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PRELIMINARY FINDINGS REPORT OF THE LEBANON RECOVERY, REFORM, AND RECONSTRUCTION GOVERNANCE FRAMEWORK

Presented by the Independent Oversight Board of the 3RF - August 2025



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Disclaimer:

While the team has made all efforts possible to cross-check information and reproduce facts and events accurately, this does not overrule the possibility of inaccuracies or oversights, for which the IOB hereby expresses deep regrets.

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List of Abbreviations:

3RF	Lebanon Recovery, Reform, and Reconstruction Framework
B5	Building Beirut Businesses Back and Better Fund
CG	Consultative Group
CSO	Civil Society Organization
EU	European Union
FGD	Focus Group Discussion
GoL	Government of Lebanon
IOB	Independent Oversight Board
KII	Key Informant Interview
MoPIC	Ministry of Planning and International Cooperation
PMO	Prime Minister Office
LFF	Lebanon Financing Facility
TI	Transparency International – Lebanon Chapter
UN	United Nations
UNDP	United Nations Development Programme
WB	World Bank Group

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Executive Summary:

The Lebanon 3RF was established in the wake of the 2020 Beirut Blast by the EU, the WB, and the UN. The first track of the 3RF responded by offering grants to respond to socioeconomic and business recovery efforts. The second track focused on reforms and supporting the design and implementation of reforms. Inspired by the Iraq 3RF, whose implementing partner was the Iraqi Ministry of Planning, the Lebanon 3RF was a unique project design in which the Lebanese civil society was given an important role to play. CSOs were given a presence in the CG, the Partnership Council in the LFF, the WGs, and predominantly in the IOB, where only civil society groups are mandated to be part of the board. The 3RF bypassed government institutions by design in track I by channeling grants directly to affected and relevant stakeholders, yet track II's success hinges on the confirmed, though nominal, commitment of the GoL to abide by the established reform agenda. This contrast may have further reinforced existing resistance to reform.

While the LFF successfully mobilized financial resources, fostered donor coordination, and supported sectoral reforms, the overall progress of the 3RF in reform implementation has been slow primarily because the 3RF needs to be viewed as a conduit for the implementation of reforms and not necessarily the platform through which reforms need to be implemented, but largely due to limited institutional and governmental ownership and the lack of political will, coupled with fragmented stakeholder engagement.

While the 3RF has laid the groundwork for recovery and reform, its success rests primarily on enhanced governmental ownership, alongside improved coordination among stakeholders, sustained engagement from international donors and civil society, and formal recognition of the pivotal role of Lebanese civil society.

Main Recommendations:

- **Clarify the Role of the 3RF and Its Units**

Define clearly the mandate, functions, and responsibilities of each unit within the 3RF (IOB, LFF, CG, WGs). This will reduce duplication, strengthen accountability, and improve stakeholder engagement.

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Regarding the CG: while it has become dormant, dissolving it would risk eliminating one of the few formal spaces for civil society within the 3RF. To safeguard this role, the CG should be maintained, even in a dormant state, as a placeholder mechanism that can be reactivated when political and institutional conditions allow.

- **Create a government-led planning and coordination unit**
Establish a coordination unit in the PM's Office (short term), reform the Council for Development and Reconstruction (medium term), and establish a Ministry of Planning and International Cooperation (long term).
- **Institutionalize Parliamentary Engagement in Reforms**
Link CSOs and WGs to parliamentary committees to strengthen oversight, ensure policy continuity, and align reforms with legal frameworks.
- **Strengthen Cross-Stakeholder Communication**
Improve coordination between the LFF, CG, IOB, WGs, and GoL through focal points, standardized communication, and systematic information-sharing.
- **Provide a Legal Anchor for the 3RF**
Formalize the 3RF through legislation to secure institutional legitimacy and sustainability.
- **Enhance Transparency Through Public Information**
Populate the 3RF website with real-time, accessible data on projects, financing, reforms, and WG activities.
- **Improve Funding Transparency and Accountability**
Publish disaggregated financial data, issue regular donor/project updates, and involve CSOs in monitoring grants.
- **Increase Government Ownership of the 3RF**
Ensure WGs are GoL-led, strengthen localized decision-making, and integrate CSOs into government coordination mechanisms.

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3RF Action Plan:

Short-Term Actions Table (July 2025 - December 2025)

Focus: Improve coordination, transparency, and lay the groundwork for government leadership.

ACTION AREA	SPECIFIC DELIVERABLES	RESPONSIBLE ENTITIES
Strengthen Coordination & Communication Between IOB, LFF, CG, & WGs.	<ul style="list-style-type: none"> ✓ Appoint focal points for each of IOB, LFF, CG, & all WGs. ✓ Update the mailing list at each of IOB, LFF, CG, and WGs to include ALL stakeholder emails. ✓ Include on 3RF website all previous MoM, dates of upcoming WG meetings, and how CSOs can apply to be part of the WG (the role that CSOs/ private sector can play in WGs). 	IOB, LFF, CG, WGs
Call for the creation of a coordination unit at the Prime Minister's Office.	<ul style="list-style-type: none"> ✓ IOB and partners to formally propose establishing a coordination and planning unit within the Prime 	IOB, LFF, CG, WGs, PMO

Medium-Term Actions (January – June 2026)

Focus: Strengthen government ownership and capacity.

Responsible: Government of Lebanon + ministries, with support from donors and IOB.

- Assign **3RF focal points** in each ministry (technical and policy levels).
- Provide **technical assistance** to build government institutional capacity.
- Ensure **political and bureaucratic buy-in** (secure endorsements, incentives).

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- Enhance **transparent communication** (include GoL reps in all mailing lists and meetings).
- Re-align or reshuffle government priorities to focus on “low-hanging fruit.”
- Increase government **visibility and ownership** in reform progress and communications.

Long-Term Actions (Beyond June 2026)

Focus: Institutionalize reform leadership within the Lebanese state.

- **Phase 1:** Coordination unit in PM’s Office (short term - already initiated).
- **Phase 2:** Reform the **Council for Development and Reconstruction** (medium term).
- **Phase 3:** Establish a **Ministry of Planning and International Cooperation (MoPIC)** to become the central planning and donor-coordination body.

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Introduction:

Established in December 2020 by the World Bank, the United Nations, and the European Union in the aftermath of the Beirut Port explosion, the 3RF was designed to address Lebanon's immediate recovery needs while laying the foundation for long-term reform and reconstruction. It adopts a people-centered approach, grounded in the principles of transparency, accountability, and inclusive governance.

The 3RF is structured into two primary tracks:

Track I: Recovery

This track focuses on urgent humanitarian assistance and the restoration of critical infrastructure and services. Its objectives include:

- a. Rebuilding essential services such as healthcare, education, and housing within the affected areas, particularly the 5 km radius of the blast site.
- b. Supporting vulnerable populations through social protection programs.
- c. Restoring economic opportunities for those affected, including small business support through initiatives like the B5 fund.

Track II: Reform and Reconstruction

This track addresses systemic challenges and aims to foster sustainable governance and infrastructure development. Its key priorities are:

- d. Implementing structural governance reforms, including anti-corruption measures and public financial management improvements.
- e. Enhancing dialogue on policy reform to promote transparency and accountability.
- f. Developing long-term strategies for the reconstruction of infrastructure, economic stability, and social protection systems.

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The IOB contends that, regardless of the degree of civil society engagement in Lebanon's 3RF, political will remain the primary determinant of reform enactment and access to reconstruction funds. Nonetheless, civil society is a critical force, as demonstrated by its leadership in responding to the Beirut Port explosion in 2020.

Within the 3RF, however, civil society's potential was underutilized due to several structural and institutional shortcomings. Chief among these was the absence of effective leadership and coordination from the GoL, which led to fragmented implementation, duplicated efforts, and the proliferation of institutional layers to compensate for the lack of a central planning ministry. Lebanon stands alone among its regional peers in lacking a Ministry of Planning or International Cooperation, an institutional gap that significantly undermines strategic coordination and oversight.

Still, the failure to achieve the 3RF's reform objectives cannot be attributed solely to design or coordination flaws. It reflected the Lebanese government's unwillingness to commit to a genuine reform trajectory.

The leadership vacuum within the GoL gave rise to several key concerns among 3RF stakeholders:

- **Coordination failures**, particularly in Track I, between municipalities and government actors, led to duplicated interventions and unclear lines of responsibility. This reinforced the urgent need for the GoL to assume a central coordinating role. The resulting vacuum also highlighted persistent communication breakdowns between the government, civil society, and international stakeholders, shortcomings evident from the outset.
- **Institutional frustration**, notably among UN agencies, stemmed from the recurrent rotation of personnel across ministries, further underscoring the absence of institutional memory and the pressing need for a dedicated government-led coordination and planning body to consolidate oversight, ensure continuity, and streamline project tracking.
- **Layered governance structures** within the 3RF diluted accountability and reduced operational efficiency, undermining the initiative's capacity to deliver on its stated objectives.
- **Fundamental limitations** rooted in political inertia rendered the framework structurally impaired. Without state commitment, neither civil society nor the international community could drive meaningful or sustainable reform.

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Context of the 3RF:

The 3RF mobilized international financial support, created a platform for dialogue between government institutions, donors, and civil society organizations, and drove technical discussions on critical reform areas such as energy, social protection, public financial management, judicial independence, and anti-corruption. Throughout the life of the 3RF as a project, the financial, social, economic, and political conditions of Lebanon significantly deteriorated, and with it, the ownership of the Lebanese Government as a main stakeholder in the 3RF. Designed to directly engage international and local organizations in project implementation and fund disbursement, the 3RF largely bypassed central government institutions during the execution of its Track I projects. While it maintained cooperation with municipalities, financial flows were channeled outside of the Lebanese Central Bank, reflecting an intentional effort to minimize reliance on state structures amid concerns over governance and accountability. LFF-financed projects are the building Beirut businesses back & better fund, the support for social recovery needs of vulnerable groups in the Beirut project, the Beirut housing rehabilitation and cultural and creative Industries recovery, and the Beirut critical environment recovery, restoration, and waste management program. Track II's success hinges on political buy-in from the GoL, as the enactment of reforms is a prerequisite for the sustained rebuilding of essential infrastructure, services, and key assets needed to support lasting economic recovery across the country. In this context, the IOB views the 3RF as a vital mechanism for gradually advancing reform efforts and facilitating long-term structural change.

The 3RF was implemented amid deepening political and socioeconomic crises, which intensified over the course of its project cycle. Despite these challenges, the reforms it proposed remained relevant and timely. We contend, however, that the persistent political paralysis and prolonged institutional deadlock, lasting until the election of President Joseph Aoun in January 2025, were the primary factors hindering the advancement of 3RF-related reforms. We argue that the 3RF should be seen as a supportive conduit for reform rather than the primary vehicle for its implementation, serving mainly as a forum for dialogue on reforms and policies among stakeholders in largely consultative roles. The Lebanese Parliament remains the central institutional arena where reforms are formally debated, negotiated, and passed.

Purpose and Scope of the Governance Assessment:

This study focuses on evaluating the effectiveness, challenges, and outcomes of the 3RF and how the systemic and structural governance compositions influenced the progress of the project's outcomes.

This study aims to evaluate the effectiveness of the 3RF, particularly Track II, in advancing Lebanon's reform and reconstruction agenda by addressing three interrelated areas: governance, coordination, and accountability. It investigates the extent to which the framework has facilitated reform, the roles played by government entities, CSOs, international donors, international organizations, and the IOB, and how the 3RF's governance structure has affected implementation.

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Methodology:

This preliminary findings report employed a qualitative approach to provide an understanding of the 3RF framework's effectiveness, challenges, and outcomes. While we acknowledge that not all views have been captured in the report, we believe this study is a starting point for thinking and re-thinking the 3RF governance framework. This approach integrates qualitative data from FGDs and KIIs to capture diverse perspectives from stakeholders involved in the 3RF.

FGDs

Three FGDs were conducted to facilitate in-depth discussions among key stakeholders:

FGD 1: With Transparency International to gather insights on the transparency and accountability mechanisms of the 3RF.

FGD 2: With the IOB to explore its role in monitoring and ensuring the effectiveness of the framework.

FGD 3: A combined session with the IOB and EU 3RF secretariat to understand broader governance and operational challenges, as well as their views on reforms.

KIIs

A total of 18 KIIs were conducted with relevant personnel across sectors and organizations. These interviews provided targeted insights into the 3RF's implementation at different levels. Participants included representatives from government agencies, CSOs, international organizations, and development partners. The interviews were semi-structured, enabling the flexibility to probe specific areas of interest while maintaining consistency across discussions. Key topics included sectoral outcomes, challenges in coordination, funding mechanisms, and sustainability strategies.

Data Analysis

The research employed qualitative methods, drawing on FGDs and KIIs across stakeholder groups to identify converging and diverging perspectives in addition to existing literature on the 3RF. A comparative component referencing Iraq's 3RF experience was incorporated to contextualize Lebanon's framework, particularly regarding government ownership. Triangulation across data sources ensured the validity and reliability of findings.

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Governance Framework of the 3RF:

Institutional Design

The LFF is a multi-donor trust fund established by the WB with close cooperation between the EU, the UN, and key donors. Established in 2020, it has an initial duration of 5 years. It funded four projects under the 3RF: the B5, the Beirut housing rehabilitation and cultural and creative industries recovery, the support for social recovery needs of vulnerable groups in Beirut project, and the Beirut critical environment recovery, restoration, and waste management program. Moreover, the LFF supported other activities under a second focus area titled **“Preparing For Reform And Reconstruction”** which includes budget preparation and management, supporting the MoF and customs IT needs, and supporting the special audit and valuation of banks. The LFF is overseen by a partnership council, which ensures alignment with 3RF priorities, sets strategic directions, approves annual work plans and budgets, and monitors progress. Co-chaired by the World Bank Country Director and a senior EU representative, the partnership council includes LFF donors contributing at least US\$5 million, government officials, and observer representatives from the UN, civil society, and the private sector on a rotating basis.

The CG comprises representatives from the Lebanese government, donors, civil society, and the private sector to provide strategic guidance for implementation. It seeks to ensure balanced representation between national and international actors while promoting coordination across stakeholders and funding channels. Nine seats are allocated to GoL representation, 10 seats for international community representation, and 9 seats are earmarked for civil society representation.

The IOB is composed of nine civil society representatives, functions as an independent accountability mechanism that monitors 3RF implementation and holds key stakeholders, government, civil society, development partners, and implementing agencies, responsible for overall progress.

The WGs are divided into 3RF relevant thematic priorities, including anti-corruption, civil service and public administration reform, education, electricity, environment, gender-related legislation, health, justice, macroeconomic, financial and fiscal reforms, port and transport, productive industries, public financial management, public procurement, social protection, urban policy, and water. All WGs are led and co-led by representatives and/or staff of the EU, the WB, and the UN, including UN agencies.

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Legal & Ministerial Anchors:

The 3RF lacks both a legal and an administrative anchor. It is not integrated into Lebanon's official planning framework, and no government institution, such as a Ministry of Planning and International Cooperation or a dedicated coordination office, was formally assigned to oversee its implementation. This gap led to fragmented coordination between ministries, weak alignment with national strategies, and limited government ownership, all of which ultimately undermined the framework's sustainability and accountability.

Stakeholder Mapping & Analysis

Government of Lebanon:

The GoL has a central and indispensable role to play and should, by extension, assume substantial ownership of the 3RF process. While it remains engaged across various 3RF platforms, including the LFF, the CG, and WGs, the persistent lack of political will has emerged as a recurring and widely voiced concern among both national and international stakeholders. The Lebanese state's inadequate response to the Beirut Blast is exemplified by its failure to uphold its commitments under several international conventions to which it is a signatory. Since 1972, Lebanon has been a party to the International Covenant on Economic, Social and Cultural Rights (ICESCR), a legally binding treaty that obliges the state to progressively realize rights such as adequate housing, health, education, and an adequate standard of living, rights that are particularly relevant in the context of post-crisis reconstruction. In addition, Lebanon ratified the United Nations Convention against Corruption (UNCAC) in 2009, thereby committing itself to implementing comprehensive anti-corruption measures, including preventive frameworks, law enforcement cooperation, and asset recovery, which are crucial for ensuring transparency and accountability in the management of reconstruction aid. Furthermore, as a founding member of the United Nations and a key drafter of the Universal Declaration of Human Rights (UDHR), Lebanon is politically and morally bound to uphold its principles, including the right to an effective remedy for victims of human rights violations. Together, these unfulfilled obligations highlight the state's systemic failure to meet both its legal and normative duties in the aftermath of the blast.

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Civil Society Participation:

The role played by CSOs encapsulates advancing advocacy, reform monitoring, and providing an overall consultative role within the 3RF. Yet, some CSOs believe that their effectiveness has been limited by structural, financial, and representational challenges. While some CSOs have successfully engaged in WGs and policy dialogues, others have been excluded from key discussions, limiting their ability to influence reform implementation.

One of the primary obstacles to CSO effectiveness has been the lack of a unified reform agenda, which has led to fragmented advocacy efforts and competing priorities. This proposition is often touted by the international community towards Lebanese civil society organizations engaged in the 3RF. A key informant observed that “grassroots organizations and larger NGOs often operate in silos, weakening the collective ability of civil society to push for meaningful reform.” This disconnect has resulted in redundant initiatives, missed opportunities for coordinated advocacy, and inconsistent participation in policy development.

Financial and technical constraints further limit the capacity of CSOs to engage in sustained reform monitoring and governance oversight, according to a KII. A key informant noted that “civil society lacks stable funding, making long-term engagement difficult; many organizations are forced to operate on short-term donor grants rather than building institutional capacity.” This financial instability has also led to unequal access to resources, where certain organizations receive continuous funding while others, particularly those critical of government policies, are sidelined.

According to a KII, CSO inclusion in the 3RF consultations has been selective, raising concerns about the transparency and inclusivity of stakeholder engagement mechanisms. They pointed out that “while some CSOs have secured representation in working groups, others, especially those advocating for systemic accountability, have been marginalized.” This uneven representation, according to KIIs, has diminished trust in the 3RF’s participatory model and weakened its ability to leverage civil society as a reform-driving force.

To address these challenges, informants highlighted the need for structural reforms in CSO engagement, financial sustainability, and advocacy coordination:

- Clarifying the role of CSOs within the 3RF governance structure by establishing clear, structured, and inclusive participation mechanisms that ensure long-term engagement rather than ad hoc consultation.
- Strengthening coordination among CSOs by aligning advocacy priorities, fostering cross-sector collaboration, and presenting a unified reform agenda to government and donor institutions.
- Institutionalizing CSO participation through formalized representation, in key reform bodies, ensuring that engagement moves beyond advisory roles to active contributions in policy formulation and monitoring.
- To become central to reform, CSOs need inclusive, sustainable, and structured participation. Institutionalizing their role in governance can boost accountability, but this hinges on reform efforts prioritizing transparency, representation, and lasting engagement beyond donor cycles.

The IOB observes that the constrained role of CSOs within the 3RF stems from a structural issue embedded in the project's design, which defines their participation as primarily consultative. While some CSOs advocate for a more impactful role, the current framework does not assign binding authority to their input. This limitation persists despite the 3RF's notable step in formally including civil society as key stakeholders in a way that is unprecedented in similar reform and recovery initiatives.

Despite formal inclusion in the LFF, CG, the IOB, and WGs, civil society's role within the 3RF remained largely symbolic. Specifically, civil society participation in the CG was often procedural rather than substantive. The current mandate of the CSOs in the CG and WGs is neither empowered nor effective; a change in the terms of reference could be a starting point, according to a KII. Many CSOs represented within the CG were not systematically consulted on key policy decisions, and they lacked any formal mandate to speak on behalf of the broader civil society landscape. Additionally, the absence of binding mechanisms governing their interactions with international actors and 3RF principals further diluted the strategic relevance of their involvement.

This symbolic engagement raised broader concerns about unintended consequences and the legitimacy of the initiative. Several CSOs questioned whether their continued participation in the 3RF might inadvertently validate a framework that systematically marginalized their influence. By endorsing a process in which civil society lacks meaningful decision-making power, they risk reinforcing the very structural flaws they seek to challenge.

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International Organizations:

International organizations and donors, including the EU, UN, and the WB, have been instrumental in mobilizing technical and financial support for the 3RF through the LFF.

A key informant highlighted that “the different mandates of international agencies often result in sectoral misalignment, with each entity prioritizing its own funding streams and technical expertise rather than forming a unified strategy.” This lack of coordination has led to fragmented donor efforts and inconsistencies in government engagement across different sectors. In some cases, international actors have approached the government in isolation, while in others, civil society engaged more actively, creating gaps in policy coherence and stakeholder participation.

The overlapping initiatives among donors have further contributed to inefficiencies, particularly in resource allocation and sectoral governance. This misalignment has weakened sector-wide collaboration and reduced the effectiveness of donor-funded reforms. Ministries continue to operate in silos, while donors and civil society organizations often engage independently, leading to overlapping efforts, duplicated initiatives, and inefficiencies in funding allocation.

KIIs consistently emphasized that enhancing coordination at all levels, government, civil society, and donors, is crucial to ensuring long-term success. A key challenge has been the absence of a Ministry of Planning & International Cooperation that is responsible for cross-sectoral reform alignment. A key informant noted that “without a structured coordination unit, reform implementation will continue to be disjointed, with each sector progressing at different speeds, often without clear oversight.”

Overall, the divergence in international agendas and strategic interests in Lebanon is a double-edged sword: while it allows the friends of the Lebanese State and international organizations to concentrate on and invest in different sectors, it also risks producing uneven support and leaving certain sectors neglected.

In the absence of a GoL-led coordination and planning unit, donors have resorted to coordinating among themselves.

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Coordination & Decision-Making

How were decisions made and communicated?

A key observation throughout the implementation of the 3RF has been the lack of effective communication and coordination channels among its various stakeholders. This gap has contributed to fragmented information flows, delays in data sharing, and, in some cases, a complete absence of transparency. In addition, civil society raised concerns about the selective inclusion of information on the 3RF website. A striking example is the IOB's repeated requests for access to comprehensive project financing and documentation. These requests have gone largely unmet, with the Board having access only to the annual LFF report. Moreover, the exclusion of the IOB from LFF partnership council meetings has significantly constrained its ability to exercise its full oversight mandate. These systemic and structural shortcomings, embedded since the inception of the 3RF, have hindered the framework units from operating at full capacity.

The IOB's absence from critical decision-making spaces has created accountability gaps, compounded by the GoL's failure to assume sole responsibility for leading and implementing reforms. Giving more breadth and a wider scope for the IOB to be present and having access to all types of data is essential to be able to address these gaps. Additionally, it is essential to formally institutionalize the role of the IOB within the governance structure of the 3RF, including granting it permanent observer status in the LFF partnership council. In parallel, the GoL should be supported through technical assistance to assume full leadership of the reform agenda, including designating a Ministry of Planning & International Cooperation with a legal and administrative mandate to oversee implementation. This dual approach would help restore accountability, enhance stakeholder coordination, and strengthen national ownership of the recovery and reform process.

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How did the absence of a coordination unit within the Prime Minister's office, a reformed Council for Development and Reconstruction, or a Ministry of Planning & International Cooperation affect coordination?

The absence of a government-led coordination and planning unit has significantly undermined reform coordination in Lebanon. Without a central body, whether in the Prime Minister's office, a reformed Council for Development and Reconstruction, or a dedicated Ministry of Planning and International Cooperation, the government has lacked both ownership and strategic direction in reform processes. This vacuum has weakened accountability and transparency, making it difficult to monitor progress, assess impact, or ensure continuity across successive governments. In practice, coordination has been fragmented: donors and international organizations often set priorities independently, resulting in overlaps in programming, gaps in critical sectors, and the pursuit of short-term projects at the expense of structural reforms.

A key informant observed that “a more structured donor-government coordination mechanism would help ensure that international assistance complements Lebanon's reform strategy rather than dictating it.” The absence of such a mechanism has therefore reinforced a pattern of donor-driven agendas, where external actors effectively shape reform trajectories without sufficient local consultation. This has led to inefficiencies and imbalanced resource allocation, with some reforms overfunded and others chronically neglected. Once established, a unit within the Prime Minister's office, a reformed Council for Development and Reconstruction, or MoPIC would create a formal interface for aligning donor contributions with national priorities, institutionalizing consultation with civil society, and ensuring greater coherence across government agencies. Beyond improving efficiency, it would also help anchor reforms within a long-term national development strategy, enabling donor-funded initiatives to transition toward sustainable, locally led implementation.

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Accountability & Oversight:

Systemic & Structural issues of the Independent Oversight Board of the 3RF

By design, the governance charter of the IOB, authored by its members, mandates it assume several core functions. These include monitoring the decisions and follow-up actions taken by the CG; providing technical recommendations to the 3RF Secretariat on the operationalization of activities related to communications, citizen engagement, community monitoring, and transparency; and identifying priority areas for action, among other responsibilities. While these functions are central to the IOB's mandate, their effective implementation depends on the establishment of clear and consistent communication channels, as well as the IOB's inclusion in all meetings relevant to the application of its mandate, particularly those related to or initiated by the LFF.

Access to timely and relevant information on funding allocations, project implementation progress, and, crucially, the decision-making processes within the LFF is indispensable. Without such mechanisms, such as routine project update presentations during LFF donor meetings, the IOB is unable to adequately monitor and evaluate the process. As a result, it cannot fully exercise its role as the sole independent oversight body within the 3RF framework.

Transparency Mechanisms:

Were there mechanisms to track project implementation, funding flows, or reform benchmarks?

Project transparency within the 3RF framework has been limited and inconsistent. While the eventual launch of the 3RF website proved helpful, offering a centralized platform populated with relevant information, it took considerable time before it became fully operational. During this period, the IOB lacked access to detailed, real-time, and aggregated data on project implementation, funding flows, and reform benchmarks.

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Although some information was available through periodic reporting, such as the LFF annual reports, reliance on these documents alone proved insufficient for effective oversight and accountability. Civil society emphasized the importance of clearly understanding the needs of the GoL to provide effective support, address existing shortcomings, and contribute to areas requiring improvement.

This lack of timely and accessible data significantly constrained the IOB's ability to fulfill its mandate. The IOB was neither invited to LFF project update meetings nor granted access to relevant documentation, often leaving it less informed than civil society organizations represented in the Consultative Group. Despite attending all relevant working group meetings and being invited twice to the CG-CSO retreat, occasions that offered broader insights, the IOB remained largely isolated from ongoing developments and decision-making processes.

Greater transparency mechanisms, such as a public data dashboard, regular stakeholder briefings, and more inclusive monitoring structures, would have strengthened institutional accountability and enabled more meaningful civil society engagement.

It is worth noting that, although the EU is the largest donor to the LFF, it too has been affected by limited transparency in relation to funding streams and project details.

Inclusion & Legitimacy:

Did the governance structure of the 3RF ensure inclusive participation?

The partnership council of the LFF grants only the WB, EU, the five biggest donors, and government representatives voting powers, where the UN and civil society remain as observers. The IOB's exclusion from the partnership council has significantly impeded its ability to fulfill its oversight mandate and has left it largely out of key information and decision-making loops.

CSOs generally reported limited inclusion in program design, and their satisfaction with the 3RF framework varied widely. This variation reflected ongoing frustrations related to weak coordination, insufficient inclusivity, and unclear communication channels.

Regarding power asymmetries, while CSOs were assigned a consultative role and engaged in dialogue, many felt that this participation fell short of meaningful involvement. They emphasized the need for more substantive engagement in project design. Additional sources of frustration included their limited ability to shape the reform agenda, a perceived lack of responsiveness from the international community, and the sense that their role within the 3RF had become ineffectual, at times even counterproductive to their broader objectives.

Although CSOs' influence extended beyond mere symbolism and was at times significant, the IOB acknowledges a core structural challenge: the 3RF's main implementing partner, the GoL, lacked the political will to convert reform commitments into concrete actions. This lack of progress generated frustration not only among CSOs but across the broader spectrum of 3RF stakeholders. The CSOs also sensed that the support they had received from the international community waned after the first 18 months of the 3RF, as focus shifted to engaging with the GoL on reforms. Along with this change, the coordination among CSOs also diminished.

While some CSOs acknowledged that the international community can help create an enabling environment for civil society to contribute to reforms, they also stressed the importance of being consulted when donors set priorities with ministries and of being present when donors present their findings. Moreover, civil society emphasized the need to be meaningfully engaged and heard in parliament and its committees during the policymaking process. Gender and inclusion should be integral components of the reform agenda, with CSOs urging the GoL to institutionalize inclusive practices and their inclusion in the budget.

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Comparative Case Study: Iraq 3RF

While Lebanon's 3RF was modeled on Iraq's 3RF, the level of responsibility assumed by Iraqi stakeholders stands in sharp contrast to that of their Lebanese counterparts. In Iraq, the Ministry of Planning served as the government's principal partner to the World Bank, which acted as the trust fund administrator. It is worth noting that, unlike the Lebanon 3RF, the Iraq 3RF did not assign civil society organizations critical roles within its governance or implementation structure. This difference reflects a fundamental divergence in design, with the Lebanon 3RF placing greater emphasis on civil society participation.

The Iraq 3RF's success can be largely attributed to strong government ownership and political will to recover from a turbulent period, most notably through the leadership of the Ministry of Planning and its Department of International Cooperation. Established in 1959, the Ministry provided the institutional anchoring necessary for effective coordination and implementation.

Overall, Iraq's 3RF benefited from clearer reform incentives, stronger institutional ownership, and a more coherent coordination infrastructure than Lebanon's, contributing significantly to its relative effectiveness.

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Assessment of Implementation Outcomes:

While the 3RF is nearing completion of the projects it initiated under both Track I and Track II, the broader reform agenda it envisioned remains largely unfulfilled. Implementing such an ambitious and wide-ranging reform package within an 18-month timeframe was, from the outset, an improbable goal, particularly given the deeply entrenched political resistance that defined Lebanon's political landscape before the 2025 election of General Joseph Aoun as President.

The initial 18 months of the 3RF were marked by notable momentum. One contributing factor appears to have been the strong presence of key international figures who actively championed civil society engagement. Prominent among them were UN Deputy Special Coordinator Najat Rochdi and EU Ambassador to Lebanon Ralph Tarraf. Many civil society actors perceived Rochdi, in particular, as a genuine interlocutor who took their recommendations seriously. However, this momentum has since diminished, with civil society organizations increasingly reporting a lack of responsiveness from the international community to their concerns. CSOs underscored the importance of building momentum around institutions instead of personalities.

Civil society actors emphasize that their role is not to supplant public institutions but to complement them within a shared governance space, particularly through sustainable monitoring and accountability efforts.

To enhance coordination and foster government ownership of the reform agenda, WGs must be directly linked to relevant ministries and parliamentary committees. For example, in the health sector, effective engagement requires the participation of the Prime Minister's Office, the Ministry of Planning & International Cooperation, the Ministry and the Minister of Health, and members of the parliamentary health committee. This integrated approach not only improves coordination but also reinforces shared responsibility and strengthens accountability mechanisms.

Creating inclusive platforms that bring together government representatives, civil society actors, and international partners fosters mutual recognition and enhances the legitimacy of civil society's role in the reform process. While government ownership is encouraged by donors and international organizations, concerns persist over the international community's reluctance to exert sufficient pressure on the Lebanese government to enact reforms. More robust international pressure could have shifted the reform trajectory in a more favorable direction.

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Some interviewees highlighted that civil society does not function as a shadow government, nor does it represent a unified or monolithic bloc. Rather, it serves as a vital actor capable of advancing oversight and accountability, if meaningfully engaged.

In hindsight, the political context during the 3RF's implementation did not compel Lebanon's governing elite to pursue meaningful reform. The financial and socioeconomic crises, while severe, were not sufficient to spur action. Instead, it was the 2024 war on Lebanon that catalyzed political change and ultimately led to the emergence of new leadership more aligned with a reformist agenda.

Misconceptions:

The international community and international organizations expected civil society organizations to present a coherent and unified agenda within the 3RF. While civil society played an essential role, whether through the CG, the IOB, or various WGs, its primary function was consultative. Dialogue remained the principal, and arguably the only, tool available to civil society within this structure.

Although civil society actors collectively support the overarching goal of reform, divergences naturally emerge in policy preferences and implementation strategies. These differences stem from the sector's diversity: CSOs have varied mandates and constituencies, compete for limited resources, and face internal power asymmetries. Their relationships with different 3RF principals, along with broader contextual factors, further shape their positions on key policy issues. Consequently, while a unified civil society stance may be desirable, it requires leadership and stronger coordination mechanisms that are currently lacking. Strengthening coordination among CSOs and within sectoral working groups would enhance their role in pushing for reforms and engaging with both the GoL and the international community.

At the same time, several CSOs contend that claims of representing the sector as a whole are unrealistic. Misconceptions are often reinforced when “joint programs” are expected from civil society, or when CSOs represented in the CG are assumed to speak on behalf of the broader sector, as one interviewee observed. To avoid overstating their role, CSOs should be meaningfully engaged during the program design phase of the 3RF. Such engagement would help delineate their specific roles within the framework, ensuring that contributions align with their actual mandates, capacities, and representative legitimacy.

Findings & Challenges

1. The Aim of the 3RF: Reforms, Policy Dialogue, or Recovery?

The 3RF was designed as a dual-track framework to address Lebanon's immediate recovery needs while initiating long-term structural reforms. It was not intended as an independent reform mechanism but rather as a bridge between emergency response and governance transformation, aligning donor strategies with Lebanon's reform priorities.

Track I initially focused on urgent recovery measures, such as infrastructure rehabilitation, emergency healthcare, and targeted social protection. By 2022, the emphasis shifted toward governance and anti-corruption reforms under Track II, in line with IMF economic policies. While this transition reflected a strategic pivot to systemic reform, informants questioned the framework's effectiveness in achieving lasting change.

A recurring concern was the limited participatory design of the 3RF. Many argued that stronger involvement of CSOs in the framework's design would have enhanced its inclusivity, legitimacy, and long-term impact. As one informant noted, the framework had significant potential but lacked meaningful co-creation with local actors, weakening its ability to foster locally owned reforms. This exclusion contributed to implementation challenges, as reforms developed without sufficient local input struggled to gain traction within Lebanon's fragmented political and institutional landscape.

2. Effectiveness of Coordination Mechanisms

The 3RF's coordination mechanisms have consistently underperformed, largely due to insufficient communication among stakeholders and the lack of effective leadership. While Working Groups were led by the UN, WB, and EU, the absence of leadership from GoL representatives was widely noted. For reforms to move forward, active engagement, particularly from the GoL is essential to guide and coordinate implementation.

A key informant noted that without a clear leadership structure and alignment among stakeholders, critical sectors have been left in paralysis, with reforms stalling despite the availability of funding.

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The lack of accountability in WGs has resulted in ineffective policy implementation, raising concerns about the broader functionality of the 3RF's coordination structure when government ownership is absent.

Beyond sector-specific challenges, the transition between different phases of the 3RF was plagued by governance failures. A key informant highlighted that the handover between the initial recovery phase and the reform phase was neither transparent nor structured, leading to disruptions in policy continuity and weakened oversight.

The inability of the 3RF to establish a coherent, results-oriented coordination strategy undermined its overall effectiveness. The 138 action points that should have been met within the first 18 months of the 3RF needed high political commitment. Of the 138 action points, 66 have legal consequences, corresponding to 86 separate legislative and executive measures that the Lebanese state is required to adopt¹.

3. Optimizing Frameworks for Resource Allocation, Transparency, and Participation

Inconsistencies in funding distribution and decision-making processes remain a significant challenge, undermining confidence in 3RF governance structures. The lack of transparency in funding decisions raises broader concerns about the overall credibility of 3RF's financial governance mechanisms, reinforcing the need for greater stakeholder inclusion in resource allocation discussions.

Given these ongoing challenges, stakeholders emphasized the necessity of strengthening oversight mechanisms, ensuring cross-sectoral coordination, and institutionalizing transparent financial tracking systems to enhance efficiency and accountability within the 3RF framework. Without a renewed focus on coordination and tangible reform execution, the risk remains that donor-funded projects will fail to deliver meaningful, lasting improvements.

¹ Wissam Maktabi et al., "Limits of Reforms and Conditionalities in Lebanon's 3RF", The Policy Initiative, 12 May 2023, <https://www.thepolicyinitiative.org/article/details/283/limits-of-reforms-and-conditionalities-in-lebanons-3rf>

4. Refining Communication and Decision-Making Processes

Effective communication and decision-making processes are essential for enhancing accountability and fostering trust among stakeholders. However, significant gaps in coordination and oversight mechanisms have weakened stakeholder engagement and reduced the overall effectiveness of reform efforts. The IOB, which was intended to monitor progress, has been largely underutilized, limiting its ability to hold decision-makers accountable, principally due to a lack of access to information, though repeatedly requested by the board.

The absence of structured feedback loops has further contributed to stakeholder disengagement, with many actors, including CSOs and donors, expressing frustration over unclear decision-making structures. Stakeholders emphasized the need for well-defined reporting mechanisms that would allow for consistent monitoring and evaluation of reform progress, ensuring that WGs, donors, and civil society remain aligned in their priorities. A key informant noted that international donors must take a stronger stance in assessing reform progress and should not hesitate to acknowledge the government's shortcomings in meeting 3RF objectives. Without firm accountability measures, reforms risk being performative rather than substantive, leading to a cycle of delayed implementation and weak enforcement.

To address these challenges, the 3RF must prioritize the institutionalization of a structured communication channel and ensure that stakeholders have clear, accessible channels to provide feedback and demand accountability. Without these mechanisms, coordination efforts will continue to struggle with inefficiencies and limited long-term impact.

5. Factors Behind the Success and Failure of Reforms

The success of reform efforts depends largely on government ownership, as well as strategic donor engagement and the provision of technical assistance, particularly given the weakened institutional capacity of government entities.

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A key informant emphasized that reforms succeed when objectives are aligned, and leadership structures are in place to drive implementation. Without these elements, reform efforts risk stagnation and inefficiency. To replicate reform successes in underperforming sectors, stakeholders emphasized the importance of aligning donor priorities with sector-specific needs while empowering local actors to take ownership of policy execution and service delivery.

Moreover, stakeholders have repeatedly highlighted the absence of a CMU as a fundamental barrier to effective coordination. Other stakeholders proposed reforming the Council for Development and Reconstruction and modernizing its structure to meet current needs. Alternatively, some suggested replicating the framework of the Lebanon Response Plan, although the latter is primarily designed for implementation rather than for advocating and driving reforms and is short-term rather than long-term. Others suggested reforming the Lebanese Economic and Social Council.

Without a centralized entity to oversee reform implementation, efforts remain disjointed and inefficient. A key informant noted that establishing a CMU within the Prime Minister's Office would enhance coordination between government agencies, CSOs, and international donors, ensuring that reform efforts are aligned, effectively monitored, and successfully executed. The failure to institutionalize such a coordination body has left reform initiatives fragmented, underscoring the need for an integrated management approach to governance and policy execution. The IOB contends that establishing a Ministry of Planning & International Cooperation, as a long-term objective, would offer a more comprehensive approach to coordination, providing institutional legitimacy, ensuring policy continuity and integration, strengthening the diplomatic and donor interface, and reinforcing national ownership of reform efforts.

6. Stakeholder Engagement and Satisfaction

Stakeholder satisfaction within the 3RF framework varies widely, reflecting ongoing frustrations with limited inclusivity, weak coordination, and unclear communication channels. CSOs have repeatedly expressed discontent over their restricted role in decision-making, while donors have struggled to coordinate effectively with government institutions, leading to inefficiencies in reform implementation. A key informant emphasized that meaningful engagement requires both inclusivity and transparency, two elements that remain underdeveloped within the 3RF structure.

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According to a survey circulated by IOB member CLDH, most of the respondents rarely or occasionally receive updates on decisions or outcomes from the 3RF process. Moreover, most of the respondents believed that their input was very little or somewhat considered in the 3RF decision-making process. They were also unsure of whether any decision or policy had changed as a result of stakeholder feedback. According to a government official, one of the primary challenges facing the 3RF was that its scope extended beyond the government's capacity and political will to implement the proposed reforms.

According to another government official, a key concern with the 3RF lies in the absence of a clear focal point for communication, leaving partners without a designated reference within the coordination mechanisms. He emphasized that the 3RF's coordination structure should not operate in isolation, but rather assess and integrate with existing coordination frameworks instead of attempting to replace them. He also stressed the need for greater clarity regarding the internal structure of responsibility within the 3RF, noting that reform efforts within ministries are complex and multi-dimensional. As such, a single working group cannot adequately lead reform across all areas. Instead, each component of the working group should be led by the most relevant agency, based on the nature of the reform.

Structural Shortcomings of the 3RF:

- No central coordinating body: Absence of a national institution/ministry to oversee reforms, donor alignment, and inter-ministerial coordination.
- Weak political will: Limited government commitment undermined credibility, delayed legislation, and reinforced reliance on external actors.
- Fragmented donor landscape: Embassies and international organizations pursued overlapping or diverging agendas with weak coordination.
- Limited civil society engagement: CSO participation lacked transparency, suffered from power imbalances, and was sidelined by GoL–donor bilateralism.
- Governance inertia: Persistent institutional inefficiencies and reluctance hindered reform momentum.
- Oversight gaps: The IOB lacked authority and access to information; the CG was bypassed in funding decisions.

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- Poor communication: A disconnect between strategic planning and implementation, with fragmented information flows.
- Reactive implementation: Resources allocated based on donor urgency rather than institutional readiness.
- Need for institutional reform: Establishing a Ministry of Planning and International Cooperation could provide the needed anchor for reform oversight.
- Build on the current opportunity: A shift in political leadership has reoriented governance priorities, strengthened national ownership, and reinvigorated reform momentum.

Recommendations:

To address the structural and operational shortcomings identified in the 3RF framework and enhance the coherence, transparency, and impact of future recovery and reform initiatives, the following recommendations are proposed:

1. Establish a coordination unit within the Prime Minister's Office in the short term, reform the Council for Development and Reconstruction in the medium term, and establish a Ministry of Planning and International Cooperation in the long term.

Create a dedicated government entity to coordinate international assistance and align donor-funded programs with national priorities. This ministry should:

- Serve as the central authority for planning, ensuring cross-cutting coordination across ministries, particularly with the budgeting unit at the Ministry of Finance, as well as for the implementation and monitoring of reforms.
- Ensure coherence across sectors and actors, improving resource allocation and reducing duplication.
- Strengthen state ownership of externally funded initiatives and shift implementation responsibility from donors to government institutions.

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- Build long-term planning capacity and promote data-driven policymaking.
- To prevent fragmentation, the government coordination unit should develop a unified digital dashboard that provides real-time, publicly accessible updates on funding allocations, reform progress, and policy outcomes for each project.

Reform the Council for Development and Reconstruction by decentralizing aspects of development financing to municipalities, strengthening their financial independence to advance planning localization. Empowering municipalities to mobilize and manage resources will enhance ownership of local priorities, while independent oversight mechanisms should ensure transparency, prevent corruption, and align both the Council for Development and Reconstruction and municipal financing with national reform goals.

When the time comes to establish a Ministry of Planning and International Cooperation, an independent oversight board should be created within it, modeled on the IOB of the 3RF. This body would have the authority to intercept non-compliant projects, initiate further investigation in cases of suspected corruption, and serve as a mediation mechanism prior to litigation. In parallel, working groups should be able to bring their concerns before the State Council and raise suspicions regarding projects to the National Anti-Corruption Commission.

2. Institutionalize Parliamentary Engagement in Reform Coordination

To address the lack of inclusivity in CSO consultations and strengthen transparency in stakeholder engagement, and given Lebanon's absence of a formal mechanism for CSOs and the private sector to interact with parliamentary committees, the following measures are suggested: WGs and CSOs should be directly linked to Parliament and its committees to:

- Strengthen legislative oversight and ensure policy continuity.
- Align reform implementation with legal and institutional frameworks.
- Enhance transparency and trust through a clear and credible process for selecting civil society experts.

Tunisia offers a regional precedent, where committees have institutionalized CSO consultations since 2011, supported by the 2018 Right of Access to Information law.

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3. Enhance Cross-Stakeholder Communication and Information Flows

Improve communication between the LFF, CG, IOB, and WGs by:

- Ensuring the IOB has systematic, timely, and unrestricted access to relevant information and meetings.
- Standardizing communication protocols to reduce fragmentation and improve oversight efficiency.
- Assign liaison focal points at each unit of the 3RF.

4. Set a legal anchor for the 3RF

- Formalize the 3RF framework through legislation to ensure its institutional legitimacy and long-term sustainability.

5. Populate the 3RF website with more relevant information

Strengthen transparency and coordination by populating the 3RF website with important, up-to-date information on:

- Project implementation, financial flows, reform benchmarks, WG activities, and upcoming meetings.
- Up-to-date dashboard on reforms with GoL status regarding different policies and legislations, decisions, progress reports, and upcoming WG meetings. In addition to international organizations and donor technical assistance status in each sector.

6. Strengthen Funding Transparency and Accountability Mechanisms

Ensure that financial reporting mechanisms are timely, detailed, and publicly accessible. This includes:

- Publishing disaggregated financial data by sector and implementing agency, as well as progress indicators linked to milestones.
- Releasing regular updates on donor disbursements, project milestones, and policy implementation.

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- Grants implementation has to be supervised by civil society.
- Civil society to play an active role in the Lebanese Economic and Social Council.
- Integrate civil society into the government's coordination mechanism and leverage the existing momentum of progressive government ownership to strengthen reform efforts.
- CSOs with relevant expertise should act through the WGs and directly engage parliamentary committees, ensuring civil society is actively involved in shaping the content of reforms.

7. The 3RF has to be owned by the GoL

- Working Groups have to be led by the GoL.
- Decision-making has to be localized, and coordination should be Lebanese-led.

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Conclusion:

The 3RF has been instrumental in mobilizing international financial support, fostering collaboration among government institutions, CSOs, and donors, and initiating policy discussions in key sectors. However, gaps in government ownership, political fragmentation, and donor-driven priorities have hindered sustained implementation.

One of the central challenges identified in this analysis is that while the 3RF has facilitated technical discussions and policy dialogue, it lacked effective mechanisms to track implementation progress and ensure accountability. Coordination across working groups, government institutions, and donors has been inconsistent and at times absent, leading to duplication of efforts, funding delays, and weak reform monitoring. Addressing these structural barriers requires governance enhancements focused on strengthening institutional leadership, optimizing resource allocation, and formalizing stakeholder participation through structured engagement.

For the 3RF to function as an effective long-term reform platform, its governance structure must be institutionalized to promote accountability, sustained stakeholder engagement, and stronger policy execution mechanisms. Key recommendations include the creation of a coordination unit in the Prime Minister's office in the short-term, reforming the Council for Development and Reconstruction in the medium term, and ultimately building a Ministry of Planning & International Cooperation when the GoL has adequate resources to sustain it.

Assigning 3RF focal points within the CG, IOB, LFF, WGs, and the GoL would strengthen communication and coordination among stakeholders, ensure information sharing, and align reforms with national priorities. Their role should focus on linking technical advisors, defining sectoral priorities, and coordinating funding to avoid duplication.

Lastly, without adequate resources to support its mandate, such as a dedicated focal point or coordinator, the IOB cannot operate effectively.



PRELIMINARY FINDINGS REPORT OF THE LEBANON RECOVERY, REFORM, AND RECONSTRUCTION GOVERNANCE FRAMEWORK

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