the absence of an independent body tasked with supervising or ensuring actual compliance.

The electoral silence period is a crucial tool to ensure equal opportunity among candidates and to allow voters to reflect calmly before voting, away from pressure and propaganda. Lebanon's parliamentary electoral law clearly stipulates rules for electoral silence, but it includes no specific provisions for its application during municipal elections.

In practice, the Ministry of Interior and Municipalities solely oversees municipal elections and states in its official communications that "electoral silence is enforced" on the day before the vote. However, this language remains general and lacks detail, with no clear mechanisms for monitoring or accountability.

There is no independent body or specialized entity responsible for monitoring whether candidates, media outlets, local press, or social media platforms respect the electoral silence period in towns and villages. Additionally, the Ministry typically does not publish any detailed reports showing the extent of violations or how they were addressed.

Moreover, media coverage during municipal elections is carried out in a decentralized manner, making it difficult to monitor thousands of local campaigns and candidates. In the absence of any supervisory structure or effective sanctioning system, the electoral silence rule in municipal elections remains more of a "symbolic recommendation" than a binding legal obligation.

# **OPPORTUNITIES FOR IMPROVEMENT AND REFORM: PRACTICAL PROPOSALS FOR MONITORING MEDIA AND ELECTORAL ADVERTISING**



# 07

## FIRST:

### ENSURING THE INDEPENDENCE AND CONTINUITY OF THE ELECTORAL SUPERVISORY AUTHORITY

Past experiences clearly demonstrate the need for comprehensive reforms at the legal and regulatory levels to ensure the integrity of electoral campaigns and equal media opportunities. The following proposals are based on recommendations issued by the Supervisory Commission itself, as well as reports from local organizations and international and regional missions, offering a practical and implementable roadmap.

#### First: Ensuring the Independence and Continuity of the Electoral Supervisory Authority

To establish a commission that can effectively enforce the law and guarantee the transparency of the electoral process, it must be fully independent—both administratively and financially—from the government and the Ministry of Interior and Municipalities.



- Establish an independent administrative authority for overseeing elections that enjoys legal personality and full financial and administrative independence from the government and the Ministry of Interior and Municipalities.



- Strengthen the independence of this authority by allocating a dedicated budget under a separate section of the state budget, in proportion to its needs for covering expenses throughout the fiscal year, especially during years in which parliamentary elections take place.



- Ensure the continuity of the authority's work by requiring full-time dedication of its members, providing it with permanent headquarters, offices, an administrative structure, and internal regulations adopted by the authority itself.

## SECOND:

### DEFINING CLEAR STANDARDS FOR ELECTORAL ADVERTISING IN THE MEDIA

#### Second: Defining Clear Standards for Electoral Advertising in the Media



- Define precise criteria to distinguish between electoral media content and electoral advertising, in accordance with the provisions of the electoral law.



- Set clear limits on the types of programs and airtime or space through which electoral media or advertising content related to candidates and lists can be broadcast or published, including the timing of such appearances.



- Establish clear and binding requirements for media outlets to disclose paid electoral advertisements and their sources of funding.

## THIRD:

### ENSURING FAIRNESS, BALANCE, AND NEUTRALITY IN MEDIA APPEARANCES

#### Third: Ensuring Fairness, Balance, and Neutrality in Media Appearances

The Commission must take effective actions through binding recommendations to media outlets to ensure:



- Fair access to media, and balanced and neutral treatment of candidates and electoral lists through media coverage.



- Enhanced representation of women and youth in media coverage, particularly in news programming and political talk shows.



- Enforcement of legal provisions regarding the use of public media to provide free airtime for candidates who wish to present their electoral programs, and promote the use of this platform among candidates and lists.

## FOURTH:

### GRANTING THE INDEPENDENT COMMISSION EFFECTIVE LEGAL POWERS

#### Fourth: Granting the Independent Commission Effective Legal Powers

The Commission must not remain limited to formal or weak powers.



- Enact legal amendments granting the Commission direct authority over candidates, lists, and media outlets to ensure compliance with regulations governing electoral media and advertising.



- Grant the Commission the power to impose direct sanctions on violating media outlets, particularly financial penalties, as well as the authority to disqualify candidates who commit serious violations of the electoral law—such as breaches of campaign finance or advertising rules.



- Amend the electoral law to empower the independent electoral supervisory commission with oversight over candidates' and lists' campaigns on social media platforms—without infringing on freedom of expression and in line with the evolving digital nature of electoral campaigning.

## FIFTH:

### VOTER EDUCATION AND COMBATING DISINFORMATION, HATE SPEECH, AND VIOLENCE AGAINST WOMEN IN POLITICS

#### Fifth: Voter Education and Combating Disinformation, Hate Speech, and Violence Against Women in Politics



- Grant the independent electoral supervisory authority broad powers to educate voters and launch awareness campaigns to counter disinformation and hate speech.



- Implement programs led by the authority in collaboration with media outlets, political parties, and civil society to combat hate speech and misinformation on social media platforms.



- Grant the authority the power to track violations related to violence against female candidates and monitor their scope within the electoral context, receive complaints in this regard, and take necessary measures to ensure a safe political environment for women.



## SIXTH:

### ENSURING MEDIA FREEDOM IN ELECTION COVERAGE AND VOTER ACCESS TO INFORMATION

#### Sixth: Ensuring Media Freedom in Election Coverage and Voter Access to Information

Some legal provisions in the electoral law may hinder media outlets from fully exercising their journalistic role, effectively imposing legal censorship that restricts freedom of expression and limits media content. This, in turn, affects journalists' ability to freely cover elections. One such provision is paragraph two of Article 74 of Law No. 44 dated 17/6/2017 on the election of members of parliament. This article includes a wide range of prohibitions using vague terminology—such as banning the publication of anything that might be considered defamatory, slanderous, or libelous against a candidate or list, or the refusal to broadcast anything that may constitute pressure, intimidation, accusations of treason or apostasy, or the offering of incentives or promises of material or moral gain. Yet, if such statements are made by others—such as parties, candidates, lists, or influencers—does refraining from publishing or discussing them not amount to media blackout and a violation of journalistic duty? Wouldn't it contradict freedom of expression, the right to access information, and the voter's right to be fully informed in order to cast an enlightened vote?

Therefore, we recommend a review of this article regarding legal restrictions on media statements, especially the following points:



- Clarifying legal provisions related to prosecuting and referring media outlets to court.



- Reviewing legal referrals by a specialized legal team within the Commission.



- Enhancing cooperation between the Commission, the judiciary, and supporting bodies to strengthen the capacity of Commission members and specialized units to perform their tasks efficiently.

## SEVENTH:

### STRENGTHENING ACCOUNTABILITY AND ENHANCING COOPERATION BETWEEN THE COMMISSION, PUBLIC PROSECUTION, AND JUDICIARY

#### Seventh: Strengthening Accountability and Enhancing Cooperation Between the Commission, Public Prosecution, and Judiciary

One of the key lessons from the 2022 elections is the urgent need to activate a genuine accountability system for media and electoral advertising violations through coordinated efforts between the Supervisory Commission, the Public Prosecution, and the judiciary.

Experience has shown that monitoring alone is not sufficient if it is not followed by a sound and effective judicial process. Most complaints were dismissed due to procedural errors, and the slow pace of proceedings rendered the cases ineffective as deterrents. Therefore, any serious reform must include:



- Empowering the Commission to improve the quality of legal referrals by assigning a specialized legal team to review and prepare files in accordance with judicial requirements.



- Urging the Public Prosecution to fulfill its role diligently by reviewing referrals, conducting necessary investigations before filing charges, and identifying the accused individuals or entities to avoid dismissals based on procedural grounds.



- Strengthening systematic cooperation between the Commission and the Public Prosecution through clear protocols, joint training workshops, and ongoing information exchange.



- Enhancing the judiciary's capacity to process electoral violations swiftly and efficiently, in line with the short adjudication deadlines stipulated in the law, to ensure timely deterrence.



- Expanding the Commission's powers to impose direct administrative fines for certain violations—such as those related to non-compliant opinion polls, which emerged as a dangerous and unregulated phenomenon in the 2022 elections—and encouraging the Commission to actively use these powers.

## EIGHTH:

### ADOPTING A NEW MEDIA LAW THAT ENSURES TRANSPARENCY AND EFFECTIVE REGULATION

#### Eighth: Adopting a New Media Law That Ensures Transparency and Effective Regulation

Enacting a new media law is a fundamental and necessary step for any serious and comprehensive reform of electoral media regulation and for ensuring the integrity of election campaigns. Past experiences, especially those from the 2022 elections, have exposed legal gaps that weakened accountability mechanisms and rendered oversight ineffective.

One of the most prominent gaps is the legal vacuum in regulating news websites. Decisions issued by the Publications Court showed that lawsuits against such websites were dismissed on procedural grounds because they were not registered as clearly defined legal entities in Lebanon, which prevented them from being held legally accountable. A new media law must address this legislative gap by formally regulating the status of online news outlets, making it easier to assign responsibility and ensure legal accountability.

In addition, the new law should include explicit and binding provisions on the transparency of media ownership and funding sources. Such transparency is essential for identifying the owners of these outlets and for ensuring that electoral coverage remains impartial and free from undisclosed financial and political influence.

Furthermore, the adoption of a comprehensive new media law should be accompanied by the establishment of an independent National Media Council tasked with setting clear professional standards, monitoring compliance, and ensuring that media outlets adhere to ethical and objective practices—especially during election campaigns, when media influence on public opinion peaks. In this framework, a clear and institutional coordination mechanism should be established between the National Media Council and the Supervisory Commission for Elections. These two bodies must play complementary roles during the electoral period.

## EIGHTH:

### ADOPTING A NEW MEDIA LAW THAT ENSURES TRANSPARENCY AND EFFECTIVE REGULATION

#### Ninth: Building a Transparent and Interactive Public Communication Strategy

The effectiveness of the Supervisory Commission for Elections does not lie solely in monitoring violations and taking legal measures—it also requires building a lasting relationship of trust with citizens through effective public communication based on transparency and engagement.

Therefore, one of the primary tasks of the newly appointed Commission should be to develop a comprehensive communication and media strategy that strengthens public confidence in electoral management and reaffirms the Commission's role as a guarantor of integrity and impartiality. This strategy should rely on both traditional and digital media, including social media platforms, to reach various age groups and geographic segments in their own language and style.

The Commission must also ensure easy access to documents and decisions through its website, and regularly publish clear and detailed information on funded electoral campaigns and advertisements, documented violations, issued recommendations, and educational materials that explain laws and procedures in simplified terms for voters.

Most importantly, it must enable public engagement so that communication is not one-sided. It should activate effective communication channels with both candidates and voters.

In this sense, a public communication strategy becomes an integral part of any genuine electoral reform and a key requirement for ensuring integrity, combating disinformation, and promoting transparency.

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## Maharat Foundation

### Address:

Jdeideh, Matn  
Lebanon

### Contact Information:

Website: [maharatfoundation.org](http://maharatfoundation.org)

Email: [info@maharatfoundation.org](mailto:info@maharatfoundation.org)



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