

## National Human Rights Index

<http://index.belhelcom.org>

2024

## Right to Freedom of Association

Expert Commentary

The score:	1,6
Including scores by component:	
• Freedom of association: general principles	1,6
• Activity of associations	1,6 +0,1

Assessing the state of freedom of association in 2024, the Index experts gave higher scores for one indicator than in 2023. **Among the main reasons:**

- changes in the regulation of sponsorship, expanding opportunities for internal (corporate) financing of CSO activities
- despite the negative nature of the re-registration of public associations, the registering bodies has shown a positive attitude towards CSOs, conducting numerous information and consultation events
- at the same time, repressive practices continue, and the practice of recognizing organizations as “extremist groups” is expanding

- **Freedom of association: general principles**

By March 4, 2024, all previously registered public associations had to bring their founding documents into line with the new version of the law on public associations adopted in 2023.<sup>1</sup> In effect, the procedure introduced is very similar to re-registration: almost all previously registered associations had to re-submit documents for approval of amendments to their statutes, otherwise they faced liquidation. Experts noted a fairly active information and outreach campaign by the authorities to explain the requirements of the law and hold consultations, although not without an element of formalism. Registration bodies often proactively contacted public associations, offering assistance in good faith and inquiring about plans to continue their activities.

In April–June 2024, the authorities initiated the liquidation of those public associations that had not amended their statutes on time<sup>2</sup>. Many CSOs did not amend their statutes – in fact, they consciously refused to continue their official existence, either because they understood the impossibility of complying with the new rules, or because they did not want to legitimize repressive requirements, or because they took advantage of the opportunity to terminate the activities of an organization that was

<sup>1</sup> <https://pravo.by/document/?guid=12551&p0=H12300251>

<sup>2</sup> <https://csometer.info/updates/belarus-new-wave-liquidation-csos-fail-amend-their-charters>



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not actually functioning. However, such “non-resistance” does not solve the problem: the activities of an already liquidated or unregistered organization in Belarus are prohibited, and activists are faced with a dilemma – to freeze their work or face criminal prosecution. According to Lawtrend monitoring<sup>3</sup>, as of October 31, 2024, 1,161 non-profits<sup>4</sup> were in the process of being liquidated, and 677 organizations decided to voluntarily dissolve themselves due to circumstances. As of December 30, 2024, there were 1,186 non-profit organizations in the process of forced liquidation, including those for which the registering authorities had filed claims for liquidation in court or which had been forcibly removed from the Unified State Register of Legal Entities and Individual Entrepreneurs (USR).<sup>5</sup>

Despite political pressure, civic initiatives are emerging, new CSOs continue to register (mainly in non-political areas), and some initiatives operate without registration or have moved abroad. Nevertheless, the registration of public associations in 2024 continues to lag behind the pace of liquidation, and the CSO sector is shrinking<sup>6</sup>. In response to a request from the Special Rapporteur<sup>7</sup>, the Ministry of Foreign Affairs announced the number of public associations registered in 2024 (26 organizations), while the Ministry of Justice did not disclose this figure<sup>8</sup>.

Other regulations affecting the right of association were also adopted in 2024. The Law on Responsible Treatment of Animals<sup>9</sup> encouraged the creation of new animal welfare organizations: after its adoption, the number of registered CSOs engaged in animal protection and assistance to stray animals increased<sup>10</sup>. Amendments to the Law on Freedom of Conscience and Religious Organizations<sup>11</sup> came into force on July 6, 2024 and led to the start of almost total re-registration of religious organizations on July 6, 2024, which must submit their documents by July 5, 2025. The amendments tighten<sup>12</sup> the requirements for religious organizations and require them to bring their statutes into line with the new

<sup>3</sup> <https://www.lawtrend.org/freedom-of-association/monitoring-situatsii-so-svobodoj-assotsiatsij-i-polozeni-organizatsij-grazhdanskogo-obshchestva-v-respublike-belarus-oktyabr-2024#:~:text=%D0%9F%D0%BE%20%D1%81%D0%BE%D1%81%D1%82%D0%BE%D1%8F%D0%BD%D0%B8%D1%8E%20%D0%BD%D0%B0%2031%20%D0%BE%D0%BA%D1%82%D1%8F%D0%B1%D1%80%D1%8F,%D0%BB%D0%B8%D0%BA%D0%B2%D0%B8%D0%B4%D0%B0%D1%86%D0%B8%D0%B8%2C%20%D0%BB%D0%B8%D0%B1%D0%BE%20%D0%BF%D1%80%D0%B8%D0%BD%D1%83%D0%B4%D0%B8%D1%82%D0%B5%D0%BB%D1%8C%D0%BD%D0%BE%20%D0%B8%D1%81%D0%BA%D0%BB%D1%8E%D1%87%D0%B5%D0%BD%D1%8B%20%D0%B8%D0%B7>

<sup>4</sup> The figures include the entire spectrum of non-profit organizations, including institutions and foundations.

<sup>5</sup> <https://www.lawtrend.org/freedom-of-association/monitoring-situatsii-so-svobodoj-assotsiatsij-i-polozeni-organizatsij-grazhdanskogo-obshchestva-v-respublike-belarus-noyabr-dekabr-2024>

<sup>6</sup> <https://www.lawtrend.org/freedom-of-association/nko-v-belarusi-situatsiya-s-registratsiej-i-likvidatsiej>

<sup>7</sup> [HRC/NONE/2025/SP/13](https://www.hrc.org/en/document/2025/SP/13)

<sup>8</sup> <https://csfusion.org/wp-content/uploads/2025/06/dajdzhest-dasledavannyau-ags-2021-2024-compressed.pdf>, p.13

<sup>9</sup> <https://pravo.by/document/?guid=12551&p0=H12400361>

<sup>10</sup> В Беларуси появляются некоммерческие организации. Но закрывается всё равно больше | [greenbelarus.info](https://greenbelarus.info)

<sup>11</sup> Закон Республики Беларусь от 30.12.2023 г. № 334-З «Об изменении законов по вопросам деятельности религиозных организаций» – [Pravo.by](https://pravo.by)

<sup>12</sup> [Forum 18: BELARUS: Repressive new Religion Law imposes compulsory re-registration - 11 January 2024](https://forum18.org/en/belarus-repressive-new-religion-law-imposes-compulsory-re-registration-11-january-2024)



requirements of the law within a year and undergo re-registration or decide to dissolve. See further comments on the right to freedom of thought, conscience, and religion.

The legislative changes do not ensure predictable conditions for the activities of CSOs. Moreover, in the absence of feedback mechanisms and civic participation, the quality of normative regulation is declining. “A telling example of this kind of instability was the repeal at the end of 2024 of recently introduced restrictions on tax forms requirements and requirements for the activities of NGOs providing social services” (the requirement to submit tax forms exclusively in electronic form was abolished and licensing requirements for residential social services were relaxed).<sup>13</sup>

In terms of the accessibility of legislation regulating freedom of association, active work continued in 2024 to translate a number of codes into Belarusian, which experts note as a positive step.

Experts noted that many important government websites were inaccessible from abroad in 2024, which limits the ability of CSOs to establish and operate from abroad<sup>14</sup>.

The authorities continue their attempts to cut off Belarusian society from CSOs in exile through the arbitrary application of anti-extremist legislation: the recognition of CSO websites and social media accounts as extremist materials, for example, the Instagram account of the European Belarus initiative, Telegram channels of independent projects Tradycyja and the channel of the liquidated Belarusian Association of Journalists (BAJ)<sup>15</sup>, and the website and Facebook page of the Belarusian Helsinki Committee<sup>16</sup>. The practice of recognizing both membership-based and non-membership-based organizations as “extremist formations (groups)” is expanding<sup>17</sup>.

#### ● Activities of associations

In terms of CSO activities, experts noted an important positive step—the adoption in 2024 of a new version of Decree No. 300 “On the Provision and Use of Free (Sponsored) Assistance”<sup>18</sup> that expands

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<sup>13</sup> <https://www.lawtrend.org/publications/neprodumannost-i-postoyannoe-izmenenie-zakonodatelstva-dopolnitelnye-slozhnosti-dlya-funktsionirovaniya-nko-v-belarusi>

<sup>14</sup> 2024 CSO Meter Belarus Country Report\_0.pdf, p.69

<sup>15</sup> Мониторинг ситуации со свободой ассоциаций и положением организаций гражданского общества в Республике Беларусь Февраль 2024 | Lawtrend — Исследования Образование Действия

<sup>16</sup> <https://belhelcom.org/ru/news/bhk-i-ekstremistskie-materialy-rekomendacii-po-bezopasnosti>

<sup>17</sup> At the end of December 2024, 144 persons were included in the “List of persons subject to special proceedings and summoned to the criminal prosecution authorities.” On December 5, the Investigative Committee of Belarus initiated special proceedings against BYSOL leader Andrei Stryzhak and BY\_help founder and director Alexey Leonchik. Five other persons were included in the “organized group”: Yaroslav Likhachevsky, Alexei Kuzmenkov, Alexander Lapko, Alexandra Zhuk, and Alexander Podgorny. According to the committee, these individuals are charged with 17 articles of the Criminal Code, including Parts 1, 2, and 3 of Article 361-1 (creation of an extremist group) and Part 2 of Article 361-2 (financing extremist activities). <https://www.lawtrend.org/freedom-of-association/monitoring-situatsii-so-svobodoi-assotsiatsii-i-polozheniem-organizatsij-grazhdanskogo-obshchestva-v-respublike-belarus-novabr-dekabr-2024>

<sup>18</sup> <https://pravo.by/document/?guid=12551&p0=P32400112>



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the possibilities for corporate financing of CSO activities<sup>19</sup>. However, the practical implementation of these provisions is still limited.

In 2024, the first sentence was handed down under the reinstated Article 193-1, which criminalizes activities on behalf of an unregistered public association (for activities carried out in 2022)<sup>20</sup>.

The authorities encourage the activities of pro-government CSOs, in particular youth and “patriotic” associations (BRSМ – Belarusian Republican Youth Union, “Belaya Rus,” veterans' unions, etc.) These organizations held mass official events, especially during election campaigns, community clean-up days, and forums, often replacing destroyed independent CSOs in their respective fields. For example, after the liquidation of independent environmental organizations, their functions were partially taken over by associations such as the Belarusian Society for Nature Protection. At the same time, many civil society structures in Belarus are forced to mimic pro-state organizations in order to continue their activities, which is typical for countries with repressive regimes where the work of independent organizations is seriously hampered<sup>21</sup>.

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<sup>19</sup> <https://belhumanrights.house/news/analiz-lawtrend-bezvozmezdnyaya-sponsorskaya-pomosh-osnovnye-izmeneniya-zakonodatelstva>

<sup>20</sup> On August 2, 2024, the Grodno Regional Court sentenced human rights defender Olga Velichko in absentia to nine years in prison, including under Article 193-1 for continuing the activities of a charitable association after its liquidation: <https://spring96.org/ru/news/115909> ; [Belarus: First criminal sentence for continuing CSO activities after liquidation | CSOMETER](#)

<sup>21</sup> [В Беларуси появляются некоммерческие организации. Но закрывается всё равно больше | greenbelarus.info](#)



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