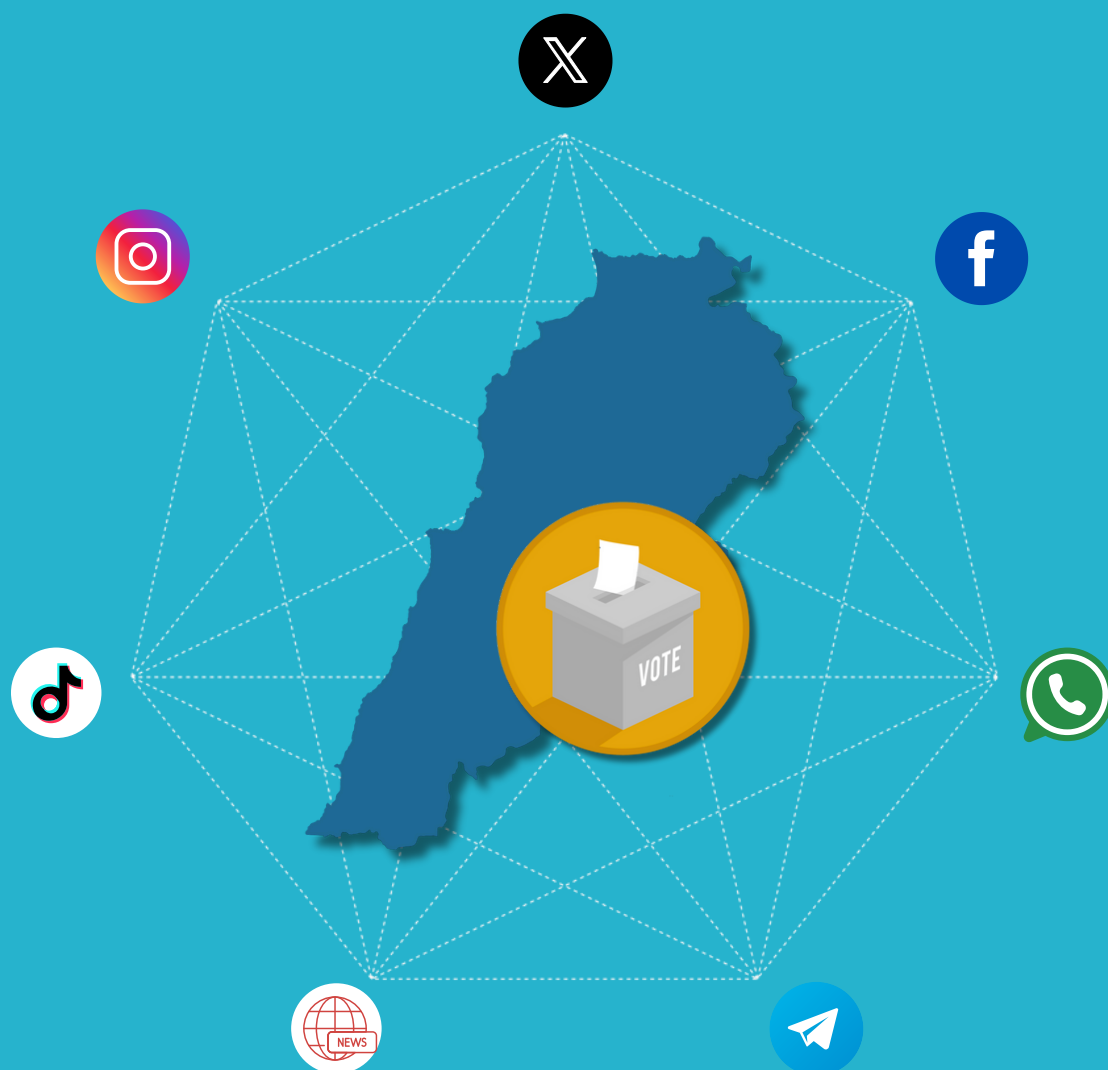


SAFEGUARDING ELECTORAL INTEGRITY IN THE SOCIAL MEDIA ERA

Challenges and Solutions for Lebanon



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.

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Safeguarding Electoral Integrity in the Social Media Era: Challenges and Solutions for Lebanon

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KEY TAKEAWAYS

Lebanon is no exception to the global trend, where social media platforms amplify falsehoods and expose users to disinformation and inflammatory content, fueling societal divisions, fragmentation, polarization, and populism. Monitoring during the last 2022 elections revealed extensive dissemination of false news, hate speech, emotionally charged propaganda, and covert political advertising.

Despite these risks, Lebanon's legal and institutional frameworks remain poorly equipped to respond:

- The 2017 Electoral Law does not cover online campaigning or digital political advertising, leaving a regulatory loophole that weakens oversight.
- The Supervisory Commission for Elections (SCE) monitored online campaigning for the first time in 2022, but it has no explicit authority to sanction violations on social media.
- Similarly, the 2018 Data Protection Law suffers from vague provisions and the absence of independent oversight, enabling widespread misuse of voters' personal data.
- Emerging technologies such as artificial intelligence remain largely unregulated, and regulatory efforts may encounter the typical institutional and legislative hurdles.
- Lebanon lacks a binding framework to hold platforms accountable and has not established mechanisms for systematic cooperation. Given its limited leverage over global platforms, fully enforcing such a framework would be challenging,

KEY TAKEAWAYS

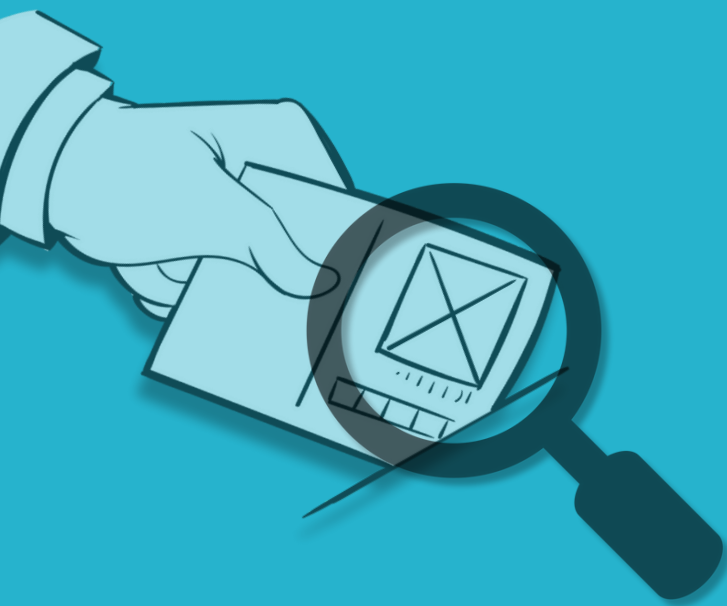
By contrast, Europe has developed a far stronger regulatory framework. Through instruments such as the Digital Services Act, Digital Markets Act, GDPR, AI Act, and the Code of Practice on Disinformation, the EU imposes obligations on platforms to ensure accountability, address online disinformation, restrict harmful microtargeting, and improve transparency in political advertising, as well as address the issue of deepfakes and harmful use of Artificial Intelligence.

Reform is urgently needed, but it must strike a **balance**. Overregulation carries the risk of further shrinking civic space and restricting freedom of expression, as demonstrated by the use of media laws in Lebanon. Effective responses should combine legislative and non-legislative measures: stronger rules on digital campaigning, data protection, AI use, and enhanced platform accountability, alongside efforts to promote media literacy, voter education, independent journalism, and fact-checking.

Moving forward, Lebanon could benefit from multi-stakeholder cooperation. A social media code of conduct for elections could establish ethical standards for campaigning, while closer partnerships between the Supervisory Commission for Elections, civil society, academia, and platforms would enhance transparency and accountability.

Furthermore, coalitions between government, civil society, academia, the private sector, and the technical community could initiate policy discussions that align interests and leverage global tech companies' existing obligations in other markets to promote greater transparency and accountability in Lebanon.

WHY IS IT IMPORTANT?



01

In democratic societies, access to accurate information is essential for citizens to make informed political choices. However, the growing prevalence of post-truth dynamics where emotions often outweigh facts has profoundly disrupted this ideal. Social media platforms, amplified by artificial intelligence, have become powerful vehicles for emotional, polarizing, and populist narratives. During election periods, these platforms are particularly vulnerable to manipulation, with disinformation and divisive content spreading rapidly through computational propaganda and algorithmic targeting.

The erosion of information integrity is further exacerbated by weak media institutions, low levels of media literacy, and deep socioeconomic inequalities. Politically motivated actors exploit these vulnerabilities, fueling public distrust and deepening social divides.

To safeguard democratic processes, urgent regulatory and policy interventions are needed. These include ensuring greater platform accountability and building societal resilience to information pollution.

WHAT IS EUROPE DOING?



02

Legislative and non-legislative measures adopted across Europe over the past decade, together with complementary legal tools, aim to address the challenges of large-scale online election-related disinformation, unlawful voter microtargeting, and the risks posed by technology-driven political campaigning. These measures are detailed in the report *Regulation of Social Media and Elections* by Adriana Mutu, [1] Research Fellow at the Media and Journalism Research Center (MJRC), and are summarized below.

The European Commission has launched several initiatives to counter disinformation. The “European approach” was first outlined in its Communication of April 26, 2018. This non-binding framework provides principles and objectives for effectively addressing online disinformation, focusing on transparency in the production and dissemination of information to empower citizens against manipulation, strengthening pluralism through support for quality journalism and media literacy, improving trust in online content, and fostering inclusive, long-term solutions involving public authorities, platforms, advertisers, and media organizations.

Other initiatives to tackle online disinformation include the Action Plan on Disinformation focusing on strengthening EU cooperation and capabilities in combating disinformation, the European Democracy Action Plan establishing accountability and the responsibilities of online platforms in tackling disinformation, the 2018 Code of Practice on Disinformation and its strengthened 2022 version; and the establishment of the European Digital Media Observatory (EDMO).

In January 2018, the European Commission also set up a High-Level Expert Group (HLEG) on Fake News and Online Disinformation. Its March 2018 report recommended a multi-dimensional strategy based on five pillars: enhancing the transparency of online news through data sharing; promoting media and information literacy to help users navigate digital environments; developing tools to empower users and journalists in combating disinformation; protecting the diversity and sustainability of the European news media ecosystem; and promoting ongoing research into disinformation in Europe to inform and adjust policy responses.

The 2018 Code of Practice on Disinformation, strengthened in 2022, is a self-regulatory EU framework with 44 commitments and 128 measures for platforms, advertisers, fact-checkers, researchers, and CSOs. It aims to curb financial incentives for disinformation, ensure transparent political advertising, empower users and researchers, and foster cooperation through a Transparency Center and a Permanent Taskforce to monitor implementation.

Alongside the Code, the Digital Services Act (DSA) and Digital Markets Act (DMA) form the cornerstone of the EU's digital strategy. They impose obligations on very large online platforms (VLOPs) and search engines (VLOSEs) to mitigate systemic risks such as illegal content, negative impact on fundamental rights, threats to civic discourse, gender-based violence, risks to minors, and AI-generated manipulation.

They introduce obligations on content moderation to curb abuse, hate speech, disinformation, and other risks; bans on targeted advertising to children; strict limits on micro-targeting based on profiling using special categories of personal data such as political opinions; options for users to opt out of recommender systems; and requirements for increased data sharing with authorities and researchers. Platforms must also publish reports on content moderation, provide data on monthly active users, and disclose key factors behind ad targeting and how users can adjust them.

It is also worth mentioning that leading technology companies—including Adobe, Amazon, Google, and OpenAI—have pledged to combat deceptive AI content in the 2024 elections through the “Tech Accord to Combat Deceptive Use of AI in 2024 Elections,” as announced at the Munich Security Conference on February 16, 2024.

As for technology-driven political campaigning, Europe has implemented both legislative and non-legislative measures to address the associated risks. Political parties using data-driven campaign tools, along with intermediary services and content providers, are required to comply with strict data processing, transparency, and risk management obligations under the General Data Protection Regulation (GDPR), the e-Privacy Directive (ePD), the Digital Services Act (DSA), the Regulation on the Transparency and Targeting of Political Advertising (TTPA), and the Artificial Intelligence Act (AIA). Activities such as content creation, engagement optimization, AI-driven microtargeting, and sentiment analysis are tightly regulated, reflecting heightened scrutiny of online political micro-targeting and behavioral advertising.

Finally, Europe has also adopted safeguards against risks associated with deepfake technologies. The AI Act, GDPR, copyright and image rights law, the DSA/DMA package, the Audiovisual Media Services Directive (AVMSD), disinformation measures, and European Parliament resolutions related to deepfakes all form part of this legal framework. Article 50(4) of the AI Act specifically requires that AI-generated or manipulated content—including text, images, audio, or video—must be clearly disclosed as artificially created when disseminated in matters of public interest. Article 50(4) of the AI Act states that deployers of AI systems generating or manipulating image, audio, or video content constituting a deepfake must disclose that the content is artificially created. Similarly, those deploying AI to generate or alter text for public dissemination on matters of public interest must disclose its artificial origin.

THE SOCIAL MEDIA LANDSCAPE IN LEBANON DURING ELECTIONS



03

Lebanon is no exception to the global trend, where social media platforms amplify falsehoods and expose users to disinformation and inflammatory content, fueling societal divisions, fragmentation, polarization, and populism. In such a divided electorate, distorted narratives erode democratic principles and deepen public distrust in political institutions. However, unlike many other countries, social media in Lebanon remains unregulated.

During the last elections in Lebanon, social media has been used as a tool to disseminate hate speech, false news, misleading information, and political propaganda to influence voting behavior.

An analysis of more than 3 million tweets and posts over the past ten years, presented by Dr. Nasri Messarra at a roundtable organized by Maharat Foundation, points to a deeply orchestrated manipulation of the online electoral environment, where multiple tactics are used to distort public perception. [2] Bot networks and automated accounts flooded platforms to push trending hashtags, not necessarily to change opinions directly, but to create the illusion of widespread consensus and suppress genuine debate. The widespread use of proxy voices, influencers, and authority figures further manufactured this false sense of popular agreement, often referred to as the “majority illusion.”



3 Million

analysis of tweets and posts

According to the same analysis, candidates—including self-proclaimed independents—frequently reversed positions before and after elections, eroding voter trust. It is also worth mentioning that disinformation was systematically seeded through fake accounts that were later deleted to erase traces of coordination, a process known as fake news washing. This ecosystem was not purely domestic: foreign-based accounts actively interfered in the elections by posting extensively in support of or against specific political groups, while behind the scenes, organized networks with defined strategic roles orchestrated efforts to shape online discourse and manipulate public sentiment.

It is also worth noting the intensive political advertising—budgets reached up to \$4 per video, often spent just on the first few seconds of engagement—amplifying emotionally charged content that dominated the discourse.

The same analysis also revealed that up to 90% of political messaging relied on fearmongering, accusations, and unverified claims, sidelining rational or fact-based arguments.

This echoes Maharat's social media monitoring findings, which showed that during the early campaign period (February–March 2022), over 80% of candidates' and politicians' discourse on Twitter and Facebook consisted of political propaganda and promotional speech aimed primarily at stirring negative emotions and directing accusations at opponents. [3] Additionally, during the same period, statements by political actors, including candidates, politicians, and influencers, contained a high proportion of content aimed at misleading the public through the promotion of conspiracy theories and accusations lacking any evidentiary basis, when in fact their messaging should have been grounded in facts and reliable evidence. [4] The same social media monitoring revealed that certain politically affiliated groups with activist backgrounds sought to manipulate democratic discourse on social media through so-called “electronic armies,” which disseminated disinformation and spread hate speech.

The social media monitoring also revealed that online hate speech persisted throughout the electoral and post-electoral period (1 February–31 October 2022), including religiously motivated rhetoric and attacks targeting candidates' sexual orientation, national origin, beliefs, or opinions. Additionally, gendered hate speech was another trend observed during elections: between 1 April and 15 May 2022, 43% of female candidates experienced various forms of online gender-based violence. [5]

Collectively, these tactics compromise the legitimacy of democratic elections by influencing voter behavior through a systematically engineered environment of misinformation, hostility and emotional manipulation. Looking ahead to the 2026 elections, despite recent political shifts in Lebanon, a significant rise in the use of AI-generated bots, synthetic content, and deepfakes is anticipated. This underscores the urgent need for effective regulation to safeguard the transparency and integrity of the electoral process. [6]



43 %

between 1 April and 15 May 2022, 43% of female candidates experienced various forms of online gender-based violence.

LEBANON'S ELECTIONS AND THE SOCIAL MEDIA REGULATORY GAP



04

As mentioned above, the advent of new digital technologies presents challenges for free elections. These technologies can shape electoral outcomes and undermine public confidence in electoral scrutiny through personalized political advertising, microtargeting, algorithmic filtering of social media feeds, and the use of artificial intelligence (AI) to influence voters' decision-making, including through deepfakes and other AI-manipulated media. Such developments have been identified as global risks of high severity in both the short and long term, as they “may radically disrupt electoral processes in several economies over the next two years”. [7]

In Lebanon, however, no legal framework governs social media platforms, and online publishing more broadly remains unregulated. By contrast, there is growing international recognition of the need for policies that ensure effective oversight of digital platforms and protect electoral integrity. Such measures are essential to safeguard public trust in electoral processes and to guarantee that voters make informed choices based on fair and balanced information.

At the same time, responses to harmful speech—including hate speech, misinformation, and disinformation—must be carefully designed to avoid unintended consequences such as over-censorship. Stakeholders must act to mitigate these risks while upholding human rights and international law. This includes addressing the regulatory gap created by emerging technologies such as generative AI and ensuring information integrity.



A- Gaps in the Electoral Law



The Lebanese Electoral Law (Law No. 44/2017) designates the Supervisory Commission for Elections (SCE), under Chapter Three, as the body responsible for monitoring electoral processes and ensuring integrity and transparency. Specifically, Article 19 authorizes the Commission to monitor the compliance of all candidate lists, individual candidates, and media outlets with the laws and regulations governing electoral competition. It also empowers the Commission to oversee election campaign spending and to receive and adjudicate complaints regarding alleged violations related to its functions.

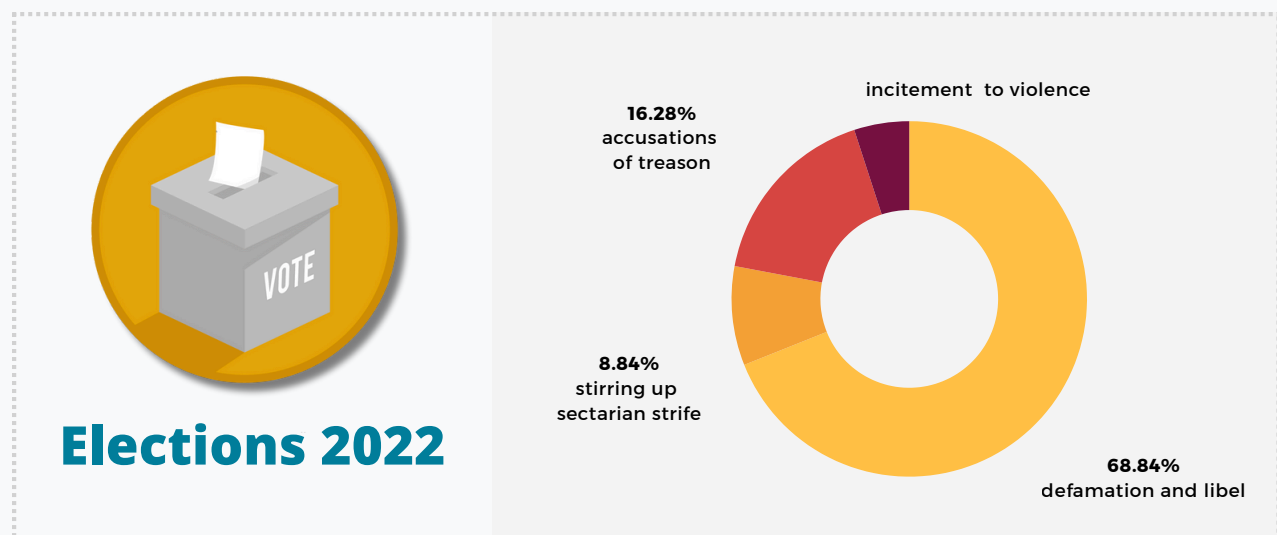
Chapter Six of Lebanon's Parliamentary Elections Law outlines the framework for monitoring electoral campaigns and financing, primarily under the authority of the Supervisory Commission for Elections (SCE). However, the Law does not explicitly mention or regulate online campaigning or digital political advertising. The provisions related to electoral media and advertising (Articles 68–79) focus on traditional media formats such as television, radio, and print. Terms like "electoral media," "electoral advertising," and "electoral broadcast" are defined and used in the context of licensed media outlets and do not extend to social media platforms or online influencers. Furthermore, mechanisms for monitoring content or spending on digital platforms are absent, highlighting a significant legal gap in addressing the growing role of online campaigning and financing in elections. According to the EU-EOM, "The election law does not reflect the increased use and specificity of social media, nor does it give the SCE an explicit mandate over violations on social media". [8]

The absence of clear regulation of online media has created a significant loophole in the electoral framework. Traditional media outlets increasingly rely on social media platforms to disseminate electoral content, yet they operate under the assumption that the provisions of the Lebanese Electoral Law (Law No. 44/2017) do not apply to these platforms. As a result, many outlets disregard rules designed to ensure fairness, transparency, and balance in electoral coverage, thereby weakening the effectiveness of existing safeguards and allowing unmonitored practices to shape the electoral landscape.

However, for the first time, during the 2022 parliamentary elections, the SCE monitored online campaigning in accordance with Chapter VI of the electoral law concerning media coverage and advertising. Eight monitors, trained and equipped by UNDP, systematically tracked candidates' online content and spending, documenting numerous violations. [9]

However, these violations could not be sanctioned nor followed by early warnings. On 9 May, the SCE released data on the types and frequency of social media violations, but no further action was taken.

According to the Supervisory Commission for Elections, the distribution of violations documented on social media was as follows: defamation and libel (68.84%), stirring up sectarian strife (8.84%), accusations of treason and unbelief (16.28%), and incitement to violence, riots, and support of terrorism (data not available).



To promote fairer elections, according to the EU-EOM, the law should be revised to explicitly regulate campaigns on social media and grant the SCE the authority to effectively sanction violations. Such reforms would extend spending limits and transparency requirements to online electoral advertising, helping curb unregulated expenditures and covert sponsored content that undermine media neutrality and electoral integrity.

However, it is crucial to ensure that certain provisions of Lebanon's media laws do not become a tool for repression since the electoral law grants the SCE the ability to take action based on the provisions of the Penal Code, the Publications Law and the Audiovisual Media Law. Experts cautioned that expanding the SCE's mandate to cover social media could inadvertently undermine freedom of expression as certain provisions of these laws risk being misused under the guise of regulating digital campaigns, thereby shrinking democratic space instead of broadening it. [10]

Indeed, the legal framework governing media in Lebanon has often been used repressively, with selective lawsuits and security agency summons targeting critical voices, especially after the October 2019 uprising, leading to increased self-censorship. Defamation and insult laws, which are not in line with international standards, are increasingly weaponized by powerful political and religious figures to silence peaceful dissent due to their vague and ambiguous wording, resulting in individuals being pressured by security agencies to delete posts or sign pledges without court rulings.

During the 2022 campaign period, at least one candidate was summoned for a months-old Facebook post and was made to commit not to post about the targeted official again. Against this backdrop, imprisonment penalties for defamation, libel, offences against religion, and the dissemination of false information should be suppressed, and media-related offences and crimes withdrawn from the jurisdiction of military courts.

This also underscores the value of non-legislative measures aimed at improving information integrity.

It is also worth noting that the SCE already struggles to fulfill its mandate—challenges that, without reform, would remain even if its authority were expanded to cover online media. While the Commission was eventually equipped with the necessary logistics to monitor media and candidates' appearances, the late delivery of this equipment hindered its effectiveness. This delay highlights the need to ensure timely preparation ahead of future elections.

Additionally, Maharat's election monitoring report on the 2022 parliamentary elections [11] highlighted weak enforcement of Lebanon's campaign finance and media rules, marked by widespread undeclared paid appearances, limited transparency, and a Supervisory Commission lacking independence and the authority to impose effective sanctions.

In line with these calls for structural reform, experts have emphasized the need for an empowered and specialized supervisory authority during election periods. They caution that, without effective enforcement mechanisms and the recruitment of experts in online campaigning and digital media, any new regulatory effort would likely remain ineffective. [12]

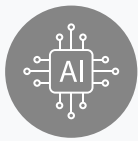


B- Gaps in Data Protection and Digital Rights

Additionally, it is worth noting that Lebanon's 2018 Law on Electronic Transactions and Personal Data fails to adequately protect user privacy. The law contains vague rules on data collection and processing, lacks clear time limits, and offers limited safeguards—particularly against misuse by government ministries. There is no independent oversight body, and authority rests with the Ministry of Economy and Trade, undermining accountability. Public awareness of data usage is low, and individuals have limited rights to withdraw consent.

During the 2022 election campaign, personal data was widely collected and used without consent. Only a few political parties disclosed partial data protection policies, and most lacked transparency about data usage. Candidates and parties obtained voter data through various means, including offline events, municipalities, and purchased voters' lists. This data was used for targeted, often unsolicited campaign outreach via SMS, phone calls, and WhatsApp, supported by call centers and specialized software.

The EU Election Observation Mission recommends amending the Law on Electronic Transactions and Personal Data to effectively ensure the protection of personal data, as well as establishing an independent oversight body to oversee the collection and processing of personal data. It also recommends guaranteeing citizens protection against unsolicited information, including political propaganda during the election campaign. [13]



C- Gaps in regulating Artificial Intelligence

On another note, Lebanon has begun discussing the regulation of emerging technologies, including artificial intelligence, with the appointment of a state minister for Technology and Artificial Intelligence who also serves as Minister of the Displaced, and a draft law proposing the creation of a national AI authority. However, the absence of a clear mandate for the minister, combined with Lebanon's notoriously slow legislative process characterized by delays in committee reviews and political inertia raises serious concerns about the timeline for enacting any regulatory framework. This legislative stagnation poses a major challenge in keeping pace with fast-evolving digital technologies, including those that impact electoral integrity.

In this context, the Ministry of Technology and AI has launched LEAP—short for Launch, Apply, Advance, and Promote—a national roadmap aiming to position Lebanon as a regional hub for artificial intelligence within five years. Its first year will focus on adopting a set of laws to regulate the sector, although the same institutional hurdles risk slowing progress.

These hurdles are further compounded by incoherence between national plans and draft laws as well as fragmented competences across ministries and entities, such as the Ministry for Technology and AI and The Office of Minister of State for Administrative Reform (OMSAR), which undermines institutional coordination and prevents the emergence of a unified national vision. These weaknesses pose a major challenge to keeping pace with fast-evolving digital technologies, including those directly affecting electoral integrity.

Recently, on 9 September 2025, the Cabinet decided to create a technology and artificial Intelligence ministry – until now the portfolio had been under a minister of state, in this case the minister for the displaced, Kamal Shehadi, as mentioned above.

It is also worth noting that other stakeholders are contributing to the policy debate around AI regulation. For instance, the Lebanese University's Faculty of Law, Political & Administrative Sciences published guidelines on AI governance and ethics in Lebanon. They outline key principles—justice, fairness, privacy, security, transparency, accountability, and social and environmental benefits—propose a national regulatory framework, and offer recommendations at local and international levels. The guidelines also suggest a monitoring mechanism through the creation of a National Authority for Artificial Intelligence.



D- Accountability of social media platforms and tech companies

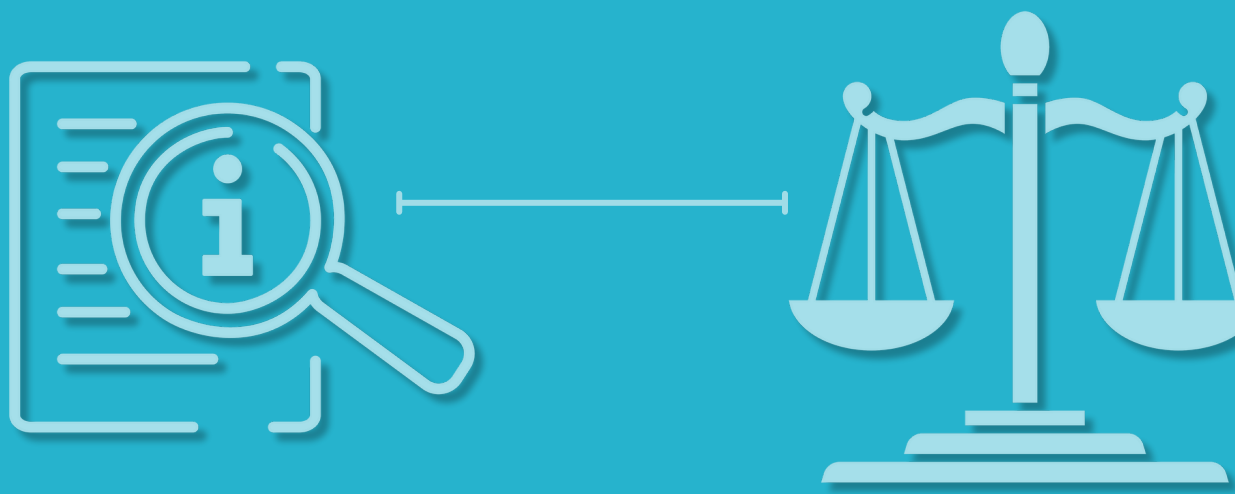
Efforts to regulate social media, emerging digital technologies, and the online sphere in Lebanon must be approached with caution, given the persistent risk that such measures could infringe on freedom of expression and opinion as guaranteed under Article 19 of both the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights.

European frameworks such as the Digital Services Act (DSA) and the AI Act offer a useful point of comparison: they impose clear, enforceable obligations on platforms and tech companies themselves, rather than on individual users.

By contrast, Lebanon lacks the leverage and regulatory capacity to impose comparable obligations on global tech companies. This means that a simple replication of the EU model is not feasible. Instead, Lebanon must adopt a context-specific approach that balances its limited enforcement capacity with the imperative of safeguarding electoral integrity and media freedom. In this sense, legal frameworks alone cannot provide a full solution; complementary strategies such as multi-stakeholder cooperation, voluntary platform commitments, and civil society monitoring are equally vital.

Government actors, civil society, academia, private sector and the technical community could form coalitions to initiate policy discussions, aligning interests and leveraging technology platform obligations already enforced in other markets. Such coalitions could increase pressure on platforms, promoting greater transparency and accountability in Lebanon. These efforts would tackle key risks such as microtargeting, algorithmic filtering, data misuse, gendered disinformation, political ad spending, and deepfakes.

NON-LEGISLATIVE MEASURES TO STRENGTHEN INFORMATION INTEGRITY ON SOCIAL MEDIA PLATFORMS IN LEBANON

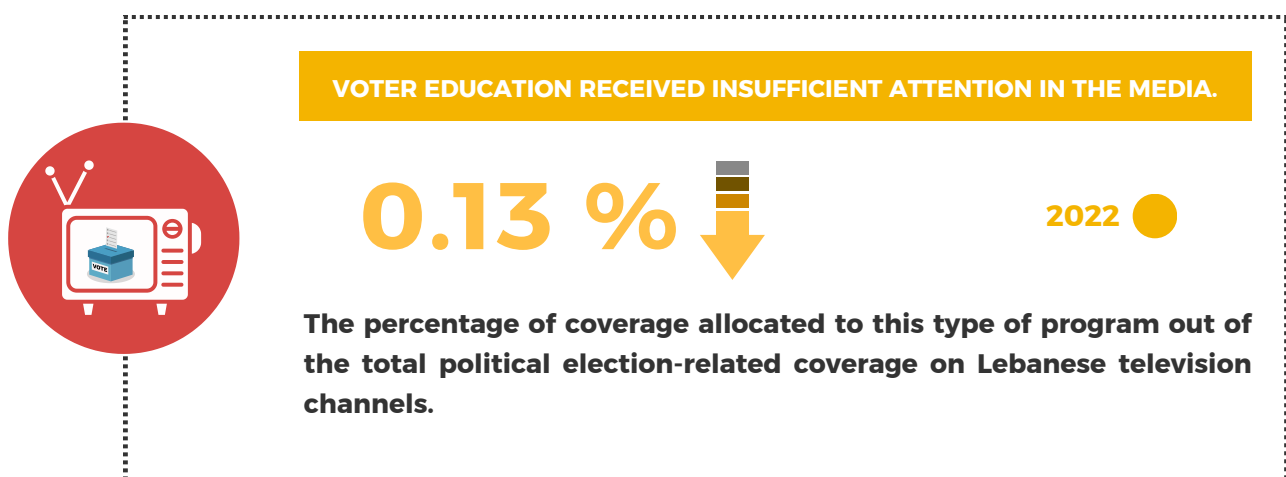


05

Non-legislative measures such as voter education, media and information literacy (MIL), and support for independent quality journalism are essential to fostering an informed electorate and countering disinformation.

During the last parliamentary elections, the official Facebook page (ministry of interior) for the 2022 parliamentary elections released 25 voter education posts—most of them in the two weeks leading up to election day, with ten boosted for wider reach. However, the campaign's late launch limited its impact. Increasing the duration and frequency of such campaigns and ensuring adherence to media obligations would enhance public understanding of the electoral process. While the EU EOM observed limited voter education efforts from political actors, several international organizations, civil society groups, online media, and diaspora platforms helped fill this gap by producing accessible content on electoral procedures.

It is also worth noting that traditional media largely failed to meet its legal obligation to provide voter education. According to media monitoring conducted by Maharat Foundation, voter education accounted for only 0.13% of the overall TV coverage dedicated to political actors and electoral issues.



Additionally, inclusion should also be taken into account. [14] Sylvana Lakkis of the Lebanese Union for People with Disabilities stressed the need for accessible electoral information to empower marginalized communities and proposed a stronger role for public service broadcasting. [15]

As mentioned before, civil society, international actors, and media development organizations play an important role in strengthening the information environment in Lebanon—not only in terms of voter education but also by supporting the production of evidence-based, ethical journalism. They build journalists' capacities and provide training on professional standards, helping to foster a healthier and more credible media ecosystem. Furthermore, these actors play a role in equipping a community of journalists with fact-checking skills, thereby contributing to the creation of a network of fact-checkers which will be able to integrate robust fact-checking mechanisms into newsrooms. In parallel, they actively empower independent media platforms, which challenge dominant narratives promoted by politically affiliated traditional outlets. These alternative voices strive to hold power accountable and to provide more representative and accurate coverage of public concerns and lived realities, including during elections.

Additionally, it is worth noting that civil society has developed initiatives to promote media and information literacy in Lebanon, but the state has yet to implement any programs. The Ministry of Education should integrate media and information literacy into school curricula, while civil society initiatives can continue providing complementary training.

Finally, multi-stakeholder cooperation is crucial to strengthening information integrity online. As highlighted during the roundtable organized by Maharat on this matter, “disinformation is a major challenge that undermines trust in the electoral process. There is a lack of cooperation with digital platforms, even in past elections. Greater collaboration among all stakeholders, including civil society and academia, is needed, alongside stronger media and information literacy (MIL) and fact-checking initiatives.” [16]

CONTEXTUALIZED RECOMMENDATIONS



06

FIRST:

LEGISLATIVE
MEASURES

Contextualized recommendations

1- Media laws



- Legislation should strictly define hate speech and incitement to hatred and violence in line with international standards.



- Suppress imprisonment penalties for defamation, libel, offences against religion, the dissemination of false information, and withdraw media-related offences and crimes from military courts' jurisdiction.

2- The Electoral Law and Online Campaigning



- Include explicit provisions on campaign on social media in the electoral law and give the SCE powers to effectively sanction violations, which would extend spending limits and transparency requirements to online electoral advertising, helping curb unregulated expenditures and covert sponsored content that undermine media neutrality and electoral integrity.

3. Data Protection



- Establish an independent oversight body to oversee the collection and processing of personal data.



- Develop a comprehensive data protection law modeled after the GDPR, ensuring stakeholder consultation.

FIRST:

LEGISLATIVE
MEASURES

4- AI regulation



- Regulate AI-generated content, particularly deepfakes, to prevent abuse in a way that does not restrict free flow of information and the right of criticism.



- Establishing a platform for discussion, dialogue and exchange, could help create a supportive policy environment.

5- Platform Accountability



- Independent research and access to platform data should be supported by Lebanese lawmakers and policymakers, drawing on the example of Article 40 of the Digital Services Act (DSA) which stipulates that technology platforms must provide access to their data for the purpose of conducting research that contributes to the detection, identification, and understanding of systemic risks.



- Establish structured communication channels with digital platforms to promote transparency and accountability, ensuring that content moderation respects human rights, particularly during elections.

SECOND:

NON-LEGAL INTERVENTIONS: MEDIA LITERACY, QUALITY JOURNALISM, AND FACT-CHECKING

Second: Non-Legal Interventions: Media Literacy, Quality Journalism, and Fact-Checking



- The government, civil society and media should strengthen voter education by expanding the timing, frequency, and accessibility of campaigns, including for marginalized groups.



- The state and civil society should promote media and information literacy to equip citizens with the skills to critically assess online electoral content. The Ministry of Education should integrate media and information literacy into school curricula, while civil society should continue providing training programs.



- Civil society should support independent quality journalism by building journalists' and fact-checkers capacities and empowering media platforms to provide accurate coverage.



- Media outlets should strengthen in-depth reporting on electoral issues while integrating fact-checking and voter education into their coverage.

THIRD:**MULTI-STAKEHOLDER
COLLABORATION****Third: Multi-stakeholder Collaboration**

- Foster multi-stakeholder cooperation among various actors such as the Supervisory Commission for Elections, civil society, journalists, academics and social media platforms to ensure coordinated social media governance and safeguard election integrity.



- Government officials, political parties, the Supervisory Commission for Elections, and other stakeholders could create a Social Media Code of Conduct for Elections, modeled on the 2024 European Parliament voluntary Code developed by the International Institute for Democracy and Electoral Assistance (International IDEA) in collaboration with European political parties and the European Commission, to set standards for ethical online campaigning and promote fair elections.



- Coalitions between government, civil society, academia, the private sector, and the technical community could initiate policy discussions that align interests and leverage global tech companies' existing obligations in other markets to promote greater transparency and accountability in Lebanon. These efforts would tackle key risks such as microtargeting, algorithmic filtering, data misuse, gendered disinformation, political ad spending, and deepfakes.

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