



## **Monitoring the situation with freedom of association and the status of civil society organizations in the Republic of Belarus**

**June 2023**

Repressions against Belarusian citizens and Belarusian civil society organizations continue unabated in Belarus, including arrests, searches, summons for questioning, torture in places of detention, and pressure on political prisoners and activists. The number of NCOs being liquidated in Belarus continues to rise. As of the end of June 2023, no fewer than 854 non-commercial organizations are in the process of forced liquidation, either through filed lawsuits for forced liquidation in court or by being forcibly removed from the Unified State Register of Legal Entities and Individual Entrepreneurs (USR). The number of organizations that have decided to voluntarily liquidate amounts to no fewer than 483 organizations as of the end of June. Thus, the losses in the public sector of Belarus, starting from the post-election period in 2020, now amount to at least 1337 institutionalized forms of non-commercial organizations (associations, professional unions, foundations, non-governmental establishments, and associations). This is 22 organizations more than in the previous monitoring period. At least two cases have been documented of tax authorities filing lawsuits to compel associations to appoint liquidators. The persecution of individuals for creating, participating in, or financing alleged extremist formations continues, with informational materials and initiatives being declared extremist, along with individuals involved in extremist activities. Human rights defender Nasta Loika has been sentenced to 7 years of imprisonment in a general regime colony. Cases of border detentions and preventing departure from the territory of Belarus have been recorded. A draft law "On Freedom of Conscience and Religious Organizations" has been published, which entails the re-registration of all religious organizations registered in Belarus. The deadline for submitting documents for the re-registration of political parties has expired.

As of June 30, 2023, there are 1 496 people recognized as political prisoners in Belarus, currently held in places of detention.

### **1. Forced liquidation of non-commercial organizations<sup>1</sup>**

As of June 30, 2023, according to [the monitoring conducted by Lawtrend](#), there have been 854 NCOs in the process of forced liquidation, including lawsuits filed by registering authorities for liquidation or being forcibly excluded from the Unified State Register of Legal Entities and

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<sup>1</sup> The monitoring only records cases of forced liquidation and self-liquidation of non-commercial organizations (NCOs), and quantitative data does not include government establishments or republican state-public organizations. Religious organizations, consumer cooperatives, and other organizational and legal forms of NCOs besides public associations, foundations, private establishments, and associations are also not taken into account.

Individual Entrepreneurs (USR). During the monitoring period, both court decisions on the forced liquidation of public associations and new lawsuits for their liquidation were filed. The majority of liquidation lawsuits were filed by the Ministry of Justice against republican public associations. A case was recorded where the Main Department of Justice of the Hrodna Regional Executive Committee filed a lawsuit for the liquidation of a foundation (Local Charitable Foundation "Krevskiy Zamok").

## **2. Non-commercial organizations deciding on self-liquidation**

The process of NCOs independently deciding on liquidation continues (during the monitoring period, this includes public associations and one foundation). As of June 30, 2023, according to [the monitoring conducted by Lawtrend](#), there have been 483 NCOs (public associations, foundations, and establishments) in which the authorized body or founders have decided to liquidate.

As before, the decision on self-liquidation is primarily due to pressure on the members and employees of NCOs, an unfavorable legal environment, the overall socio-political situation in the country, and often the authorities' pressure on NCOs to make such a decision.

Thus, an analysis of the general statistics of forcibly liquidated or self-liquidating NCOs shows that starting from September 2020 until the end of June 2023, there have been at least 1,337 fewer NCOs (including public associations, including professional unions, foundations, establishments, and associations) in Belarus.

## **3. Coercion of public associations to appoint a liquidator**

Many NCOs for which a decision on liquidation has been made cannot complete the liquidation process, even if they have the intention to do so. This situation is caused by several factors, including the seizure of documents, and the mass departure of the leadership and members of civil society organizations from the country. For public associations, one of the factors hindering the completion of the liquidation procedure is the lack of developed and precise legislative norms. According to the legislation, the liquidation procedure of a public association is carried out by a specially created liquidation commission or a liquidator. According to the statutes of the majority of public associations, only the body that decided on liquidation can decide to create a liquidation commission to which all powers related to the liquidation actions are transferred. This provision corresponds to the provisions of the Civil Code of the Republic of Belarus. However, in practice, a liquidation commission is not created during the liquidation of public associations by the court. When forcibly liquidated organizations request information from the registering authorities, they are offered to create a liquidation commission either by representatives of the organization or its governing body. Thus, forcibly liquidated organizations are placed by the authorities in a situation where they are forced to violate the legislation and their statutes. Without creating a liquidation commission or appointing a liquidator, public associations often cannot resolve the issue of assets remaining after the decision on liquidation, including those received as foreign gratuitous and/or international technical assistance.

In previous monitoring periods, cases were identified where the authorities, in violation of the law, excluded from the Unified State Register of Legal Entities and Individual Entrepreneurs (USR) NCOs that had not completed the liquidation process. For example, independent trade unions and several public associations were excluded from the USR because they did not create a liquidation commission and did not take action to complete the liquidation process.

In the current monitoring period, cases were recorded of the Inspection of the Ministry of Taxes and Levies for the Smarhon District (Hrodna Region) filing lawsuits to compel the appointment of a liquidator for a public association: in relation to the public associations "Football Club 'Oshmyany'" and " Smorgon frontovaya". In the case of the latter, the decision on liquidation was made by the members of the association themselves back in 2019, and the court schedule erroneously indicated that the lawsuit for the liquidation of this association would be considered. The consideration of the lawsuits is scheduled for July 2023.

#### **4. Re-registration of political parties.**

According to the Law of the Republic of Belarus dated February 14, 2023, "On Amending Laws on the Activities of Political Parties and Other Public Associations," the deadline for political parties to submit documents to the Ministry of Justice for their re-registration has expired on June 5th.

In addition to the requirement for re-registration, the law has established new criteria for political parties, including the presence of no fewer than five thousand adult citizens of the Republic of Belarus who permanently reside in Belarus as party members, the existence of organizational structures of the party in each region and the city of Minsk, representation of party members in each of these territorial units not less than one hundred people, and the creation of district and city organizational structures in at least one-third of the districts in each region and the city of Minsk.

After the law came into force, the Minister of Justice, Sergey Kholmenko, [stated](#) that as a result of re-registration, the number of political parties in Belarus would decrease to 3-4. According [to statistics](#) from the Ministry of Justice of the Republic of Belarus, as of January 1, 2023, there were 15 registered political parties in Belarus. Another political party, "Belaya Rus" (White Russia), was registered by the Ministry of Justice on May 2, 2023 (therefore, this party did not need to undergo the re-registration procedure).

According to the information from the Ministry of Justice, on June 23, 2023, [decisions were made to re-register two political parties](#): the Liberal Democratic Party and the Communist Party of Belarus.

Overall, the situation regarding the mandatory re-registration of political parties at the time of preparing this review, based on the information available in open sources (online publications, party websites, Ministry of Justice website), is as follows.

№	Political Party Name	Completion of the Re-registration Process
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1	Belarusian Party "Belaya Rus" ("White Ruthenia") (Leader: Aleh Ramanau)	Registered after the amendments to the Law on Political Parties came into effect. Did not undergo re-registration (information from the Ministry of Justice)
2	Liberal Democratic Party (Leader: Aleh Haidukevich)	Completed the re-registration process. The party's new name is the Liberal Democratic Party of Belarus (information from the Ministry of Justice).
3	Communist Party of Belarus (Leader: Aliaksei Sokal)	Completed the re-registration process (information from the Ministry of Justice).
4	Republican Party of Labor and Justice (Leader: Aliaksandr Hizhnyak)	<a href="#">Submitted documents</a> for re-registration on June 1 (information from the party's website). Completed the re-registration process ( <a href="#">information</a> from online publications citing the Ministry of Justice's press service).
5	Belarusian Social-Sports Party (Leader: Uladzimir Aleksandrovich)	No information is available in accessible online sources regarding the party's submission of documents for re-registration.
6	Belarusian Party "Zelenyye" ("Greens") (Leader: Dzmitry Kuchuk)	<a href="#">Documents</a> for re-registration have been submitted. A resolution was adopted to terminate the Law on Political Parties in its new version due to its non-compliance with the Constitution and Belarus's international obligations, as well as the party's failure to provide the Ministry of Justice with a list of members due to lack of security guarantees and associated consequences. The Ministry of Justice responded with a proposal to hold a congress, decide on self-liquidation, and report within one week from the date of the letter on the measures taken to fulfill these actions (information from online publications and press conferences, joint resolution).
7	Social-Democratic Party of People's Consent (Leader: Siarhei Yarmak)	No information is available in accessible online sources regarding the party's submission of documents for reregistration.
8	Belarusian Agrarian Party (Leader: Mikhail Rusy)	No information is available in accessible online sources regarding the party's submission of documents for re-registration.
9	Republican Party (No information about the leader, including on the Ministry of Justice's website)	No information is available in accessible online sources regarding the party's submission of documents for re-registration.
10	Conservative-Christian Party – BNF (Leader: Zyanon Paznyak)	No information is available in accessible online sources regarding the party's submission of documents for re-registration.
11	BNF Party (Leader: Ryhor Kastusiou, political prisoner)	Decision made not to submit documents for re-registration. A resolution was adopted to terminate the Law on Political Parties in its new version due to its non-compliance with the Constitution and Belarus's international obligations, as well as the party's failure to provide the Ministry of Justice with

		a list of members due to lack of security guarantees and associated consequences (information from online publications, press conferences, joint resolution).
12	Belarusian Left Party "Spravedlivyi Mir" (Leader: Siarhei Kalyakin)	Documents for re-registration have been submitted. At the congress, a decision was made not to disclose the list of party members with personal data to ensure their safety (information from the party's website and online publications).
13	United Civic Party (Leader: Mikalai Kazlou, political prisoner)	Decision made not to submit documents for re-registration. A resolution was adopted to terminate the Law on Political Parties in its new version due to its non-compliance with the Constitution and Belarus's international obligations, as well as the party's failure to provide the Ministry of Justice with a list of members due to lack of security guarantees and associated consequences (information from online publications, press conferences, joint resolution).
14	Belarusian Patriotic Party (Leader: Mikalai Ulakhovich)	No information is available in accessible online sources regarding the party's submission of documents for re-registration.
15	Belarusian Social Democratic Hramada (Leader: Siarhei Cherachen)	Documents for re-registration <a href="#">have been submitted</a> . No individual list is provided. The accompanying document contains a commitment to bring the number of organizational structures in line with the new requirement of the law within a year (information from the party's website).
16	Belarusian Social-Democratic Party (Hramada) (Leader: Ihar Barysau)	Documents for re-registration have been submitted. A resolution was adopted to terminate the Law on Political Parties in its new version due to its non-compliance with the Constitution and Belarus's international obligations, as well as the party's failure to provide the Ministry of Justice with a list of members due to lack of security guarantees and associated consequences (information from online publications, press conferences, joint resolution).

Thus, opposition political parties that submitted documents for re-registration to the Ministry of Justice did not provide individual lists of members as part of the general document package. In response to the inquiry of the Belarusian Party "Green" regarding the legality of the Ministry of Justice's requirement for lists of party members with personal data, the National Center for Personal Data Protection clarified that personal data regarding membership in political parties fall under special personal data. However, the consent of the data subject for processing special personal data is not required when the processing of personal data is necessary to fulfill obligations (powers) provided for by legislative acts. At the same time, the Law of the Republic of Belarus "On Personal Data Protection" stipulates that "the processing of personal data must be proportionate to the stated purposes of their processing and ensure a fair balance of interests of all parties concerned at all stages of such processing. The processing of special personal data is only allowed if a set of measures is taken to prevent risks that may arise from processing such personal data for the rights and freedoms of data subjects." Given the unprecedented situation of repression,

including criminal prosecution, against members of non-commercial organizations and political parties, providing information about a person's affiliation with an opposition party along with their personal data contradicts common sense, security criteria, and the provisions of the law.

The new version of the law imposes an obligation on the Ministry of Justice to carry out re-registration within six months after the law comes into force (until September 5, 2023). Political parties that have not submitted documents for re-registration by June 5, including those that haven't decided on self-liquidation, will be subject to liquidation based on decisions of the Supreme Court of the Republic of Belarus upon lawsuits filed by the Ministry of Justice.

### **Increased pressure on civil society organizations and activists.**

Despite a significant decrease in the number of civil society organizations in Belarus, pressure on these organizations and the initiatives of activists continues. This pressure takes various forms, ranging from administrative and criminal persecution to the liquidation of organizations, raids, summons for questioning and conversations with activists and their relatives, interference in the internal activities of organizations, including intervention in their methods of operation, programs, and plans, as well as the disruption of their events. For example, a tent camp organized by the Public Association "Christian Community of Adults and Youth" in the village of Panyamony (Hrodna region) [was closed](#). The current monitoring period is characterized by increased inspections and summons for conversations when crossing the Belarusian border. Former activist of the Union of Poles in Belarus, Anzhalika Arechva, was not allowed to leave the territory of Belarus with the corresponding stamp in her passport. Searches were conducted at the home and registered address of Ales Zarembyuk, the director of the Belarusian Foundation in Warsaw, who has been residing in Warsaw since before the 2020 presidential elections, and his parents were interrogated. In Barysau (Minsk region), human rights defender Aleh Matskevich, who had already been detained in January 2022, was detained at work and subsequently sentenced to 15 days of administrative arrest under Article 19.11 of the Code of Administrative Offenses (distribution of extremist materials).

#### **4.1. Criminal prosecution of representatives of civil society organizations.**

Due to the performance of their professional activities, human rights defenders continue to serve prison sentences. [Leanid Sudalenka](#), chair of the Homiel branch of Human Rights Center Viasna (listed as involved in extremist activities, sentenced to 3 years of imprisonment in a general regime colony) and coordinator of Viasna Volunteer Service [Marfa Rabkova](#) (sentenced to 14 years and 9 months in a general regime colony, listed as involved in terrorist and extremist activities) are serving prison terms, Viasna volunteer [Andrey Chapiuk](#) (sentenced to 5 years and 9 months in a medium security prison, listed as involved in terrorist and extremist activities); Viasna chairman and Nobel laureate [Ales Bialiatski](#); Viasna Board member and FIDH Vice-President [Valiantsin Stefanovich](#); lawyer [Uladzimir Labkovich](#), coordinator of the campaign "Human Rights Defenders for Free Elections".

On June 20, 2023, the Minsk City Court sentenced human rights defender Nasta (Anastasia) Loika to seven years of imprisonment in a correctional colony of the general regime. The trial was closed, and details of the court proceedings are unknown. Judge Alena Shylko of the Minsk City

Court found her guilty of "inciting racial, national, religious, or other social enmity or discord" under Part 3 of Article 130 of the Criminal Code of the Republic of Belarus. The charges were based on the fact that in 2018, Anastasia was preparing a report on human rights, specifically addressing the persecution of the anarchist community in Belarus by the state. The report provided a legal assessment of the activities of law enforcement officers in Belarus.

In places of deprivation of liberty, other representatives of civil society organizations are also being held, for example,

members of the Coordination Council [Maxim Znak](#) (included in the list of individuals involved in terrorist activities, sentenced to 10 years of imprisonment), [Marya Kalesnikava](#) (included in the list of individuals involved in terrorist activities, sentenced to 11 years of imprisonment),

cultural activist and head of the establishment "City Life Center" [Pavel Mazheika](#) (had his case transferred to court),

representative of the "Green Patrol" initiative [Pavel Nazdra](#) (included in the list of individuals involved in extremist activities, sentenced to 2 years of imprisonment),

former leader of the Public Association "Akhova Ptushak Batskaushchyny" [Viktar Fianchuk](#) (included in the list of individuals involved in extremist activities, sentenced to 2 years and 6 months of imprisonment),

public figure, founder of the "Flying University" [Uladzimir Matskevich](#) (included in the list of individuals involved in extremist activities, sentenced to 5 years of imprisonment),

expert of the analytical group of the Agency for Humanitarian Technologies, coordinator of the "Flying University," senior analyst at the Center for European Transformation [Tatsiana Vadalazhskaya](#) (included in the list of individuals involved in extremist activities, sentenced to 2 years and 6 months of restricted freedom with placement in an open-type correctional facility ("chemiya")),

member of the Council and co-founder of the School of Young Public Administration Managers Sympa, expert of the research project bipart [Tatsiana Kuzina](#) (sentenced to 10 years of imprisonment),

founder and editor of the expert community website "Our Opinion," head of the expert monitoring group "Belarus in Focus" [Valeryia Kastsuhova](#) (sentenced to 10 years of imprisonment),

co-chair of the association "Tell the Truth" and former presidential candidate [Andrey Dzmitryeu](#) (sentenced to 1.5 years in a colony),

founder of Symbal.by, [Pavel Belavus](#), has been included in the lists of individuals involved in terrorist and extremist activities and has been sentenced to 13 years in a high-security correctional facility,

art manager [Uladzimir Bulauski](#) has been included in the list of individuals involved in extremist activities and has been sentenced to 2 years in a general regime colony.

Deputy Director of Minsk Cycling Society, [Maksim Puchynski](#), has been included in the list of individuals involved in extremist activities and has been subjected to a 2-year and 6-month restriction of freedom without being sent to an open-type correctional facility ("home chemistry").

On June 23, the Minsk City Court considered the appeal of [Andrey Dzmitryeu](#), co-chair of the "Tell the Truth" association. The verdict was upheld, and the appeal was dismissed.

According to the Belarusian Independent Trade Union, currently, nearly four dozen trade union activists and leaders of democratic trade unions are imprisoned in Belarus. Thus, leaders and activists of Belarusian independent trade unions are being held in places of detention:

[Aliaksandr Yarashuk](#), Chairman of the Belarusian Congress of Democratic Trade Unions (sentenced to 4 years of imprisonment, included in the list of individuals involved in extremist activities).

[Siarhei Antusevich](#), Deputy Chairman of the Belarusian Congress of Democratic Trade Unions (sentenced to 2 years of imprisonment, included in the list of individuals involved in extremist activities).

[Iryna But-Husaim](#), Accountant (sentenced to 1.5 years of imprisonment, included in the list of individuals involved in extremist activities).

[Andrey Khanevich](#), Chairman of the primary organization of the Belarusian Independent Trade Union at OJSC "Hrodna Azot" (included in the list of individuals involved in extremist activities, sentenced to 5 years of imprisonment).

[Aliaksandr Mishuk](#), Chairman of the Independent Trade Union at "Belaruskali" (included in the list of individuals involved in terrorist activities and extremist activities, sentenced to 2 years and 6 months of imprisonment).

[Yanina Malash](#), Activist of the Free Metalworkers Union (included in the list of individuals involved in extremist activities, sentenced to 1.5 years of imprisonment).

[Henadz Fiadynich](#), Head of the Independent Trade Union of Radioelectronic Industry Workers (sentenced to 9 years of imprisonment in high-security conditions, included in the list of individuals involved in extremist activities).

[Vasil Berasnieu](#), Leader of the Orsha Independent Trade Union of Radioelectronic Industry Workers, acting Chairman of the Trade Union of Radioelectronic Industry Workers (sentenced to 9 years of imprisonment in high-security conditions, included in the list of individuals involved in extremist activities).

[Vatslau Areshka](#), Activist of the Trade Union of Radioelectronic Industry Workers (sentenced to 8 years of imprisonment, included in the list of individuals involved in extremist activities).

[Artsiom Zharnak](#), Chairman of the primary trade union organization of the Free Metalworkers Union at MAZ (included in the list of individuals involved in terrorist activities, sentenced to 4 years of imprisonment).



[Mikhail Hromau](#), Secretary of the liquidated Free Metalworkers Union (sentenced to 2 years and 6 months of restricted freedom without placement in an open-type correctional facility).

[Vital Chychmarou](#), Head of the primary trade union organization of the Free Metalworkers Union (sentenced to 3 years of restricted freedom without placement in an open-type correctional facility).

On June 12, in the Hrodna Regional Court, a verdict was issued against [Maksim Senik](#), an activist of the trade union organization BNP at Hrodna Azot LLC. Maxim was charged under multiple articles of the Criminal Code, including insulting the president (Part 1 of Article 368) and facilitating extremist activities (Part 1 of Article 361-4 and Part 1 of Article 361-2). The court sentenced Senik to four years of imprisonment in a high-security correctional facility.

#### **4.2. The application of legislation on countering extremism as a means of exerting pressure on civil society organizations (CSOs) continues.**

Application of legislation on countering extremism as a means of exerting pressure on civil society organizations (CSOs) continues. The practice of recognizing information products, including initiatives posted abroad, as "extremist materials" and expanding the lists of individuals, organizations, groups, and individual entrepreneurs involved in extremist activities remains unchanged.

During the monitoring period, several individuals were included in the [List of citizens of the Republic of Belarus, foreign citizens, or stateless persons involved in extremist activities](#). These individuals include the activist of the Union of Poles, [Andrey Pachobut](#) (previously listed as involved in terrorist activities), the founder of Symbal.by, [Pavel Belavus](#) (also listed as involved in terrorist activities), and activist/art manager [Uladzimir Bulauski](#).

Among [the materials classified as extremist](#) are informational products found on various platforms such as the "YouTube" channels "Homelskaya Vesna" and "Paleskaya Vyasna," the social networking site "Facebook," the "Viciebskaya Vyasna" accounts on the social network "VKontakte," the social network "Twitter," the "Vyasnaya Pravaabaronchaya" group on "Odnoklassniki," the Telegram channel "Tsentr Belaruskai Salidarnasci," the website, social media, and logo of the Belarusian Association of Journalists.

By the decision of the KGB on June 12, 2023, the initiative "SYMPA" (School of Young Public Administration Managers "SYMPA") was recognized as an extremist formation, and its activities were banned. It is specifically noted that participants of the "SYMPA" initiative publish and disseminate deliberately false information about problematic aspects of the state governance system with the aim of inspiring protest sentiments in society.

The practice of holding individuals criminally liable for alleged financing of extremist activities, including donating to various funds, participating in or creating extremist formations, and providing other assistance to extremist activities, continues.

For example, on June 14, a verdict was issued by the Homiel Regional Court against [Anastasiya Petrachenka](#), a former manager of a software development company. She was sentenced to three years of imprisonment under general regime conditions for Article 361<sup>2</sup> of the Criminal

Code (financing of extremist activities) for transferring funds to the Kalinouski Battalion in Ukraine, which consists of volunteers of Belarusian origin. On June 26, [Kiryl Klimau](#) was sentenced to four years of imprisonment in a correctional colony under general regime conditions for Article 361<sup>2</sup> for transferring six donations of \$10 each to the By\_help and Bysol funds. On June 21, the Belarusian human rights community [recognized](#) 12 individuals accused of financing extremist activities (Article 361<sup>2</sup> of the Criminal Code), creating an extremist formation or participating in it (Article 361<sup>1</sup> of the Criminal Code), and assisting extremist activities by transmitting information to a community recognized as an extremist formation (Article 361<sup>4</sup> of the Criminal Code) as political prisoners.

## **5. The draft law "On Freedom of Conscience and Religious Organizations".**

Starting from June 5th, the Commissioner for Religious and Nationality Affairs of Belarus has organized [a public discussion](#) of [the draft law](#) amending the "Law on Freedom of Conscience and Religious Organizations" with [justification for the need for its adoption](#). Despite the exceptional significance of the draft law for religious and social life, the collection of comments and suggestions within the framework of public discussion has been organized in a very short time - only 10 days have been allocated for submitting comments on the document.

As announced, the draft law presents a revised version of the Law of December 17, 1992, No. 2054-XII "On Freedom of Conscience and Religious Organizations," taking into account its application practice and bringing it into compliance with the Constitution of Belarus.

The proposed new version of the law involves the re-registration of all religious organizations existing in Belarus, including major national confessional associations ("religious associations") as well as specific religious cells and specific churches ("religious communities"). The draft law stipulates that all religious organizations existing in Belarus will need to make changes to their statutes and submit documents for re-registration to local or central authorities within one year after the new law comes into force. The authorities will have six months to consider the submitted documents for re-registration.

A more [detailed analysis](#) of the changes in the draft law.

## **6. Amendment of the legislation of the Republic of Belarus regulating the establishment and activities of non-commercial organizations.**

On June 23, 2023, Decree No. 180 "On Amending Decrees of the President of the Republic of Belarus" was issued by the President of the Republic of Belarus. Among other changes, the decree suspends the provisions of Clause 3 of the Decree of the President of the Republic of Belarus of January 26, 1999, No. 2 "On Certain Measures to Organize the Activities of Political Parties, Trade Unions, and Other Public Associations," as well as certain provisions of the Regulations on State Registration (Re-registration) of Trade Unions and their Associations.

By suspending certain provisions of Decree No. 2, Decree No. 180 introduces changes to the President's Decree of the Republic of Belarus dated October 6, 2006, No. 605 "On Certain Issues of State Registration of Public Associations and their Unions (Associations)." Considering these legislative changes, one might initially conclude about the significant nature of these changes.

However, upon analyzing these regulatory changes as a whole, it can be concluded that they have a technical nature: transferring similar provisions from one regulatory act to another and aligning certain provisions of legislation with previously adopted norms. Thus, these regulatory acts did not introduce new provisions regarding the establishment and activities of non-commercial organizations, including trade unions.