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Introduction

The Gulf Cooperation Council (GCC) countries together constitute a migration hub with regional primacy and global importance. Since the 1970s, rapid growth, development, and oil-linked wealth in Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates (UAE) have driven the emergence and evolution of a vast migration system, connected first through flows from Asia and other Arab states and later from sub-Saharan Africa and beyond (Valenta & Jakobsen, 2016). Today, the GCC is the world's third-largest migration hub, after Europe and North America, and hosts around 10% of the global migrant population (UN DESA, 2024). Given this critical position in regional and global migration patterns, developments in labor migration and migration policy in the GCC can significantly influence and shape understandings of broader migration policy in the Middle East and the Global South (Thiollet, 2024).

To examine the GCC's regional influence on labor migration governance, this article positions Lebanon as a peripheral yet structurally connected state within the broader regional migration system centered on the Gulf. It unpacks how, from the 1970s onward, Lebanon adopted and formalized labor migration governance arrangements, particularly the *Kafala* or sponsorship system, resembling those found across the Gulf (Pande, 2013). While the GCC states have undertaken differentiated migration reform in recent decades, Lebanon's labor migration governance remains largely unchanged (Amnesty International, 2020; De Bel-Air & Shah, 2025). Examining

GCC migration reforms from Lebanon's peripheral position thus provides a lens for assessing the extent of Gulf influence on regional trajectories of labor migration governance.

This analysis is situated in an understanding of a migration system as consisting of the people, institutions, policies, and other factors that shape migration between places, and the relationships through which these factors influence one another and change over time (Bakewell, 2014; Mabogunje, 1970). From a migration systems approach, the article thereby argues that migration policy should be understood not solely as the product of domestic state processes, but as strongly linked to regional logics, patterns, and influences. In doing so, it asks: *how does labor migration policy in peripheral states change when the migration regime at the center of a migration system begins to reform?*

The article considers how selected GCC labor migration reforms—reduced employer control over residence status, selective moves toward self-sponsorship, and greater internal labor market mobility—could be adapted to Lebanon's distinct political and institutional context. This analysis also contributes to broader discussions on what the Gulf experience reveals about forms of labor migration governance that both move beyond the *ka-fala* system and offer an alternative to a Western-centric migration trajectory of settlement, integration, and citizenship (Abdelbaki & Barakat, 2025; Siddiqui, 2026a; Vora & Koch, 2015). Methodologically, the article draws on Gulf migration policy documents, relevant secondary sources and reports, and a larger ongoing historical study of migration to Lebanon from 1943 to 2019, including multilingual newspaper archives, policy and legal documents, and interviews with migrants and key informants.

The article continues with a brief historical overview of the emergence of the GCC-centered migration system, Lebanon's incorporation within it, and the regional development of an employer-based sponsorship model for labor migration governance. It then unpacks recent GCC migration

reforms, particularly in Bahrain, Qatar, Saudi Arabia, and the UAE. To assess the degree of GCC influence on regional labor migration policy, the article examines why Lebanon has been unable to implement a long-demanded overhaul of labor migration policy and identifies transferable principles from GCC reforms that could influence future migration reform in Lebanon.

The Emergence of a Gulf-Centered Migration System and Its Regional Influence

Scholars have extensively studied and documented the emergence and trajectory of the Gulf-centered migration system since the 1970s (e.g., Kamrava & Babar, 2012; Khalaf et al., 2015; Shah & Fargues, 2011). In brief, after the oil boom of the 1970s, rapidly rising oil revenues enabled resource-rich Gulf states to undertake transformative infrastructure development and economic expansion (Hertog, 2016). Given the small size of their national populations and limited domestic labor supply, these projects generated demand for foreign labor (Winckler, 1997). Consequently, the Gulf states transformed not only in their economic and developmental standing but also in their demographic composition, becoming the center of an emerging regional migration system. Early post-boom migration inflows came from other Arab countries, including Egypt, Palestine, Yemen, Sudan, and Lebanon, alongside recruitment from South and Southeast Asia, particularly India, Pakistan, the Philippines, and other Asian states (AlShehabi, 2015). In the following decades, labor migration continued to expand, drawing heavily from Asia but also from Arab countries, while migration from sub-Saharan Africa and Western countries contributed to an increasingly diverse regional labor market (Naufal & Genc, 2014).

What remains comparatively understudied is how the Gulf's development and migration transformation also affected other regional states—most notably Lebanon and Jordan—at the periphery of an increasingly GCC-centered migration system. Before the outbreak of its civil war in 1975, Lebanon was a relatively stable, market-oriented, and socially liberal regional center. A review of *As-Safir* and *An-Nahar* newspaper archives, along with secondary sources, indicates that Lebanon served as a major destination for regional labor migration. During its economic boom in the 1960s, it received significant inflows of migrant labor, primarily from Syria, Egypt, and Sudan (Chalcraft, 2009; Reumert, 2020), while its capital, Beirut, became a refuge for exiled Syrian, Egyptian, and Iraqi intellectuals as authoritarian rule expanded in neighboring states (Kassir, 2010; Tra-boulsi, 2012). Importantly, alongside Syria and Jordan, Lebanon also served as a critical—though reluctant—host for Palestinian refugees since 1948 (Sayigh, 2008). With the outbreak of its civil war in 1975 and the ensuing political instability, economic contraction, and dangers of armed conflict, Lebanon lost its leading role as a *regional* migration destination. However, conflict did not halt migration inflows; instead, it reshaped them, as Lebanon increasingly adopted labor recruitment practices already underway in the Gulf.

As regional labor migration inflows contracted and Lebanese emigrated in large numbers during the civil war (1975-1990), Lebanon began recruiting labor migrants from Sri Lanka, India, the Philippines, and other Asian countries from the mid-1970s onward, and later from sub-Saharan Africa, particularly Ethiopia (De Bel-Air, 2017). These new migration linkages drew in part on economic, social, and recruitment networks established by Lebanese emigres in the Gulf who witnessed the influx of Asian labor migrants (Jureidini, 2009). As such, Lebanon became increasingly incorporated as a labor migration destination at the periphery of the emerging Gulf-centered migration system, though with two critical distinctions. First, unlike in the Gulf, where labor migration was driven by the pull factors of economic development, these new flows arrived in Lebanon paradoxically

during a period of armed conflict and economic contraction. Second, migration linkages between the Gulf and certain Asian states, particularly in the Indian subcontinent, were less novel given the long-standing social, cultural, economic, and commercial connections between the two regions (Bishara & Risso, 2016). Yet for Lebanon, the arrival of South and Southeast Asian migrants from the 1970s onward established new migration-centered linkages and contributed to the emergence of new linguistic, cultural, religious, and racial dynamics in Lebanese society (Jureidini, 2009). As such, Lebanon's peripheral incorporation into the Gulf-centered migration system not only internationalized labor migration at a time of conflict and instability, but also began to reshape its socio-cultural composition.

To govern this more international migrant labor force, Lebanon developed and formalized an employer-based sponsorship system, or *Kafala*, with structural features similar to the Gulf model (Khan & Harroff-Tavel, 2011; Pande, 2013). A review of Ministry of Labor statements in the newspaper archives and an analysis of Decree No.17561 of 18 September 1964, regulating the employment of foreigners, indicate that the ministry previously issued work permits directly, often at border entry points. In practice, however, employment of migrants was also highly informal. For example, among male Syrian migrants—the largest foreign labor force—Chalcraft (2009) documents that Syrians rarely had to obtain the required work permit and entered and worked in Lebanon without one. Such arrangements were expedient and, in the government's view, commonsensical within the scope of "brotherly" bilateral relations, when the labor migrant population was primarily from neighboring countries with shared history, language, and culture, and often closely intertwined economies, such as between Lebanon and Syria.

As the migrant workforce became more internationalized and private intermediaries began facilitating recruitment, new forms of migration governance became necessary. Without a shared border, established social networks, or mutual cultural and linguistic traits, new migrants arrived

through an international network of private recruitment agencies that quickly emerged in the 1970s across the sending countries, the GCC, and peripheral states like Lebanon (Fernandez, 2013). The recruitment agencies became intermediaries between the migrant, employer, and receiving state, licensed by the receiving state to recruit new workers, ensure their legal residency, and oversee their placement with an employer (Agunias, 2012). This arrangement directly tied migrant workers' residency status to their employer and, through a layered matrix of formal laws and decrees and informal practices, became known as the *Kafala*, or sponsorship, system (Kassamali, 2026).

Within the Gulf, scholars have argued that *Kafala* stems from Bedouin traditions of providing sponsorship and protection to visiting foreigners, links to older religious traditions, or British colonial-era practices in the region (for an overview of origin theories, see Beaugrand & Thiollet, 2023). Regardless of its origins, today *Kafala* can be understood as “a system of migration in which individual migrants are sponsored by citizens or companies rather than the state” (Vora & Koch, 2015, p. 540). Although the system has country-specific variations across the Middle East, it broadly stipulates that the migrant “cannot typically enter the country, resign from a job, transfer employer, nor leave the country without first obtaining explicit permission from his or her employer” (ILO, 2017, p. 3). What makes *Kafala* distinct from other forms of employer-based sponsorship around the world is the degree to which the sponsor/employer exerts control over the individual migrant, particularly through: (1) renewal of residence tied to the employer; (2) termination of employment subject to the employer's approval; (3) transfer to another employer dependent on approval from the first employer; and (4) exit from the country subject to the employer's approval (ILO, 2017).

Existing scholarship points to connections between the Gulf-centered migration system and the internationalization of labor migration to Lebanon, specifically the arrival of Asian workers through networks linked to Leba-

nese emigres in the Gulf and the subsequent development of sponsorship arrangements in Lebanon (Jureidini, 2009; Kassamali, 2026). This trajectory makes particular sense when Lebanon's labor migration evolution is understood in relation to its position at the periphery of the Gulf-centered migration system. However, *Kafala* has evolved differently in the GCC and in Lebanon, particularly as some GCC countries have undertaken recent reforms, raising the question of whether migration reform at the center of a migration system can influence reform at the peripheries.

From Regional Convergence to Divergence: Reforming *Kafala* in the Gulf

Despite the contested origins of *Kafala* in Gulf history, modern sponsorship arrangements provided a mechanism that responded quickly to growing international labor migration flows, particularly during rapid economic transformation and state formation. Although sponsorship practices predated the 1970s oil boom, they became increasingly institutionalized as GCC states experienced a demographic shift driven by the influx of a large migrant workforce (AlShehabi, 2015). Decades later, as the GCC grew into a critical global migration hub and individual states built sufficient institutional capacity, international critiques of the *Kafala* system and its negative impact on migrants' rights intensified, particularly as the migrant population grew to constitute over half of the overall Gulf population and as high as 88% in the UAE and 76% in Qatar by 2018 (IOM, 2018). At the same time, Gulf states also sought to increase nationals' participation in the private sector, assert greater state control over migration management rather than private actors like recruitment agencies, and improve the flexibility, productivity, and efficiency of their economies. These collective factors created a need for labor migration governance reforms (Beaugrand & Thiollet, 2023; De Bel-Air & Shah, 2025; Diop et al., 2018). Although highly

differentiated, the most substantial reforms have taken place in Bahrain, Qatar, Saudi Arabia, and the UAE and are therefore examined here, while reforms in Kuwait and Oman remain comparatively limited (ILO, 2021).

Perhaps the most significant reforms concern *labor mobility*, namely a migrant's ability to change employers without the sponsor's permission. Bahrain was the first to introduce such measures in 2009, allowing migrants—except domestic workers—to change employers without the employer's permission after one year of work (ILO, 2023a). Qatar has made more significant reforms, where “changing to another sponsor/employer is allowed at any time during the validity of the residence permit or within 90 days of the expiration of the residence permit” (ILO, 2023b). Reforms in the UAE and Saudi Arabia also allow labor mobility when specific temporal or administrative criteria are met (ILO, 2023c, 2024). Labor mobility has been championed by the International Labour Organization (ILO) in particular as a means not only to improve migrants' rights in the GCC, but also to enhance internal labor mobility, thus improving labor productivity, reducing costs of recruitment and training, and better matching migrants' skills with employers' needs (ILO, 2021). *Exit mobility* through the removal of sponsor/employer approved exit permits has been another critical aspect of reforms. Bahrain, Qatar, and the UAE have all removed exit permit requirements for migrants, though Saudi Arabia retains the requirement in differentiated forms (ILO, 2023a-c, 2024). Many GCC countries have also developed wide-ranging reforms to private-sector labor laws on worker protections, salaries, and benefits, though some still exclude domestic workers (Diop et al., 2018).

Reforms have also increasingly extended protections to *migrant domestic workers*, who were historically excluded from many labor laws. Bahrain, for example, allows domestic workers to benefit from certain, though not all, provisions of the key labor legislation (Law No. 36 of 2012) (ILO, 2023a). Since 2017, Qatar has adopted a specific labor law for domestic workers and a Standard Unified Contract that sets legally binding regulations for

employing domestic workers (ILO, 2023b). Most notably, Qatar adopted a set minimum wage for all workers in the country, including domestic workers. Saudi Arabia and the UAE have similarly developed specific legislation concerning domestic workers.

Alongside these reforms, the notion of *Kafala* has come into question with the emergence of tiered migration structures and economic free zones that produce uneven migration experiences in Gulf countries (Diop et al., 2018; Vora & Koch, 2015). For example, high-skilled migrants and Western foreigners in the Gulf often encounter migration processes that differ substantively from those of lower-skilled migrants and face fewer of the restrictions commonly associated with *Kafala*. Similarly, in economic free zones across the GCC, private companies hire foreign workers outside the confines of the *Kafala* system, a critical fact given the importance and proliferation of these economic zones. In another critical development, Bahrain and the UAE have recently introduced residency obtainment through self-sponsorship schemes, thereby eliminating the need for a sponsor entirely (ILO, 2021). Although the UAE model targets higher-income individuals, these differentiated structures suggest a non-linear trajectory of reforms in GCC migration governance, leading scholars to increasingly call for analysis that moves beyond reductionist understandings of *Kafala* (Siddiqui, 2026b; Vora & Koch, 2015).

The evolution of GCC migration governance is evident not only in official reforms, but also in the everyday forms of inclusion and belonging that have come to characterize migrant communities across the region. Attention is increasingly being paid to the embeddedness of migrant communities in the social structures of Gulf societies (Koch, 2015; Siddiqui, 2026a; Vora, 2013). Thus, though reforms are highly differentiated and uneven across nationality, class, and employment category, the collective overview of migration governance in the GCC can no longer be reduced solely to the *Kafala* framework. Though continued reforms of migration governance in the GCC would help ensure the efficiency of the regional labor market and

improve migrants' rights, migrants in the GCC have nonetheless already established rooted, multigenerational families and communities. Collectively, this points to a form of migration governance that is more nuanced and layered and, as Vora & Koch (2015) argue, has in practice become less distinct from other forms of labor migration governance globally. It also provides evidence of how long-term presence and settlement are occurring across the region and, more broadly, in the Global South, without following Western-centric trajectories in which settlement is expected to culminate in the acquisition of citizenship (Siddiqui, 2026b).

Why Lebanon Has Not Followed a Regional Pattern to Migration Reform

Reform of labor migration in Lebanon, and the amalgamation of decrees, laws, and practices that produce the *Kafala* system, have long been debated at the government, civil society, migrant, and community levels. Though limited, a few reforms have occurred, mostly regarding migrant domestic workers who remain excluded from Lebanon's labor law (Chaar, 2021). Under Order No.1/1 Governing the Work of Placement Agencies, agencies are now prohibited from charging recruitment fees to migrant domestic workers, though other migrant workers may be charged such fees. Additionally, according to the ILO (2023d), Lebanon does not require migrants to obtain an exit permit to leave the country. In 2009, Lebanon adopted a Standard Unified Contract for all migrant domestic workers under the Unified Contract Decree No. 19/1 (ILO, 2023d). Although the Ministry of Labor adopted an improved Standard Unified Contract in September 2020, the State Shura Council later suspended its implementation after a complaint from the Syndicate of Owners of Recruitment Agencies, demonstrating the latter's influence in reform processes (ILO, 2020). The new contract would have legally provided migrant domestic workers greater labor mobility and improved worker protections. While these reform efforts often

result from collective organizing by migrant communities, local activists, and international organizations, they remain far from the broader labor migration reforms undertaken in the Gulf and highlight the particular nature of politics and policymaking in Lebanon.

First, Lebanon's sectarian political system differs fundamentally from the monarchical political structures of the GCC states. Constitutionally, Lebanon's top leadership posts are organized according to established principles of confessional power-sharing, including parity between Christians and Muslims and proportional representation among sects in parliamentary seats and cabinet representation. This system makes consensus and inter-sectarian negotiation central to political decisions, creating multiple veto points for reform, often leading to political deadlock and inaction (Fakhoury, 2019). For example, a review of *As-Safir* newspaper archives indicates that proposed reforms by Labor Minister Charbel Nahhas in 2011–2012 faced significant political opposition within the government, limiting their implementation and ultimately contributing to his resignation. Additionally, interviews with key informants working on labor migration reform suggest that the reforms initiated by Labor Minister Camille Abou-sleiman in 2019–2020 encountered institutional and political obstacles, including resistance to proposed changes to the above-mentioned Standard Unified Contract. Together, Lebanon's fragmented political structure and limited state capacity constrain labor migration reform in ways that differ from the more concentrated political authority and greater institutional resources available to GCC states.

The second reason concerns Lebanon's political economy, which has historically been characterized as open-market and, since the 1990s, increasingly neoliberal, combined with weak state enforcement of labor laws, structural reliance on cheaper foreign labor, and powerful private -sector employers—many of whom overlap with the political class (Longuenesse & Tabar, 2014). Although accurate statistics are difficult to obtain, by 1997 migrant labor accounted for at least one third of the active population, and by

2011 it had grown to approximately half of the labor force (Longuenesse & Tabar, 2014; Makdisi, 2004, p. 143). This reliance is particularly pronounced in sectors such as domestic work, construction, agriculture, and some service and industry occupations, where employers have preferred lower-paid migrant workers to fill jobs that Lebanese workers increasingly perceive as undesirable (Tabar, 2010). At the same time, Lebanese labor regulations reserve a broad range of private sector occupations for Lebanese nationals, reinforcing a distinction between jobs legally reserved for Lebanese workers and employment increasingly associated with migrant workers. This pattern is further shaped by historically sustained high rates of Lebanese emigration and a structural reliance on remittances (Pearlman, 2013). The political class has often supported this labor market arrangement. Already in 1998, then-Prime Minister Rafik Hariri declared, “We are a country that exports skilled labor abroad, and large sums of money are transferred to Lebanon. Instead, we import labor at a lower cost and with good production, while transferring much less abroad than what Lebanese expatriates send... and thus the outcome is in our favor” (As-Safir, 1998).

However, these features do not entirely distinguish Lebanon from the Gulf, where certain occupations are also reserved for nationals and migrant labor is likewise central to market-oriented economies. Thus, Lebanon’s structural reliance on lower-cost migrant labor and the influence of private-sector employers therefore cannot, on their own, explain the absence of comparable reforms. A more consequential difference lies in the structure of Lebanon’s and the Gulf’s political economies of labor migration. In Lebanon, labor migration remains far less differentiated, with migrant workers concentrated in a narrower range of predominantly low-skilled occupations. By contrast, the increasingly tiered nature of labor migration in much of the Gulf has meant that experiences of sponsorship are highly differentiated by skill, occupation, and nationality. This differentiation has contributed to greater variation of the sponsorship model in practice and consequently, migrants’ experiences of it (Vora & Koch, 2015). Thus, changes in Gulf sponsorship models emerged not only through deliberate

policy reforms but also from changes in the composition and organization of migrant labor. By comparison, Lebanon's concentrated reliance on lower-skilled migrant workers has also been accompanied by a more uniform and persistent model of employer-dependent sponsorship.

Taken together, this analysis shows that Lebanon was incorporated into the Gulf-centered migration system, experienced a rapid internationalization of its migrant labor force, and consequently adopted a sponsorship model of labor migration governance similar to those in the region. However, neither process was coordinated or purposeful; instead, they resulted from regional influence and, as other scholars suggest, from Lebanese emigres' experiences in the Gulf (Jureidini, 2009). Given Lebanon's sectarian political system, particularities of its political economy, and its weaker institutional and state structures, labor migration reforms in the Gulf are unlikely to directly drive positive change in the peripheral state. Instead, pressure for labor migration reform in Lebanon—particularly concerning migrant domestic workers—has largely come from international actors such as the ILO, as well as migrant workers and local civil society organizations (Kobaissy, 2017).

Nevertheless, when considering the future of reform in this regional context, the Gulf provides an important comparative reference point for Lebanon. Though still unevenly applied across the Gulf, a critical step is decoupling all migrant workers' legal status from their employer/sponsor, allowing workers to renew their own residence and work permits, terminate employment, and change employers without losing legal status (ILO, 2017). The ILO (2017) has also proposed "bridging" schemes to ensure that migrants do not fall into irregular status while seeking new employment. Importantly, these reforms would shift responsibility toward state institutions and away from private actors like recruitment agencies. Reforms should also address employer-migrant worker relations and migrant worker protections, including effective wage and dispute-settlement mechanisms, and stronger state oversight of employment conditions. At the same

time, reform would need to account for Lebanon's institutional context and current economic constraints. For example, a wage protection system based on formal banking channels—such as one adopted in Qatar (ILO, 2023b)—faces practical difficulties in an economy where cash remains widely used, and confidence in the banking sector has deteriorated sharply since the 2019 banking and economic crisis. Reform should also expand legal pathways for family migration, which remain available to varying degrees in several Gulf states but are relatively limited in Lebanon.

Conclusion: Beyond Migrants' Rights and Toward Non-Citizen Rights

Although labor migration reform at the center of a migration system does not automatically translate into similar reform in peripheral countries, changes at the center can nevertheless provide a regional or system-level reference point for rethinking labor migration governance. A regional or system-level approach remains relevant because, as this article has shown, labor migration patterns across the region share important characteristics and are similarly embedded in broader political economies. Within the GCC-centered migration system, migration initially conceived as “temporary” has nevertheless developed into the long-term presence of migrant communities, who have established practices of belonging and placemaking (Kassamali, 2017; Vora, 2013; Vora & Koch, 2015). Labor migration governance reforms therefore need to address migrants' rights and reflect their sustained contributions to the societies in which they live and work.

At the same time, a migration systems approach and a regional framework allow for consideration of the institutional and political constraints within which reform takes place. Western-centered models of long-term settlement culminating in citizenship for most migrants are poorly aligned with a region in which naturalization remains highly exceptional (Ali &

Cochrane, 2024). Rather than treating alternative frameworks as defective, discussions of labor migration reform within the GCC-centered migration system, and across much of the Global South, should instead move beyond migrants' rights-focused frameworks and toward what Koh (2020) terms non-citizen rights. With highly embedded migrant populations, many of whom have developed forms of situated belonging (Vora, 2013), the GCC is particularly well positioned to demonstrate how a non-citizen rights-based framework can provide an alternative basis for migration governance, with implications for the region and potentially beyond.

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GULF HORIZONS 03

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Karina Goulordava

NOT SOLD FOR MONEY

