



HUMAN RIGHTS DEFENDERS FOR FREE ELECTIONS

Elections*2025. Analytical report on the formation of precinct commissions

The expert election 2025 observation mission was¹ organized by the Belarusian Helsinki Committee and the Viasna Human Rights Center as part of the "Human Rights Defenders for Free Elections" campaign. The mission collects and analyzes information about the election campaign based on open sources and messages from voters from Belarus.*

CONCLUSIONS

1. The formation of precinct election commissions (PECs), which directly organize and conduct voting and counting of votes, was completed following the calendar plan on December 26, 2024.

2. A total of 5,325 PECs were formed (86 fewer than on a single voting day in 2024, and 398 fewer than in the 2020 presidential election (data excluding polling stations abroad in 2020)). 56,550 persons became their members. A reduction in the number of PECs with a slight increase in the average number of commission members means that small polling stations have been reduced, i.e. this process can be described as an enlargement of polling stations; such optimization reflects demographic processes, but may raise the issue of physical accessibility of polling stations;

3. The typical pattern of the Belarusian model of imitating democratic processes persists, with the main entities nominating their representatives to the PECs being "other public associations," political parties, citizens, and labor collectives. In a situation of total suppression of civil activity, the claimed grassroots activity of citizens, who allegedly nominated more than 16,500 representatives who collected signatures of at least 10 people to support their nomination, is particularly questionable.

4. The behavior of political parties looks unnatural (after the 2023 re-registration, there are only 4 of them left): the leaders of 3 of these parties are registered as presidential candidates, and it would be logical to see an active willingness to fill out PECs with their representatives, but these 3 parties collectively nominated only 4.3% of the total number of nominated representatives. Such indicators emphasize the imitative nature of the participation of political parties and their leaders in these elections*; their main role is to legitimize the procedure by creating a picture of democratic elections with alternatives;

5. As a result of an opaque process of review by the executive vertical of the lists of nominated representatives, they were almost fully approved (99.5% of those nominated to PECs). Citizens' representatives hold 29.1% of the seats in the PECs; representatives of 4 political parties — 9.8%; representatives of public associations (most of which are the largest pro-government organizations that have legislatively established special relations with the state since 2023) — 49.4%; representatives of labor collectives — 11.7%;

6. The special role of pro-government trade unions is noticeable, which hold 15.7% of the seats in the PECs, which confirms the role of trade unions as one of the main sources of "manpower" for violating

¹ The term "elections*" in relation to the 2025 election campaign is used with an asterisk by the "Human Rights Defenders for Free Elections" campaign to emphasize the perfunctory nature of this term, since any free and fair election campaign presupposes, first of all, conditions where rights and freedoms are fully realized, including freedom of speech, freedom of peaceful assembly and association, the right to participate in the governance of one's state, freedom from discrimination, which is currently practically absent in Belarus

electoral legislation and at the same time creating a picture of a democratic process.

7. Just as in the case of territorial and district commissions, a gender imbalance persists: the share of women (74.8%) in PECs significantly exceeds the share of men.

8. For the third election campaign, the legislation allows not to publish the lists of individual PECs members. This makes it much more difficult to assess the specifics of PECs' composition, in particular, the extent to which the commonly noted "occupational principle" of forming election commissions is preserved, when commission members represent different entities (parties, citizens, public associations), but are recruited from the same organization and the workers' immediate superiors are the chairpersons of these election commissions;

9. The formation of PECs (as well as other stages of the 2025 elections) took place without independent supervision, therefore, the procedural aspects of the formation of PECs remain without public control.

10. The stage of the formation of PECs was practically not noticeable in the public space: there was no widespread informing of voters about the rights and opportunities to participate in the formation of PECs, which shows the authorities' complete disinterest in the real participation of citizens in the electoral process and confirms the course towards absolute administrative control over all election* stages in 2025.

I. LEGAL FRAMEWORK

A precinct election commission is a body that organizes elections at a specific polling station: voter registration, voting, and vote counting.

Compared to the previous presidential elections, the legislative regulation of the PECs formation process has undergone a number of changes, including:

- mentions of the formation of precinct commissions outside the Republic of Belarus are excluded;
- the provision on the publication of the decision on the formation of commissions (which, in particular, contains a list of names of the commission members) has been removed.

A PEC is created for the duration of a specific election campaign and operates within the powers defined by Article 44 of the Electoral Code (EC). The procedure for the formation of PECs and their composition is defined in articles 34-35 of the EC: the excessively complex and overloaded text of these norms makes it difficult to understand and apply them in practice. Therefore, CEC usually issues appropriate explanations for the next election campaign. An explanation of the procedure for the formation of PECs in the framework of the 2025 elections* is given in the CEC's Resolution No. 69 dated October 24, 2024, On clarifying the procedure for the formation of commissions for the election of the President of the Republic of Belarus,² which largely duplicates the provisions of the same "explanatory" resolutions of the CEC on previous election campaigns.

The formation period. PECs must be formed no later than 30 days before the start of the election.³ In relation to the 2025 elections*, no later than December 26, 2024.

The right to nominate representatives to PECs. Representatives to the PECs have the right to be nominated by:⁴

- political parties and other public associations,
- labor collectives of at least 10 people,
- citizens who have the right to vote, in the number of at least 10 people.

The procedure for nominating representatives to PECs. Each of the subjects authorized to nominate their representatives to the PECs has its own procedure for making a decision on nominating

² <https://rec.gov.by/uploads/files/Calendar/post69-2025.pdf>

³ EC, Part 1 of Article 34

⁴ EC, Part 2 of Article 35

candidates and the necessary set of documents. To nominate representatives to the PECs, it is necessary to submit the minutes of the meeting or assembly or an application signed by a group of citizens.⁵

Formation of the composition of PECs. Formation of PECs, i.e., deciding which of the nominated representatives will become part of a PEC, is entrusted to the executive vertical accountable to the president: district or city executive committees, and local administrations in cities with regional divisions.

The decision on the formation of PECs is made at a meeting of local executive bodies, which the representatives of the subjects who nominated their representatives to the PECs have the right to attend.⁶ The possibility of observers' presence at such meetings is not provided for.

There are no selection criteria and a system for evaluating candidates in the electoral legislation of Belarus. In its explanations, CEC repeats ⁷a general directive from one election cycle to another: "before deciding on the formation of the commission [...], the issue of the business and personal qualities of the persons nominated to the commission is put up for discussion."⁸ Judging by the wording of the recommendations, a personal vote on each candidate is held only if the number of applicants exceeds the stipulated number of PEC members.⁹

The decision to form a PEC. The decision on the formation of commissions specifies the surname, proper name, patronymic (if any) of each member of the commission, the method of nomination to the commission, the location, and telephone numbers of the commission. The decision is not published.¹⁰ Instead, a notice on the formation of commissions (which does not contain a list of commission members) is published in periodicals within seven days after the relevant decision is made.

Requirements for the composition of PECs. According to Part 1 of Article 34 of the EC, commissions should consist of 5 to 19 people.

The Electoral Code attempts to set thresholds for political representation: it is recommended to form at least one-third of a PEC (except for PECs in military units and places where voters reside temporarily) from representatives of political parties and other public associations.¹¹ At the same time, there are no guarantees for ensuring equality of election campaign participants, with the exception of restrictions on the number of representatives from one organization (no more than one).

Mandatory restrictions are set for civil servants: the share of civil servants in a separate PEC may not exceed one third. The categories of civil servants who cannot be part of PECs are also defined: judges, prosecutors, and heads of local executive and administrative bodies.

Appeal. Following the established procedure, the ¹²subjects who have nominated their representatives to the commissions are entitled to appeal. The appeal is filed with the court based on the territorial affiliation of the executive body that issued the appealed decision. The deadline for submitting an appeal is 3 days from the date of the decision.

⁵ EC, Part 6 of Article 35

⁶ EC, Article 34

⁷ For example, for the 2024 elections* — CEC Resolution No. 30 dated 11/21/2023, paragraph 12:
<https://rec.gov.by/uploads/files/Calendar/post30-2023.pdf>

for the 2020 presidential elections — CEC Resolution No. 13 dated 05/08/2020, paragraph 9:
<https://rec.gov.by/files/2020/post13.pdf>

⁸ CEC Resolution No. 69 dated 10/24/2024, paragraph 9.

⁹ Ibid.

¹⁰ EC, Part 6 of Article 34

¹¹ EC, Part 2 of Article 34

¹² EC, Part 7 of Article 34

II. THE PROCESS OF NOMINATING REPRESENTATIVES TO THE PECs

The nomination of representatives to the PECs took place in accordance with the Calendar Plan¹³: no later than December 20, 2024.

There is a tendency to reduce the number of PECs (even considering the removal of polling stations abroad). Thus, 5,325 precinct commissions were formed in the 2025 elections*, that is, 86 fewer than in the parliamentary and local elections* of 2024 ¹⁴(5,411 PECs) and 398 fewer than in the 2020 presidential campaign (5,723 ¹⁵PECs excluding polling stations abroad). The reduction in the number of PECs may be related to a decrease in the population of Belarus ¹⁶and indicate a decrease in the number of voters, which, in turn, may often be due to factors such as forced emigration¹⁷.

According to official data, 56,840 people decided to become members of election commissions. The four remaining pro-government ¹⁸political parties after the 2023 re-registration, the leaders of three of which are formally registered as candidates, i.e. they should be interested in the active participation of their representatives in the work of PECs in the real political process, nominated only 5,548 (9.8%) representatives. Public associations (mainly the largest pro-government public associations with legislatively established special relations with the state since 2023¹⁹) have nominated the largest number of representatives to PECs: 27,949 (49.2%), respectively, citizens — 16,677 (29.3%), labor collectives — 6,666 (11.7%).

¹³ CEC, Calendar plan, page 2: <https://www.rec.gov.by/uploads/files/Calendar/kalendar2025.pdf>

¹⁴ Human Rights defenders for Free Elections, Elections* 2024. Analytical report on the formation of precinct commissions / Human Rights Defenders for Free Elections 2024: <https://spring96.org/en/news/114190>

"A total of 5,411 PECs have been formed (374 fewer than in the last parliamentary elections and 459 fewer than in the last local elections). They included 57,233 persons."

¹⁵ Human Rights Defenders for Free Elections, Analytical report on monitoring the formation of precinct election commissions, p. 4: <https://elections2020.spring96.org/en/news/97895>

¹⁶ Compare: As of January 1, 2021 — 9,349,645:

https://www.belstat.gov.by/upload-belstat/upload-belstat-pdf/oficial_statistika/2024/naselenie_2024.pdf; as of January 1, 2024 — 9 155 978:

<https://www.belstat.gov.by/upload/iblock/f89/f89f2ee43f87b7d7f5392e680da5e529.pdf>

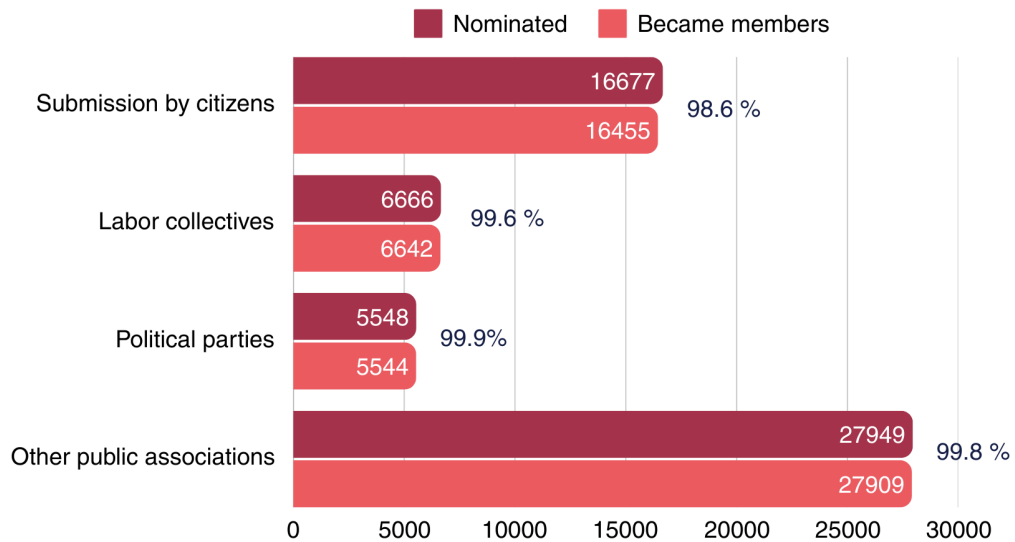
¹⁷ The UN, *Fear and Repression: Since May 2020, 100,000 people have left Belarus*, 03/22/2023: <https://news.un.org/ru/story/2023/03/1439007>

¹⁸ Viasna, *The human rights situation in Belarus. September 2023*, 10/03/2023: <https://spring96.org/en/news/112961>

"[...] there are currently no registered opposition parties left in Belarus, and out of a total of 15 parties that existed at the beginning of 2023, only 3 remained..."

¹⁹ In accordance with the law On the Foundations of Civil Society, they are classified by the decision of the Ministry of Justice as subjects of civil society "having the right to interact with state bodies (organizations) in special forms", i.e. their subordination to the state is enshrined in law: https://minjust.gov.by/directions/compare_coverage/

Pass Rate for Candidates



The process of nomination to the PECs was hardly noticeable. There was no visible work in the public space to promote the importance of election commissions and there were no calls to join them. Information was posted on the websites of local executive and administrative bodies only about the time and place of receiving documents on nomination to members of precinct election commissions. With such a de facto hush-up of the PEC formation stage, there are reasonable doubts about the existence of a grassroots initiative that allowed citizens to unite to nominate more than 16,500 of their representatives, especially in comparison with the 2020 campaign, when 35,355 people were nominated by citizens and there was an active campaign to involve citizens in commissions, in particular, the Honest People nominated at least 2,042 representatives to 1,164 precinct commissions (these figures subsequently increased)²⁰.

The lack of active informing about the stage of nominating representatives to PECs may indicate the state's disinterest in admitting candidates to election commissions who were not sanctioned by the authorities, who, among other things, did not pass the loyalty test, i.e. willingness to commit violations of electoral laws or keep silent about them. The general climate of intimidation and fear of being repressed²¹ for expressing willingness to count votes honestly did not contribute to the activity of nominating representatives to the PECs.

²⁰ [Final analytical report on the results of the observation of the Presidential elections of the Republic of Belarus in 2020 | Human Rights Defenders for Free Elections 2020](#)

²¹ Viasna, *At least 3,645 people convicted in criminal cases: three years after the 2020 elections*, 08/09/2023: <https://spring96.org/en/news/112443>

Viasna, *At least 1,721 people were convicted in 2024: results of criminal prosecution*, 12/30/2024: <https://spring96.org/en/news/117078>

III. MEETINGS OF THE BODIES FORMING THE COMMISSIONS

Judging by the information posted on the websites of the executive committees and local administrations, the meetings of the bodies forming the PECs were held on the prescribed date — no later than December 26, 2024.

This stage of the formation of precinct commissions took place in a climate of opacity and insufficient informing of citizens about the possibility of participating in it, which is characteristic of the entire campaign. There were still no effective opportunities to monitor the decision-making process at meetings of the bodies forming the commissions. CEC Resolution No. 69, clarifying the procedure for the formation of commissions, provides for the possibility of attendance at meetings only for representatives of political parties, other public associations, labor collectives, and citizens who have nominated their representatives to the commission²². The possibility of broadcasting the meetings is not provided for. At the same time, informing about the upcoming meetings remained very formal (succinct messages on the websites of the relevant authorities in the tabs dedicated to the elections*, which were not highlighted in the important news about the life of the region; the right of citizens to attend the meeting was often not mentioned if they nominated their representatives to the PECs ²³and in some cases was absent altogether²⁴.

Brief reports on past meetings posted on the websites of executive committees and local administrations also do not contain information about how decisions were made; there are no clear criteria in the legislation either: CEC Resolution No. 69 mentions only "business and personal qualities of persons nominated to the commission" as information based on which decisions are made on membership in the PECs.

IV. THE COMPOSITION OF PECS

On December 27, 2024, the day after the deadline for the formation of commissions (no later than December 26), CEC published the results of the formation of PECs. In total, 5325 polling stations were formed and, accordingly, the same number of precinct commissions. 56,550 persons became their members.

On average, 99.5% of candidates were admitted to PECs, which does not allow PEC formation to be truly elective and competitive and confirms the administrative and command nature of appointing loyal and sanctioned people to PECS. For comparison, in 2020, 35,355 candidates were nominated from citizens to PECs, while 20,800 were admitted, i.e. only 58.83%²⁵.

Method of nomination	Nominated	Admitted	% of persons admitted
Applications by citizens	16677	16455	98.6 %

²² CEC Resolution No. 69 dated 10/24/2024, paragraph 8

²³ Among others, see examples of concise information on the websites of the Hrodna Regional Executive Committee (<https://vitebsk.vitebsk-region.gov.by/ru/vybory-prezidenta-respubliki-belarus>), Brest Regional Executive Committee (<https://www.brest.brest-region.gov.by/ru/v4-ru/view/o-provedenii-ocherednogo-zasedaniya-brestskoy-rajonnoj-komissii-po-vyboram-p-rezidenta-respubliki-belarus-2000005263>), Homel Regional Executive Committee (<https://gomelisp.gov.by/obrazovanie-i-deyatelnost-uchastkovykh-komissij/>).

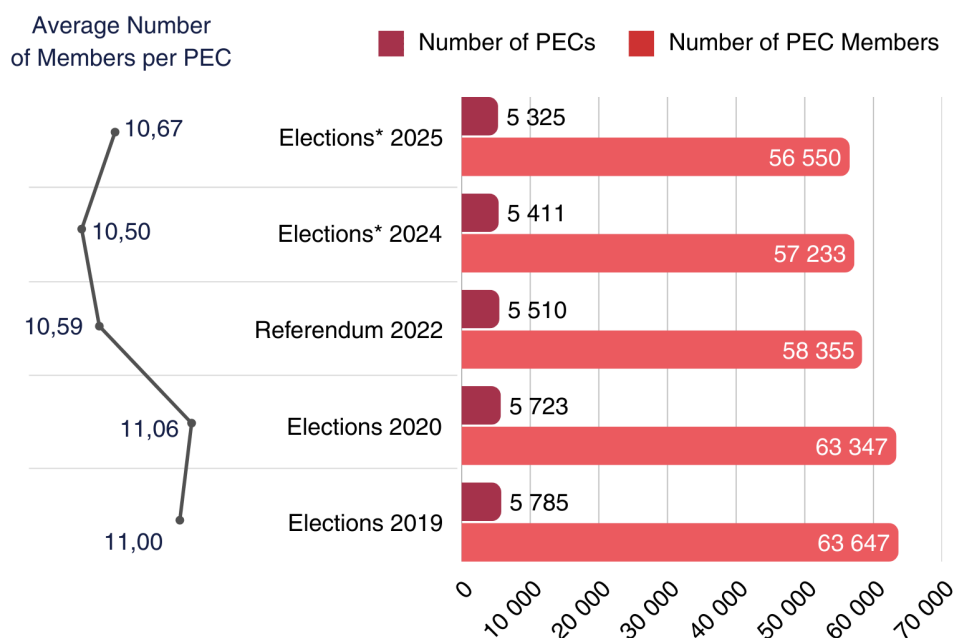
²⁴ Among others, see the information on the website of the Viciebsk Regional Executive Committee: <https://vitebsk.vitebsk-region.gov.by/ru/vybory-prezidenta-respubliki-belarus>

²⁵ [Final analytical report on the results of the observation of the Presidential elections of the Republic of Belarus in 2020 | Human Rights Defenders for Free Elections 2020](#)

Labor collectives	6666	6642	99.6 %
Political parties	5548	5544	99.9%
Other public associations	27949	27909	99.8%
Total	56840	56550	99.5%

There is an obvious continuing trend of reducing the number of commission members (due to a reduction in the number of polling stations themselves): in 2024, during the elections* to the lower house of parliament and local councils of deputies, the CEC has already significantly reduced the number of polling stations and left even fewer for the current elections.²⁶ Nevertheless, the calculation of the national average number of PECs members shows a slight increase, or rather, a return to the pre-COVID practices of 2019–2020. Thus, we observe an enlargement of polling stations: it can be assumed that small polling stations have been reduced in the first place. The enlargement of polling stations may be related to the expectation of low voter turnout against the background of population decline and general apathy towards political processes, which at the same time allows the authorities to optimize the costs of organizing elections. The reduction of small polling stations may raise the issue of the physical accessibility of electoral procedures.

Quantitative Dynamics of the Composition and Number of PECs (2019–2025)



As a result, representatives of political parties, which should have been the main players in the electoral process, made up 9.8% of the commission members. Taking into account the registration of the leaders of 3 of the 4 remaining political parties as presidential candidates, this indicator best illustrates the

²⁶ Human Rights defenders for Free Elections, Elections* 2024. Analytical report on the formation of precinct commissions: <https://spring96.org/en/news/114190>

dependent position and decorative nature of both the parties themselves and their candidates, sparring partners for A. Lukashenka. The absolute majority of PEC members, 49.4% of the total membership, are representatives of "other public associations." As before, among those represented are Belaya Rus, the Belarusian Republican Youth Union, the Belarusian Women's Union, the Belarusian Peace Foundation, the Belarusian Public Association of Veterans, and trade unions affiliated to the Federation of Trade Unions of Belarus. All these five public associations (except the Peace Foundation) are not just GONGOS, but under the new law On the Foundations of Civil Society, are recognized by the decision of the Ministry of Justice as ²⁷subjects of civil society "having the right to interact with state bodies (organizations) in special forms", i.e. their subordination to the state is enshrined in law. Of all these organizations, the largest share is held by pro-government trade unions (15.8%), which confirms the role of trade unions as the main "manpower" of electoral law violations in creating a picture of the democratic process. There are no independent civil society organizations dealing with political issues in Belarus today: many organizations are being forcibly liquidated, and their members are being persecuted for purely political reasons.²⁸

Almost a third of the PECs members, ostensibly representing citizens, in an environment where the formation of the commission is carried out with a directive from above from loyal and proven candidates, indicate an attempt by the authorities to imitate democratic procedures in order to legitimize the current elections*.

At the same time, given the administrative and command approach to organizing elections*, ²⁹the labor collectives of state organizations are strongly influenced by their leadership, which acts in the interests of the authorities. Formally, this allows for demonstration of "public" participation, but in reality, such PEC members most often represent not the independent will of employees, but a directive from above. The inclusion of 11.7% of labor collective members in PECs once again indicates their use as a tool of state mobilization, where the inclusion of loyal employees in electoral structures guarantees the fulfillment of specified election scenarios.

Thus, the precinct commissions, having lost the signs of a democratic institution, turned into performers whose function is to demonstrate the conduct of elections and thereby legitimize the authorities.

Due to the created situation, there are no known facts about appealing the decisions on the formation of PECs, which usually take place in a democratic system. None of the nominated and later appointed members of the PECs feel the need to challenge the decisions, as the entire process is formal and fully conducted by the executive vertical.

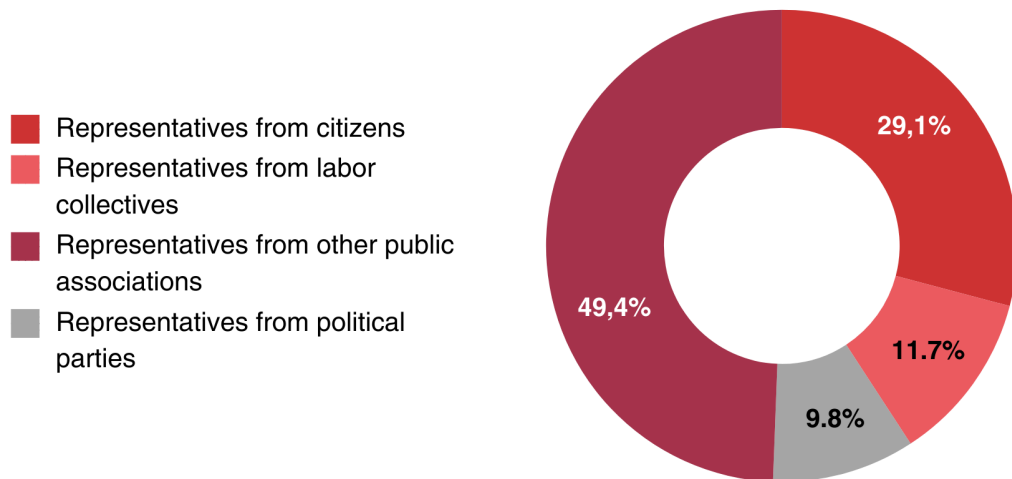
²⁷ The Ministry of Justice, Political parties, public associations, and other non-profit organizations: https://minjust.gov.by/directions/compare_coverage/

²⁸ Lawtrend, NGOs in Belarus: registration and liquidation situation: <https://www.lawtrend.org/freedom-of-association/nko-v-belarusi-situatsiya-s-registratsiej-i-likvidatsiej>

The results of a quantitative study as of November 15, 2024: from the beginning of 2021 to November 15, 2024, at least 1,180 non-profit organizations of various organizational and legal forms were forcibly liquidated. The largest number of forcibly liquidated NGOs are public associations, 889 organizations. At least 11 political parties, 8 associations, and 4 trade unions were also forcibly liquidated.

²⁹ According to the conclusions of the previous report, allowing the collection of signatures in the territories of enterprises has strengthened the mechanism of administrative coercion in support of A. Lukashenka, having eliminated equal conditions for candidates and focusing administrative resources on demonstrating support for one candidate: <https://elections2025.spring96.org/en/news/117067>

Composition of Precinct Election Commissions



There is still a high representation of women in PECS (74.8%), as opposed to their low representation in higher-level commissions (for example, 33% in the CEC), which indicates the dominance of classical patriarchal values entailing that women are predominantly involved in the performance of bureaucratic functions, while management and decision-making at higher levels remain a predominantly male prerogative.

The lack of lists of individual PEC members continues to make it difficult to assess their composition. This opacity makes it impossible to verify compliance with the principle of independence and diversity in the formation of commissions, as well as to analyze the superiority of the "occupational principle", when commission members formally represent different entities (citizens, political parties, public associations), but are recruited from the same organization and the workers' immediate superiors are the chairpersons of these PECs. In this regard, it cannot be ruled out that the composition of the commissions this year may not differ much from previous years, when there were gross violations of electoral legislation and international standards for fair and free elections, which also exacerbates the problem of non-transparency and strengthens existing ties within the system. The lack of transparency in the composition of PECs undermines confidence in the electoral process, impeding public control, independent monitoring, and accountability of the main link responsible for compliance with electoral legislation at the most important stages of the electoral process.