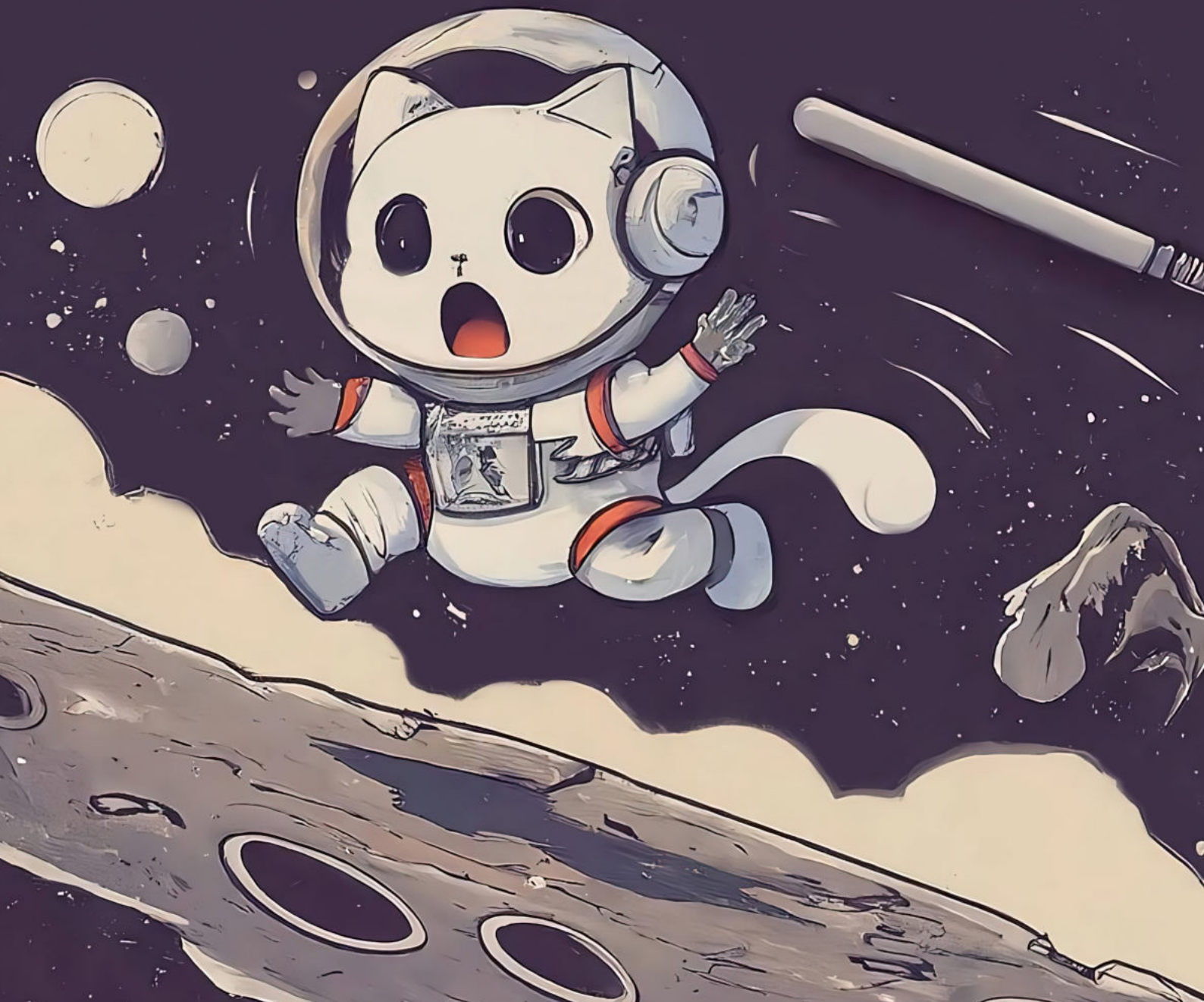


JANUARY – APRIL 2024  
TRENDS.BELHELCOM.ORG

# HUMAN RIGHTS IN BELARUS: THE MAIN TRENDS OF PUBLIC POLICY

GENERAL MEASURES | LAW ENFORCEMENT PRACTICE | KEY REACTIONS  
OF INTERNATIONAL STRUCTURES



n 2024, AI is not only getting «smarter» but also becoming more accessible to a growing number of people. To capture our audience's attention, we create cover images for reviews using AI, reflecting the reality in Belarus.

In late March to early April 2024, a female Belarusian citizen flew into space for the first time. The Belarusian authorities proudly hailed this event as «historic». However, just a couple of days before the flight, A. Lukashenko issued a decree titled «On the Status of the Belarusian Astronaut», which formalized the requirements of loyalty to the government in exchange for social benefits for astronauts. While this might not be the most significant event in state policy during the review period, it vividly demonstrates the state's relentless manipulations to achieve its unlawful political goals.

In the image created by Shutterstock.AI, an astronaut kitten, which could be suspected of disloyalty to the authorities due to its white-red-white spacesuit, is shown running away from a police baton.



© Belarusian Helsinki Committee, 2024

# | CONTENTS

<b>INTRODUCTION</b>	<b>5</b>
<b>SUMMARY</b>	<b>7</b>
<b>I. GENERAL MEASURES: LEGISLATION, STRATEGIES AND POLICIES THAT SHAPE THE CONDITIONS AND PREREQUISITES FOR THE FULFILLMENT OF HUMAN RIGHTS IN THE COUNTRY</b>	<b>11</b>
Expansion of the legalization of systemic repressions	11
Strengthening of the security sector as part of the institutionalization of repressive policies	15
Intensification of militarization	16
Addressing the lack of financial resources and the outflow of human capital through violations of economic and social rights	18
<b>II. LAW ENFORCEMENT PRACTICE: VIOLATIONS OF CIVIL, POLITICAL, SOCIAL, ECONOMIC AND CULTURAL RIGHTS</b>	<b>21</b>
Surge in repressive practices towards relatives of political prisoners and pressure on relatives of persons that have left the country	21
Persecution for financial donations to funds supporting victims of repression	22
Politically motivated charges under articles previously unused	22
New practices in prosecution under «extremist» articles	23
New practices in persecution for human rights activities	25
New practices of pressure at workplace	25
Expansion and intensification of the use of in absentia («special») proceedings	26

<b>III. KEY CHANGES IN THE REACTIONS OF INTERNATIONAL INSTITUTIONS CONCERNING THE HUMAN RIGHTS SITUATION IN BELARUS</b>	<b>27</b>
Significant changes in the assessment of the human rights situation at the UN level	27
Evolution of the UN special mechanism on the human rights situation in Belarus	28

# | INTRODUCTION

The human rights situation in Belarus remains the subject of monitoring and analysis by both Belarusian and international NGOs and international organizations. Since 2012, the mandate of the [Special Rapporteur](#) on the situation of human rights in Belarus has been in place. Civil society's alternative reports to treaty bodies overseeing the implementation of the core UN human rights conventions, as well as in the [reports](#) of these bodies themselves, also provide reviews. In response to the unjustified use of force, torture against peaceful protesters contesting the 2020 rigged elections, and the subsequent repressions, a special [Mandate on the human rights situation in Belarus](#) was established under the auspices of the OHCHR in March 2021. In 2024, it was [amended](#) and gained more independence.

Since 2019, the Belarusian Helsinki Committee has been calculating [the Belarus Human Rights Index](#), within which more than 40 Belarusian experts assess changes in each specific human right. Belarusian NGOs regularly conduct targeted human rights situation monitoring based on their areas of expertise.<sup>1</sup>

The events of 2020, followed by the war in Ukraine and Belarus' complicity in Russia's aggression, have significantly altered the situation in the country, including its policies and practices in the realm of human rights. The situation is continually deteriorating, with daily updates on legislative changes, government initiatives<sup>2</sup>, specific violations, etc. Amidst this influx of information, **maintaining focus** and distinguishing between essential and minor aspects **becomes challenging**.

To ensure that significant events are not overlooked and to gain a better understanding of the situation in Belarus regarding the rule of law and human rights, we track **the most significant and qualitative changes in the main trends of state policy in the field of human rights**.

For this purpose, since July 2023, the Belarusian Helsinki Committee has been issuing a periodic review. Its aim is to present our expert assessments of **the most significant and qualitative changes in the trends of Belarusian state policy** in the field of human rights and the international community's reactions to it over the reporting period in three areas:

- *general measures*: systemic issues – legislation, strategies, and policies that generally shape the conditions and prerequisites for the fulfillment of human rights in the country;

---

<sup>1</sup> See, in particular, *Analytical reviews of the situation with human rights prepared by Human Rights Center «Viasna»*: <https://spring96.org/ru/publications>;  
*Monitoring the situation of freedom of association and civil society organizations in the Republic of Belarus by Lawtrend*: <https://www.lawtrend.org/english>;  
*Electronic bulletins of mass media in Belarus by the Belarusian Association of Journalists*: [https://baj.media/en/aglyady\\_category/baj-monitors/](https://baj.media/en/aglyady_category/baj-monitors/) and others.

<sup>2</sup> We consider the current authorities in Belarus as the *de facto* authorities.

- *law enforcement practices*: trends in violations of civil and political, social, economic and cultural rights;
- *key decisions and reactions of international institutions* related to the human rights situation in Belarus.

Our analytics will contribute to a better understanding of human rights trends in Belarus, aid international partners in navigating the Belarusian agenda, facilitate monitoring of systemic and qualitative changes in the situation, expand the human rights focus of analytics in related areas (political, economic, social, etc.), and serve as a useful resource for developing strategies and positions.

The analysis for 2023 is presented in 2 reviews. Issues for 2023, as well as a summary analysis of the year as an interactive presentation can be found [here](#).

In 2024, the review will be published three times (after every four months). **You can subscribe to our review [here](#).**



SUBSCRIBE TO THE NEXT  
ISSUE OF TRENDS  
[TRENDS.BELHELCOM.ORG](https://trends.belhelcom.org)

## | SUMMARY

- A **formal legislative framework** has been established for the first time, laying the basis for **systemic discrimination practices** and persecution based on **gender identity, sexual orientation, and transgender status**. The definition of pornography has been expanded to include the «deliberate display of non-traditional sexual relations and/or behavior». Furthermore, the new version of the National Security Concept declares the «comprehensive protection and preservation of the traditional family as a union between a woman and a man by birth» to be a national interest.
- **State access to personal data has been further expanded** (including, as well, the acquisition of such data without consent); the changes affect passenger transport and banking operations. The regime of total surveillance continues to strengthen, distorting the idea that such data collection should ensure procedural guarantees.
- **The formalization of requirements of loyalty** to the authorities extends to **new professional groups** seeking various social benefits (at that point, astronauts are affected<sup>3</sup>).
- **Powers allowing arbitrary use of force against civilians have been expanded further**: the military's use of weapons has been broadened, and A. Lukashenko has mandated equipping street patrols with firearms. This indicates the reinforcement of the security sector as part of institutionalizing repressive practice.
- The transition of state bodies and organizations from peacetime to wartime functioning has been legislatively established, which is a natural continuation of significant changes in military legislation from the second half of 2023. Thus, active militarization is gathering pace.
- **Certain forms of expressing dissenting opinions** have been **classified** by the state as **military risks and challenges** under the new Military Doctrine of the Republic of Belarus. This includes, among others, dissemination of ideas leading to rejection of traditional spiritual and moral values in Belarusian society, incitement to hostility or discord based on ideological-political beliefs, and agitation undermining trust in the military-political leadership of the state. Mass evasion of conscription events is also labeled a **military threat**.

---

<sup>3</sup> In this report, masculine gender nouns are used in a generic sense to refer to all genders.



- There is a trend towards **recruiting and training civilians for military purposes** and strengthening the resource potential of the armed forces through such individuals. In early 2024, a program was launched to train members of the Hunters and Fishermen Society as snipers «for using this resource in wartime», as directly stated by the former Minister of Internal Affairs and current Chairman of the Belarusian Hunters and Fishermen Society, I. Shunevich. It is noteworthy that in 2023, for similar purposes, amendments were made to the Law «On the People's Militia», introducing the concept of «amplification apparatus».
- **Employers** have been granted a **legally established right**, with the agreement of the trade union and the consent of the workers, to **increase the limit of overtime and weekend work in industrial organizations**. This measure is purportedly aimed at ensuring stable operations and addressing crucial strategic tasks in production. However, the apparent nominal nature of obtaining trade union consent and the utilization of the Belarusian production sector for Russia's military needs suggest that the new norms create formal conditions for the **maximum exploitation of human resources for purely political and illegal purposes of the regime of A. Lukashenko**.
- The trend of violating social and economic rights to counter human capital outflow is intensifying. Pressure is increasing due to the departure of young people for education or immediately after obtaining a degree. **Advertising employment and education abroad is legislatively prohibited**, and A. Lukashenko has verbally instructed university rectors to take measures to prevent graduates from leaving the country.
- The resurgence of the «iron curtain» inherited from the USSR, clearly manifesting itself in 2023, and indicative of the «anti-Western» policy of the current Belarusian regime, is evolving. At the Belarusian State University (the largest university in the country), employees are **mandated to complete a 37-question questionnaire after any trip abroad** (even during work and social vacations) to all countries worldwide except Russia.
- There is a surge in repressive **pressure on the relatives of political prisoners**, including subjecting them to administrative liability for receiving humanitarian assistance. Following a raid in January, at least 287 individuals were detained. The adoption of **Decree No. 269 «On Measures to Counter Unauthorized Payment Transactions»**, which allows law enforcement agencies to control (and suspend) banking operations, along with the first prosecution for money transfers to political prisoners, indicates the authorities' intent to tighten measures to prevent any assistance to individuals currently detained for political reasons.

- Pressure on the **relatives of individuals who have left the country** is escalating, with efforts to persuade the latter to return. Despite such cases having already occurred, **the explicit threat against the relatives of those who have left**, voiced by A. Lukashenko during the All-Belarusian People's Assembly, suggests a qualitatively new character of such pressure and an intensification of the tendency towards collective responsibility which we noted at the end of 2023.
- There has been a shift in the scope of persecution concerning **financial donations to funds aiding victims of repression**: instances involving significant volume and intensity of such donations now face the threat of treason against the state charges. Consequently, **systematic charitable donations may as well amount to acts of treason**.
- Cases of politically motivated administrative and criminal liability under articles of the respective Codes previously unused have emerged: for the first time, a criminal case has been initiated **for denying the «genocide of the Belarusian people»**; relatives of political prisoners have been subjected to administrative liability under the **article on violation of legislation on foreign gratuitous aid**, previously unapplied;
- New practices in applying «anti-extremism» legislation have emerged. Notably, **a court has, for the first time, classified a website with LGBTQ+ themes as «extremist material»**; **taking part in monitoring court sessions** (which entails additional pressure and represents a new form of repression against human rights defenders) and **assistance to political prisoners with money transfers** have, for the first time, been deemed as **aiding «extremist activities»**.
- When applying the article on violation of legislation on foreign gratuitous aid to relatives of political prisoners as «extremist activities», the unlawful conduct's goal is termed as «public, knowingly unlawful legitimization of persons who have committed a crime, including giving them the pseudo-status of "political prisoners"». Although this doesn't yet constitute direct persecution for the «political prisoner» status under «anti-extremist» articles (as the qualification is provided within the framework of another article), it suggests a developing trend. In the context of pressuring the relatives of political prisoners to refrain from accepting assistance from funds, and the prosecution of individuals for providing financial aid to political prisoners, there are indications that **such qualification may signify the authorities' intent to employ harsher measures (beyond previously used discriminatory treatment in detention facilities) to influence both the activities of human rights defenders in identifying individuals as political prisoners and the refusal of their relatives to acknowledge this status**.

- The expansion and intensification of the use of special proceedings are apparent: **firstly**, they are now applied to **non-public, non-media figures** (previously limited to well-known opponents of the authorities: leaders of the democratic forces, politicians, prominent activists; **secondly**, the initiation of special proceedings **is becoming a standardized process**. While approximately 30 persons faced the initiation of such proceedings from September 2022 to the end of 2023 (that is, 1 year and 3 months), the number surged to 59 persons in the first trimester of 2024 (just 4 months).
- Regarding international organizations' responses to the human rights situation in Belarus, **firstly, significant changes in the assessment of the situation at the UN level can be noted**: violations of social and economic rights were mentioned separately within the context of political repression in the latest report on Belarus – alongside civil and political violations. Furthermore, there is more specific and detailed recognition that crimes against humanity were committed in Belarus in connection with the 2020 elections. **Secondly, the status and mandate of the UN special mechanism** on the human rights situation in Belarus **was altered and expanded**.

# I. GENERAL MEASURES: LEGISLATION, STRATEGIES, POLICIES, THAT SHAPE THE CONDITIONS AND PREREQUISITES FOR THE FULFILLMENT OF HUMAN RIGHTS IN THE COUNTRY

## KEY POINTS:

- for the first time, a legal framework enabling systemic discrimination practices and persecution based on gender identity, sexual orientation, and transgender status is established;
- the scope of permissible weapon use against civilians has been widened again;
- various forms of dissent against the authorities have been labeled as military risks and challenges.

## EXPANSION OF THE LEGALIZATION OF SYSTEMIC REPRESSIONS

**Firstly**, the beginning of 2024 was marked by the establishment of **the first formal regulatory basis** for systemic discriminatory practices and persecution **against LGBTQ+ community**, as well as systemic discrimination based on gender identity.

1. On March 19, 2024, the Ministry of Culture **amended** the Instruction governing the production, distribution, exhibition, sale, and promotion of erotic materials, including those with elements of eroticism, violence, and cruelty, as well as those related to sexual education. These changes **broadened the definition of «pornography»** to encompass «non-traditional sexual relations and/or behavior», incorporating diverse sexual practices such as «homosexuality, lesbianism, bisexuality, polyamory, and transsexuality».

Prior to the amendments, pornography was defined as «vulgar-naturalistic, disgustingly cynical, indecent display of sexual intercourse, intentional

demonstration, mostly of exposed genitalia, non-aesthetic scenes of sexual intercourse, sexual perversions, sketches from nature that do not meet moral criteria, offend the honor and dignity of the individual, placing it on the level of animal instincts». In the new version, «non-traditional sexual relations and/or behavior» have been added after «sexual perversions».

Thus, potentially, «self-justifying and intentional depictions of homosexuality and lesbian love, bisexual relationships, polyamory, and transsexuality<sup>4</sup>» might now fall under the category of pornography. The formal criteria for pornography defined at the end of the norm are crucial. Any portrayal of these relationships or behaviors may be labeled as pornography if they «do not meet moral criteria, offend the honor and dignity of the individual, reducing it to animal instincts». Based on these criteria, the production depicting any manifestations of such relationships or behavior should not fall under the ban. However, it is important to note that the evaluative notions are used, and the extent to which the demonstration of «non-traditional» sexual behavior or relationships is considered to meet such criteria is decided based on the opinion of the Republican Expert Commission for the Prevention of Pornography, Violence, and Cruelty Propaganda. This body **will decide** on the presence of pornographic elements and, accordingly, on the distribution and advertisement of such products.

Given that the current Belarusian authorities interpret moral standards through the lens of «traditional values», any representation of LGBTQ+ relationships may be considered pornography. It's important to note that the ban applies to products containing «**elements** of pornography propaganda», which allows broadening the scope to prohibit any form of representation of such relationships.

Thus, any content (including educational and awareness-raising materials) mentioning relationships classified under the Instruction as «non-traditional» could potentially be banned.

These changes blatantly violate several human rights, including the right to freedom from discrimination in conjunction with non-interference in personal and family life, as well as freedom of expression. Additionally, the ban **infringes upon the rights to education and health**, since it may hinder the dissemination of materials for sexual and medical education, including those on HIV/AIDS prevention and safer MSM behavior.

---

<sup>4</sup> What is more, transsexuality is understood as «the desire to live and be perceived by others as a person of the opposite sex, usually accompanied by discomfort with one's anatomical sex or a sense of incongruence with one's gender identity».

2. The All-Belarusian People's Assembly (hereinafter ABPA) has adopted a **new Concept of National Security**. In the first half of 2023, we had already analyzed it<sup>5</sup> during its approval by the Security Council, focusing on provisions that could lay the groundwork for systematic human rights violations. In the final version, it's notable that the safeguarding and promotion of the traditional family institution, defined as a **union between a woman and a man by birth**, has been assigned to national interests. Such provision in a key strategic document establishes a discriminatory stance towards alternative family structures, potentially paving the way for discrimination and targeted persecution of individuals based on gender identity, sexual orientation, and transgender status.

**Secondly**, at the beginning of 2024, legislative amendments were introduced, **expanding state bodies' possibilities to access personal data, including without individual's consent**. While officially justified by the good faith goals of combating fraud and safety of road transport operations, these changes grant law enforcement agencies broad powers of surveillance and control over any life spheres, further threatening privacy rights and creating additional opportunities for the persecution of other civil rights.

1. On January 25, 2024, A. Lukashenko signed the **Decree No. 32 «On Automobile carriage of Passengers»**. This decree mandates carriers and dispatchers of irregular connections and taxis to:

- use programs whose servers are located exclusively within Belarusian territory for receiving orders;
- provide remote access to information about orders and data in the carrier's personal account to state authorities;
- ensure video recording of transportation by installing cameras in car cabins.

Moreover, the transport inspection now has the authority to request and obtain personal data from individuals without their consent, free of charge. This decree not only aims to enhance transportation quality control but also significantly expands law enforcement agencies' capabilities to pursue individuals evading repression and monitor those previously known for disloyalty to the regime. Consequently, the idea that such information can only be collected with procedural safeguards

---

<sup>5</sup> *The main change is the approach to defining the source of threats to national security, which has become subjective: the concept of «actors producing threat factors» has been introduced, formalizing and expanding the search for «enemies of the state», for more details see p. 13: <https://trends.belhelcom.org/storage/reviews/August2023/pzspkGp9ZZ3AHW9XN53D.pdf>*

is further blurred. The [involvement](#) of the Committee for State Security and the State Control Committee in developing this decree suggests an intention to use these new powers for repressive purposes, utilizing personal data of Belarusians for political persecution.

2. On March 1, 2024, [Decree No. 269 «On Measures to Counter Unauthorized Payment Transactions»](#) took effect. The document establishes an automated incident processing system, incorporating data on unauthorized transfers, cryptocurrency operations, and suspicious payments. State security agencies, internal affairs agencies, prosecutors, the Investigative Committee, and the Operational Analytical Center under the President will have access to this database.

Law enforcement agencies are empowered to suspend banking operations for up to 10 days upon receiving information or suspicion of «unlawful acts». Under the Decree, the processing of personal data contained in information about incidents is conducted **without individuals' consent, and it cannot be considered a violation of banking secrecy**. These innovations will likely be used not only to combat fraud but also to identify and halt operations related to supporting political prisoners and financing civil initiatives. Alongside with the violation of the right to privacy, such measures **infringe upon individuals' property rights** without any judicial control or authorization.

3. On April 17, 2024, the House of Representatives passed [the draft Law «On Amendments to Laws on the Investigative Committee»](#) in the second reading. This bill grants the Investigative Committee the authority to obtain information from information resources and systems containing personal data **without individuals' consent**, as well as the possibility to have remote access to it. These changes formally simplify the process of obtaining information by investigators, including in politically motivated criminal cases. Since the personal data of individuals subjected to political persecution de facto (and – increasingly – de jure) lacks adequate procedural safeguards, law enforcement officials can operate almost unrestrained. These legislative provisions **exacerbate the erosion of human rights guarantees within the criminal procedure**.

**Thirdly**, the trend of **formalizing requirements for loyalty to the authorities** continues to expand, **encompassing new professional groups** eligible for various social benefits. These legislative changes impose restrictions on individuals' rights and freedoms, especially the freedom of expression. For instance, on March 19, 2024, A. Lukashenko signed [Decree No. 100 «On the Status of a Belarusian Astronaut»](#), which outlines a range of privileges for this group. At the same time, the decree

stipulates that a Belarusian astronaut forfeits social guarantees and benefits if they commit crimes or administrative offenses of an «extremist nature». Given the broad interpretation of «extremist activity» by the authorities, encompassing any form of disagreement with the Belarusian regime's policies, this decree serves as another tool to reinforce loyalty to the regime, promote self-censorship, and persecute dissent in yet another professional sphere.

**Fourthly**, new instruments for online censorship are being introduced, primarily aimed at restricting the activities of independent media, violating freedom of expression and association. For instance, on April 4, 2024, the Operational Analytical Center under the President issued [Order No. 69](#), mandating **the annulment of the registration record of a domain name recognized as «extremist material»**. This practice, previously known in isolated cases, now has a legislative framework, enabling mass-scale implementation.

## STRENGTHENING OF THE SECURITY SECTOR AS PART OF THE INSTITUTIONALIZATION OF REPRESSIVE POLICIES

The trend of expanding the possibilities for the use of weapons, which began in 2023, is intensifying.<sup>6</sup>

**Firstly**, at the beginning of 2024, changes were made to the conditions for the use of weapons by servicemen, signaling not only increasing militarization but also the strengthening of the security sector, notably the integration of servicemen into law enforcement agencies' personnel to strengthen the latter.<sup>7</sup>

In February, [amendments](#) were made to **Decree No. 355 of June 26, 2001, "On the Approval of the General Regulations of the Armed Forces of the Republic of Belarus"**. These changes altered the provision regarding the right of servicemen to use weapons:

- the wording «if the accomplishment of tasks assigned to them with the use of other means is impossible» has been abolished, meaning the removal of the requirement to assess whether aims can be achieved without the use of weapons;

<sup>6</sup> <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 15-17

<sup>7</sup> In 2023, the intention for such strengthening was evidenced by legislative changes regarding the powers of the KGB in the sphere of military service and mobilization: <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p.16.



- instead, it was stipulated that weapons and special equipment can be used «taking into account the situation, the nature of the crime or administrative offense, and the identity of the offender»;
- the necessity for a warning shot before using weapons, physical force, or special equipment was eliminated, leaving only a warning;
- the provision holding personnel accountable for using force beyond their authority was removed;
- the provision was introduced that, by special order of the Deputy Minister of Internal Affairs - Commander of the Internal Troops, the duty shift personnel can be armed with weapons loaded with combat cartridges.

These changes represent a clear expansion of the military's powers for arbitrary use of force against civilians and a reduction in institutional safeguards against such arbitrary use of weapons, thereby increasing the state's capacity to violate human rights, including the right to life and health.

**Secondly**, during an expanded meeting with the leadership of state bodies responsible for national security, A. Lukashenko **demanded** street patrols to be armed with firearms. This directive was assigned to the Ministry of Internal Affairs, the KGB, and the Prosecutor's Office for implementation. Typically, such verbal instructions from A. Lukashenko are documented in the meeting's protocol, and subsequent measures are taken to enact them.

## INTENSIFICATION OF MILITARIZATION

The active militarization, initiated in 2023, is continuously escalating to new heights.

**Firstly**, in March, a **Decree titled "On the Transition of State Bodies and Other Organizations to Work in Wartime Conditions"** was enacted<sup>8</sup>. This decree outlines the process for state bodies and other organizations to transition from operating in peacetime to wartime conditions, ensuring their coordinated and effective response to national security threats amid evolving military-political circumstances. The decree delineates its application to various state bodies, including the All-Belarusian People's Assembly, the chambers of the National Assembly (the parliament), the Constitutional Court, and the Supreme Court.

<sup>8</sup> *The text of the document itself is not available.*

**Secondly**, at the end of April, the All-Belarusian People's Assembly approved a new **Military Doctrine of the Republic of Belarus**. Of significance to policies impacting human rights are the notable revisions in sections concerning the primary potential internal and external military threats to the Republic of Belarus, as well as the utilization of military force during peacetime.<sup>9</sup>

1. Compared to its previous version (2016), the current doctrine makes a clear distinction between risks, challenges, and threats, signifying different levels of preparedness for the state to respond.

**New internal military risks** encompass, among others: the **propagation of cosmopolitanism and statelessness** within Belarusian society, **as well as other ideas leading to a rejection of traditional spiritual and moral values**, and orientations in fulfilling the citizens' obligation and sacred duty to defend the Fatherland; **incitement of enmity or discord in Belarusian society based on ideological-political beliefs**. The previous edition only referred to interethnic and social tensions, extremism, and incitement to ethnic and religious hatred or enmity.

**New internal military challenges** include, among others: **campaigns aimed at undermining the trust of the population in the military-political leadership of the state** and decisions made by it to maintain the defense capability of the state (including enhancing the prestige of military service and motivation to defend the Fatherland – which, in essence, lays the groundwork for the qualitative strengthening of persecution restricting freedom of expression<sup>10</sup>); deliberate actions (or omissions) by individual citizens of Belarus aimed at harming the military security of the state and **treason against the state; escalation of enmity or discord based on ideological-political beliefs into mass riots**.

Mass evasion of Belarusian citizens from conscription measures into military service, as well as the emergence of armed confrontations between various segments of Belarusian society based on ideological-political beliefs are recognized as **military threats**.

Hence, it's clear that various forms of dissent against the government are no longer merely subject to criminal and administrative penalties, as corresponding legisla-

---

<sup>9</sup> *It's worth noting that these sections have significantly expanded. In the previous version of the doctrine, there were a total of 22 positions for both external and internal risks, challenges, and threats combined. In the current version, there are 21 positions for internal and 39 for external, making a total of 60.*

<sup>10</sup> *According to the Belarus Human Rights Index, the assessment of the freedom of expression in Belarus has nearly reached its minimum value on a scale from 1 to 10, with a score of 1.2 for the year 2023. See more details: <https://index.belhelcom.org/en/>*

tion has been amended. Instead, they are now being classified by the state as military risks and challenges at the strategic level, signaling the government's preparedness to counter dissent through any means necessary.

Simultaneously, among the potential **external** military **risks**, there's the inclusion of anti-Belarusian themes on the agendas of international organizations and intergovernmental entities, including their events. Some activities of human rights organizations could be categorized as such actions.

2. In the updated Concept, a provision on **the use of military force in peacetime** (paragraph 60) has been introduced<sup>11</sup>. It states that, for the purpose of preventing military conflicts, Belarus considers it legitimate to use such force for deterring other states from aggression against Belarus, preventing destabilization within its borders, containing armed incidents (actions, provocations), including at the borders, and **maintaining special legal regimes of the state functioning**.

**Thirdly**, there's a developing<sup>12</sup> trend of enlisting and training civilians for military purposes and enhancing the Armed Forces' resource potential through such individuals, which is seeing further development. During the All-Belarusian People's Assembly, former Minister of Internal Affairs I. Shunevich, now Chairman of the Belarusian Society of Hunters and Fishermen, **announced** the launch of a program to retrain willing society members (hunters) as snipers, to utilize their specialized expertise in military operations if necessary.

## ADDRESSING THE LACK OF FINANCIAL RESOURCES AND THE OUTFLOW OF HUMAN CAPITAL THROUGH VIOLATIONS OF ECONOMIC AND SOCIAL RIGHTS

**Firstly**, there's a noticeable trend of increasing pressure concerning the departure of young people for education or immediately after their graduation.

1. In January 2024, **amendments** to advertising legislation were introduced, **banning the advertising of employment and education abroad**, with exceptions only for organizations and individual entrepreneurs offering related services. Their advertisements are restricted to their own websites online. This legislative

---

<sup>11</sup> In the previous version, it only addressed measures for ensuring military security in peacetime.

<sup>12</sup> In the first half of 2023, the «People's Militia Law» was adopted, and in the second half of that year, a new concept, the «reinforcement apparatus», was introduced in the legislation on mobilization. This apparatus involves citizens who are mobilized to assist military commissariats and the KGB in notification, conscription, and dispatching (supplying) mobilization resources to the Armed Forces.

shift partly echoes the repressive practices observed in the latter half of 2023, particularly regarding the study of the Polish language. The aim of such pressure is clear: to curb the outflow of individuals seeking education abroad (many Polish courses declared assistance with migration to Poland for education as one of the purposes of their services)<sup>13</sup>.

2. In February, during a meeting with members of the Council of Rectors, A. Lukashenko **demand**ed rectors to take measures to enhance the quality of education and **halt the «brain drain» of university graduates** by September 1. Given the formalization that typically follows Lukashenko's verbal instructions, which are closely monitored by his administration, one can anticipate a systemic reinforcement of restrictive measures targeting those planning to study abroad after university, as well as prospective students. In 2023, isolated cases of such pressure were noted, including the tracking of apostilles and refusals to issue duplicate education documents<sup>14</sup>, which infringes at least on the right to education and the right to work in terms of freedom to choose employment.

**Secondly**, the natural consequences of the suspension of membership of Belarus Red Cross Society in the International Federation of Red Cross and Red Crescent Societies in December 2023 have become evident<sup>15</sup>. Alongside the membership suspension, its funding was also halted, with funding from the federation and the International Committee of the Red Cross constituting over half of the Society's budget.

In January 2024, the Belarusian Medical Solidarity Fund revealed that the Minsk branch of Belarus Red Cross Society requested assistance from the Chairman of the Health Committee of the Minsk City Executive Committee to transition healthcare institution employees in Minsk to fixed membership in the Society's primary organizations, with contributions amounting to 1% of the average wage. In simpler terms, **Belarus Red Cross Society is seeking to compel employees of healthcare institutions in Minsk to contribute 1% of their wages to it**. This request violates the freedom of association, particularly the right not to participate in the latter, as well as infringes on the right to work, specifically in terms of fair and favorable working conditions.

**Thirdly**, in March, **Decree No. 105 «On Overtime and Weekend Work in Industrial Organizations»** was issued. Aimed at «creating additional conditions for ensuring the stable operation of industrial organizations», the decree grants employers the

---

<sup>13</sup> <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 26-27

<sup>14</sup> <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 25

<sup>15</sup> <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 29

right, with the agreement of the trade union and the consent of the workers, to extend the limit of overtime work and work on weekends if there's a justified production and economic necessity. However, given the complete dependence of the state-affiliated trade union (Federation of Trade Unions of Belarus) on the government, such agreement appears to be merely a formality. Moreover, considering the utilization of Belarusian enterprises for Russia's defense industry amid the ongoing conflict<sup>16</sup>, it's reasonable to assume that this decree primarily serves to **legitimize the maximum exploitation of human resources for the political and potentially unlawful aims of the state.**

---

<sup>16</sup> See, for instance, <https://www.sb.by/articles/dvoynoy-shchit-soyuza.html>; <https://www.reuters.com/business/energy/russia-increases-gasoline-imports-belarus-domestic-supplies-shrink-2024-03-27/>

## II. LAW ENFORCEMENT PRACTICE: VIOLATIONS OF CIVIL, POLITICAL, SOCIAL, ECONOMIC, AND CULTURAL RIGHTS

### KEY POINTS:

- politically motivated prosecutions under previously unused articles of the criminal and administrative codes.;
- emergence of new practices in the application of «anti-extremist» legislation;
- expansion and intensification of the use of in absentia («special») proceedings;

## SURGE IN REPRESSIVE PRACTICES TOWARDS RELATIVES OF POLITICAL PRISONERS AND PRESSURE ON RELATIVES OF PERSONS THAT HAVE LEFT THE COUNTRY

**Firstly**, pressure on relatives of political prisoners, including their detention, *isn't a novel occurrence*, however, at the year's onset, its new twist emerged as authorities began seeking novel avenues to prosecute those aiding individuals confined for political reasons. Between January 23-24, the KGB carried out a mass **raid** on relatives of political prisoners, resulting in the persecution of **at least 287 individuals** by the end of February, with a majority being women. This operation appears linked to the provision of food assistance to these relatives by the «INeedHelpBY» initiative via the «E-Delivery» service, owned by «Euroopt» (relatives' data was obtained from the same source). On January 23 (the first day of the raid), this initiative was recognised as an "extremist organization.

**Secondly**, in January, *reports emerged* of raids on relatives of individuals who had left the country. They were urged to convince their relatives to return to Belarus through a «Return Commission». While such instances were documented *previously*, it's clear authorities are intensifying efforts in this regard, as highlighted by A. Lukashenko's remarks at the All-Belarusian People's Assembly in April, where he **emphasized** the issue, urging those who left after 2020 «**not to forget about their**

**relatives who remained in Belarus»** and «not to expose them to harm». Essentially, these are **direct threats**, which suggests a deepening of the trend towards collective responsibility that we observed last year.<sup>17</sup>

## PERSECUTION FOR FINANCIAL DONATIONS TO FUNDS SUPPORTING VICTIMS OF REPRESSION

These persecutions began in early 2023<sup>18</sup> and persisted over time, gradually diversifying in practice<sup>19</sup>.

In early 2024, new dimensions of this trend emerged. By the end of February, it was revealed that individuals who made donations to BYPOL<sup>20</sup> or other funds «often and in large numbers» now face the threat of criminal charges for treason against the state, carrying sentences of 7 to 15 years of imprisonment. Consequently, **engaging in systematic charitable activities can now be equated with treason against the state.**

Evidently, the state has transformed the narrative of donations into a lucrative endeavor. **According** to the Investigative Committee, in 2023, the total amount of «charitable donations» transferred to various organizations by detained Belarusians exceeded 37 million rubles (more than 10 million euros). The state has turned it into a distinct systematic pursuit, receiving special attention. This is indirectly **indicated** by the appearance of a billboard on the Minsk Ring Road at the year's outset regarding donations: «If one likes to donate, one has to like facing the consequences» (a rough translation) alluding to Article 361-2 «Financing of extremist activities».

## POLITICALLY MOTIVATED CHARGES UNDER ARTICLES PREVIOUSLY UNUSED

**Firstly**, in early March, it **became known** that a criminal case had been initiated for the first time **for denying the «genocide of the Belarusian people»** (Part 1 of Article 130-2 of the Criminal Code of the Republic of Belarus). According to the Belarusian Investigative Committee, a person (administrator of a public page) was detained for «posting on historical topics and expressing his views on events that occurred

<sup>17</sup> <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 7

<sup>18</sup> <https://trends.belhelcom.org/storage/reviews/August2023/pzspkGp9ZZ3AHW9XN53D.pdf>, p. 25-26

<sup>19</sup> *If a person has made a single payment to the fund and has not «appeared» anywhere else, they are only required to donate a significantly larger amount to recipients indicated by KGB employees. If a person has made several donations (or, for example, one donation but has also appeared at protests), a criminal case is initiated against them.*

<sup>20</sup> *Association of former law enforcement officers of Belarus who left the regime after 2020.*

during the Great Patriotic War» and claiming that the residents of the village of Khatyn were not burned by the German fascist invaders. These are natural **results of a large-scale state campaign to reframe genocide<sup>21</sup>, which has been ongoing since 2021** and violates at the very least freedom of expression.

**Secondly**, as a result of mass detentions of relatives of political prisoners mentioned above, several persons have been **held administratively liable** under article 24.15 of the Administrative Code for **«violating the legislation on foreign gratuitous assistance»** for «using foreign gratuitous assistance to carry out terrorist and other extremist activities or other actions prohibited by law». This article was not previously applied. In this case, foreign assistance **refers to** «material goods purchased in the Euroopt online store from the foreign association INeedHelpBY for extremist activities – [which is] 'publicly and knowingly legitimizing the actions of persons who have committed a crime, including by giving them the pseudo-status of 'political prisoners'».

**Thirdly**, following the major terrorist attack in the Crocus shopping center in Russia on March 22, 2024, a series of arrests for **«justifying terrorism»** took place in Belarus (as it was formulated in a Telegram channel affiliated with Belarusian law enforcement agencies<sup>22</sup>). At the moment, there is no precise information on the specific charges brought against these individuals. However, it is presumed that Article 289-1 of the Criminal Code («Propaganda of terrorism») may be applied.

## NEW PRACTICES IN PROSECUTION UNDER «EXTREMIST» ARTICLES

In the first quarter of 2024, new practices in persecuting individuals under extremism articles emerged. Specifically, there are new interpretations and expansions of situations recognized as «assistance to extremist activities», new content labeled «extremist materials», and new trends regarding who is targeted for «spreading extremist materials».

**Firstly**, according to **information** from a Telegram channel affiliated with law enforcement agencies, **a website with LGBTQ+ themes was recognized as «extremist material» for the first time by a court**. It is also mentioned that this is «the first step in recognizing this entire topic as prohibited and extremist in Belarus».

<sup>21</sup> <https://trends.belhelcom.org/storage/reviews/August2023/pzspkGp9ZZ3AHW9XN53D.pdf>, p. 12-13; <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 18-19

<sup>22</sup> <https://t.me/guBAZA/4649?single>, <https://news.zerkalo.io/life/64468.html?tg=9>



**Secondly, participation in monitoring court sessions** has been classified as «assistance to extremist activities» (Article 361-4 of the Criminal Code). «Systematic attendance of court sessions, recording the course and results of the sessions, and providing information about them to the human rights center 'Viasna'» have been declared culpable actions. Until now, simply attending court sessions and recording their proceedings did not lead to criminal liability.

**Thirdly,** authorities have evidently taken comprehensive measures to crackdown on **providing assistance to political prisoners in the form of financial transfers and parcels.** The first cases<sup>23</sup> of qualifying such actions as aiding extremist activities have been documented. In March, it was reported that the investigation of a criminal case under Part 1 of Article 361-4 (aiding extremist activities) had been completed, and materials were sent to court regarding a woman who systematically sent money transfers to political prisoners (no fewer than 125 postal money transfers to no fewer than 114 individuals totaling more than 1,500 rubles). Also in April 2024, it **became known** that investigators were interrogating people convicted under «political articles» (both those in custody and those under house arrest), seeking information on who specifically sent them money transfers and parcels while they were in pre-trial detention, and whether the solidarity funds offered them support.

**Fourthly,** it's worth noting that within the qualification under Article 24.15 of the Administrative Code «**Violation of legislation on foreign gratuitous assistance**», the «public and knowingly unlawful legitimization of the actions of persons who have committed a crime, including by giving them the pseudo-status of 'political prisoners'», has been classified as extremist activity (the latter has to be the purpose of unlawful behavior under this article) for the first time. Thus, this does not yet constitute direct persecution under «extremism» articles, however, there are grounds to assume the beginning of a trend to recognize the operation of the «political prisoner» status as «extremist activity».

**Fifthly,** for the first time (according to information publicly known), an active employee of the Ministry of Internal Affairs **was held** administratively accountable for subscribing to «extremist materials» (a Facebook page). This may partly indicate an increasing monitoring of loyalty within the system.

---

<sup>23</sup> *In 2021, volunteers that still stayed in Belarus were already detained for preparing parcels for political prisoners under the accusation of assisting extremist activities; however, later their actions were reclassified, and they were convicted under different articles: <https://www.dw.com/ru/siloviki-vzalis-za-belorusov-kotorye-otpravljali-posylki-politzaklucennym/a-68857467>*

## NEW PRACTICES IN PERSECUTION FOR HUMAN RIGHTS ACTIVITIES

Some of the trends mentioned above, regarding holding individuals accountable under new articles and new practices in applying «anti-extremist» legislation, collectively indicate another significant shift in the state's repressive policy. In 2024, the authorities clearly began to demonstrate an intention **to eradicate the remnants of opportunities to assist people facing liability for political reasons** using human rights tools.

**Firstly**, this is evidenced by the qualification of **participation in monitoring court sessions** in politically motivated cases as aiding «extremist activities». **Secondly**, the previously mentioned new and quite remarkable narrative concerning **the status of political prisoners**. «The public and knowingly unlawful legitimization of the actions of persons who have committed a crime, including by giving them the pseudo-status of 'political prisoners'», is classified as extremist activity within the composition of Article 24.15 of the Administrative Code «Violation of legislation on foreign gratuitous assistance». While authorities have repeatedly<sup>24</sup> denied the status of political prisoners, this formulation and context are being used for the first time. **In the context of pressure on the relatives of political prisoners for receiving assistance from funds, as well as the prosecution of individuals for providing assistance to political prisoners, such a qualification may indicate the authorities' intention to use harsher tools (beyond discriminatory treatment in places of confinement) to influence both the activities of human rights defenders in recognizing political prisoners and the refusal of relatives to accept such status.** The situation may be moving towards formalizing the illegality of using the «political prisoner» status.

## NEW PRACTICES OF PRESSURE AT WORKPLACE

Strong politically motivated pressure on workers in all spheres, including through changes in labor legislation, has been present in various forms since the beginning of the crisis related to the 2020 presidential elections<sup>25</sup>. However, in the first quarter of 2024, there were some qualitative changes (albeit at the local level).

In January, **it came to light** that a new directive within the Belarusian State University (BSU) was adopted, stating that as of January 1, 2024, BSU employees returning from

---

<sup>24</sup> Among others, in the indictment of Darya Losik (the wife of political prisoner Ihar Losik), the phrase «positioned herself as the wife of a political prisoner» was used. However, in her case, the interview with the recognized «extremist» media (Belsat channel) was considered to indicate «extremism».

<sup>25</sup> See some examples here: [https://belhelcom.org/sites/default/files/business\\_and\\_human\\_rights\\_in\\_belarus\\_the\\_context\\_of\\_political\\_and\\_human\\_rights\\_crisis\\_-\\_kopiya.pdf](https://belhelcom.org/sites/default/files/business_and_human_rights_in_belarus_the_context_of_political_and_human_rights_crisis_-_kopiya.pdf)

abroad (all countries except Russia) are required to fill out a special questionnaire within 5 working days. Remarkably, this applies not only to official business trips but also to trips during annual leave and social leave. The questionnaire is accompanied by a directive from the first vice-rector and appears not to be regulated by any local regulatory acts. The questionnaire includes 37 questions, including **about relatives residing abroad, contacts with representatives of foreign state authorities, and non-official contacts with individuals permanently residing abroad** other than relatives.

So far, this is the only publicly known case of such a practice and appears to be an initiative of local KGB employees (overseeing BSU and working in the university). However, considering that this is the largest university in the country (including in terms of the number of employees), it is obvious that this illegal practice will affect a large number of people, creating additional violations of both labor rights and the right to privacy. Thus, a significant number of people fall under the total control of the employer (not only as to their professional activities but also as to their private lives). This change also reflects the trend of «unfolding» the Soviet-era «iron curtain», the beginning of which we documented in 2023, representing one of the indications of the «anti-Western» policy of the current Belarusian regime.<sup>26</sup>

## EXPANSION AND INTENSIFICATION OF THE USE OF IN ABSENTIA («SPECIAL») PROCEEDINGS

**Firstly**, in early 2024, there is a trend of expanding the use of special proceedings **regarding non-public, non-media individuals** (previously, this was mainly targeted at well-known opponents of the government, such as leaders of democratic forces, politicians, and prominent activists).

On February 22, the Investigative Committee **initiated** the first politically motivated special proceedings against 9 Belarusians, about whom almost nothing is publicly known. They are all charged under one article, «gross violation of public order» (Part 1 of Article 342 of the Criminal Code). Several more special proceedings **were initiated** on March 12 and 13.

**Secondly**, it is noteworthy that the initiation of special proceedings is becoming a standardized process. While approximately 30 persons **faced** the initiation of such proceedings from September 2022 to the end of 2023 (that is, 1 year and 3 months), the number surged to 59 persons in the first trimester of 2024 (just 4 months).

---

<sup>26</sup> <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 9

### III. KEY CHANGES IN THE REACTIONS OF INTERNATIONAL INSTITUTIONS CONCERNING THE HUMAN RIGHTS SITUATION IN BELARUS

#### KEY POINTS:

- evolution of the position regarding the commission of crimes against humanity in Belarus in connection with the 2020 elections and in the aftermath (specificity and detailed legal qualification were added);
- change in the status and mandate of the UN special mechanism on the human rights situation in Belarus (it has become more independent).

### SIGNIFICANT CHANGES IN THE ASSESSMENT OF THE HUMAN RIGHTS SITUATION AT THE UN LEVEL

On February 15, 2024, the [fourth report](#) of the UN High Commissioner for Human Rights on the situation in Belarus in connection with the 2020 elections was published. Compared to three previous reports (one before the establishment of the special expert mission and two others within its mandate), the latest report reveals **three main substantial changes in the assessment of the situation in Belarus.**

**Firstly, violations of the right to work and the right to education** have been singled out into a separate paragraph (including mention of special lists that the KGB distributes to workplaces to identify and persecute disloyal individuals). The fact that at the level of the UN High Commissioner for Human Rights, separate emphasis is placed on the violations by the regime of A. Lukashenko of social and economic rights as part of political repression (not only civil and political rights, as traditionally) indicates the comprehensive nature of the repressions, penetrating into all spheres of life. Recording this at the international level is crucial as it provides the international community with a more adequate understanding of the atmosphere and conditions in which people in Belarus live.

**Secondly**, there has been a substantive evolution in the position on recognizing crimes against humanity committed in Belarus in connection with the 2020 elections and thereafter. In the [report](#) dated February 3, 2023, where such crimes were mentioned for the first time, the wording «some of the violations may also amount to crimes against humanity» (para. 54) was used. The [latest report](#) uses the wording «OHCHR has reasonable grounds to believe that the crime of persecution, which is a crime against humanity, may have been committed...» (para. 52) Thus, it contains not just a general vague assumption, but a specific assertion with reference to the standard of proof («reasonable grounds to believe»). In addition, whereas in the previous report it was mentioned that «the organized nature of the violations renders it improbable that they were random and accidental. On the contrary, they appear to have been part of a campaign of violence and repression, intentionally directed at those who were – or were perceived to be – opposing the Government..», in the latest report, without assumptions and with much greater substantial specificity, it is asserted that **the systematic commission of such violations through the legal and institutional apparatus of the State took place, encouraged at highest levels**. Thus, at the UN level, two important elements of crimes against humanity in relation to actions committed on the territory of Belarus are unequivocally recorded: systematicity and the commission of such actions as part of a state policy.

**Thirdly**, the report **expands the focus on forced deportation from the country of hundreds of thousands of people**. In the [previous report](#), it was stated that there were at least 7 cases of forced expulsion (forced deportation), and as an addition, it was mentioned that 100,000 people were forced to leave the country for security reasons (para. 49-50). In the latest report, first and foremost, the issue of forced deportation is linked to the right to nationality (the relevant section is titled «Forced exile and right to nationality») and special emphasis is placed on the consequences of Decree No. 278 «On the procedure for issuing documents and performing actions» («Passport decree») for persons who have been forced to leave Belarus<sup>27</sup>. In addition, it is mentioned that the UNHRC estimates the number of such individuals at 300,000. Prior to this, the mass character of this problem in such numbers was only acknowledged at the European level.<sup>28</sup>

## EVOLUTION OF THE UN SPECIAL MECHANISM ON THE HUMAN RIGHTS SITUATION IN BELARUS

In March 2021, the UN Human Rights Council [established](#) a special OHCHR mandate to examine the human rights situation in Belarus, a commission of three experts. In April 2022, the mandate was extended for another year.

<sup>27</sup> <https://trends.belhelcom.org/storage/reviews/February2024/jc4HGY7nx1A4rgU3PYzy.pdf>, p. 14-15

<sup>28</sup> [https://pace.coe.int/en/files/31822/html#\\_TOC\\_d19e303](https://pace.coe.int/en/files/31822/html#_TOC_d19e303); [https://www.europarl.europa.eu/doceo/document/TA-9-2023-0321\\_EN.html](https://www.europarl.europa.eu/doceo/document/TA-9-2023-0321_EN.html)

On March 26, 2024, the Human Rights Council adopted [another resolution](#) on the human rights situation in Belarus, enshrining its decision to urgently **establish a group of three independent experts on the human rights situation in Belarus**, to be appointed by the President of the Human Rights Council (para. 9). Thus, unlike the previous mandate, which was created as an OHCHR mandate (meaning three experts worked under the auspices of the High Commissioner for Human Rights and did not submit separate reports), the new mandate envisages their action as a more independent structure.

In addition, the scope of the mandate has also been expanded. Under the OHCHR mandate, monitoring, establishing facts and circumstances related to alleged violations from May 1, 2020, and collecting and storing information and evidence for accountability were carried out. According to the resolution of March 24, 2024, the mandate of the new structure also includes «investigation», as well as establishing not only the facts and circumstances but also root causes for all alleged violations committed since May 1, 2020.



**WE WILL BE GRATEFUL**

**FOR YOUR FEEDBACK**

EMAIL US [OFFICE@BELHELCOM.ORG](mailto:OFFICE@BELHELCOM.ORG)