# The United States and Lebanese Labor Laws: Foreign Employment and Protection of National Labor

Khodr Fakih, Abdul Nasser Kassar, and Nassif Al Hakim

Many countries have recently suffered from an increase in the rate of unemployment. This has been the result of several factors, including the competition from foreign workers and the lack of protection of national labor force. The United States and Lebanon have both accepted Syrian refugees since the beginning of the Syrian conflict. However, the latter had a severe impact on the Lebanese economy compared to that of United States. This is because about 1.5 million Syrian refugees have entered Lebanon compared to only a few thousands who have entered the United States. This article discusses foreign employment under United States and Lebanese labor laws. It focuses on the policies that each of the counties has followed regarding the employment of Syrian refugees. Although the United States and Lebanon have special rules related to the admission and employment of foreigners, Lebanon failed to protect its national labor force due to the lack of effective enforcement mechanisms.

Labor law is a complex set of rules related to employment contract, conditions of work, labor unions, social security, and settlement of disputes. The main reason that lies behind the establishment of this law has been the insurance of minimum requirements in the contractual relation between employers and employees for the balance and protection of both parties' interests. Historically, labor law can be traced back to the aftermath of the industrial revolutions. This is due to the fact that the rules that were present at that time failed to insure basic protection of workers' rights. However, the development of labor law has been slow until the 20th century where labor codes entered into force.<sup>1</sup>

Dr. Khodr Fakih (khodr.fakih@lau.edu.lb) is the director of the LL.M. Program and the coordinator of Business Law and Ethics at the Lebanese American University, a practicing lawyer, and a member of the Lebanese Bar Association. Abdul-Nasser El-Kassar, Ph.D., (abdulnasser.kassar@lau.edu.lb) is Associate Professor of Quantitative Methods, Adnan Kassar School of Business, Lebanese American University, Beirut, Lebanon, researching quantitative methods, including corporate governance, corporate social responsibility data analytics, production planning and inventory control. Nassif Al Hakim (nassif.alhakim@lau.edu) is a trainee judge at the Lebanese Institute of Judicial Studies conducting research on various business law topics.

United States' labor law dates back to the industrial revolution when employees suffered from harsh and severe working conditions. In the early 1900s, the United States started issuing laws to ensure protection of the basic labor rights, which were mainly focused on the rights of the injured workers, minimum wage, standard work week, and child labor. After that, the U.S. government issued laws aimed at improving the working conditions, promoting health care, and prohibiting discrimination.<sup>2</sup>

On the other hand, the Lebanese Labor Law was first issued on September 23, 1946. The sources of this law are both domestic and international. Regarding domestic sources, the Labor Law complies with the constitution, local law, decrees, case law, and jurisprudence. At the international level, the sources include regional and international treaties.<sup>3</sup> Although the law was issued in 1946, several provisions have been amended later on. This article will address the legal aspects of foreign employment in the United States and Lebanon. The article will specifically scrutinize the major legal principles relating to the employment of Syrians in the United States and Lebanon. The article also provides an empirical study of foreign worker awareness of Lebanese labor rules and regulations.

# FOREIGN EMPLOYMENT IN UNITED STATES AND LEBANON

The United States and Lebanon have different policies regarding the employment of foreigners. Foreigners willing to work in the United States are subject to a detailed screening process conducted by different agencies during several phases. On the other hand, Lebanon has simpler procedures concerning foreigners. In addition to that, the foreigners' right to benefit from the social security system differs in both countries.

# Foreign Employment in United States

Foreigners seeking employment in the United States are required to obtain authorization from several government agencies.

First, employers seeking to hire foreign workers should obtain certification from the U.S. Department of Labor. The required documents vary according to the type of work the employee is seeking to perform. The application contains information about the employer, agent, wage, job description, recruitment information, and information about the worker.

If the application is approved, the employer should apply for a visa with the U.S. Citizen and Immigration Services (USCIS). The category of visa depends on the type of work to be performed. Workers can be classified as temporary, permanent, and student workers.

Regarding temporary workers, the employer must apply for a visa on behalf of the employee. Temporary workers are classified into several

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categories, each having its own requirements regarding qualification of persons, process, period of stay, eligible nationalities, and other conditions. However, one common requirement is that the employer must prove that there are no available U.S. workers who are qualified or suitable to perform the job.<sup>4</sup>

The second category of workers is permanent workers. It includes aliens who immigrate to the United States to perform a certain type of job. The permanent worker visa is divided into five categories:

- 1. Persons with extraordinary abilities in some fields such as business, education, research, executives, arts, science;
- 2. Employees holding advanced degrees or exceptional abilities;
- 3. Professionals and skilled workers;
- 4. "Special immigrants" including religious workers and retired employees of international organizations; and
- 5. Business investors with a minimum investment of \$1 million or \$500,000 (in a targeted area) in a new commercial entity that employs 10 or more full time U.S. employees.

Each of the following categories has a set of requirements including skills, experience, and previous achievements.<sup>5</sup>

# Foreign Employment in Lebanon

The employment of foreigners in Lebanon is regulated by decree 17561 issued on September 18, 1964. Article 1 point out the principle of reciprocity, meaning that the acceptance of foreign workers in Lebanon may differ depending on the rules of applicants' home country. It also clearly points out the application of conventions that have been approved by the legislator or by the Ministry of Labor and Social Affairs. The process of foreign employment in Lebanon can be divided into several consecutive phases.

First, the alien should obtain a prior approval from the Ministry of Labor and Social Affairs, with the exception of artists that are granted approval by the General Security. This application is filed through the Lebanese Mission abroad or through the legal representatives of the alien in Lebanon.<sup>6</sup> It includes information about the alien, his or her name, date of birth, religion, nature and duration of work, skills, capabilities, and the name of his or her employer if possible. In addition to that, the foreigner should sign an undertaking that the approval is personal and does not extend to his or her family.<sup>7</sup>

If the alien is a wage or salary earner, his or her employer should submit to the Ministry of Labor an application declaring approval of the alien's arrival, as well as other supporting documents. In addition to that, the employer should present a work contract ratified by a notary public or other member of the Lebanese diplomatic mission abroad.

On the other hand, if the alien wishes to work on his or her account or represent a company, he or she must submit copy of the evidence confirming the bona fides of the declarations and stating his or her willingness to employ Lebanese workers.<sup>8</sup>

The second step is the work permit. After receiving prior approval, within 10 days of arriving in Lebanon, the alien is required to request a work permit from the Ministry of Labor. If the alien fails to apply for the permit within 10 days or did not enter Lebanon within three months of receiving his or her prior approval, the approval may be canceled. It is important to point out that the permit is considered an extension of the prior approval. This implies that if the term of the permit elapses, then the prior approval is suspended.

The decree clearly states preferential rights for Lebanese nationals. However, an alien seeking to work in Lebanon may be granted a work permit in certain situations. The first is based on the alien's qualifications; if he or she has certain unique capabilities to perform a job that cannot be done by Lebanese nationals. The employer may be required to submit a notice stating the nature of the job and the needed skills.

The second situation for granting a work permit is residency; if the alien has entered Lebanon before January 1, 1954 and has been working for at least nine consecutive months each year.

The third situation is the alien being married to a Lebanese national for at least one year.

The fourth case is the alien born to a Lebanese mother or if he or she is of Lebanese descent.

The fifth case is related to companies, whereby the alien is a manager, chief accountant, or a deputy manager of a foreign company or its branches in Lebanon or Middle East. Article 8 adds another case for granting work permit where the alien is a representative of a foreign company and is not engaged in a direct activity with the public.

Finally, the alien pursuing a profession, handicraft, and other work at his or her own expense may be granted work permit if two conditions exist. The first is if he or she has been residing in Lebanon before 1954 and started working before 1960. The second condition is the alien has entered Lebanon after 1960 or wished to have a residence, on condition that his or her capital exceeds L.L 100 million and employs at least three Lebanese. If several aliens created a partnership, the capital of each should not be less than L.L 100 million, with the employment of at least three Lebanese. <sup>10</sup>

To ensure additional protection, each year the Ministry of Labor determines the jobs and professions that should be limited to the Lebanese



nationals.<sup>11</sup> In addition to that, special protection has been granted to Lebanese teachers, whereby the Minister of Labor and the Minster of National Education set the conditions for foreign teachers to carry on their profession in private schools located in Lebanon.<sup>12</sup>

The work permit may be granted or renewed for a maximum of three years starting from the date of issue.<sup>13</sup> Once the work permit has been issued, the alien is prohibited from changing jobs before obtaining another approval from the Ministry of Labor.<sup>14</sup>

Article 17 stipulates the cases under which the permit may be cancelled. First, if the concern dismissed a Lebanese worker according to Article 50 of the Lebanese Labor Law, while retaining a foreign worker with the same qualifications, a permit may be canceled. The second case is if the concern does not give priority to a Lebanese worker meeting the required qualifications, or if the concern fails to train a Lebanese worker instead of the foreigner. In addition to that, the permit may be cancelled if the foreigner violates the conditions set in the prior approval or the work permit, or if he has been convicted of a crime. The concern fails to train a Lebanese worker instead of the foreigner violates the conditions set in the prior approval or the work permit, or if he has been convicted of a crime.

## Social Security System for Foreigners in United States

The social security system in the United States was established in 1935. It is based on contributions made by employees during their employment period. The benefits include:

- 1. Retirement, Disability, and Survivors;
- 2. Sickness and Maternity;
- 3. Work Injury;
- 4. Unemployment; and
- 5. Family Allowances. 17

All employees, including foreigners, have the right to benefit from the Social Security System. A Social Security Number is necessary to get a job, in addition to other governmental benefits. However, some employees are excluded such as agricultural workers. Both the employee and employer are required to contribute to this fund with a certain percentage, which differs between branches.<sup>18</sup>

# Social Security System for Foreigners in Lebanon

The social security in Lebanon is governed by decree 13955 of September 26, 1963. The security fund is divided into four branches:



- 1. Sickness and Maternity Care;
- 2. Work Related Accidents and Diseases;
- Family Allowance; and
- 4. End of Service Pensions. 19

All Lebanese workers, including full time and part time, permanent, and seasonal workers are in principle subject to the social security law on condition they perform their work within Lebanese territory.<sup>20</sup>

All foreign workers in Lebanon and their employers are subject to the law, concerning sickness and maternity care, work related accidents and diseases, and family allowance. Employers of foreigners are not obliged to contribute to the end of service branch, unless the foreigner has the right to benefit from this branch. Regarding the benefits, foreign workers have the right to benefit from the social security system if they hold a work permit, and if their country of origin grants Lebanese workers an equal treatment.

However, foreign workers working in Lebanon through contracts signed with foreign companies outside Lebanon are not subject to this law, if the employer is able to prove that the worker benefits from a similar or additional protection in his or her country of origin or the country in which the contract was concluded.<sup>21</sup>

# THE EMPLOYMENT OF SYRIANS IN THE UNITED STATES AND LEBANON

The conflict in Syria forced millions of Syrians to leave their country seeking protection and better living conditions. Each country has imposed different regulations to control the entrance and work of Syrians. This section discusses the policies that the United States and Lebanon have followed regarding the employment of Syrians.

# Employment of Syrians in the United States

The immigration of Syrians to the United States can be divided into three main phases. In the late 19th century, many Syrians left Syria due to the violence that took place during that time, especially against Christians. The second phase took place during the 1960s due to the Immigration and Nationality Act of 1965 that replaced the national origin quotas that have been followed in the United States. The third wave of immigration was due to the recent conflict in Syria.<sup>22</sup>

The United States has been accepting Syrian refugees who are most vulnerable, and about 72 percent are children and women.



The United States Refugee Admission Program (USRAP) is responsible for the issues of refugees through its several organs. It involves several agencies such as United Nations High Commissioner for Refugees (UNHCR), Department of Homeland Security, Resettlement Support Center, and non-governmental organizations.<sup>23</sup> According to U.S. law, a refugee is a foreigner who fled his or her home country out of persecution or fear of persecution or any other humanitarian concern.<sup>24</sup>

The number and nationalities of persons to be accepted as refugees are determined each year by the President of the United States in coordination with the federal authorities, with priorities provided in certain situations. <sup>25</sup> Currently, priorities followed in accepting refugees are persons referred by the UNHCR, the U.S. Embassy, or other designated institutions. Second are cases that require certain concerns as determined by the responsible authorities in the United States. After that are cases involving family ties and unifications. <sup>26</sup>

In 2016, about 15,500 Syrian refugees were resettled during Obama's presidency. Under Trump's administration, about 3,000 Syrians refugees were accepted into the United States in 2017. The decrease has been due to the strict policies President Trump has been following regarding foreigners.<sup>27</sup>

Syrians seeking entry to the United States are subject to a detailed screening process. Applicants must first register with the UNHCR, which is responsible for collecting refugee data. After that, the UNHCR validates that the applicant is a refugee and is seeking protection. The applicant also should meet the criteria for refugee status under the U.S. rules. An interview is then conducted by the Resettlement Support Center, which is responsible for gathering security information, in addition to the analysis of the refugee's biography to check his or her history. The biographic and biometric checks are conducted on several phases by different departments. Applications are then reviewed by the U.S. Citizenship and Immigration Services, which then conducts another interview with the refugee abroad to determine his or her eligibility for resettlement in the United States. If accepted, refugees undergo a health test followed by orientation classes, after which they are referred to a resettlement agency within the United States that plays the role of the sponsor.<sup>28</sup>

Normally, any foreigner applying to enter the U.S. as a refugee should be interviewed by the Department of Homeland Security. However, in case of families, all the members are interviewed, but it is enough for one member to meet the required criteria. If accepted, the applicant can pass refugee status to his or her spouse and unmarried children under the age of 21.<sup>29</sup> Concerning the type of protection sought, Syrian refugees have the option to apply for asylum status, refugee resettlement, or temporary protected status (TPS).<sup>30</sup>

Before arriving to the U.S., refugees are assigned to a resettlement agency in coordination with the federal government. Its role includes providing the refugee with the necessary services such as accommodation,

education, employment, and health services.<sup>31</sup> The agency also matches the need of each refugee with the available opportunities, unless the refugee has relatives inside the United States whereby resettlement will usually be near them.<sup>32</sup>

Once the refugee reaches the United States, the resettlement agency sends a representative to assist and guide him or her to the designated apartment. The traveling costs from the refugee's home country to the United States are covered, but are considered a loan that the refugee should repay after his or her arrival.<sup>33</sup>

Refugees also receive additional support in starting their lives in the United States, such as social security and education for their family members. During the first few months, refugees receive certain payments to cover their living expenses.<sup>34</sup>

Concerning employment, refugees have the right to work as soon as they reach the United States, where opportunities present commensurate with their skills and experience. After a period of one year, refugees are obliged to apply for a Green Card, after which their status changes to Legal Permanent Resident. They are also granted the right to apply for U.S. citizenship five years after their arrival.<sup>35</sup>

A refugee that has already approached the United States has the right to file a petition requesting that his or her spouse and unmarried children under the age of 21 also be admitted to the United States. The filing should take place within two years of arrival to the United States.<sup>36</sup>

Syrians who have already entered the United States or reached the U.S. borders have the option to apply for asylum protection. Asylum seekers are individuals who left their home country due to persecution or out of fear of being persecuted as a result of their religion, political thoughts, race, belonging, or nationality. Individuals granted asylum in the United States have the automatic right to work without any formalities.<sup>37</sup>

This can be done through an application filed with the U.S. Citizenship and Immigration Services within one year of entry to the United States, or filed with an immigration judge. The number of Syrians who received asylum has increased significantly in the recent years, from 60 approvals in 2012 to about 600 in 2015.<sup>38</sup>

In 2012, U.S. authorities granted Syrians the option to apply for Temporary Protection Status (TPS). This measure is considered protection against deportation which is usually associated with the right to employment. Approximately 5,000 Syrian nationals have benefited from TPS in 2015.<sup>39</sup>

# Employment of Syrians in Lebanon

Several bilateral agreements have been signed between Lebanon and Syria related to the economic coordination. In 1993, Lebanon and Syria signed an Agreement on the Regulation of Transport of Persons and



Goods. According to this agreement, both countries should ease the movement of persons and goods across their borders. Another related agreement is the Agreement for Economic and Social Cooperation and Coordination, which explicitly stated the freedom to work according to the laws and regulations of both countries. In 1994, Lebanon and Syria signed the Bilateral Agreement in the Field of Labor, which ensured that workers in both countries are subject to the rights and obligations according to the laws in force.<sup>40</sup>

However, on January 5, 2015, Lebanon ended the open border policy that it had been following with Syria. The General Security issued more restrictive regulations regarding the entry and residence of Syrians in Lebanon.<sup>41</sup>

On January 3, 2017, the Minister of Labor issued a decision regarding the procedure of providing and renewing work permits for foreign workers. In granting prior approvals and work permits, an employer can employ one alien for a minimum of 10 Lebanese workers, with the exception being companies that deal with cleaning, which can employ 10 aliens for one Lebanese worker.

Construction companies are authorized to employ one foreigner for each Lebanese worker.<sup>42</sup> Article 7 added certain exceptions to the above rule, whereby the foreigner is treated as a national worker and thus is not subject to the above rule. The first exception is if the foreigner is born in Lebanon or married to a Lebanese; or if the foreigner is a registered Palestinian refugee; or if the foreigner is a domestic worker, concierge, nanny, or works in the agricultural sector if certain conditions are met.<sup>43</sup>

Regarding the jobs and professions that Syrians are permitted to participate in, the Minister of Labor issued a decision listing the works that are exclusively limited to Lebanese. As a result, Syrians are allowed to work in agriculture, construction, and environment, or other work upon the approval of the Minister of Labor.<sup>44</sup>

There are certain exceptions whereby foreigners, including Syrians, may be allowed to work in certain professions upon the approval of the Minister of Labor. A foreigner may work as technician or specialized worker if it is proved that no Lebanese can perform the same work; or if the foreigner is born to a Lebanese mother or is a Lebanese descendant; or if he or she is domiciled in Lebanon since birth; or if he or she is chairperson or representative of a company registered in Lebanon. <sup>45</sup> The former Labor Minister allowed hospitals to employ Syrians as nurses due to the lack in the number of Lebanese workers in this field. <sup>46</sup>

Based on the new regulation issued on January 5, 2015, Syrians entering Lebanon are classified into two groups. Syrians who are registered in the UNHCR are required to prove their registration and sign a pledge before the notary public not to work in Lebanon. Those Syrians not registered in the UNHCR have to present a "pledge of responsibility" signed by a Lebanese national for the process of obtaining a work permit.<sup>47</sup>

The aim of these policies is to reduce the number of Syrians in Lebanon, by imposing additional constraints on their residency and employment.



## **EMPIRICAL STUDY**

# Methodology

From a practical point of view, we conducted a study on the Lebanese labor market to test the foreign workers' awareness of the Lebanese rules and regulations. The hypotheses that were tested are:

- Hypothesis 1: The percentage of Syrian workers in Lebanon who are not aware of the Lebanese Labor Law is more than 50 percent.
- Hypothesis 2: The percentage of Syrian workers who believe that they are obliged to have a prior approval is less than 50 percent.
- Hypothesis 3: The percentage of Syrian workers who believe that they are obliged to hold a work permit is less than 50 percent.
- Hypothesis 4: The percentage of Syrian workers who believe that they are not subject to the National Social Security permit is more than 50 percent.

A questionnaire was addressed to a sample of 80 foreign workers, mainly Syrians located in the Beirut and Mount Lebanon areas. The sample included daily and permanent workers who perform their work in companies of different types, including industrial and educational institutions. The questionnaire also was addressed to independent and self-employed workers.

The questionnaire contained 28 close-ended questions targeting different provisions of the Lebanese law. Their aim was to test the foreign workers' knowledge of their rights and obligations under Lebanese labor rules and regulations.

#### Results

After the data have been gathered, it was analyzed using simple software, reaching the following results.

Hypothesis 1: the percentage of Syrian workers in Lebanon who are not aware of the Lebanese Labor Law is more than 50 percent. An upper tailed z-test was performed. The sample data provided a significant evidence to support hypothesis 1 (z = 3.86; p-value = 0.0001). The study concluded that the majority of Syrian workers in Lebanon are not aware of the Lebanese Labor Law.

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Hypothesis 2: the percentage of Syrian workers who believe that they are obliged to have a prior approval is less than 50 percent. A lower tailed z-test was performed. The sample data provided a significant evidence to support hypothesis 2 (z = -2.27; p-value = 0.0115). The study concluded that the majority of Syrian workers are not aware of their obligation to hold a prior approval under Lebanese Labor Law.

Hypothesis 3: the percentage of Syrian workers who believe that they are obliged to hold a work permit is less than 50 percent. A lower tailed z-test was performed. The sample data provided significant evidence to support hypothesis 3 (z = -4.11; p-value = 0.000019). The study concluded that the majority of Syrian workers are not aware of their obligation to hold a work permit under Lebanese Labor Law.

Hypothesis 4: the percentage of Syrian workers who believe that they are not subject to the National Social Security permit is more than 50 percent. An upper tailed z-test was performed. The sample data provided significant evidence to support hypothesis 4 (z = 4.47; p-value = 0.0000039). The study concluded that the majority of Syrian workers are not aware of their subject to the National Social Security.

### **CONCLUSION**

Everyone has the right to work, which cannot be denied through any means. This is clearly stipulated in national laws as well as international conventions. However, limitations can be imposed to regulate the labor market and ensure protection of the local labor force.

Both the United States and Lebanon have issued laws to regulate the employment of foreigners. The former ensured sufficient protection for its national labor through the strict screening process it has been following regarding foreigners willing to work in the United States. On the other hand, Lebanon failed to ensure proper implementation of its rules and lacked a legal process which resulted in significant foreign competition with its national labor force.

The market study revealed that the majority of foreign workers are not aware of their rights and obligations under the Lebanese laws. This requires the authorities to take measures to insure that foreign workers, including Syrians, got introduced to the rules and regulations in Lebanon before entering the country. This is necessary to guarantee that Syrians willing to work in Lebanon have a minimum knowledge of the Lebanese laws before entering the country.

The problem in Lebanon is not the law itself, but rather its implementation. As a result, responsible authorities in Lebanon should enforce the law to maintain a balance between protecting the national labor force from foreign competition on one hand, and the need to attract foreign labor with skills that local industry lacks on another hand.

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