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MEDIA TRANSPARENCY UNDER THREAT:

Addressing Opacity and Undue Influence Through Reforms

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OUTLINE

EXECUTIVE SUMMARY

This paper highlights the urgent need to address the lack of transparency in Lebanon's media ownership and financing, which has enabled entrenched political and economic interests to exert influence on the sector. Existing laws do not adequately ensure transparency in ownership structures or prevent concentration, while weak enforcement further undermines financial transparency and compliance, thereby compromising editorial independence. Additionally, there is a critical need to clearly distinguish advertising and paid content from editorial material to protect journalistic integrity and inform audiences. The proposed media law presents a timely chance to close legal loopholes, promote accountability, and restore public confidence. The paper concludes with targeted recommendations for stakeholders to support a more transparent and independent media environment.

THE IMPORTANCE OF MEDIA TRANSPARENCY IN PRESERVING INFORMATION INTEGRITY

01

This paper highlights the urgent need to address the lack of transparency in Lebanon's media ownership and financing, which has enabled entrenched political and economic interests to exert influence on the sector. Existing laws do not adequately ensure transparency in ownership structures, prevent concentration, or ensure full financial disclosure, and weak enforcement further compromises editorial independence. Additionally, there is a critical need to clearly distinguish advertising and paid content from editorial material to protect journalistic integrity and inform audiences. The proposed media law presents a timely chance to close legal loopholes, promote accountability, and restore public confidence. The paper concludes with targeted recommendations for stakeholders to support a more transparent and independent media environment. [1]

1- Media Ownership Monitor – Lebanon. (2024). Political affiliations. In Media Ownership Monitor Lebanon 2024. Global Media Registry & Samir Kassir Foundation. Retrieved July 18, 2025, from https://lebanon.mom-gmr.org/en/findings/political-affiliations/

THE REALITY OF THE LEBANESE MEDIA LANDSCAPE

02

The 2025 RSF World Press Freedom Index stated that "Genuine freedom of expression does exist in Lebanese media, but the sector remains controlled by a handful of individuals affiliated with political parties or belonging to local dynasties." [2]

This observation is reinforced by findings from the 2024 edition of Lebanon's Media Ownership Monitor (MOM) launched by the Samir Kassir Foundation which revealed that over 80% of the media outlets are linked, through shares and ownership, to the Lebanese political class, including those in legislative or executive roles. It also found that more than 70% of the media owners analyzed are associated with elected or appointed politicians, including members of parliament, ministers, or party leaders. [3]

Furthermore, Lebanon's Media Ownership Monitor (MOM) highlighted the fact that a dozen familial dynasties play leading roles in media ownership as 38% of the media outlets covered by the Media Ownership Monitor count at least a member of these 12 families in their ownership or board – or both. More than a third is also directly owned by one of them. [4]

The analysis also revealed that the views of owners almost invariably dictate the editorial line of the covered media outlets when they are directly affiliated to political forces or families.

Control over media extends beyond formal ownership. In many cases, those who finance media outlets are not their nominal shareholders. [5] This reflects a broader structural issue: the reliance on foreign investors and political parties, rather than on readership, which has reduced the media's incentive to produce quality journalism. [6]

2- Reporters Without Borders. (2025). Lebanon. In World Press Freedom Index 2025 country profile. Retrieved July 23, 2025, from https://rsf.org/en/country/lebanon

3- SKeyes Center for Media and Cultural Freedom – Samir Kassir Foundation. (2024, May 28). SKF launches 2024 Lebanon Media Ownership Monitor. SKeyes Center for Media and Cultural Freedom. Retrieved July 23, 2025, from https://www.skeyesmedia.org/en/News/News/28-05-2024/11655

4- Global Media Registry & Samir Kassir Foundation. (2024). Family Connections. In Media Ownership Monitor Lebanon 2024. Retrieved July 23, 2025, from https://lebanon.mom-gmr.org/en/findings/family-connections/

5- Media Ownership Monitor – Lebanon. (2024). Political affiliations. In Media Ownership Monitor Lebanon 2024. Global Media Registry & Samir Kassir Foundation. Retrieved July 18, 2025, from https://lebanon.mom-gmr.org/en/findings/political-affiliations/

6- Hollifield, A. (2021, May). Media Viability in Lebanon: Applying DW Akademie's Media Viability Indicators (MVIs). Deutsche Welle Akademie. Retrieved June 20, 2025, from http://data.infopro.com.lb/file/Media%20Viability%20in%20Lebanon%202021%20DW%20Akademie.pdf

According to the Media Viability in Lebanon report by DW Akademie, news outlets in Lebanon lack financially sustainable business models. Respondents in the study indicated that many media organizations rely on direct financial support from major donors, political parties or foreign governments. These actors fund the production costs of specific newspapers or broadcast channels to secure influence over communication platforms in what remains the Arab world's most politically open environment. The return on these investments has been primarily political rather than financial. [7]

Although the 1962 Press Law and Audiovisual Media Law No. 382 of 1994 grants the Ministry of Information the authority to monitor media finances, this oversight is not enforced. As a result, the funding and revenue structures of Lebanese media outlets remain opaque.

In recent years, the injection of foreign funding has declined due to the global economic downturn and shifting media priorities in the Gulf. Lebanon's 2019 financial collapse further weakened the media sector, devastating its economic foundations. Consequently, advertising revenues have sharply declined. For television, for example, these revenues dropped by nearly 90% within a few years, from an average of around $80 million between 2016 and 2018 to just $9 million in 2022. Print and radio have experienced similar downtrends. [8]

Additionally, an analysis by The Policy Initiative revealed that advertising revenues covered less than 10% of the TV sector's operating since the onset of the crisis, indicating the presence of informal funding channels. The findings suggest that the media sector has become heavily dependent on financial support from political and economic elites in return for editorial influence.

This funding structure has serious implications for access to unbiased and accurate information. Media outlets' reliance on funding from political parties, foreign investors and the banking sector compels them to promote narratives that align with the interests of their funders. As a result, journalists' editorial independence is compromised, which can lead to self-censorship practices. [9]

7- Hollifield, A. (2021, May). Media Viability in Lebanon: Applying DW Akademie's Media Viability Indicators (MVIs). Deutsche Welle Akademie. Retrieved June 20, 2025, from http://data.infopro.com.lb/file/Media%20Viability%20in%20Lebanon%202021%20DW%20Akademie.pdf
8- Dagher, G., Zoughaib, S., & Atallah, S. (2023, July 31). Follow the money: The informal channels of Lebanese media funding. The Policy Initiative. Retrieved July 23, 2025, from https://api.thepolicyinitiative.org/content/uploads/files//Media-Funding-Report_20230731.pdf
9- Dagher, G., Zoughaib, S., & Atallah, S. (2023, July 31). Follow the money: The informal channels of Lebanese media funding. The Policy Initiative. Retrieved July 23, 2025, from https://api.thepolicyinitiative.org/content/uploads/files//Media-Funding-Report_20230731.pdf

MEDIA OWNERSHIP AND FINANCING: LEGAL GAPS AND WEAK ENFORCEMENT IN LEBANON

03

Lebanese media laws contain several gaps and shortcomings in regulating ownership structure transparency and media concentration, while weak enforcement further undermines financial transparency.

a-Ownership structure transparency

Print publications are required to obtain a license from the Ministry of Information, which involves disclosing the identity of their owners. In contrast, there is currently a legal vacuum regarding online media, as no specific regulations define how websites should be established or whether ownership must be declared. Television and radio outlets, meanwhile, must be established as joint-stock companies and are therefore required to disclose their ownership structure through the commercial register, as is the case for all media outlets established as companies.

Commercial companies with their principal place of business in Lebanon, are governed by the Lebanese Commercial Law. Under Article 26 of the law, all companies must register with the commercial register in the commercial register of their area within one month of incorporation. The legal representative must submit the company's incorporation document and detailed information, including the names, nationalities, and birthdates of all partners and shareholders, the company's name and purpose, names of managers or signatories, and the identity of the beneficial owner(s).

Additionally, Article 27 stipulates that any amendments or changes to the information required by Article 26 must also be recorded in the commercial register. It further requires the registration of the name, surname, date and place of birth, and nationality of each of the company's directors, board members, and managers appointed for the duration of its existence.

Public access to company records is guaranteed under Article 22 of the Commercial Law, allowing the public to obtain information about commercial entities. However, the online archive (http://cr.justice.gov.lb) was inaccessible at the time this report was produced. The only alternative is to request hard copies of registration certificates in person through a lawyer, [10] a process that is time-consuming and not easily accessible to the general public.

Additionally, anyone may officially submit a request for information from the Commercial Register under the Access to Information Law. If no response is provided within the legal timeframe (15 days, renewable once), the request is considered implicitly rejected. In such cases, the applicant may appeal to the National Anti-Corruption Commission in accordance with the provisions of the Access to Information Law.

In conclusion, although the law theoretically guarantees public access to media ownership information via the Commercial Register, this is difficult in practice due to the lack of online access. Transparency remains well below international best practices: neither the Ministry of Information nor the National Council for Audiovisual Media publishes ownership data. The only available channel is through the Commercial Register, which is not easily accessible. As a result, the public must rely on formal requests under the Access to Information Law — a mechanism whose implementation remains inconsistent and incomplete.

10- Global Media Registry & Samir Kassir Foundation. (2024). Transparency. In Media Ownership Monitor Lebanon 2024. Retrieved July 23, 2025, from https://lebanon.mom-gmr.org/en/findings/transparency/

b- Nationality requirement

The 1962 Press Law, as amended by Legislative Decree No. 104/1977, sets out strict conditions for individuals wishing to establish or operate a political periodical in Lebanon. For example, in the case of a single owner, he or she must be a journalist and meet the criteria specified in Article 22. Notably, foreign nationals are prohibited from owning shares in Lebanese press outlets. Licenses may only be issued to Lebanese citizens or companies registered in Lebanon with exclusively Lebanese shareholders, as stipulated in Articles 30 and 31.

However, the ownership restriction requiring Lebanese nationality has often been bypassed: According to Nabil Dajani, foreign investors seeking to own Lebanese newspapers have used Lebanese citizens as nominal shareholders, securing covert agreements with them.[11]

Terrestrial broadcasting—unlike satellite broadcasting, which is not restricted to Lebanese broadcasters—shares with the print media the requirement of Lebanese ownership. However, the 1994 Broadcast Law is even more restrictive than the Press Law in this regard, as it further stipulates that any future buying or selling of shares in a broadcast corporation (i.e., after the initial granting of licenses) must receive prior approval from the Council of Ministers (Article 15).

It is worth noting that provisions concerning the nationality of media owners do not align with European best practices. As shown by the Media Pluralism Monitor 2016, most EU Member States (23 out of 28) do not impose restrictions on foreign ownership in the media sector. In the remaining countries, restrictions apply only to non-EU ownership and do not amount to a complete prohibition. Instead, these countries, most notably France and Cyprus, limit the level of foreign (non-EU) capital to prevent foreign control, with maximum thresholds set at 20% and 25% respectively across all media sectors.

11- Dajani, N. H. (1992). Disoriented media in a fragmented society: The Lebanese experience. American University of Beirut.

12- Sciacchitano, F. (2015). Assessment of media legislation in Lebanon. MedMedia Project. Retrieved July 23, 2025, from http://data.infopro.com.lb/file/AssessmentofMediaLegislationMedmedia2015.pdf

13- European University Institute, Ostling, A., Nenadic, I., Ginsborg, L., Parcu, P. L. et al., Media ownership rules in Europe – A focus on EU Member State' legislation on foreign ownership, European University Institute, 2017, https://data.europa.eu/doi/10.2870/252187

c-Transparency of media funding

Articles 42 to 46 of the Audiovisual Media Law (Law No. 382/1994) and Articles 44 to 49 of Legislative Decree No. 104/1977 (which amended the 1962 Press Law) establish frameworks that grant the Ministry of Information the authority to oversee the revenues of media institutions. Licensed companies are required to submit biannual investment reports to the Ministry, which include only the funds and resources generated from their professional and legally recognized media activities. Failure to comply with these obligations can result in legal action against those responsible, including penalties ranging from three to six months of imprisonment and/or monetary fines.

If the Ministry of Information discovers revenues obtained through illegitimate means, it may refer the case to the Publications Court, which can order the suspension of broadcasting or publication for up to six months and impose a fine equivalent to double the amount unlawfully obtained. In more severe cases, such as when unlawful funding is found to serve the interests of foreign or domestic actors in ways that conflict with the public interest or threaten public order, the Court may suspend operations for up to two years or permanently revoke the institution's license.

However, despite these ostensibly protective measures, enforcement has remained largely ineffective, according to Attorney at Law Ghassan Moukheiber. [14]

14- Interview with Attorney at Law and former Member of Parliament Ghassan Moukeiber, on June 19, 2025.

Spotlight on Media Funding During Elections: Transparency in Electoral Advertising


الجمهورية اللبنانية
مجلس النواب

قانون
انتخاب أعضاء مجلس النواب

مادة وحيدة: - صدّق مشروع القانون المعجل الوارد بالمرسوم رقم ٨٨٣ المتعلق بقانون انتخاب أعضاء مجلس النواب كما عدلته الهيئة العامة لمجلس النواب.
- يعمل بهذا القانون فور نشره في الجريدة الرسمية مع استعمال إصداره وفقاً للفقرة الأولى من المادة من الدستور.

Lebanon's Electoral Law No. 44 of 2017 requires that any paid electoral advertisement be clearly labeled as such to ensure transparency and inform the public.

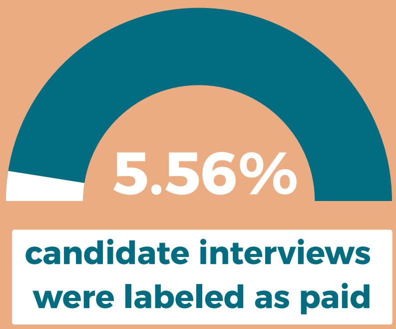
Article 71 of that law states that media and advertising outlets shall clearly state during the transmission or publication of electoral advertisements that such advertisements are paid, and specify the client who requested their transmission or publication. Hence, media outlets are obligated to label electoral advertising to distinguish it from editorial material.

The Electoral Law also states that electoral advertisements must be paid for, and their costs should be reported as part of the candidates' or lists' official campaign expenses.

In practice, compliance is inconsistent. During the 2022 parliamentary elections, only two television stations — LBCI and Al Jadeed — declared parts of their live electoral coverage as paid, according to Maharat's media monitoring. [15] However, it remains unclear whether these declarations covered all paid segments. Moreover, even in these cases, the paid content promoted electoral lists without naming individual candidates, which constitutes a breach of the Electoral Law.

Additionally, only LBCI used the label "SP" (sponsored) to identify paid content. The channel grouped such segments under a dedicated program titled Elections2022, which included talk shows and interviews where candidates presented their views in exchange for payment. However, it is unclear whether all sponsored content was consistently labeled. Other channels did not clearly identify paid segments, blurring the line between journalistic content and paid promotion.

15- Maharat Foundation. (2022). The electoral media performance during the parliamentary elections 2022. Maharat Foundation. Retrieved July 23, 2025, from https://maharatfoundation.org/media/2288/100322-en_final-tv-monitoring-report.pdf



Notably, according to Maharat's media monitoring during the 2022 parliamentary elections, only 5.56% of candidate interviews were labeled as paid, while over 94% were not, even though many exhibited promotional characteristics, allowing the hosted candidate to express themselves without any interruption or objection, while showing favoritism.

These findings highlight a lack of consistent enforcement and raise concerns about media transparency and fairness during elections.

While the Electoral Law mandates clear labeling of paid political content, many outlets fail to fully comply. Even those that do, or partially do, often omit key details —such as the names of the benefiting candidates—thereby undermining the law's purpose.

Clear distinction between editorial content and advertising content (including all forms of paid content), both during and outside election periods, remains essential to protect editorial independence and audience trust.
Electoral advertising is overseen by the Supervisory Commission for Elections. However, this body lacks the capacity to effectively enforce compliance.

15- Maharat Foundation. (2022). The electoral media performance during the parliamentary elections 2022. Maharat Foundation. Retrieved July 23, 2025, from https://maharatfoundation.org/media/2288/100322-en_final-tv-monitoring-report.pdf

d- Ownership concentration

Print and audiovisual media must obtain a license before they can legally operate in Lebanon. Media ownership concentration is addressed through the 1962 Press Law and the 1994 Audiovisual Media Law. As for ownership concentration in the online sector, it is not regulated as the whole online sector is not.

According to article 31 of the 1962 Press Law, one person is allowed to own a newspaper. However, according to the 1994 Audiovisual Media Law, any person or entity cannot own, directly or indirectly, more than 10% of the total shareholding of a single broadcast media station, meaning that a broadcasting corporation must have at least 10 distinct shareholders. Moreover, a spouse, parents, and minor children are legally regarded as one person (Article 13). In practice, however, this requirement is often bypassed.

The Audiovisual Media Law differs from Law No. 531/1996 governing satellite broadcasting, which imposes no restrictions on the number of owners or shareholders.

However, similar to print media, licensed television stations often relied on "indirect ownership" to circumvent ownership concentration limits, effectively bypassing legal restrictions. The National Council for Audiovisual Media, while strictly applying Article 13 during license reviews, did not account for this practice, allowing it to go unchecked. Ownership structures at Future TV and MTV during the license review process illustrate this pattern of indirect political control: although former Prime Minister Hariri officially held no shares in Future TV, 56% of shares were linked to him through family members, employees and advisors. Likewise, approximately 70% of MTV's 43 shareholders were low-level employees, many in their twenties, indicating indirect ownership.[16]

Neither does the Ministry of Information monitor compliance with ownership thresholds in the media, which has been a longstanding issue, nor does the National Council for Audiovisual Media effectively review license applications to prevent indirect ownership.

16- Sciacchitano, F. (2015). Assessment of media legislation in Lebanon. MedMedia Project. Retrieved July 23, 2025, from http://data.infopro.com.lb/file/AssessmentofMediaLegislationMedmedia2015.pdf

e- Restrictions on cross-media ownership

Article 12 of the 1994 Audiovisual Media Law limits a corporation to owning only one television and one radio station, allowing a corporation to own a maximum of two broadcast companies simultaneously. As for the Press Law, it imposes no cross-ownership restrictions. Hence, cross-media ownership is only addressed in the law for radio and television, ignoring other media such as cable and newspapers.

As a result, a single corporation could legally dominate the media landscape—owning one TV and radio station with near-total audience reach, while also controlling unlimited newspapers and cable outlets. Since such a corporation can be fully owned by one individual and close relatives (adult children or siblings), this opens the door for a single family to legally monopolize Lebanon's media sector. [17]

Laws should more effectively regulate cross-media ownership to prevent any single media corporation from dominating the media landscape.

17- Sciacchitano, F. (2015). Assessment of media legislation in Lebanon. MedMedia Project. Retrieved July 23, 2025, from http://data.infopro.com.lb/file/AssessmentofMediaLegislationMedmedia2015.pdf

POTENTIAL MEDIA LAW REFORMS

04

New Media Law Proposal

A new media law proposal has been before parliament since 2010, when it was submitted by Maharat and former MP Ghassan Moukheiber. It was discussed in the Media and Telecommunications Parliamentary Committee until 2016, after which it was transferred to the Justice and Administration Committee. As part of the latest legislative development, the Parliamentary Committee of Justice and Administration convened on January 9, 2024, to review the media law proposal in light of feedback from the Ministry of Information and UNESCO. Subsequently, a subcommittee, led by MP George Okais was formed to delve into the proposal and deliver a report.

The subcommittee concluded its work in May 2025 and submitted its report to the Administration and Justice Committee along with an amended draft of the media law, in the hope that the committee would proceed with its review as it sees fit. As of today, the Administration and Justice Committee has not scheduled a session to discuss the law, noting that it must eventually be presented to the Parliament's General Assembly following the committee’s review.

One of the core reforms reintroduced in the draft is the obligation for media outlets to disclose their ownership and funding structures, thereby enhancing transparency. The draft law grants the National Media Council— a new regulatory authority to be established under the law and tasked with ensuring the independence, competence, and financial autonomy of media regulation in Lebanon— full access to all relevant information pertaining to media ownership and financing and requires the Council to proactively publish such information in a dedicated public register available on its website. This obligation is considered one of the most significant reforms reintroduced in the draft, as it enables the public to build trust in media institutions and reinforces the transparency and integrity of the information they disseminate.

To promote pluralism and prevent media concentration, the draft sets out specific conditions for the ownership of television and radio stations. These outlets must be established as Lebanese joint-stock companies (Société Anonyme Libanaise – SAL) which may own no more than one television and one radio station. All shares must be nominative, and shareholders must meet strict eligibility criteria: natural persons must be legally competent and have no serious criminal convictions, while legal persons must be Lebanese-registered companies. No individual or legal entity may directly or indirectly own more than 10% of a company's shares, and family members (including spouses, ascendants, and descendants) are treated as a single ownership unit. Additionally, the new law will prohibit any single investor from owning more than one media outlet of the same type

Foreign ownership is allowed in all media outlets, but stricter limits apply to those broadcasting political content. In such outlets, foreign ownership—whether by individuals or by entities majority-owned by foreigners—may not exceed 20% of the capital. In all cases, no shareholder or beneficial owner may control more than 10% of the company's capital or hold more than 10% of seats on the board of directors. The possibility of limited foreign ownership is seen as a step toward aligning Lebanon's media sector with international standards and attracting investment in a globalized, digital media landscape. Attorney at Law Ghassan Moukheiber argues that such provisions could help position Lebanon as a regional media hub, supporting freedom of expression and restoring its historic role as a center for media development in the Middle East. [18]

Ownership concentration is to be monitored by the National Media Council, which is expected to assume the regulatory functions currently assigned to the Ministry of Information. The Council's role is to ensure that oversight is consistent, transparent, and free from arbitrary interference. Its credibility is reinforced by its composition, which is intended to reflect the diversity of Lebanese society.
The Council is also mandated to monitor compliance and is authorized to request documentation, initiate legal proceedings, and, where necessary, revoke licenses or notification status in cases of violations.

Finally, the draft law also introduces comprehensive regulation of advertising. It clearly distinguishes between editorial content and advertising content (including all forms of paid content), requiring that all media outlets clearly separate the two to protect editorial independence and ensure the public's right to transparent information. Media institutions may choose to manage advertising in-house or work with advertising agencies ("régies"), but exclusivity agreements are banned to prevent monopolistic practices. Furthermore, the law prohibits cross-ownership between broadcasters and advertising agencies to reduce potential conflicts of interest. The National Media Council is responsible for verifying audience measurement data and monitoring compliance, with financial penalties imposed for violations.

18- Interview with Attorney at Law and former Member of Parliament Ghassan Moukeiber, on June 19, 2025.

RECOMMENDATIONS

05

FOR THE LEBANESE STATE

- The Lebanese Parliament should adopt the new media law while preserving key reforms aimed at ensuring transparency in media ownership and financing, preventing concentration, and clearly distinguishing between editorial and advertising content.

- Ensure the timely creation and adequate resourcing of the National Media Council envisioned by the new media law, while strengthening existing bodies such as the Supervisory Commission for Elections to enforce media transparency and compliance.

- Establish a public, accessible registry of media ownership and funding sources to enable accountability and limit hidden political or commercial influence over media content.

FOR MEDIA INSTITUTIONS

- Enhance transparency by fully disclosing ownership structures and sources of funding, including all forms of paid content, to build public trust and uphold editorial independence.
- Implement clear separation between editorial content and advertising or sponsored material, with visible labeling to protect journalistic integrity and inform audiences.

FOR CIVIL SOCIETY ORGANIZATIONS

- Civil society organizations should regularly monitor media outlets for compliance with transparency standards, ownership and financing disclosure requirements, publicly reporting any violations to increase accountability.
- Civil society should actively engage in educating the public about media ownership, financing disclosure, and the importance of discerning between editorial content and paid content to foster a more informed and critical audience.

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