



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

November-December 2024

The large-scale repressions against civil society organizations and activists in Belarus continue for more than four years. Over a hundred civil society representatives are in detention. There are constant reports of detentions, which have intensified as a result of the so-called electoral process, summonses for interrogations and interviews, and the initiation of new administrative and criminal cases, including those related to receiving foreign gratuitous aid. Courts continue to issue sentences with severe prison terms for facilitating extremist activities, leading and participating in extremist formations, and financing extremism by donating to solidarity funds and other structures. Criminal cases continue to be processed through special (in absentia) proceedings, including cases involving activists and human rights defenders. Belarusian human rights defenders and activists forced to leave the country are being placed on wanted lists.

The campaign to liquidate non-governmental organizations (NGOs) continues. As of the end of December 2024, it amounts to at least 1.186 NGOs. As of the end of December 2024, the number of organizations that decided on self-liquidation is at least 705. Consequently, the losses in Belarus's civil sector since the post-election period in 2020 amount to no less than 1.891 institutionalized forms of NGOs (including civic associations, professional unions, political parties, foundations, non-governmental institutions, associations, and religious organizations).

Forced liquidation of non-governmental organizations

The process of forced liquidation, which was very active in November and the first half of December 2024, slowed down slightly by the end of the year. As in previous monitoring periods, lawsuits for liquidation are primarily filed against public associations (primarily those with republican and international status) that failed to submit reports for 2023 or update their charters in accordance with the new requirements of the Law “on Public Associations”.

At the same time, at least 54 public associations that have not undergone mandatory re-registration since 1999 and/or have not updated their charters in accordance with the 2005 amendments to the Law “on Public Associations”¹ remain registered. The forced liquidation of public associations that did not update their charters to meet the new legal requirements is

¹ As a result of the amendments to the Law “on Public Associations” in 2005, nearly all public associations were required to undergo a mandatory procedure to register the changes and additions to their charters necessitated by the amendments to the law.

selective in nature. Although the deadline to comply with the new legal requirements was set for March 4, 2024, the registration of changes is still ongoing for some public associations. For example, the registering authority approved changes to the charter of the International Public Association "Afghan Community, Compatriots, and Refugees" (renamed the Local Public Association "Afghan Community, Compatriots, and Refugees" after registration) only in November 2024. Similarly, the charter of the International Charitable Public Organization "Social-Christian Services "TOS Weissrussland" (after the amendments registered – the Charitable Public Association "Social-Christian Services TOS Weissrussland") was updated in late October 2024.

Cases of forced liquidation of foundations have been recorded, including the Local Foundation for Supporting Forced Migrants "Integration-A" and the Local Charitable Foundation "Chernobyl Aid Action". A non-governmental institution was also forcibly liquidated: the Scientific and Innovative Institution "Sustainable Business Initiatives," whose forced liquidation over the past three years has been highly selective in nature.

In total, as of December 30, 2024, according to [the monitoring conducted by Lawtrend](#)², there have been 1.186 NGOs 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 Individual Entrepreneurs (USR).

Non-governmental organizations deciding on self-liquidation

As of December 30, 2024, according to [the monitoring conducted by Lawtrend](#), there have been 705 NGOs (civil associations, foundations, institutions, and political parties) in which the authorized body or founders have decided to liquidate. During the November-December 2024 period, at least NGOs of various organizational and legal forms – public associations, foundations, institutions, and associations – made the decision to self-liquidate.

The liquidation of NGOs achieving their founding objectives is a normal process that occurs in any country. In Belarus, however, the decision by founders to liquidate NGOs has been taking place on a large scale for the fourth consecutive year. This is primarily due to the unprecedented repressions in the country, the unfavourable legal environment, and pressure on the entire independent civil sector, as well as on specific organizations and their leadership, members, and employees.

Unlike the public associations being forcibly liquidated, most of which had not interacted with the registering authorities in recent years or the past year (failing to submit reports or update their charters), most public associations that decided to self-liquidate had engaged with the registering authorities in the last year. Of the 10 public associations that decided to self-liquidate,

² The monitoring includes only cases of forced liquidation and self-liquidation of non-governmental non-profit organizations; state institutions and republican state-public organizations are not counted in the quantitative indicators. Likewise, consumer cooperatives and other organizational-legal forms of non-profit organizations (apart from public associations, professional unions, political parties, foundations, private institutions, associations, and religious organizations) are not included in these statistics.

6 submitted the required annual reports for 2023 to the registering authority in 2024 (in October, 6 out of 8).

Administrative and criminal prosecution of the leadership and members of civil society organizations, and activists.

In connection with the performance of their professional activities, participation in civil society organizations, and the manifestation of civic activism, 6 human rights defenders, dozens of representatives of civil society organizations and religious organizations, and 34 representatives of trade unions and the labour movement³ continue to serve prison sentences. Pressure on representatives of religious organizations continues. According to Christian Vision, the number of Christian clergy members who have been subjected to political persecution from September 1, 2020, to November 30, 2024, is 86 individuals.

Human rights defender of the Viasna Human Rights Centre, Siarhei Sys, has been added to the list of people wanted by Russian Ministry of Internal Affairs. Prior to this, human rights defenders Ihar Kazmerchak, Pavel Levinau, Alena Maslyukova, Natallia Satsunkevich, Dzmitry Salaeu, Leanid Sudalenka, Marya Tarasenka, Iryna Tretsiakova, Uladzimir Khilmanovich, as well as several activists, including former head of the Hrodna Children's Hospice Volha Vialychka and founder of Dissidentby Maryna Kasinerava, were also listed.

Dzmitry Kuchuk, the former head of the Belarusian Green party, which was dissolved on July 27, 2023, was sentenced to 6 years in a penal colony and fined 500 basic amounts.

Trials continue against the relatives of political prisoners, including former ones, for allegedly receiving foreign gratuitous assistance (violating the decree of May 25, 2020, No. 3 "On Foreign Gratuitous Assistance").

The authorities continue active efforts to suppress the civil activity of Belarusians forced to leave the country. For these purposes, criminal legislation on special (absentee) proceedings is widely used. At the end of December 2024, 144 people were included in the [List of persons against whom special proceedings have been initiated and who are summoned to the criminal prosecution authority](#).

On December 5, [the Investigative Committee of Belarus initiated a special procedure](#) against BY SOL leader Andrei Stryzhak and the head and founder of the BY_help foundation, Aliaksei Liavonchyk. Five other individuals were included in the "organized group": Yaraslau Likhacheusky, Aliaksei Kuzmiankou, Aliaksandr Lapko, Aliaksandra Zhuk, and Aliaksandr Padhorny. According to the Investigative Committee's information, these individuals are charged with 17 articles of the Criminal Code, including Part 1, Part 2, and Part 3 of Article 361-1 (creating an extremist group) and Part 2 of Article 361-2 (financing extremist activities).

³ Examples of civil society organization representatives serving prison terms, as well as information on individuals listed in extremist and/or terrorist registries can be found in Lawtrend's monthly reviews of the situation with freedom of association and the situation of civil society organizations, for example, [for May 2024](#). Information about detained trade union members and trade union activists is published based on [Solidarity data](#).

[The state television channel ONT aired a report discrediting the work of solidarity funds](#), particularly the BYSOL fund. This is not the first such report aired by this channel.

[According to the Investigative Committee](#), Streamline Foreign Languages School (a Private Educational Institution for Adult Education "Training Center for Professional Development and Retraining of Personnel 'Educational Technologies'", which was subject to forced liquidation in October 2024) underpaid taxes by at least 17 million rubles. The Investigative Committee's statement notes that the "circumstances of the criminal activities of the head and employees of the Streamline foreign languages school" are currently being investigated. According to the materials of the criminal case, the "Educational Technologies" training center was originally established as a non-profit organization for educational purposes, which afforded it a special tax regime⁴. A criminal case has been initiated against the founder of Streamline, his wife, and other leaders of the training center for tax evasion on a particularly large scale (Part 3, Article 243 of the Criminal Code). Property belonging to the individuals involved, including homes and land plots, has been seized, with a total value exceeding 9 million rubles.

The use of legislation to combat extremism as a form of pressure on civil society organizations

Legislation on combating extremism continues to be actively used against representatives of civil society organizations: prosecution for money transfers to solidarity funds, and also for the assistance to political prisoners and their families, including criminal prosecution, recognition of public initiatives as extremist formations, and information resources, social networks, etc. as extremist materials.

Summonses for questioning continue to be issued to citizens who made donations to solidarity funds. Some individuals are being called for questioning or interviews a second time after transferring the amounts set by the authorities to special accounts. There have been cases of individuals being coerced into transferring money to special accounts due to previous donations made to solidarity funds.

During the monitoring period, [several items were added to the Republican list of extremist materials](#), including the Odnoklassniki group "Independent Trade Union REP", the public page on Odnoklassniki titled "Belarusian Social Democrats", the page on X titled "Coordination Council", the Odnoklassniki page "MHD – Young Christian Democrats", informational products on the internet resource "budzma.org", the Facebook page "Community of Belarusians in the World Homeland", and the account on the TikTok titled "Fundacja Tutaka".

[The list of organizations, formations, and individual entrepreneurs involved in extremist activities](#) during the monitoring period includes, for example, the initiative "pismo.bel." Prior to this, the social media pages and website of this initiative were recognized as extremist materials. Three individuals connected to this initiative – Aliaksandr Mazur, Aliaksandr Lykshyn, and Pavel

⁴ The tax regime for non-profit organizations engaged in entrepreneurial activities is very similar to the taxation system for commercial organizations.

Karanyukhin – according to data from the Human Rights Center Viasna, have been detained and are currently held in the KGB detention center.

Legislation Regarding Non-Governmental Organizations

The legislation on NGOs in Belarus continues to change frequently. Some recent changes involve newly adopted norms. For example, [the Law of the Republic of Belarus dated December 13, 2024, No. 47-Z "On Amendments to the Laws"](#) suspended the requirement for non-profit organizations not engaged in entrepreneurial activities to submit tax declarations (calculations) in the form of electronic documents for the period 2024-2025. This requirement, introduced in paragraph 4 of Article 40 of the Tax Code on January 1, 2024, effectively meant that all non-profit organizations, regardless of their income size, financial resources, employees, or activities, had to obtain a personal key for submitting the declaration with an electronic signature. Obtaining such a signature requires time and resources, including gathering a package of documents. Throughout 2024, legal entities and individual entrepreneurs faced difficulties obtaining an electronic signature. Moreover, obtaining such a signature requires financial expenditures; for example, a digital signature on a carrier using the AvPass software (excluding VAT) costs legal entities 215 Belarusian rubles (approximately 63 euros) annually. Thus, Law No. 47-Z effectively cancelled a hasty norm introduced into the legislation.

The Law of the Republic of Belarus dated December 13, 2024, No. 48-Z "On the Republican Budget for 2025," like similar laws in previous years, established that public associations can receive funds from the republican budget by decision of the President of Belarus. The law allocated budget funds to two public associations: the Union of Writers of Belarus (695,483 Belarusian rubles) and the Belarusian Republican Youth Union (14,144,997 Belarusian rubles).

By the Resolution of the Council of Ministers of the Republic of Belarus No. 995 dated December 20, 2024, the international technical assistance project "Strengthening the Capacity of the State Border Committee of the Republic of Belarus in Response to Potential Increases in Migrant Arrivals at the Border" was approved. This year, the government approved several other international technical assistance projects, including: "Enhancing the National Infrastructure for Radiation Monitoring and Emergency Response Systems" (May 2024); "Strengthening the Nuclear and Radiation Safety Regulatory Infrastructure at the Early Stage of Nuclear Power Plant Operation" (April 2024); "Improving the Safety, Reliability, and Efficiency of Nuclear Power Plants during the Early Stage of Operation" (April 2024); and "Assisting Belarus in Strengthening Monitoring, Evaluation, and Reporting on Sustainable Development Goals Related to Migration" (March 2024).

Public councils

Coordination councils for state protection of children are being created. The regulation defining the procedure for establishing coordination councils, which will coordinate the actions of structural units of local executive and administrative bodies and other organizations in the state protection of children, was approved by the Resolution of the Council of Ministers of the Republic of Belarus No. 1004, dated December 24, 2024, "On Coordination Councils". These

coordination councils will be created by regional executive committees and the Minsk city executive committee. It is established that the coordination council will include, in addition to representatives of local executive and administrative bodies and other organizations engaged in the protection of children's rights and legal interests, representatives of public associations. This will allow addressing issues related to the organization of interaction and coordination of actions between state bodies and other organizations involved in state child protection and developing measures aimed at improving state child protection activities.

[At the meeting of the National Council on Gender Policy under the Council of Ministers of the Republic of Belarus](#) on December 10, 2024, it was announced that one of the goals of gender policy for the current five-year period is the implementation of gender budgeting mechanisms and gender expertise of legislation in the development of draft regulatory legal acts, state plans and programs, and budget planning. These plans will be implemented by state bodies with the support of UN agencies.