

BELARUS'S UNIVERSAL PERIODIC REVIEW: COMPARING THE 2020 AND 2025 CYCLES

RECURRING AND NEW RECOMMENDATIONS
AND PATTERNS OF STATE RESPONSE

UPR

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Summary

The completion of the third cycle of the Universal Periodic Review (UPR) (2020–2025) and the beginning of the fourth cycle (2025–2030) took place amid a **significant reduction in the State's cooperation with international human rights mechanisms**. As a result, the UPR has acquired particular importance as one of the few universal platforms through which Belarus continues to participate in international dialogue on human rights.

Since the first cycle, the number of recommendations addressed to Belarus has steadily increased (93 in 2010, 257 in 2015, and 266 in 2020). The fourth UPR cycle set a new record both in the number of recommendations received by Belarus and in the number of delegations participating in the dialogue: the State received 332 recommendations from 101 delegations.

A comparison of the 2020 and 2025 recommendations demonstrates significant **continuity in the agenda**. The following issues remained prominent:

- Belarus's cooperation with international human rights mechanisms;
- freedom of expression, freedom of association and peaceful assembly;
- the independence of the judiciary;
- prevention of torture;
- abolition of the death penalty;
- establishment of a national human rights institution and accession to international human rights treaties.

The recurrence of these recommendations indicates not only a lack of progress but, in many cases, a further deterioration of the human rights situation.

An important feature of the 2025 cycle was the emergence of **new thematic areas**. The international community devoted significantly greater attention to:

- political prisoners and arbitrary detention;
- systemic repression;

- the use of anti-extremism and counter-terrorism legislation to restrict rights and freedoms;
- transnational repression against journalists;
- students' rights to freedom of assembly and association;
- the activities of independent trade unions and cooperation with the International Labour Organization.

For the first time, recommendations addressing the rights of LGBTQ+ people, the instrumentalisation of migrants, Belarus's involvement in the war against Ukraine, the restoration of international commitments abandoned by Belarus after 2020, as well as accountability for human rights violations, featured to such an extent.

Despite the significant expansion of the thematic scope of the recommendations in the 2025 UPR cycle, a number of issues actively raised by civil society during the review preparation process were not reflected in the outcome recommendations. In particular, the following issues **remained outside the agenda**:

- environmental and climate rights;
- cultural rights;
- the ideologisation and militarisation of education;
- the criminalisation of activities carried out on behalf of unregistered organisations;
- the dissolution of political parties and issues of political pluralism.

In addition, recommendations concerning the rights of persons with disabilities remained predominantly general in nature and did not address a number of systemic problems affecting the implementation of their rights.

Belarus's **response to the recommendations** in 2025 changed noticeably compared with the previous cycle. Whereas the authorities previously often classified recommendations as already implemented, they now use the category "accepted" significantly more frequently. However, this change is primarily technical in nature and does not indicate greater openness to reform. The number of recommendations not supported remains extremely high, accounting for exactly 50% of all recommendations received in the fourth cycle.

Belarus did not support half of the recommendations received during its latest UPR cycle.

For context: Belarus has itself issued over 740 recommendations to other countries since the UPR was established. Only around 15% of these recommendations were not supported by the receiving states.

The previously established pattern of interaction with the UPR remains largely unchanged. Belarus continues to readily support recommendations of a general and declarative nature, particularly those containing formulations such as "continue efforts", "strengthen measures" or "consider the possibility", i.e. commitments of conduct. At the same time, recommendations calling for specific legislative, institutional or policy changes, i.e. commitments of result, are generally rejected. The rhetoric used in recommendations is also significant: proposals calling on the State to "cease", "release", "abolish" or otherwise acknowledging existing violations are consistently rejected. Thus, the determining factor is often not the subject matter of a recommendation itself, but the degree of specificity of the proposed measures and their potential impact on State accountability.

The General Logic of Belarusian Authorities' Engagement with the UPR

- ✓ Support recommendations involving **"commitments of conduct"**: continue efforts, consider taking action.
- ✗ Reject recommendations involving **"commitments of result"**: concrete legislative, institutional, or policy changes.
- ✗ Wording matters: recommendations that explicitly acknowledge human rights violations are rejected.

Another important pattern is the **difference in Belarus's response to recommendations put forward by different groups of States.**

Recommendations from States maintaining close political relations with Belarus are significantly more likely to receive support, even when they call for the adoption of new public policy measures. By contrast, recommendations from democratic States are often rejected even when their content is virtually identical to supported recommendations of other States. This suggests that, when assessing recommendations, the political context of relations with the State making the recommendation is an important factor alongside the substance of the recommendation itself.

*The General Logic of
Belarusian Authorities'
Engagement with the UPR*

! Sometimes, the political context of relations with the recommending state matters more than the content of the recommendation itself.

Belarus's official position is that the State does not support “*politicised recommendations containing unilateral value judgments*”, as well as *recommendations that fail to take into account national specificities and the domestic policy developments.*

Overall, the results of the fourth UPR cycle indicate that Belarus's participation in the mechanism is becoming increasingly formalistic. Despite maintaining engagement with the review process and supporting a significant proportion of the recommendations, the State predominantly **accepts recommendations of a general nature while consistently rejecting proposals requiring concrete reforms, independent oversight or enhanced accountability.** This significantly limits the potential of the Universal Periodic Review as a tool for promoting domestic change and demonstrates that the effectiveness of the mechanism with regard to Belarus continues to depend to a large extent not on the quality of the recommendations themselves, but on the State's political will to implement them.

The Universal Periodic Review as a Mechanism for International Human Rights Monitoring

The [Universal Periodic Review](#) is a unique mechanism of the UN Human Rights Council established to regularly assess the human rights situation in all UN Member States. Unlike UN treaty bodies, which monitor compliance with specific international treaties, the UPR covers the full range of human rights and applies to all UN Member States without exception. The primary objective of the mechanism is to contribute to improvements in the human rights situation through constructive dialogue among States.

Each State is reviewed once every four and a half years. Each such period is referred to as a UPR cycle. During the review, UN Member States assess the country's progress in the field of human rights, identify persisting concerns and formulate recommendations aimed at addressing them. On average, a State receives around 200 recommendations during each review. These recommendations may address a broad range of issues, including civil and political rights, economic and social rights, non-discrimination and other matters.

The review is conducted by the UPR Working Group, which consists of the 47 members of the Human Rights Council. At the same time, the UPR is based on the principle of equal treatment of all States, which distinguishes it from many other international human rights monitoring mechanisms. Each State not only undergoes a review of its own human rights situation but may also participate in the assessment of the situation in other countries by making recommendations during the interactive dialogue. In this way, the mechanism combines elements of international scrutiny and inter-State dialogue.

The review is based on three key documents. The first is the national report of the State under review. In this report, the authorities provide their own

assessment of the human rights situation, information on progress achieved and measures taken to implement previously received recommendations. The second document is the compilation of UN information prepared by the Office of the United Nations High Commissioner for Human Rights (OHCHR). It incorporates information contained in documents of treaty bodies, special procedures of the Human Rights Council and other UN structures. The third source is the summary of stakeholders' information, which consolidates information submitted by national human rights institutions, civil society organisations and other non-State actors.

A distinctive feature of the UPR is the **significant role of civil society organisations** at all stages of the process. Although the substantive discussion within the Working Group is conducted by States, human rights organisations have a number of tools through which they can influence both the content of recommendations and their subsequent implementation.

One of the most important forms of participation is involvement in national consultations during the preparation of the State's national report. Where there is open engagement between the State and civil society, such consultations can contribute to a more objective and comprehensive picture of the human rights situation. In Belarus, some civil society organisations participated in such consultations during the preparation of the 2020 review and in earlier cycles.

Another important tool is the preparation and submission of alternative reports. In these submissions, civil society organisations assess the implementation of previously received recommendations, document existing problems and raise issues requiring the attention of the international community. Alternative reports often serve as an important source of information for States preparing recommendations, as well as for UN bodies involved in preparing the review documentation.

Advocacy is also of significant importance. Civil society organisations engage with diplomatic missions and representatives of UN Member States, drawing

attention to the most pressing human rights concerns and seeking to have them reflected in the recommendations.

At the stage when the situation is considered by the Working Group, the participation of civil society organisations is more limited, but remains important. Organisations with consultative status with the United Nations Economic and Social Council (ECOSOC) may attend the meetings as observers. In addition, following the adoption of the outcome report, they may deliver statements before the Human Rights Council, assessing the results of the review and highlighting issues they consider to be priorities.

Civil society activity after the completion of the review is equally important. Organisations monitor the implementation of recommendations, collect data on progress achieved and document cases in which the State fails to implement recommendations it has accepted. Mid-term reports, usually prepared 2–2.5 years after the review, play a significant role in this process. Such reports make it possible to assess the implementation of recommendations midway through the cycle and provide an additional source of information for both the international community and national authorities.

Belarus's Participation in the UPR

Belarus has participated in the Universal Periodic Review mechanism since its establishment and has to date completed three full review cycles. In 2025, the country underwent its fourth review and is currently at the stage of implementing the recommendations received. The accumulated experience of Belarus's participation in the UPR therefore makes it possible to trace both the evolution of international expectations towards Belarus and changes in the State's approach to engaging with the mechanism.

In the context of Belarus, the UPR is of particular importance as one of the few universal international instruments that allows for a comprehensive assessment of the human rights situation in the country. The significance of the mechanism has increased in recent years amid the State's limited engagement with a number of international human rights procedures and the significant shrinking of the space for civil society activity inside the country.

The number of recommendations received by Belarus under the UPR has increased consistently from one cycle to the next.

1st cycle (2010)	84 states	93 recommendations
2nd cycle (2015)	95 states	257 recommendations
3rd cycle (2020)	92 states	266 recommendations
4th cycle (2025)	101 states	332 recommendations

Although the review took place in November 2020, it covered the implementation of recommendations from the previous cycle (2015–2020). Therefore, most of the recommendations were formulated on the basis of the human rights situation that existed prior to the mass repression that began following the August 2020 presidential election. The consequences of this repression were reflected to a much greater extent in the recommendations of the fourth UPR cycle in 2025.

Thus, the fourth cycle, held in 2025 after five years of continuous repression and a large-scale deterioration in the situation with civil and political rights, was unprecedented in the history of Belarus's participation in the UPR: the State received 332 recommendations from 101 delegations.

The recommendations received by Belarus have traditionally covered a broad range of issues. These include economic, social and cultural rights; civil and political rights; equality and non-discrimination; the protection of the rights of vulnerable groups; abolition of the death penalty; cooperation with UN human rights mechanisms; establishment of a national human rights institution in accordance with the Paris Principles; accession to international human rights treaties; and other matters. Despite changes in the political context between cycles, most of the key thematic areas have remained consistent throughout Belarus's participation in the UPR.

At the same time, an analysis of the recommendations reveals a consistent distinction between the approaches taken by different groups of States.

- Traditionally, States maintaining close political relations with Belarus tend to formulate more general and favourable recommendations, primarily concerning socio-economic development. Such recommendations are characterised by formulations such as “continue efforts”, “continue to improve” or “continue to implement”. These recommendations are aimed primarily at acknowledging measures already being taken and supporting existing State policies.
- By contrast, European States, North America and a number of other democratic States are more likely to formulate recommendations containing specific requirements to amend legislation, end human rights violations and bring national practice into line with international standards. Such recommendations use “commitment of result” formulations such as “abolish”, “amend”, “ensure”, “release” and “cease”. As a rule, these recommendations address the issues most sensitive to the Belarusian authorities, including freedom of expression, freedom of association and peaceful assembly, the independence of the judiciary, politically motivated persecution and cooperation with international human rights mechanisms.

Belarus's response to recommendations also demonstrates a degree of consistency from one cycle to the next. As a rule, the State accepts

recommendations that are consistent with policies already being implemented or that do not require significant changes to existing practices. The most sensitive recommendations are often not supported or, on formal grounds, classified as already implemented, thereby allowing the State to avoid assuming additional commitments regarding their implementation. At the same time, the authorities frequently resort to arbitrary interpretations of the criteria for implementation, referring, for example, to the formal existence of relevant provisions in national legislation regardless of their practical implementation and compliance with international standards. Such an approach cannot be considered a good-faith fulfilment of the State's human rights obligations.

Following the 2020 review, Belarus stated that 123 recommendations had already been implemented, a further 4 recommendations were considered to be in the process of implementation, 10 recommendations were accepted, 18 were partially accepted, and 111 recommendations were not supported. In other words, a significant proportion of the recommendations was classified by the State as already implemented at the time the report was considered.

In 2025, the distribution was different. Belarus indicated that a total of 27 recommendations had already been implemented, 139 recommendations were accepted, and 166 recommendations were not supported. The categories "in the process of implementation" and "partially accepted" were not used by the authorities in the current cycle. This means that the State became significantly less likely to claim that recommendations had been fully implemented at the time of their consideration and more frequently acknowledged the need for further work in particular areas. At the same time, the number of recommendations not supported remains very high, accounting for exactly half of all recommendations received.

This change may indicate a transformation in Belarus's strategy for engaging with the UPR mechanism. Whereas following the 2020 review the emphasis was placed on demonstrating progress already achieved and obligations already fulfilled, following the 2025 review the State has increasingly used the category of acceptance without acknowledging actual implementation.

However, the high number of recommendations not supported demonstrates that the Belarusian authorities remain unwilling to accept a significant proportion of the demands concerning the most sensitive issues relating to civil and political rights.

Thus, by the beginning of the fourth UPR cycle (2025), Belarus was facing an unprecedented level of international attention to its human rights situation. The record number of recommendations, the broader range of States participating in the review and the change in the structure of the State's responses make the 2025 cycle an important point of reference for analysis. A comparison of the recommendations from the third (2020) and fourth (2025) cycles makes it possible to assess which problems the international community considers to be persisting, which new issues have emerged on the agenda, how the State's response to international recommendations has changed, and what prospects exist for their further implementation. These are the issues addressed in the subsequent sections of this report.

Recurring Recommendations in the 2020 and 2025 UPR Cycles and Changes in Belarus's Response

One of the most telling findings from the comparison of the third and fourth UPR cycles is the high degree of continuity in the recommendations. A significant number of issues raised by States in 2020 (and earlier) reappeared in the recommendations issued in 2025. This recurrence indicates that the international community does not consider these problems to have been resolved and continues to regard them as relevant to Belarus.

At the same time, it is noteworthy that whereas following the 2020 review Belarus frequently classified recommendations as already implemented, in 2025 there was a noticeable increase in the proportion of recommendations that were simply accepted without a claim that they had already been implemented. At the same time, the high rate of recommendations not supported on the most sensitive issues relating to civil and political rights remained unchanged.

International Human Rights Treaties

One of the most persistent categories of recurring recommendations concerns calls for Belarus to accede to international human rights treaties.

For several cycles, Belarus has received recommendations to accede to the **1954 Convention relating to the Status of Stateless Persons and the 1961 Convention on the Reduction of Statelessness**. In 2020, recommendations on this issue were formulated more categorically and contained a direct call to ratify the respective treaties. At that time, Belarus classified them as already implemented. In 2025, similar recommendations were again put forward by several States, but the State's response changed: the recommendations were **accepted**. In the current circumstances, this appears to signal an unserious

approach to the review rather than a genuine intention to implement the recommendations, as there is no evidence that Belarus is actually considering this issue.

A similar situation can be observed with regard to the **International Convention for the Protection of All Persons from Enforced Disappearance**.

Despite recommendations calling for its ratification being repeated from cycle to cycle, Belarus's position remains unchanged. In 2025, the State **did not support** recommendations from Malta, Ukraine and Japan that explicitly called for ratification of the Convention. The exception was a recommendation from Colombia that combined the issue of enforced disappearances with accession to the conventions on statelessness, which Belarus accepted. However, given the State's overall practice, this decision appears to be an isolated case rather than evidence of a change in approach.

The same approach can be observed with regard to the **Optional Protocol to the Convention against Torture**. Despite numerous recommendations to ratify the Protocol and establish a national preventive mechanism against torture, Belarus has maintained its previous position and **has not supported** the relevant recommendations. Thus, no progress has been made on this issue between the two cycles.

The State's position has also remained unchanged regarding accession to the **Second Optional Protocol to the International Covenant on Civil and Political Rights, aiming at the abolition of the death penalty**. As in the previous cycle, recommendations to ratify the Protocol **were not supported**.

In 2020, Belarus accepted as implemented a recommendation to continue considering accession to the **International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families**. However, in 2025, recommendations calling directly for ratification of the Convention **were not supported**, while softer proposals to consider ratification or continue examining the issue **were accepted**. This further confirms the tendency whereby the State demonstrates a willingness to support **commitments of conduct**, while avoiding acceptance of **commitments of result**.

Recommendations calling for ratification of the **Rome Statute of the International Criminal Court** have traditionally not been supported by Belarus, despite their recurring appearance across different review cycles.

An analysis of recommendations concerning international treaties demonstrates virtually no change in the State's position. Issues related to expanding Belarus's international obligations and strengthening external accountability mechanisms remain one of the most persistent categories of recommendations that the State systematically does not support or accepts only when they are formulated in the most general and non-binding terms.

Cooperation with International Human Rights Mechanisms

Cooperation with international human rights mechanisms has traditionally featured prominently among the recommendations addressed to Belarus under the UPR. As in previous cycles, in 2025 Belarus received a significant number of recommendations concerning engagement with treaty bodies, the special procedures of the Human Rights Council and other international mechanisms.

An analysis of the State's response to these recommendations reveals a characteristic pattern: Belarus is willing to support general calls for cooperation but refuses to accept recommendations that require specific action or involve "inconvenient" mechanisms.

For example, the State supported a number of general recommendations calling for continued cooperation with international human rights mechanisms. These included recommendations to **continue engaging with UN treaty bodies, maintain dialogue with the special procedures, and cooperate with international human rights institutions in accordance with its national obligations**. Such formulations are sufficiently broad and do not contain specific requirements concerning the form, scope or outcomes of such cooperation.

At the same time, Belarus **did not support** recommendations that specify the substance of such engagement. A particularly illustrative example is Lithuania's recommendation to **cooperate with all United Nations special procedures and provide them with free, full and unhindered access to the country**, which was not supported.

It is difficult to draw a meaningful distinction between a recommendation to “fully cooperate with international human rights mechanisms” and one calling for special procedures to be provided with “free and unhindered access” to carry out their mandates. Moreover, genuine and comprehensive cooperation with international mechanisms necessarily entails the possibility of monitoring, conducting visits and accessing the information required for their work.

Thus, recommendations that allow Belarus to determine the scope and substance of its cooperation remain acceptable to the State, whereas recommendations providing for specific mechanisms of external scrutiny are considered unacceptable.

A similar pattern can be observed with regard to other international mechanisms. Belarus **did not support** recommendations concerning **full cooperation with the Special Rapporteur on the situation of human rights in Belarus**, as well as a number of recommendations addressing engagement with international monitoring mechanisms more broadly.

As a result, a situation has emerged in which the State formally affirms its willingness to cooperate with the UN system while simultaneously restricting the ability of mechanisms that provide for an independent assessment of the human rights situation and public documentation of violations to carry out their mandates.

National Human Rights Institution

The issue of **establishing an independent national human rights institution in accordance with the Paris Principles** remains one of the most persistent themes among the recommendations addressed to Belarus under the UPR. Relevant recommendations have been repeated across several cycles, demonstrating the lack of progress towards establishing an independent national human rights mechanism that complies with international standards.

A comparison of the 2020 and 2025 recommendations shows that the international community has maintained a consistent approach to this issue. At the same time, Belarus's response continues to depend on the degree of specificity of the wording. Recommendations directly calling for the **establishment of an independent national human rights institution** **are** **generally not supported** by the State. At the same time, softer recommendations calling on Belarus to **consider establishing such an institution or continue examining the issue** **receive support.**

In this regard, Burkina Faso's recommendation to **establish a national mechanism for reporting and monitoring the implementation of recommendations from international human rights mechanisms with the participation of civil society** is particularly noteworthy. Unlike recommendations concerning the establishment of a national human rights institution, this recommendation **was accepted** by Belarus. At the same time, the systematic dismantling of independent civil society organisations and the ongoing repression of their representatives cast doubt on the possibility of implementing such a recommendation in good faith. Under these circumstances, there is a risk that only a nominal mechanism involving organisations loyal to the State, rather than independent civil society representatives, could be established.

National Human Rights Programmes and Action Plans

Recommendations concerning national human rights programmes and action plans regularly feature in the UPR and have traditionally received the State's support. In both cycles, States called on Belarus to **continue developing and implementing national strategies and plans aimed at promoting and protecting human rights**, while the recommendations themselves remained highly general in nature.

The recommendations generally do not address the quality of such programmes, the extent to which they comply with international standards, or the effectiveness of their implementation. As a result, the formal existence of national action plans is often considered by the State sufficient to classify such a recommendation as implemented.

At the same time, the status of such recommendations also changed compared with the third cycle. Whereas a significant proportion of similar recommendations was classified as already implemented in the previous cycle, in 2025 Belarus **accepted** these recommendations. This is consistent with the general approach to responding to recommendations adopted by Belarus in the fourth cycle. However, when assessing progress in the future, it will be important to consider not only the existence of programmes and strategies, but also their content, the participation of relevant stakeholders in their development, the availability of monitoring mechanisms, and their impact on the situation of the most vulnerable groups. These aspects remain largely outside the scope of the recommendations formulated under the UPR.

National Dialogue, Rule of Law and Democracy, and Separation of Powers

Recommendations concerning **participation in national dialogue, respect for the principles of the rule of law and democracy, and effective separation of**

powers recur in small numbers from cycle to cycle. They remain general in nature and do not contain specific institutional requirements, making them politically “easy to accept” within the UPR. In 2025, such recommendations were predominantly **accepted**. At the same time, it is noteworthy that **separation of powers** itself was separately identified by the State as an element of the institutional system that **had already been implemented**.

It is telling that the State is willing to accept recommendations affirming the basic principles of democratic governance, while not supporting many recommendations that give practical substance to these principles through requirements to hold free elections, ensure judicial independence or respect political freedoms.

A recommendation put forward by Cuba on **expanding the participation of civil society organisations in decision-making processes in accordance with national legislation** **was also accepted** by Belarus. However, it is clear that this recommendation does not require any significant changes to the existing mechanisms for civil society participation, while the wording “in accordance with national legislation”, rather than “in accordance with international standards”, gives Belarus broad discretion.

Trafficking in Persons

In 2020, many recommendations concerning combating trafficking in persons were classified by Belarus as already implemented. In 2025, the approach changed: recommendations with similar content **were more often accepted**.

The recommendations themselves retain their conventional structure and call on the State to **strengthen measures to combat trafficking in persons, improve legislation, intensify prevention efforts, and ensure support for victims**. Most of them are formulated in sufficiently general terms and focus on continuing policies already in place.

At the same time, the 2025 cycle included more substantive recommendations. In particular, the Philippines proposed that Belarus **adopt a comprehensive anti-trafficking strategy, including effective identification of victims, prosecution of perpetrators, and ensuring a robust support for victims.** The **acceptance** of such recommendations may indicate the State's willingness to maintain cooperation with the international community in an area traditionally regarded as less politicised, in which Belarus seeks to demonstrate positive results.

Equality and Non-Discrimination

In both cycles under comparison, Belarus has demonstrated a willingness to support general recommendations aimed at preventing discrimination, developing inclusive policies and supporting vulnerable groups. In 2025, the State **accepted** recommendations on **adopting additional measures to prevent discrimination, improving inclusive policies concerning women, children, persons with disabilities and other vulnerable groups, intensifying efforts to combat hate speech, and ensuring the effectiveness of existing mechanisms for protection against discrimination.**

At the same time, recommendations calling for the **adoption of comprehensive anti-discrimination legislation** **were once again not supported,** despite having been addressed to Belarus for 10 years already (since the second UPR cycle in 2015). Thus, the State continues to recognise the importance of the principle of non-discrimination at a declaratory level, while showing no willingness to establish a comprehensive legislative framework that would provide systematic protection against discrimination on various grounds.

Unlike many other States, Belarus has traditionally received relatively few recommendations concerning racial discrimination. In 2025, the State **accepted** Nigeria's recommendation to **strengthen measures to prevent and eliminate all forms of racial discrimination in accordance with the International Convention on the Elimination of All Forms of Racial**

Discrimination. However, this recommendation is general in nature and does not provide for any specific legislative or institutional changes.

Belarus consistently supports recommendations concerning the promotion of equality, inclusion and non-discrimination in general terms, while avoiding commitments that would require the adoption of comprehensive legislative mechanisms for protection against discrimination. As a result, the international community continues to repeat the same recommendations from one cycle to the next, further underscoring the lack of substantial progress in this area.

Torture and Cruel, Inhuman or Degrading Treatment

The issue of torture, cruel, inhuman or degrading treatment, as well as impunity for such violations, remains one of the most persistent themes among the recommendations addressed to Belarus under the UPR. As in previous cycles, most of these recommendations come from European States and concern not only the prevention of torture, but also independent investigations, holding perpetrators accountable and establishing effective mechanisms to prevent such violations.

Belarus **accepted** Luxembourg's recommendation to **“combat all acts of torture and other cruel, inhuman or degrading treatment or punishment, in particular by law enforcement officials”**. At the same time, Liechtenstein's recommendation calling for **taking immediate measures to prevent torture, conducting prompt, effective and impartial investigations, and holding perpetrators accountable** **was not supported.**

The difference between the two recommendations lies primarily in the level of specificity of the “commitments” they entail. The first is general and declaratory in nature and does not require any measurable action by the State. The second contains specific requirements concerning the investigation of violations and the holding of perpetrators accountable. Once again, Belarus's

approach is evident: the decisive factor in accepting a recommendation is whether it requires the achievement of concrete results.

The situation concerning recommendations on the legislative prohibition of torture is particularly noteworthy. Despite the existence of certain provisions on torture in criminal legislation, torture is still not established as a separate criminal offence in the Criminal Code of Belarus that fully corresponds to the definition contained in the Convention against Torture. The existing provisions do not cover all forms of torture and all purposes for which torture may be used under international law. Nevertheless, in 2025, Belarus again, as in the third UPR cycle in 2020, stated that this recommendation **had already been implemented.**

146.69 Ensure the absolute prohibition of torture and other ill-treatment (Estonia)

146.70 Define as an offence and punish all acts of torture in full compliance with the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Costa Rica)

At the same time, Belarus **did not support** Chile's recommendation to **guarantee the absolute prohibition of torture and ill-treatment.** This creates a paradoxical situation in which Belarus simultaneously claims that the relevant safeguards already exist and have been implemented, while rejecting recommendations calling for such safeguards.

Overall, an analysis of the recommendations concerning torture and impunity for such violations demonstrates the persistence of fundamental differences between Belarus and the international community in their assessment of the existing problems. The State is willing to support general and declaratory formulations concerning the need to combat torture and respect human rights, while consistently rejecting recommendations that would require independent oversight, effective investigations or the establishment of additional accountability mechanisms.

Impunity and Investigation of Human Rights Violations

Belarus received a number of identical recommendations calling for **ensuring independent and effective investigations into human rights violations and holding perpetrators accountable**. However, the State's responses to these recommendations differed. The recommendations put forward by Poland, Czechia, Montenegro and Latvia **were not supported**. At the same time, recommendations from the Republic of Moldova and the Dominican Republic concerning **the investigation of human rights violations and ensuring accountability for those responsible** **were accepted as implemented**.

146.84 Ensure that all alleged human rights abuses are promptly and effectively investigated in a transparent and independent manner and ensure accountability for any violation (Republic of Moldova)

146.82 Initiate independent and effective investigations into all human rights violations and ensure their perpetrators are held to account (Poland)

146.85 Ensure full accountability for law enforcement officials involved in human rights violations (Czechia)

In substance, these recommendations are virtually indistinguishable from one another. This makes it difficult to explain the markedly different responses solely through an analysis of their wording. Rather, such practice suggests either the absence of transparent criteria for assessing recommendations or that political factors, including relations with the State making the recommendation, play a significant role in the decision-making process.

These recommendations were considered after the UN Group of Independent Experts had concluded that there were reasonable grounds to believe that crimes against humanity, including imprisonment and persecution on political grounds, had been committed in Belarus. In this context, Belarus's refusal to support recommendations aimed at conducting independent investigations and ensuring accountability for those responsible is particularly significant, as

it concerns not only individual human rights violations but also the State's response to allegations of the commission of the most serious international crimes.

Moreover, an analysis of the responses to individual recommendations reveals signs of inconsistency and a lack of uniform criteria for their assessment, which further complicates any assessment of the State's genuine willingness to implement the recommendations it has received.

Death Penalty

Throughout all UPR cycles, the international community has consistently called on Belarus to cease the use of the death penalty.

A comparison of the 2020 and 2025 recommendations shows virtually no change either in their substance or in the State's response to them. As before, most States called on Belarus to **introduce a moratorium on the death penalty, abolish this form of punishment, or accede to the Second Optional Protocol to the International Covenant on Civil and Political Rights**. All such recommendations **were not supported**.

The only exception was Mongolia's recommendation to **"move towards the abolition of the death penalty"**, which Belarus **accepted**. However, this wording differs significantly from most other recommendations on this issue, as it contains neither clear commitments nor specific timeframes or criteria for assessing progress. In practice, it merely identifies a general direction for possible action without specifying the steps necessary to achieve the stated objective.

Political Prisoners

In 2025, Belarus received a large number of recommendations containing direct calls to **release and rehabilitate all political prisoners, end politically motivated persecution, and refrain from further arbitrary detention**. As in

2020, all such recommendations **were not supported.** This indicates that the State continues not to recognise the existence of political prisoners as such and is unwilling to accept recommendations based on this characterisation of the situation.

147.17 Release all political prisoners arbitrarily detained for exercising their legitimate rights to freedom of opinion and belief, expression and association, and commit to guaranteeing conditions for a free, democratic and independent Belarus (Australia)

Elections

In both cycles, States recommended that Belarus ensure the conduct of free and fair elections in accordance with international standards. However, the State's response changed.

During the 2020 review, France's recommendation to **ensure the holding of free and fair elections, in line with international standards and in the presence of the OSCE observers** **was accepted as implemented** by Belarus. In 2025, an identical recommendation from Poland **was not supported.** This change is difficult to explain based on the content of the recommendation itself and instead appears to reflect the broader context following the events of 2020 and subsequent political developments in the country.

It is also noteworthy that the number of recommendations concerning elections was lower in 2025 than in the previous cycle. This may indicate that some States focused less on the electoral process itself and more on the consequences of the events following the 2020 elections, including political repression, arbitrary detention, the dissolution of civil society organisations and restrictions on fundamental freedoms.

Sexual and Gender-Based Violence, Domestic Violence and Violence against Children

Gender-based violence and domestic violence remain a recurring theme among the recommendations addressed to Belarus under the UPR.

As in 2020, during the fourth cycle Belarus received numerous recommendations concerning gender-based and domestic violence, as well as violence against children. Belarus consistently **supports** general recommendations relating to **“continuing efforts”, “strengthening measures” and “improving policies”**. In 2025, recommendations concerning the **development of new strategies to combat gender-based and domestic violence** **were also accepted.**

At the same time, recommendations requiring institutional or legislative changes, such as **ratification of the Istanbul Convention, criminalisation of domestic violence, or recognition of marital rape as a criminal offence,** **are not accepted.** At the same time, some proposals that are substantively similar, such as **prohibiting all forms of gender-based violence** or the relatively ambitious recommendation to **establish a comprehensive system for collecting data on violence against women and girls,** **were classified as already implemented.** This further highlights the contradictory and inconsistent nature of the State’s approach and makes it difficult to determine which specific measures the State considers to have been implemented.

Economic and Social Rights

Some recommendations concerning economic and social rights have remained unchanged, covering issues such as social protection, healthcare, education, protection of the family, poverty reduction and implementation of the 2030 Agenda for Sustainable Development.

For example, recommendations called on Belarus to **continue efforts to promote family values and ensure social protection for families and all their members; take measures at the national and international levels to protect traditional family values; promote equal opportunities in admissions and academic training processes, ensuring equitable access, without distinction based on gender or other status; continue improving access to routine medical care in rural areas, further improve the quality of healthcare services and their accessibility to the population; adopt national strategies to combat poverty, particularly in rural areas, and strengthen measures to reduce child poverty; continue implementing inclusive social policies; and continue implementing the 2030 Agenda for Sustainable Development.**

In both cycles, a significant proportion of recommendations on economic and social issues has been formulated in general terms, primarily highlighting Belarus's achievements in these areas and not requiring specific institutional or legislative changes. Such recommendations generally come from States taking a more favourable position towards Belarus, making them the least contentious part of the UPR agenda.

In 2020, a significant proportion of recommendations concerning economic and social rights was classified by Belarus as already implemented. In 2025, a different trend can be observed: recommendations with similar content **were more often accepted,** but were not classified as already implemented.

Thus, the key change in this area concerns not the substance of the international recommendations, but rather the change in their status in national reporting. The shift from “implemented” to “accepted” may reflect the State's intention to manage its international commitments more flexibly without having to demonstrate their full implementation.

Rights of Persons with Disabilities

The rights of persons with disabilities are also among the least contentious themes in the UPR recommendations addressed to Belarus. As in the previous cycle, the State **accepted** all recommendations in this area.

The substance of the recommendations has remained stable and includes **the development of inclusive education, ensuring equality and non-discrimination, increasing the participation of persons with disabilities in public life, improving social support, and implementing the Convention on the Rights of Persons with Disabilities.**

It is noteworthy that most recommendations are formulated in relatively broad terms and focus on continuing existing measures and programmes. States recommend that Belarus **continue implementing national action plans, take the views of persons with disabilities into account in decision-making, and expand measures to address stigmatisation and social exclusion.**

This largely explains the high level of support they receive from the State and the absence of significant disagreement between Belarus and the States participating in the review.

New Thematic Areas of the 2025 UPR Recommendations

International Human Rights Treaties

A distinct new area of recommendations in the 2025 UPR cycle concerned calls on Belarus to **restore its participation in the Optional Protocol to the International Covenant on Civil and Political Rights**, which provides for the right of individual complaints to the Human Rights Committee.

Following Belarus's withdrawal from the Optional Protocol in 2022, States for the first time began to issue recommendations aimed not at accession to new international treaties, but at restoring obligations that had already been relinquished. For example, Austria recommended that Belarus **fully re-engage with the human rights system, reaccede to human rights treaties denounced over the past five years and ratify outstanding human rights treaties**. Similar recommendations to rejoin the Optional Protocol were put forward by Cyprus and Ecuador.

All recommendations containing a direct call for re-ratification of the Protocol **were not supported** by Belarus. At the same time, the State **accepted** Namibia's recommendation, which was formulated in significantly softer terms and called only to **consider reratifying the Optional Protocol**.

A similar approach can be observed with regard to other international treaties. Belarus **accepted** Namibia's recommendation to **consider ratifying the Optional Protocol to the Convention on the Rights of Persons with Disabilities**. In this case, too, the State agreed only to consider the issue, without undertaking a commitment to ratify the Protocol itself.

At the same time, recommendations involving more specific international commitments did not receive support. For example, Belarus **did not support** Austria's recommendation to **reverse its support for nuclear rearmament by signing and ratifying the Treaty on the Prohibition of Nuclear Weapons**, as well

as Mauritius's recommendation to **accede to a number of International Labour Organization conventions, Workers with Family Responsibilities Convention, 1981 (No. 156), and the Violence and Harassment Convention, 2019 (No. 190).**

Belarus's response to these recommendations is consistent with the broader trend observed across many thematic areas of the UPR. The State demonstrates a willingness to accept recommendations that involve examining an issue or considering the possibility of taking certain measures, while refusing to support recommendations containing specific commitments and expected results.

Constitutional Framework, Separation of Powers and the Rule of Law

In the 2025 UPR cycle, recommendations included specific issues concerning the constitutional amendments adopted in 2022 and their impact on the system of governance.

Austria recommended that Belarus **review its Constitution in line with the [opinion of the Council of Europe's Venice Commission](#)**, issued following the 2022 constitutional reform. This recommendation **was not supported.**

At the same time, the Russian Federation's recommendation to **ensure the participation of a broad range of representatives in the work of the All-Belarusian People's Assembly (ABPA)** **was accepted** by Belarus.

It is noteworthy that the All-Belarusian People's Assembly was itself one of the central subjects of criticism in the Venice Commission's opinion. The Commission stated that the structure and powers of the ABPA are incompatible with the principle of separation of powers and result in an excessive concentration of power. The Commission also expressed the view that the establishment of this body contributes to preserving the existing political system and is inconsistent with the democratic standards of the Council of Europe.

Combating Corruption and Organised Crime

Unlike many politically sensitive issues, recommendations concerning the fight against corruption and organised crime received a positive response from Belarus. At the same time, it is noteworthy that some of these recommendations call not merely for the continuation of existing policies, but for the adoption of new measures and the development of additional tools. At the same time, it should be recalled that, following Belarus's denunciation of the Council of Europe Criminal Law Convention on Corruption (ETS No. 173), its Additional Protocol (ETS No. 191) and the Civil Law Convention on Corruption (ETS No. 174), the country ceased to be a member of the Group of States against Corruption (GRECO) as of 1 May 2024.

Nevertheless, Belarus **accepted** Kyrgyzstan's recommendation to **develop and effectively implement new national policy documents on combating organised crime and corruption**. Unlike many recommendations formulated as calls to “continue efforts” or “strengthen existing measures”, this recommendation requires specific action, albeit at the policy rather than legislative level.

In many other thematic areas, the State has demonstrated caution towards recommendations requiring specific legislative changes or the establishment of new mechanisms. However, in the area of combating corruption and organised crime, Belarus is willing to accept recommendations that entail not only maintaining existing policies but also undertaking new commitments. This may be explained by the fact that these issues are traditionally regarded by the State as part of its official domestic policy and are not perceived as interference in domestic political processes.

Independence of the Judiciary

Recommendations concerning the independence of the judiciary and ensuring fair trials are among the issues that have been consistently raised with

Belarus throughout all UPR cycles. However, a comparison of the 2020 and 2025 recommendations reveals an important change: States have begun to formulate their recommendations in significantly more specific terms.

In the previous cycle, recommendations were predominantly limited to general calls to guarantee the independence of the judiciary both in law and in practice. In 2025, States increasingly pointed to specific mechanisms necessary to safeguard such independence. For example, Costa Rica recommended **guaranteeing the independence of the judiciary through transparent and merit-based procedures for the appointment and removal of judges free from all political interference**. Spain, in turn, recommended **reviewing national legislation concerning the right to a fair trial and due process**.

Costa Rica's recommendation **was classified by the State as already implemented**. This assessment raises questions, as the system of appointment, reappointment and removal of judges in Belarus continues to assign a key role to the president and does not comply with a number of international standards on judicial independence. Moreover, the leadership and judges of the Constitutional Court and the Supreme Court are appointed on the recommendation of the president, subject to subsequent approval by the Presidium of the All-Belarusian People's Assembly. This further confirms the influence of the executive branch over the judiciary, particularly given the lack of genuine independence and representativeness of that body. At the same time, Spain's recommendation to review national legislation concerning guarantees of a fair trial **was not supported**.

Thus, Belarus simultaneously claims that recommendations aimed at ensuring judicial independence have already been implemented, while refusing to support recommendations that would require further examination and improvement of the relevant legal mechanisms.

Systemic Repression and Politically Motivated Persecution

One of the most notable differences in the 2025 UPR cycle was the emergence of a large number of recommendations explicitly characterising the situation in Belarus as involving systemic repression.

A number of States recommended that Belarus **end repression against demonstrators, human rights defenders, journalists, political opponents and civil society organisations**. Some recommendations explicitly referred to “**systemic repression**” and “**politically motivated persecution**”, including the persecution of relatives and family members.

147.54 End systemic repression and politically motivated prosecutions, including detentions, torture and persecution of political opponents and their families (Norway)

147.55 Cease all intimidation and repression directed at its citizens, at home and abroad, and initiate an inclusive, transparent dialogue with the political opposition (Romania)

Such formulations were virtually absent in the 2020 cycle. Their emergence reflects a qualitative change in the human rights situation in Belarus over the past five years, as confirmed by international assessments of the situation.

All recommendations on this issue **were not supported.**

Conditions of Detention

Compared with the 2020 UPR cycle, the 2025 recommendations placed noticeably greater emphasis on conditions of detention and the treatment of persons deprived of their liberty. States increasingly highlighted the need to **bring detention conditions into line with international standards and ensure respect for the rights of prisoners.**

General recommendations on this issue **were classified by Belarus as already implemented.** However, the State's response changes when recommendations address specific problems. A telling example is Chile's recommendation, which also calls for **bringing detention conditions into line with international standards**, but additionally highlights the need to **end the practice of holding prisoners *incommunicado* and coercive psychiatric detention.** This recommendation **was not supported.**

Freedom of Expression, Freedom of Association and Peaceful Assembly, and Cooperation with Civil Society

Freedom of expression, freedom of association, freedom of peaceful assembly, media independence and access to information have traditionally remained among the largest thematic areas of recommendations addressed to Belarus under the UPR. As in previous cycles, the State's response to such recommendations remains predominantly negative. **None** of the recommendations requiring changes to legislation or practice to ensure these rights **was supported.**

The substance of a number of recommendations reflects the changes that have taken place in Belarus since 2020.

One of the new themes was the **arbitrary use of anti-extremism and counter-terrorism legislation.** A number of States recommended that Belarus **repeal or review the relevant provisions used to restrict the activities of independent media, civil society organisations and peaceful civic activity.** The emergence of such recommendations reflects recognition of the fact that anti-extremism legislation has become one of the key instruments for restricting civil and political freedoms since 2020.

The recommendations also addressed academic freedoms and students' rights for the first time. In particular, Costa Rica recommended **guaranteeing students' right to peaceful assembly and association, eliminating restrictions**

on demonstrations on campuses, and preventing the practice of forcibly involving students in pro-government organisations.

The issue of transnational repression against journalists was also a new element. Norway recommended **ceasing media censorship, removing extremist labels on independent media and ending transnational repression of reporters in exile.**

Recommendations concerning the review of legislation adopted after 2020 and restricting the exercise of civil freedoms also continued to be made. In particular, the United Kingdom called on Belarus to **review the Law on Mass Events and the Law on Public Associations**, which have for many years been the subject of criticism by international human rights mechanisms.

Particular attention should be paid to Poland's recommendation to **engage in constructive dialogue with independent civil society**. Although this call was formulated in relatively moderate terms and contained no direct criticism of the State's actions, Belarus nevertheless **refused to support it.**

Thus, while the overall thematic focus of recommendations concerning freedom of expression, the media, freedom of association and peaceful assembly has remained consistent, the 2025 cycle demonstrates a noticeable evolution in their substance. Belarus's response remains unchanged: recommendations requiring reforms in these areas are consistently not supported.

Historical Memory and Countering the Glorification of Nazism

In the 2025 cycle, Russia put forward a recommendation concerning the preservation of historical memory and countering the glorification of Nazism. In particular, Belarus was recommended to **continue efforts to preserve historical truth and commemorate the victims of fascism.**

This recommendation **was supported**, as it clearly corresponds to the State's official policy in this area.

Freedom of Conscience and Religion and the Situation of Religious Organisations

Although recommendations concerning freedom of religion have also been made in previous cycles, their nature changed in 2025. The number of such recommendations remained minimal – one recommendation per cycle. Whereas in the previous cycle the Holy See limited itself to general calls not to restrict freedom of religion, the new recommendation from Romania contains direct references to pressure on clergy and religious organisations.

Romania drew attention to cases of **the persecution of members of the clergy, pressure on believers, and State interference in the activities of religious communities**. The recommendation **was not supported** by Belarus.

Conscientious Objection to Military Service

Belarus classified as **already implemented** Costa Rica's recommendation on **guaranteeing the effective access to the right to conscientious objection to military service for all persons, regardless of their beliefs and at any stage, including during active service**. At the same time, the existing Law on Alternative Service **provides** for a number of significant restrictions. In particular, the right to alternative service is effectively recognised primarily for persons who base their objection on religious beliefs and does not fully extend to non-religious conscientious objectors, while alternative service itself remains significantly longer than regular military service. In this regard, the classification of this recommendation as implemented is questionable.

Labour Rights

In 2020, Belarus received only one recommendation concerning the right to work, from Angola. It concerned the adoption of specific measures to reduce the gender pay gap and combat negative stereotypes concerning women. Belarus classified this recommendation as already implemented.

In 2025, both the number and the substance of recommendations concerning labour rights changed significantly. Independent trade unions, forced labour and good-faith cooperation with the ILO came to the fore. Belarus has failed to implement the recommendations of the ILO Commission of Inquiry and subsequent recommendations of the ILO supervisory bodies for more than 20 years, which led to the application of Article 33 of the ILO Constitution in 2023 and Belarus's subsequent refusal to implement it in good faith.

States recommended that Belarus **restore the activities of independent trade unions, end the persecution of trade union leaders, and ensure workers' right to freedom of association in accordance with international labour standards.** Thus, for the first time, labour rights were addressed through the lens of civil freedoms.

In addition, Croatia recommended that Belarus **engage with the ILO in good faith with a view to fully implementing all outstanding recommendations of the ILO Commission of Inquiry.**

The recommendations put forward by Luxembourg and Croatia also addressed the **problem of forced labour, particularly in prisons and medical labour centres.**

None of these recommendations **was supported.**

The only exception was Ethiopia's recommendation, which did not address issues sensitive to the authorities: **continue efforts to promote full and productive employment for all, and further strengthen occupational safety and**

health in line with international labour standards. This recommendation **was** **accepted** by Belarus.

Right to Education

Recommendations concerning the right to education have traditionally been addressed to Belarus under the UPR and have generally received the State's support. The 2025 cycle retained the general recommendations described in the previous section.

At the same time, there was a noticeable increase in the number of recommendations addressing inclusive education and the needs of specific vulnerable groups. States recommended that Belarus **develop education policies concerning children with disabilities and minority groups, ensure access to education for all children, including persons deprived of their liberty, combat school dropout, and strengthen the capacity of institutions working with adolescents in crisis situations.** All recommendations in this category **were supported** by the State.

The recommendations also addressed specific issues that had previously received little attention under the UPR. For example, the Dominican Republic recommended **introducing an explicit prohibition of corporal punishment in educational institutions.** Belarus **classified this recommendation as already implemented,** which is to some extent consistent with the situation, as national legislation already contains a general prohibition of physical and psychological violence against children that is sufficient to protect children from corporal punishment.

Particular attention should be paid to Venezuela's recommendation on **ensuring that education promotes "active patriotism" among young people, encouraging them to participate in decision-making processes and to engage actively in public life.** The wording itself reflects a less common approach in the UPR, linking the right to education not only to the accessibility of educational services but also to their "quality". At the same time, the

recommendation contains no criticism of the authorities' actions and does not call for ensuring "patriotic" education that complies with international human rights standards. Its wording allows Belarus to interpret the recommendation at its discretion, in line with its own approach to patriotic and ideological education. It is therefore unsurprising that this recommendation **was supported.**

Overall, the 2025 recommendations demonstrate an expansion of the education agenda. Whereas the main focus previously was on access to education, increasing attention is now being paid to inclusion, support for vulnerable groups and the quality of education.

Rights of LGBTQ+ People

Another issue that received significantly greater attention in the 2025 cycle was the rights of LGBTQ+ people. Previously, the rights of LGBTQ+ people were mentioned in the context of broader recommendations on the adoption of anti-discrimination legislation. In 2025, however, the recommendations became more specific and directly referred to actions by the authorities aimed at discriminating against LGBTQ+ people.

European and Latin American States recommended that Belarus **repeal legislation and policies that discriminate against the LGBTQ+ community, including recent amendments to the definition of pornography, the Law on the Rights of the Child, and draft Article 19.16 of the Code of Administrative Offences criminalising the promotion of "non-traditional family relations" (now adopted); develop, introduce and ensure the enforcement of comprehensive legislation providing for criminal liability for all forms of discrimination against persons of different sexual orientations, gender identities, gender expressions and sex characteristics; ensure the protection of human rights defenders advocating for the human rights of persons of different sexual orientations, gender identities, gender expressions and sex characteristics from persecution, and abandon the policy of dissolving civil**

society organisations; and conduct awareness-raising campaigns to combat stereotypes, stigmatisation and discrimination against LGBTI people.

Belarus **did not support any** of these recommendations. At the same time, the State continues to accept general recommendations on non-discrimination that do not refer to specific groups. This reflects a broader approach whereby the principle of non-discrimination is recognised at a general level but is not extended to particular categories considered sensitive by the authorities.

Women's Rights

In the 2025 UPR cycle, States devoted significant attention to women's rights and gender equality. Most recommendations in this area were supported by Belarus, continuing the trend observed in previous cycles.

The State **accepted** recommendations on **supporting women's entrepreneurship, ensuring equal participation of women in public and political life, reducing the gender pay gap, expanding women's access to vocational and technical education, and combating gender stereotypes**. Most of these recommendations were formulated as calls to "continue efforts" or to further develop existing State policies.

Against this background, Belarus's response to Bolivia's recommendation to **work on developing comprehensive regulations for promoting gender equality with an intersectional approach** is noteworthy. Unlike most other recommendations concerning women's rights, it **was not supported**, further confirming Belarus's general approach to UPR recommendations.

Older Persons

Another new theme was recommendations concerning the well-being of older persons. Venezuela and Azerbaijan recommended that Belarus **continue providing social support to older persons and take measures to improve their quality of life**.

All such recommendations **were supported.** Their emergence reflects a broader international trend towards recognising the rights of older persons as a distinct area of human rights policy.

Situation of National Minorities

Among the new or particularly noteworthy features of the 2025 UPR cycle is Belarus's response to a recommendation concerning national minorities. Poland recommended **ensuring that all national minorities, including the Polish national minority, are able to fully exercise their rights in accordance with Belarus's international obligations.** The recommendation **was not supported.**

In substantive terms, this recommendation is relatively neutral. It contains no allegations of human rights violations, does not refer to persecution or discrimination, and essentially reiterates the State's existing international obligations concerning the protection of the rights of national minorities.

The text of the recommendation itself does not make it possible to explain the decision conclusively. Unlike many other recommendations that were not supported, it contains no demands for far-reaching reforms, politically sensitive issues or calls to revise State policy. However, its emergence may be linked to the Belarusian authorities' repressive policies towards national minorities, particularly the Polish national minority, which intensified after 2020 as part of broader repressive pressure and the "anti-Western" campaign.

This example further supports the assumption that, when assessing recommendations, Belarus takes into account not only their substance but also its relations with the State making the recommendation.

Rights of Migrants

One of the new and significantly expanded themes in the 2025 UPR cycle was the rights of migrants, refugees and asylum-seekers. At the same time, an

analysis of the recommendations makes it possible to identify two groups of recommendations to which Belarus responded differently.

The first group concerns the protection of migrants' rights and is predominantly humanitarian in nature. States recommended that Belarus **continue measures to ensure the safety and protection of the rights of refugees, migrants and asylum-seekers, strengthen mechanisms to prevent the exploitation of migrant workers, improve national legislation in line with international obligations, and enhance cooperation with international organisations and UN mechanisms in this area.** A separate recommendation called on Belarus to **grant the right to citizenship to all children born in the country, regardless of the status of their parents.**

Almost all recommendations in this category **were supported** by Belarus.

A completely different response can be observed with regard to the second group of recommendations, which addressed the use of migration for political purposes. These recommendations should be viewed in the context of the migration crisis that began in 2021, during which Belarus, according to assessments by a number of States and international organisations, has failed to prevent and in many cases has facilitated migrants' attempts to cross the borders of neighbouring States. Poland, Latvia, Estonia and Lithuania recommended that Belarus **end the use of migrants as an instrument of political pressure, refrain from their instrumentalisation, and not put their lives and well-being at risk at the borders of the European Union.**

All recommendations in this group **were not supported.**

As a result, migration has become one of the most illustrative areas for understanding the logic underlying Belarus's response to UPR recommendations. Within a single thematic area, the State demonstrates a willingness to accept a significant number of recommendations while categorically rejecting others when they concern contentious foreign policy issues or contain critical assessments of the authorities' actions.

Involvement in the War against Ukraine and International Humanitarian Law

A completely new theme in Belarus's UPR was recommendations related to Russia's war against Ukraine.

Lithuania, Poland, Estonia, Latvia, Finland and Australia called on Belarus to **end its involvement in the war of aggression and ensure the return of Ukrainian children transferred from occupied territories**. There were obviously no comparable recommendations in the 2020 cycle.

All recommendations directly linking Belarus to the war against Ukraine or the transfer of Ukrainian children **were not supported**. At the same time, Belarus **supported** Cyprus's more general recommendation on **complying with international obligations under international humanitarian law and international human rights law**.

As in other thematic areas, the State demonstrated a willingness to support general principles while refusing to acknowledge specific problems.

Recommendations Related to the Foreign Policy Agenda

Among the features of the 2025 UPR cycle was the emergence of recommendations that are only indirectly related to human rights and primarily reflect the foreign policy priorities of the States making them. Such recommendations came predominantly from States maintaining close political relations with Belarus and received support from the Belarusian authorities.

For example, China recommended that Belarus **continue to promote South-South cooperation and jointly promote and protect human rights**. The recommendation **was supported** by Belarus and is consistent with the State's official approaches to international cooperation and its domestic political system.

A separate group consisted of recommendations concerning unilateral coercive measures – sanctions. Russia recommended that Belarus **continue efforts to counter such measures in view of their alleged negative impact on human rights**, while China recommended **developing cooperation with other States affected by sanctions to mitigate their consequences**. Both recommendations **were also supported**.

It is noteworthy that the issue of sanctions was virtually absent from the recommendations in the previous UPR cycle. Its emergence in 2025 reflects changes in the international context in which Belarus has found itself since 2020, as well as the efforts of certain States to use the UPR platform to promote their own positions regarding the consequences of sanctions policies.

What Was Not Reflected in the 2025 Recommendations?

Despite the significant expansion of the thematic scope of recommendations in the 2025 UPR cycle, a number of important issues that were actively raised by civil society and advocated for in the preparation for the review were not reflected in the final recommendations.

First, **environmental and climate issues** were almost entirely absent. Unlike the 2020 cycle, where such issues were addressed, albeit to a limited extent, in 2025 there was not a single separate recommendation concerning environmental policy, climate commitments or environmental rights.

Key issues relating to **civil society** were also not reflected. In particular, none of the recommendations addressed the criminalisation of activities carried out on behalf of unregistered organisations, despite this issue being one of the central restrictions affecting the civic sector. Nor were there any recommendations concerning the dissolution of political parties or the restoration of political pluralism. Overall, the section about civic participation and institutional dialogue between the State and society remained extremely limited and non-specific.

The rights of **persons with disabilities** also remain an area with significant gaps. Despite the inclusion of some recommendations concerning inclusive education and social support, their wording remains general and does not address systemic aspects of the exercise of their rights.

The absence of recommendations on **cultural rights** is also noteworthy. Despite active advocacy on this issue, the final recommendations did not contain a separate section addressing access to culture, cultural participation or the protection of cultural rights. This issue was also absent from the previous cycle, indicating a persistent lack of attention to this area in the UPR process concerning Belarus.

In the area of **freedom of religion**, there were likewise no recommendations concerning the re-registration procedures for religious organisations, which became one of the key developments affecting religious rights in 2025.

Finally, despite active advocacy in the field of **education**, no recommendations directly addressed the ideologisation and militarisation of the educational process. These issues remained outside the final list, although they had been raised by civil society organisations during the preparation for the review.

Overall, the analysis of the recommendations that were not made demonstrates that, despite the significant increase in the overall number of UPR recommendations, structural gaps remain. Some issues, particularly those relating to cultural rights, institutional civic participation and the ideological dimension of education policy, continue not to receive sufficient attention in the international agenda concerning Belarus.