International Accountability Platform for Belarus

Ninth progress report

1 April - 30 September 2025

PUBLIC VERSION

9th PROGRESS REPORT

1 April - 30 September 2025

A. EXECUTIVE SUMMARY

Human Rights Situation in Belarus

During the reporting period from 1 April to 30 September 2025, the human rights situation in Belarus remained critically repressive, characterised by systematic political persecution, arbitrary detention, and expanding transnational repression. Despite isolated prisoner releases tied to diplomatic negotiations, the overall trend continues towards entrenchment of authoritarian control and institutionalised impunity.

Scale of Repression

- Since 2020, over 7,500 politically motivated criminal convictions have been recorded, including against minors and individuals accused of "extremism" or "treason" for activities including the support of aid funds or conduct of academic research.
- As of September 2025, 1,194 people remain imprisoned as political prisoners, with 4,120 designated since May 2020.
- Authorities continue to re-prosecute former protesters to avoid statute of limitations expiry, and extend existing prison sentences under Article 411, with 46 prisoners' terms prolonged—some multiple times.

Politically motivated detention

Between May 2020 and 20 September 2025, Human Rights Centre Viasna recorded more than 7,533 convictions in politically motivated criminal cases, including 33 sentences to compulsory psychiatric treatment. As of 24 September 2025, 1,194 political prisoners remained in prison, including prominent Belarusian human rights defenders Ales Bialiatski, Valiantsin Stefanovic, Uladzimir Labkovich, Maria Rabkova, and Nasta Loika.

Conditions of Detention

Political detainees face systematic ill-treatment, including beatings, medical neglect, and solitary confinement in deliberately cold conditions. During the reporting period, two prisoners died in penal colonies and three shortly after release, reflecting life-threatening neglect. Prominent inmate Valiantsin Shtermer died reportedly following denial of medical care.

Misuse of Terrorism and Extremism Laws

The State continues weaponising counter-extremism and counter-terrorism legislation to criminalise dissent:

- 585 individuals were newly placed on the national "extremist list," leading to financial exclusion and employment bans.
- 43 organisations were declared extremist, including NGOs and even cultural brands.
- 34 people were designated as "terrorists," blocking them from receiving funds in detention.

Transnational Repression

During the reporting period, Belarus escalated efforts to target Belarusians abroad, including:

- Trials in absentia against at least 21 exiled individuals, many resulting in long sentences.
- Raids, seizures and interrogations against families of exiles.
- Misuse of Interpol tools and passport databases to harass dissidents abroad.

International Response

The UN Group of Independent Experts on Belarus (GIEB) concluded that there are reasonable grounds to believe President Lukashenko and other senior officials are responsible for crimes against humanity, including persecution and imprisonment in violation of international law as part of an organised repressive apparatus. It emphasised that Belarus is unwilling and unable to hold perpetrators accountable, solidifying the case for international legal intervention.

- The UN Human Rights Council renewed the mandates of both the Special Rapporteur and the UN Group of Independent Experts on Belarus (GIEB).
- Lithuania filed a case at the International Court of Justice against Belarus over cross-border migrant smuggling.
- The European Parliament condemned extraterritorial persecution, urging EU Member States to ignore politically motivated extradition requests.

Overall Conclusion
Impunity for human rights violations remains absolute at the national level, reinforcing the urgency of international accountability mechanisms, including universal jurisdiction investigations, inter-state litigation, and evidence preservation for future prosecutions.

B. BRIEF PLATFORM OVERVIEW

The IAPB is a consortium of independent non-government organisations that have joined forces to collect, verify, preserve, and analyse evidence of gross human rights violations constituting crimes under international law allegedly committed by Belarusian authorities and others in the run-up to the 2020 presidential election and during the following years. The objective of the IAPB is to achieve accountability of perpetrators for serious violations of human rights and international criminal law in Belarus and redress for the victims. To this end, the IAPB directly assists criminal justice authorities and international accountability bodies in their investigation and prosecution of alleged perpetrators of these crimes.

The IAPB was created in March 2021 in response to the Organisation for Security and Co-operation in Europe's (OSCE) Moscow Mechanism report on alleged human rights violations related to the presidential elections in Belarus, published on 5 November 2020. The report made a series of recommendations calling for accountability for the serious violations of international law in Belarus, and for the documentation and preservation of evidence to this end.

The consortium is composed of two Belarusian and one international co-lead organisations, Human Rights Centre Viasna, International Committee for the Investigation of Torture in Belarus, and REDRESS, and its lead organisation DIGNITY – Danish Institute against Torture.

Since its establishment, the IAPB is or has been supported by a wide range of States, notably (*countries in alphabetical order*) Austria, Belgium, Canada, Czech Republic, Denmark, Estonia, Finland, Germany, Iceland, Ireland, Latvia, Lichtenstein, Lithuania, the Netherlands, Norway, Poland, Romania, Slovakia, Sweden, Switzerland, the United Kingdom and the United States of America, as well as the European Union.

C. PROJECT OBJECTIVES & KEY DELIVERABLES

Strategic Outcome 1: Consolidate the IAPB's evidence hub by continuing to expand evidentiary sources, centralise the preservation of information and evidence, and analyse crimes under international law committed in Belarus in the context of the August 2020 election and its aftermath.

- As of 30 September 2025, more than 3,245 **interviews** have been conducted with victims and witnesses, for which transcripts have been produced, translated, tagged according to pre-determined criteria, and securely stored and organised in the IAPB database.

- To date the IAPB is in possession of 1,103 interviews residing in over 40 countries with a valid GDPR-compliant **consent form**.
- As of September 2025, IAPB produced 404 **witness summaries**.
- By 30 September, the IAPB has catalogued more than 36,198 **closed-source documents/ files**, comprising medical documents, court and other official documents, and photos and videos linked to testimonies, which have also been tagged and organised in the database alongside the testimonies.
- By September 2025, the IAPB had collected over 2 million **open-source materials** from over 1,050 sources, verifying information, proactively researching relevant issues, and securing evidence from official Belarusian websites to avoid situations wherein content was subsequently removed. The collection includes over 383,000 videos, 959,000 images, and 678,000 text items.

Strategic Outcome 2: Expand the range of evidentiary and analytical products, accountability processes and other actors the IAPB's work outputs will effectively serve (including the OHCHR examination, other human rights mechanisms and bodies and criminal justice authorities).

- The IAPB has **provided evidence and analyses** to prosecutorial services from six States in response to 11 requests, receiving complimentary feedback from such services.
- Comprehensive information and evidence were made available to the **Office of the Prosecutor** of the International Criminal Court based on Article 15 of the Rome Statute.
- Further submissions were produced in response to a further five requests for information from **UN mechanisms** (OHCHR Examination of the Human rights situation in Belarus and the UN Group of Independent Experts on the Human Rights Situation in Belarus), and one as a result of a request from the OSCE Moscow Mechanism Rapporteur.
- Moreover, the IAPB is working with two **independent lawyers**, and responded to several requests from civil society organisations.
- In total, the IAPB has sent **23 submissions** to national and international authorities.
- To further enhance its response to requests from prosecution services and other bodies, the IAPB has produced multiple **analytical products** supporting case-building under international criminal law, with a focus on crimes against humanity.
- The IAPB continues to carry out an **analysis of linkage evidence** with a view to building criminal cases against potential suspects.
- Desk-based research and interviews with Belarusian gender experts were conducted to examine how gender norms influenced the commission of **sexual and gender-based crimes** before, during and after the August 2020 presidential elections.
- The IAPB finalised a report titled "***Paths to Accountability for Belarus – Mechanisms to Address Human Rights and International Criminal Law Violations***" (launch on 3 October 2025), providing a comprehensive overview of mechanisms available to States who wish to advance accountability for Belarus.
- In partnership with the Polish Helsinki Foundation and the University of Warsaw's Academy of Science, the IAPB has established a **working group on universal jurisdiction** (UJ) to strengthen Polish CSOs' capacity to engage in UJ cases, including evidence collection, victim and witness support, and perpetrator tracking. The group also promotes coordination among CSOs amid discussions on potential UJ legal reforms in Poland.

Strategic Outcome 3: Mainstream a survivor-centred, trauma informed approach to all aspects of the IAPB's work.

- The IAPB continues to provide survivors with evidence-based **mental health and psychosocial support (MHPSS)** in a survivor-centred and trauma-informed manner. Since the

establishment of the Platform, over 717 survivors have benefitted from the MHPSS services of the IAPB, including further referral pathways for MHPSS and a comprehensive clinical monitoring and evaluation system.

- Since its establishment, the IAPB expanded the geographical area and increased the **pool of specialists and medical centres** in more than four countries to improve access to these services.
- The IAPB published the **Practice Guide** '*A Survivor-Centred Approach to Documentation for the Purpose of Criminal Accountability*' in English, Belarusian and Russian language, outlining key principles of a survivor-centred approach to documentation of torture and other serious international crimes by CSOs for the purpose of criminal accountability.

Strategic Outcome 4: Ensure creation of standing infrastructure and the sustainability of the IAPB's operations.

- The IAPB has established a closed-source **database** for interview-based information along with a secure database for open-source investigation files.
- **Risk mitigation strategies** include strong data security guidelines, use of secure databases for evidence, encrypted software and limiting public communication about its activities.
- **Standard Operating Procedures** were developed, including for personal and data security and the delivery of capacity-building activities. A modus operandi was developed for informed consent and GDPR-compliant procedures. Interviews are conducted according to interview guidelines. Template and workflow for the preparation of witness summaries were reviewed based on lessons learned, facilitating current and future IAPB submissions to investigative and judicial authorities.
- The IAPB **governance structure** ensures full involvement of the four partner organisations and Belarusian ownership through the Steering Committee, as well as substantive advice from and coordination with relevant other civil society organisations through the Advisory Council.
- **Comprehensive training** was provided to enable all partners to implement their role professionally, safely, and in a survivor-centred manner. Belarusian partners were trained on general investigation and interview skills and the Istanbul Protocol, coupled with survivor-centred and trauma-informed approaches in interviews. Further trainings included elements of crimes against humanity, including deportation and sexual and gender-based crimes, identification of evidence linking perpetrators to documented crimes, standards relating to the use of force and less-lethal weapons, and capacity-building in the format of a mock trial.
- The IAPB contributed to initiatives integrating the **Platform's lessons learned** into studies, surveys, and workshops, and shared insights with other documentation efforts.
- **Visibility of the platform** has increased through participation at and organisation of events and a proactive communication strategy which included establishment of a presence on LinkedIn. The IAPB's account currently has 756 followers, a 35% increase from the 560 on X. Between 1 April 1 and 30 September 2025, the account gained 24,616 impressions, 545 post reactions, and achieved an engagement rate of 21.2% - well above the 3% benchmark for non-profits on LinkedIn.
- In April 2025, the IAPB initiated an **external evaluation** reviewing its operations since its establishment. Moreover, it engaged a former judge of the ICC and a prosecutor with international experience to review a sample of the IAPB's submissions for quality, clarity and relevance, with a view to further improving its support to accountability mechanisms.

D. DETAILED PROGRESS REPORT

1. Human Rights Situation in Belarus

1.1. Politically motivated prosecutions

From May 2020 to 20 September 2025, Human Rights Centre Viasna recorded more than 7,533 convictions in politically motivated criminal cases, including 33 sentences to compulsory psychiatric treatment.[1] Between April and August 2025 alone, at least 333 instances of politically motivated persecution – including arrests, home searches, criminal and administrative cases – were documented.[2] Viasna underlines that the apparent decrease compared to the previous reporting period[3] is linked to the discontinuation of public access to an electronic schedule of court hearings since March 2025.[4]

The authorities also continued to target protesters from 2020. As the statute of limitations under Article 342 ("Actions grossly violating public order") of the Criminal Code approached in August 2025, several hundred people were newly charged under this provision in July 2025.[5] Human Rights Centre Viasna reported that some persons detained under Article 342 were additionally charged under Article 293 ("Mass riots") of the Criminal Code to avoid the expiry of the statute of limitation under Article 342.[6] Between January and June 2025, 17 minors were convicted under Articles 342 ("Actions grossly violating public order"), 368 ("Insulting the President"), 361-4 ("Facilitating extremist activities"), 370 ("Desecration of state symbols") of the Criminal Code.[7]

Moreover, reports indicate that individuals supporting aid foundations for political prisoners were prosecuted under "extremism" provisions.[8] For example, three researchers conducting sociological research related to COVID-19 and European integration respectively were charged under Part 1 of Article 356 of the Criminal Code ("High treason") and Part 2 of Article 243-3 ("Failure to pay social security contributions resulting in large-scale damage").[9]

Following a data leak from the *Belaruski Hajun* Telegram channel, which monitors military movements, since February 2025, at least 61 persons, who had sent the information to the Telegram channel and whose identifying information was leaked, were charged under Article 361-4 of the

---

[1] "List of political prisoners and persons convicted in political criminal cases", *Viasna*, undated; "Human rights situation in Belarus. August 2025", Viasna, 08-Sep-2025. For the number of cases of compulsory psychiatric treatment, *see* "List of political prisoners and persons convicted in political criminal cases", *Viasna*, undated.

[2] At least 50 cases in April 2025, 80 cases in May 2025, 67 cases in June 2025, 64 cases in July 2025, 72 cases in August 2025. *See* "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights situation in Belarus. May 2025", *Viasna*, 09-Jun-2025; "Human rights situation in Belarus. June 2025", *Viasna*, 07-Jul-2025; "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025; "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.

[3] 209 cases of repressions in March 2025, 656 cases – in February 2025, 506 cases – in January 2025, 759 cases – in December 2024, 671 cases – in November 2024, 366 cases – in October 2024. *See* "Human rights situation in Belarus. October 2024", *Viasna*, 11-Nov-2024; "Human rights situation in Belarus. November 2024", *Viasna*, 09-Dec-2024; "Human rights situation in Belarus. December 2024", *Viasna*, 09-Jan-2025; "Human rights situation in Belarus. January 2025", *Viasna*, 07-Feb-2025; "Human rights situation in Belarus. February 2025", *Viasna*, 05-Mar-2025; "Human rights situation in Belarus. March 2025", *Viasna*, 08-Apr-2025.

[4] "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights in Belarus: the main trends of public policy: January – April'25", *Belarusian Helsinki Committee*, 03-Jun-2025, p. 18.

[5] Telegram channel @viasna96, posted 17-Jul-2025, https://t.me/viasna96/31415; "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.

[6] "Trial of a banket and an update of an 'extremists list': chronicle of persecution 19-22 September", *Viasna*, 22-Sep-2025.

[7] "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025.

[8] "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights situation in Belarus. June 2025", *Viasna*, 07-Jul-2025.

[9] "Three Minsk residents, who conducted sociological research, were accused of high treason", *Zerkalo*, 04-Apr-2025.

Criminal Code ("Facilitating extremist activities").[10] As of August 2025, at least seven of them were convicted.[11]

1.2. Political prisoners and pardons

Since May 2020, Human Rights Centre Viasna has designated 4,120 persons as political prisoners,[12] with at least 251 political prisoners recognised between April and 23 September 2025 alone.[13]

As of 24 September 2025, 1,194 political prisoners remained in detention,[14] including prominent Belarusian human rights defenders Ales Bialiatski, Valiantsin Stefanovic, Uladzimir Labkovich, Maria Rabkova, and Nasta Loika.[15]

The reporting period saw a number of releases of political and non-political prisoners, subsequently forcing people to leave the country.

Between May and September 2025, Lukashenko "pardoned" 150 prisoners who had been convicted of political (among others, extremism and terrorism-related crimes) and non-political crimes.[16] As part of diplomatic agreements with the United States, 14 prisoners released on 21 June 2025 and 51 prisoners (including 40 political prisoners) released on 11 September 2025 were deported from Belarus to Lithuania.[17] The authorities took political prisoners' passports prior to release and brought them to the border with Lithuania without giving a choice to stay in Belarus.[18] Some political prisoners had almost served their sentences before being deported.[19]

[10] "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025. *See also* "'I even forgot about these photographs.' Human rights defenders suspect that the number of accused in the 'Hajun case' may amount to a thousand of people", *Radio Svaboda*, 03-Sep-2025.
[11] "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025; "Oleg Loiko, pastor from Homel, was sentenced to imprisonment on the 'Hajun case'", *Viasna*, 21-Aug-2025.
[12] "Political prisoners in Belarus", *Viasna*, undated.
[13] 41 persons in April 2025, 28 – in May 2025, 29 – in June 2025, 48 – in July 2025, 37 – in August 2025. *See* "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights situation in Belarus. May 2025", *Viasna*, 09-Jun-2025; "Human rights situation in Belarus. June 2025", *Viasna*, 07-Jul-2025; "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025; "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025. At least 68 persons were recognised as political prisoners from 1 to 23 September 2025. *See* "Statement of recognition of 14 persons as political prisoners", *Viasna*, 05-Sep-2025; "Statement of recognition of eight persons as political prisoners", *Viasna*, 11-Sep-2025; "Statement of recognition of nine persons as political prisoners", *Viasna*, 12-Sep-2025; "Statement by human rights society of recognition of 17 persons as political prisoners", *Viasna*, 17-Sep-2025; "Statement of recognition of five persons as political prisoners", *Viasna*, 23-Sep-2025; "Statement of recognition of 15 persons as political prisoners", *Viasna*, 23-Sep-2025.
[14] "Political prisoners in Belarus", *Viasna*, undated.
[15] "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.

Sergei Tikhanovskii, political activist Dmitrii Dashkevich, journalists Igor Karnei, Igor Losik, Irina Slavnikova, Pavel Mozheiko, philosopher Vladimir Matskevich and at least 22 foreign citizens were among those released and deported.[20]

At the same time, opposition politician Nikolai Statkevich refused to cross the border and walked back to Belarus from the neutral zone. He was reportedly returned to the penal colony in Glubokoe,[16] however, the penal colony's administration denied Statkevich's return to the facility.[17]

In a joint statement the Special Rapporteurs on Belarus and on human rights and counter-terrorism, experts of the Working Groups on Enforced or Involuntary Disappearances and on Arbitrary Detention, and the Independent Expert on human rights of older persons denounced Statkevich's attempted deportation from Belarus and his subsequent disappearance.[18]

As of September 2025, 29 media representatives are reported to be imprisoned in Belarus, including under Articles 356 ("High treason") and 361-1 ("Creation or participation in an extremist formation") of the Criminal Code,[19] with at least 41 media denounced as extremist formations since 2020.[20]

At least two lawyers were convicted under politically motivated charges in the reporting period.[21] In a joint statement on 15 August 2025, the Special Rapporteurs on Belarus, on torture, on human rights and counter-terrorism and on the independence of judges and lawyers, as well as experts of the Working Groups on Arbitrary Detention and on the discrimination against women and girls raised concerns about mistreatment of political detainees and denial of proper medical care, leading to potentially irreversible health harm in detention.[22] Former political prisoners report, among others, being beaten, insulted, and detained in solitary confinement in deliberately cold temperatures and without proper medical care for months.[23]

During the reporting period, two individuals died while in penal colonies and three others passed away shortly after release.[24] Among them was Valiantsin Shtermer, a 61-year-old businessman, who

---

[16] "'Released' Statkevich was found in the colony of Glubokoe", *Nasha Niva*, 15-Sep-2025.
[17] "Belarus: UN experts denounce disappearance of Mikalai Statkevich after his attempted deportation", *OHCHR*, 23-Sep-2025.
[18] "Belarus: UN experts denounce disappearance of Mikalai Statkevich after his attempted deportation", *OHCHR*, 23-Sep-2025.
[19] "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025; "Daniil Palianski", *Viasna*, undated; "Aleh Supruniuk", *Viasna*, undated.
[20] *See* the table at "Repressions against journalists in Belarus 2025, list of colleagues in prison", *BAJ*, 27-Jul-2025.
[21] "Siarhei Khlystou", *Viasna*, undated; "Human rights defenders report that an advocate Siarhei Khlystou was sentenced to imprisonment in Homel", *Right to defence*, 16-Aug-2025; "Trial against a lawyer for participation in the protests and 15 days of arrest to a signer for a 'Internet picket': chronicle of repression 16-17 September", *Viasna*, 17-Sep-2025.
[22] "Belarus must end ill-treatment of prisoners convicted on terrorism and extremism charges, say UN experts", *OHCHR*, 15-Aug-2025. In particular, the experts called on Belarusian authorities to immediately release Viktoria Kulsha, imprisoned in penal colony No. 24, in order to save her life. *See* "Belarus: Experts demand immediate release of activist Viktoria Kulsha", *OHCHR*, 19-May-2025. On 25 August 2025, the UN Committee on the Elimination of Discrimination against Women called on Belarusian authorities to provide access to a medical examination and psychological support and ensure adequate conditions of Kulsha's detention. *See* "UN CEDAW urged Belarus to take urgent measures in relation to Viktoria Kulsha", *Respect-Protect-Fulfill*, 27-Aug-2025.
[23] "'When we refused to sign, they started to break our fingers.' The story of a former political prisoner Nikita Litvinenko", *Viasna*, 01-Sep-2025; "'I was treated awfully in the colony.' Politician Dmitrii Kuchuk spoke about 'low status'", *Viasna*, 12-Sep-2025; "Ilia Dubskii was forced to cut out his tattoo with Pahonia himself in the colony", *Viasna*, 15-Sep-2025; "'In winter, the temperature in SHIZO is so law that your feet froze to the floor', - Vitalii Bondaruk about his detention", *Viasna*, 17-Sep-2025.
[24] "How Belarusians die because of political persecution", *Viasna*, 09-Sep-2025; "Belarus: UN experts call for investigations into deaths in custody", *OHCHR*, 16-Jul-2025; "Human rights situation in Belarus. May 2025", *Viasna*, 09-Jun-2025.

reportedly died in penal colony No. 17 in Šklou in late May 2025 after having been mistreated and denied proper medical care[25] following a conviction for comments about Russia's invasion into Ukraine.[26]

In addition, authorities continue to arbitrarily extend the deprivation of liberty of political prisoners by invoking Article 411 of the Criminal Code.[27] As of August 2025, 46 political prisoners already serving sentences had their terms extended under Article 411,[28] with some subjected to multiple extensions.[29]

1.3. Misuse of terrorism and extremism legislation

The persecutory use of legislation on countering extremism and terrorism targeting those who express political opposition continued.[30] Between April and August 2025,[31] at least 585 persons, including former law enforcement officers, were added to the "*List of Citizens of the Republic of Belarus, Foreign Citizens or Stateless Persons Involved in Extremist Activities*" for participation in peaceful protests and other forms of perceived dissent.[32] Persons listed as "extremists" face financial restrictions concerning opening of bank accounts and money transfers and are banned from working in education, public administration, military service, and specific areas of medicine.[33]

At least 43 entities were denounced as extremist organisations by the State Security Committee and the Ministry of Internal Affairs between April and August 2025,[34] including the Belarusian Association of Human Rights Lawyers, the Belarusian Social Democratic Party (Hramada),[35] the jewellery brand Belaruskicry and the educational initiative for schoolchildren Vasminog.[36] By designating an entity as an extremist organisation, authorities criminalise involvement in its activities and any interaction with it.[37]

---

[25] "Belarus: UN experts call for investigations into deaths in custody", *OHCHR*, 16-Jul-2025.
[26] "Belarus: UN experts call for investigations into deaths in custody", *OHCHR*, 16-Jul-2025.
[27] "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.
[28] "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.
[29] For example, Uladzimir Kniha was convicted twice under Article 411, Viktoryia Kulsha was convicted four times under Article 411, and Siarhei Ramanau was convicted three times under Article 411. "Human rights situation in Belarus. May 2025", *Viasna*, 09-Jun-2025; "Human rights situation in Belarus. June 2025", *Viasna*, 07-Jul-2025; "Viktoryia Kulsha", *Viasna*, undated; "Uladzimir Kniha", *Viasna*, undated; "Siarhei Ramanau", *Viasna*, undated.
[30] *See* the independent human rights experts' call to investigate mistreatment of prisoners detained under terrorism- and extremism-related charges. "Belarus must end ill-treatment of prisoners convicted on terrorism and extremism charges, say UN experts", *OHCHR*, 15-Aug-2025.
[31] As of 19 September 2025, the list includes 5,784 individuals. *See* "Trial of a head of a bank and the 'list of extremists' update: chronicle of repression 19 September", *Viasna*, 19-Sep-2025.
[32] 117 individuals were listed in August 2025, 93 – in July 2025, 124 – in June 2025, 112 – in May 2025, 139 – in April 2025. *See* "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights situation in Belarus. May 2025", *Viasna*, 09-Jun-2025; "Human rights situation in Belarus. June 2025", *Viasna*, 07-Jul-2025; "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025; "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.
[33] "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025; "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.
[34] As of March 2025, the list is comprised of 264 entities, while at the end of August 2025, the list of contained 307 entities. *See* "Human rights situation in Belarus. March 2025", *Viasna*, 08-Apr-2025; "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025. Importantly, Viasna notes that in August 2025, certain entities denounced as extremist exhibited neo-Nazi characteristics.
[35] The political party was liquidated by the Supreme Court's decision of September 2023. "BSDP (Hramada) reported of its final liquidation", *Pozirk*, 22-Jan-2024.
[36] "International legal associations made a statement regarding denouncing of the Belarusian Association of Human Rights Lawyers an 'extremist organisation'", *Right to defence*, 12-Sep-2025; "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights situation in Belarus. May 2025", *Viasna*, 09-Jun-2025; "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025; "Human rights situation in Belarus. August 2025", *Viasna*, 08-Sep-2025.
[37] "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights situation in Belarus. June 2025", *Viasna*, 07-Jul-2025.

Between April and August 2025, the State Security Committee listed at least 34 persons in the "*List of Persons involved in Terrorist Activities*".[38] Inclusion into the "terrorists list" imposes strict control over financial transactions, in particular, it effectively deprives political prisoners of the possibility to receive money transfers in prison.[39]

1.4. Transnational repression / Belarusians in exile

Transnational repression against Belarusians in exile also continued during the reporting period. In a report published in June 2025, the European Parliament's Subcommittee on Human Rights listed Belarus as among the top perpetrators of physical incidents of transnational repression against journalists (six incidents) and political activists (27 incidents) between 2014 and 2024.[40] It further denounced Belarus for "working with Interpol's database of lost and stolen passports to harass dissidents and trap them while travelling abroad".[41]

Between April and September 2025, at least 21 people were tried *in absentia* under politically motivated charges, the majority resulting in lengthy prison sentences.[42] The Investigative Committee also initiated new criminal cases against individuals, who had already been convicted *in absentia*.[43]

New criminal cases were initiated against former political prisoners in exile.[44] Importantly, in August 2025, authorities reportedly conducted a wave of raids, property seizures and interrogations connected with 207 individuals who participated in peaceful protest abroad.[45] The Investigative Committee initiated two cases under Articles 361 Part 3 ("Calls for sanctions and other actions aimed at harming national security") and 361-4 Part 2 ("Facilitating extremist activities") and considers holding the trials *in absentia*.[46]

1.5. International organisations and Belarus

On 26 March 2025, the UN Human Rights Council extended the mandates of the Special Rapporteur

---

[38] 11 persons were listed in July 2025, 10 – in May 2025, 13 – in April 2025. *See* "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025; "Human rights situation in Belarus. May 2025", *Viasna*, 09-Jun-2025; "Human rights situation in Belarus. July 2025", *Viasna*, 06-Aug-2025. As of 9 September 2025, of the 1,335 people currently on the "terrorist list," 639 are Belarusian nationals who were added for political reasons. *See* "Nine persons were added to the 'list of terrorists'", *Viasna*, 09-Sep-2025.

[39] "Human rights situation in Belarus. April 2025", *Viasna*, 12-May-2025.

[40] S. Furstenberg, M. Michaelsen, S. Anstis, "Transnational repression of human rights defenders: The impacts on civic space and the responsibility of host states", *European Parliament's Subcommittee on Human Rights*, June 2025, p. 18.

[41] Ibid, p. 13.

[42] "List of political prisoners and persons convicted in political criminal cases", *Viasna*, undated. For example, the Hrodna Regional Court sentenced Anton Matolka, a founder of *Belaruski Hajun* project, which monitored military activity, to 20 years of imprisonment on 3 June 2025. See "Belarus blogger Anton Matolka to 20 years in prison in absentia", *Belarusian Association of Journalists*, 03-Jun-2025.

[43] For instance, the Investigative Committee opened a new criminal case against Ales Lahvinets, a professor at the Free Belarusian University. On 1 July 2024, he was sentenced *in absentia* to 10 years of imprisonment in the "Tsikhanoiskaya's analysts" case and was enlisted as a "terrorist" and "extremist". Lahvinets is charged under the same Articles as he was convicted in 2024: Part 3 of Article 130 ("Incitement of discord"), Part 1 of Article 357 ("Conspiracy or other actions aimed at seizing state power"), Part 6 of Article 16 and Part 3 of Article 361 ("Calls for sanctions and other actions aimed at harming national security"), and Parts 1 and 3 of Article 361-1 ("Creation or participation in an extremist formation"). *See* "New in absentia cases: chronicle of repression 25-29 April", *Viasna*, 29-Apr-2025.

[44] *See*, for example, two criminal cases were initiated against Palina Sharenda-Panasiuk and one case against a human rights defender Leanid Sudalenka. "New in absentia cases: chronicle of repression 25-29 April", *Viasna*, 29-Apr-2025.

[45] "Raids, property seizures, interrogations: How Belarus is persecuting participants of solidarity actions abroad", *Viasna*, 07-Aug-2025.

[46] "Raids, property seizures, interrogations: How Belarus is persecuting participants of solidarity actions abroad", *Viasna*, 07-Aug-2025; "Regime charges 207 more exiled Belarusians with participating in Freedom Day demonstrations abroad", *Viasna*, 06-Aug-2025.

on the situation of human rights in Belarus (Special Rapporteur on Belarus) and the Group of Independent Experts on the Situation of Human Rights in Belarus (GIEB) for another year.[47]

By its resolution of 3 April 2025, to which IAPB had contributed by sharing information, the European Parliament condemned the repressions targeting Belarusians abroad through criminal prosecution and asset seizures.[48] The European Parliament further considered the persecution of Belarusian citizens for peaceful democratic activities abroad through *in absentia* criminal proceedings to be a violation of the European Union's Member States' territorial sovereignty and urged "the countries concerned to disregard Interpol arrest warrants for the extradition of Lukashenka's political opponents".[49]

On 19 May 2025, Lithuania filed an application instituting proceedings against Belarus before the International Court of Justice regarding "the large-scale smuggling of irregular migrants" from Belarus into Lithuania in violation of the Protocol against the Smuggling of Migrants by Land, Sea and Air.[50]

In the period from April to September 2025, the Special Rapporteur on Belarus published two reports. Covering human rights developments in Belarus between 1 April 2024 and 31 March 2025, the Rapporteur underlined the persistent misuse of counter-terrorism and anti-extremism legislation for politically motivated persecution; extraterritorial persecution, including via *in absentia* trials and expropriation of property in Belarus; prisoners facing ill-treatment, indefinite deprivation of liberty through the convictions under article 411 ("Malicious disobedience to the requirements of administration of the correctional facility") of the Criminal Code and politically motivated assignment to institutions for compulsory psychiatric treatment; using repressive measures against family members of individuals deemed disloyal by the authorities and LGBTQ+ persons.[51]

In his July 2025 report, the Rapporteur concluded that Belarus engages in a systematic practice of "discrimination and harassment based on political motives in both the public and the private sectors; unjustified restrictions on access to various professions based on political motives; the use of hard, dangerous forced labour for meagre or no pay as a form of punishment for persons unjustly incarcerated; and the wholesale destruction of trade union rights."[52]

The GIEB report titled "Closing the accountability gap for human rights violations and related crimes in Belarus" dated 4 September 2025 recapitulates the GIEB's findings and maps options for accountability, including an international *ad hoc* tribunal for Belarus, the International Criminal Court, universal jurisdiction and inter-state litigation before the International Court of Justice. The group noted it has reasonable grounds to believe that "the President and other high-level State officials have participated in the crimes against humanity of political persecution and imprisonment and [...] should be subject to judicial investigations for determining their individual criminal responsibility."[53] It further found that "President Lukashenko played a central role in the perpetration

[47] UN HRC, Situation of human rights in Belarus, 26-Mar-2025, A/HRC/58/L.10, paras 7-8.
[48] European Parliament resolution of 3 April 2025 on the immediate risk of further repression by Lukashenka's regime in Belarus – threats from the Investigative Committee (2025/2629(RSP)), *European Parliament*, 03-Apr-2025, para. 2. *See generally* OHCHR's guidance paper on transnational repression "Transnational repression", *OHCHR*, 18-Jun-2025.
[49] European Parliament resolution of 3 April 2025 on the immediate risk of further repression by Lukashenka's regime in Belarus – threats from the Investigative Committee (2025/2629(RSP)), *European Parliament*, 03-Apr-2025, para. 4.
[50] "Lithuania refers Belarus to the International Court of Justice in The Hague over the international law violating migrant crisis caused by the Lukashenko regime", *Ministry of Foreign Affairs of the Republic of Lithuania*, 19-May-2025; "Lithuania institutes proceedings against Belarus", *International Court of Justice*, 19-May-2025.
[51] UN HRC, Report of the Special Rapporteur on the situation of human rights in Belarus, 22-Apr-2025, A/HRC/59/59, para. 3.
[52] UN GA, Report of the Special Rapporteur on the situation of human rights in Belarus, 22-Jul-2025, A/80/217, para. 98.
[53] UN HRC, Report of the Group of Independent Experts on the situation of human rights in Belarus "Closing the accountability gap for human rights violations and related crimes in Belarus", 04-Sep-2025, A/HRC/60/CRP.1., para. 30.

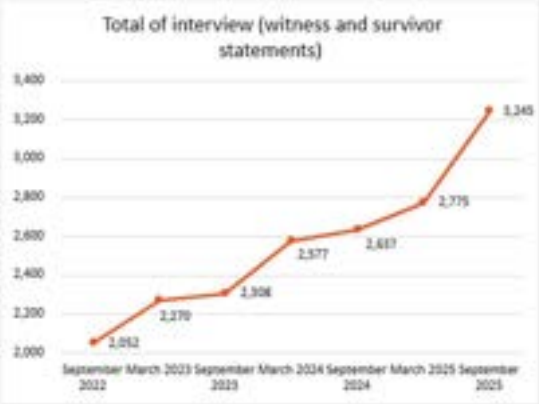
of the violations and crimes and, in general, in the organized repressive apparatus in Belarus" and "gave orders and instructions that resulted in human rights violations and related crimes against real or perceived opponents, especially leading to and after the 2020 presidential election."[54] Apart from President Lukashenko, the GIEB underlined the "instrumental" role of the former Minister of Internal Affairs of Belarus, Yuri Karayev[55] alongside Nikolai Karpenkov,[56] current Deputy Minister of Internal Affairs and Commander of Internal Troops, and former Head of GUBOPiK (September 2014 - October 2020), in violent repression of peaceful protests in 2020.[57]

The GIEB concluded that "[t]he orchestrated campaign of violence and mistreatment led by Belarusian authorities since 1 May 2020 is part of a discriminatory policy designed to systematically persecute and silence any person and shut down any civic or political organization that maintains a position that differs from that of the Government or that is perceived as such",[58] and that "not only is the State of Belarus unable and unwilling to prosecute international crimes under its jurisdiction, but it also promotes impunity for the alleged perpetrators of these crimes."[59]

2. Evidence-gathering and analysis

2.1. Victim/ witness interviews and related materials

During the reporting period, the IAPB collected information and evidence from 63 survivors/witnesses (19 women, 44 men) regarding alleged crimes under international law, bringing the total number of interviewees to 3,245. The newly collected interviews provide information on arrests, the ill-treatment of detainees, including poor conditions of detention and various forms of physical and psychological ill-treatment, as well as acts of persecution by State authorities, including against Belarusians who fled abroad.

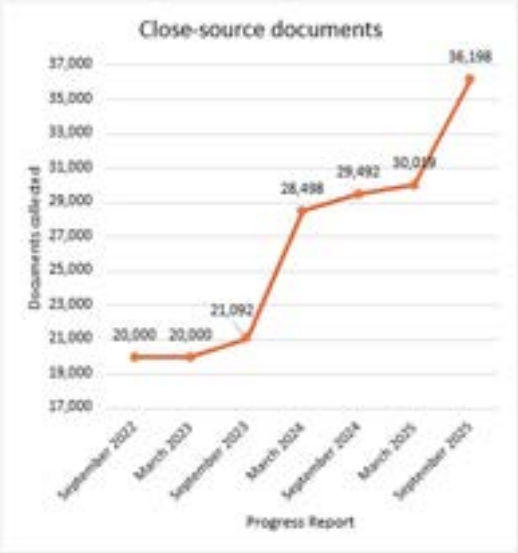


The provision of witness-related materials by these new interviewees brings the IAPB's closed-source collection to 36,198 witness-related documents. These include audio/video material, medical documents and court records, photographs of injuries, and other relevant items. Translated into English through an automated translation software, the records are catalogued for preservation and analysis in the IAPB's closed-source database.

[54] UN HRC, Report of the Group of Independent Experts on the situation of human rights in Belarus "Closing the accountability gap for human rights violations and related crimes in Belarus", 04-Sep-2025, A/HRC/60/CRP.1., para. 31.
[55] Karaev held the position of the Minister of Internal Affairs from 11 June 2019 to 29 October 2020.
[56] Karpenkov serves as Deputy Minister of Internal Affairs and Commander of Internal Troops and is former Head of GUBOPiK (September 2014 - October 2020).
[57] UN HRC, Report of the Group of Independent Experts on the situation of human rights in Belarus "Closing the accountability gap for human rights violations and related crimes in Belarus", 04-Sep-2025, A/HRC/60/CRP.1., paras 32-33.
[58] UN HRC, Report of the Group of Independent Experts on the situation of human rights in Belarus "Closing the accountability gap for human rights violations and related crimes in Belarus", 04-Sep-2025, A/HRC/60/CRP.1., para. 16.
[59] UN HRC, Report of the Group of Independent Experts on the situation of human rights in Belarus "Closing the accountability gap for human rights violations and related crimes in Belarus", 04-Sep-2025, A/HRC/60/CRP.1., para. 62.

Additionally, materials are coded according to a detailed coding framework created to facilitate evidentiary retrieval from the database. The approach enables searches based on various criteria, such as the time and location of an incident or arrest, detention facility, officials referenced in interviews or documentary evidence, specific acts of mistreatment, and enhances analysis of the materials and the preparation of analytical briefs produced to support investigations at both domestic and international levels.

The IAPB continues to seek renewed informed consent from survivors/victims and witnesses to ensure it remains valid for disclosure to third parties. By 30 September 2025, over 1,103 victims/ witnesses had signed a consent form. Consent forms are renewed to ensure that the forms align with international standards and comply with GDPR requirements so that they can be used in criminal investigation and prosecution. It allows witnesses to review and reaffirm their consent since their personal circumstances may have changed over time.



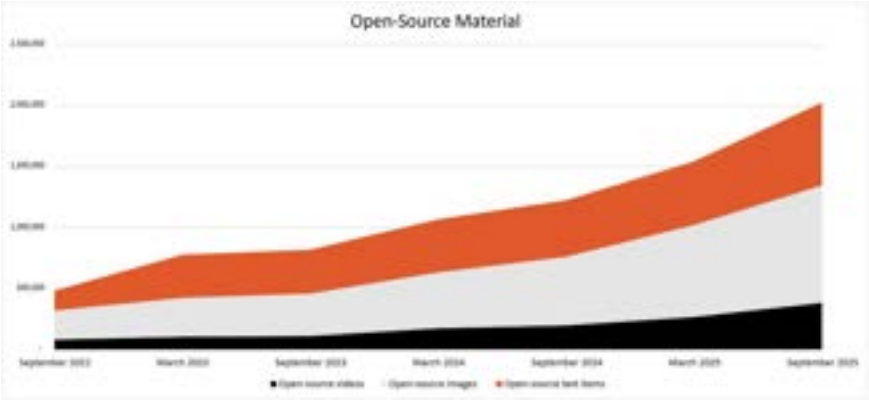
One of the key focus areas for the IAPB has been the generation of 'witness summaries', summarising interview transcripts and relevant materials for those victims/ witnesses who confirmed their consent to share evidence with accountability mechanisms. Witness summaries are a common tool in international criminal justice processes, enabling clearer delineation of the IAPB's present evidence-base and are the preferred format of domestic and international authorities as part of other analyses or as a stand-alone product. In early 2025, the IAPB reviewed and updated its internal guidelines for the preparation of witness summaries based on its lessons learned. As of September 2025, IAPB had produced 404 witness summaries.

2.2. Open-source information

Complementing the evidence obtained from victim-survivors and witnesses, the IAPB continues to collect open-source information, including social media posts and audio/video material, news articles and reports, publications by public or private entities, satellite imagery, material from court records and archives, and other information from blogs, forums and websites.

Open-source information and evidence have also been instrumental to the development of analytical products and responses to prosecution authorities. I

To date, the IAPB has collected over 2,022,453 items from open-source research from 1,057 sources, verifying information, proactively researching relevant issues, and securing evidence from official Belarusian websites to prevent the loss of evidence due to subsequent content removal. The collection includes over 383,000 videos, 959,000 images, and 678,000 text items.



2.3. Linkage evidence

The IAPB continues to carry out an analysis of linkage evidence with a view to building criminal cases against potential suspects, aiming to produce a report compiling this analysis. Linkage evidence refers to evidence and information that connects mid- and high-level perpetrators with crimes committed by direct perpetrators on the ground, such as in a detention facility, a police station, or during a demonstration in a public square.

There are considerable challenges in analysing linkage evidence which the IAPB is still working to overcome. Different jurisdictions have different laws on perpetration and complicity, which means that the IAPB has to consider multiple legal frameworks on liability.

To date, the IAPB has surveyed the different laws on perpetration and complicity from a range of jurisdictions and identified common elements which can be analysed together, and reviewed a wide range of sources from interviewees and open-sources to establish information relevant to linkage, including on the identification of individuals in authority who co-perpetrated, indirectly perpetrated, instigated, or aided in crimes, or could be held liable under the doctrine of command and superior responsibility, because they knew or should have known about crimes committed by their subordinates or people under their control, and they failed to prevent, repress, or refer such crimes. Further work is to be conducted in the coming months.

2.4. Gender-competent approach to analysis

Continuing its commitment on a gender-competent approach in documentation, analysis and support of accountability bodies, during the reporting period, the IAPB conducted desk-based research and interviews with Belarusian gender experts to examine how gender norms influenced the commission of sexual and gender-based crimes (SGBC) before, during and after the August 2020 presidential elections.

This work also analyses the structural factors that enable such crimes and the barriers that victims and witnesses face in disclosing them. Building on these findings, the IAPB is currently drafting a report for prosecuting authorities on gender norms which will include information on the role of gender in the commission of crimes in Belarus and barriers to disclosure of SGBC, with best practice and context-specific guidance on how to identify SGBC and address barriers to disclosure.

These activities helped shape recommendations for prosecutors and informed the team's broader approach to strengthening its gender competence. In the next phase of the project, the IAPB will convene a roundtable with national and international experts to discuss the report's findings and their implications for investigating and addressing SGBC.

3. Assistance to accountability mechanisms

3.1. Support provided to the Office of the Prosecutor of the International Criminal Court

During the reporting period, the IAPB provided evidence and information to the Office of the Prosecutor of the International Criminal Court (OTP/ ICC) in support of its ongoing preliminary examination relating to alleged crimes against humanity, including deportation, persecution, and other inhumane acts allegedly committed by Belarusian senior officials since 1 May 2020.

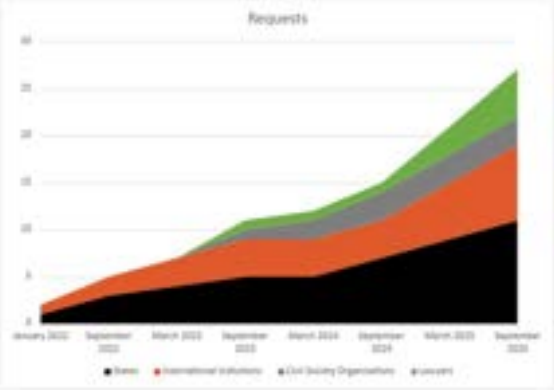
Following the IAPB Communication submitted on 31 January 2025, presenting relevant witness evidence as well as factual and legal analyses, the IAPB submitted further evidence to inform the ongoing examination, in particular in relation to the coercive environment in Belarus that effectively forced Belarusians to leave the country.

3.2. Support provided to national prosecution authorities

In the reporting period, the IAPB continued to provide witness evidence and open-source information to national prosecution authorities of two states following up requests from prosecution authorities in support of investigations of alleged crimes committed in Belarus against specific individuals. The evidence presented additional details concerning victims' arrest, information about state bodies present in the area where arrests were conducted, information about detention facilities where victims were detained as well as names of state officials employed in the relevant detention facilities, as reported by IAPB witnesses.

Moreover, the IAPB received a new request from a prosecution authority of another state, for which the response is in the process of preparation.

The IAPB furthermore shared its factual and legal analyses in relation to alleged international crimes committed in Belarus since May 2020 with the prosecution authorities of the six states that have to date requested the IAPB's assistance. By focusing on the contextual elements of crimes against humanity, this analysis sought to provide further support to ongoing investigations and help to better contextualise the individual incidents under review.



Following the recent releases of prisoners from Belarusian detention facilities, the IAPB contacted the states whose citizens were released, have since left Belarus, and are now in a position to provide testimonies of human rights violations they may have endured while detained, offering its support upon request.

3.3. Support provided to GIEB

During the reporting period, the IAPB continued its cooperation with the Group of Independent Experts on the Human Rights Situation in Belarus (GIEB), the UN investigative mechanism established by resolution A/HRC/RES/55/27 on 4 April 2024 based on the existing Memorandum of Understanding. At the stage of drafting this report, the IAPB is preparing its 2nd submission to the GIEB in order to help inform the experts' forthcoming report.

3.4. Support provided to lawyers

Support of independent lawyers in two States who had sought IAPB's assistance in the context of domestic proceedings regarding human rights violations and crimes committed in Belarus since May 2020 also continued during the reporting period.

In both cases, the IAPB also reached out to the respective prosecution authorities directly, offering the provision of relevant evidence, information and analytical products upon request.

3.5. Report "Paths to Accountability for Belarus"

During the reporting period, the IAPB finalised a report titled "Paths to Accountability for Belarus – Mechanisms to Address Human Rights and International Criminal Law Violations", which will be launched on 3 October 2025.


TABLE
of Contents

ACKNOWLEDGEMENTS
ACRONYMS
I. SUMMARY AND RECOMMENDATIONS
A. Executive Summary
B. Recommendations to States
C. How Does the IAPB Support Accountability Mechanisms for Belarus?
II. PURSUING ACCOUNTABILITY: CONTEXT, PATHWAYS AND CHALLENGES
A. Background
B. Different Mechanisms with Distinct Purposes and Outcomes
C. What Do We Mean by Accountability?
D. Why is Accountability Important?
E. Challenges with Securing Accountability in Belarus
III. INDIVIDUAL ACCOUNTABILITY
A. International Criminal Court (ICC)
B. Belarus and the ICC Investigation into the Situation in Ukraine
C. Universal Jurisdiction (UJ)
D. Jurisdiction Based on the Active or Passive Personality Principle
E. Belarusian National Courts
F. Council of Europe Special Tribunal for the Crime of Aggression against Ukraine
IV. STATE RESPONSIBILITY
A. International Court of Justice (ICJ)
B. The International Labour Organization (ILO)
V. MECHANISMS TO SUPPORT ACCOUNTABILITY EFFORTS
A. UN Group of Independent Experts on the Human Rights Situation in Belarus
B. UN Treaty Bodies
C. UN Special Procedures
D. OSCE Moscow Mechanism
VI. NEW MECHANISMS THAT COULD BE CONSIDERED
A. Register of Damages
B. International (Special) Tribunal for Belarus

The report differentiates between mechanisms aimed at pursuing state responsibility, those focused on achieving individual criminal accountability, and mechanisms contributing to both areas. Additionally, it evaluates how the situation in Belarus has been addressed to date and identifies existing gaps, suggesting further actions and mechanisms that could be employed to bridge these gaps. Underscoring the importance of justice for victims, the report emphasises their involvement as well as the potential roles of civil society organisations within each mechanism and examines how each accountability approach contributes to meeting survivor-centred justice needs. By delineating the options available, it aims to assist States in identifying suitable accountability mechanisms, detailing the steps required for engagement, and exploring potential outcomes and the added value of each option.

The report concludes that each mechanism offers a distinct contribution towards what survivors have consistently sought: acknowledgment of the truth, accountability for perpetrators and State responsibility, access to redress, and guarantees of non-repetition. Their effectiveness hinges not only on the execution of their individual mandates but also on their interaction and mutual reinforcement over time. Furthermore, the report maintains that most of these avenues require robust engagement from States, who remain the primary gatekeepers of international justice.

Finally, achieving justice for Belarus necessitates sustained, committed, and coordinated action across multiple mechanisms, with survivors at the centre. Only through an inclusive and survivor-centred approach can the international community ensure that truth, accountability, and redress are consistently upheld as universal principles, rather than applied selectively.

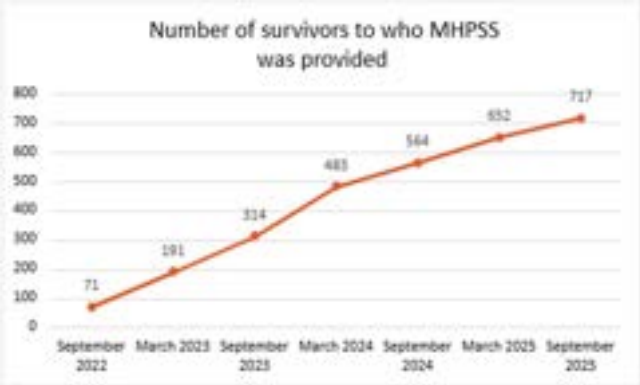
Recommendations included in the report call on States to:

- Ensure that legal frameworks are in place to effectively investigate and prosecute violations of international criminal law;

- Establish specialised structures and allocate sufficient resources for the investigation and prosecution of violations of international criminal law;
- Strengthen cooperation in relation to extraterritorial and universal prosecutions for crimes committed by the Belarusian regime;
- Support the ICC Prosecutor's preliminary examination into the Lithuania/Belarus situation
- Initiate mechanisms to address accountability gaps, to enhance victim redress provisions and to prevent future human rights violations;
- Renew the mandate of UN mechanisms tasked with monitoring and investigating human rights violations in Belarus;
- Support Belarusian human rights organisations, independent lawyers, journalists and accountability initiatives.

4. Survivor-centred approach

4.1. Access to mental health and psychological support



The IAPB continues to provide survivors with evidence-based mental health and psychosocial support (MHPSS) in a survivor-centred and trauma-informed manner. Since 1 April 2025, 65 more survivors (34 women, 30 men and 1 non-binary) have benefitted from the MHPSS services of the IAPB, bringing the total number to 717 since the establishment of the IAPB.

4.2. Publication of SCA Guide on Survivor-Centred Approach

On 18 June 2025, the IAPB published the Practice Guide '*A Survivor-Centred Approach to Documentation for the Purpose of Criminal Accountability*' outlining key principles of a survivor-centred approach to documentation of torture and other serious international crimes by CSOs for the purpose of criminal accountability by CSOs for the purpose of criminal accountability.

Based on a comprehensive internal IAPB-document on its survivor-centred approach, the guide provides a shortened, public version of the IAPB's approach to documentation, sharing lessons learned in English, Russian, and Belarusian languages.

5. Capacity-building & Sustainability

5.1. Capacity-building in the format of a mock trial

Benefiting from synergies created by another project, implemented by DIGNITY[60] in close coordination with the IAPB Secretariat, staff of the Belarusian co-lead organisations and Secretariat staff benefited from a capacity-building exercise conducted in the form of a mock trial in Warsaw in June. Orientated around an anonymised case study, the training aimed at improving the interview and documentation skills of the Belarusian partners by showing how evidence comes to life throughout a trial.

5.2. Working Group on Universal Jurisdiction in Poland

The initiative aims to build capacity of Polish CSOs to engage with universal jurisdiction (UJ) cases, including roles in evidence collection, victim and witness support throughout UJ processes, and perpetrator tracking. In light of ongoing discussions about a possible legal reform of Polish law relating to UJ, the group also seeks to facilitate coordination among CSOs interested in the use of UJ in Poland.

Seeking to embed local ownership and expertise and in the interest of sustainability, the WG is organised in cooperation with Polish partners, the Polish Helsinki Foundation and the Academy of Science of the University of Warsaw, both closely engaged in the developments related to universal jurisdiction in Poland.

Two Working Group (WG) meetings were organised within the reporting period by IAPB co-lead REDRESS, in April and June 2025. Attended by about 30 participants representing CSOs, academics and practitioners, discussions covered UJ success stories, the legislative and political context in Poland, the roles of CSOs, evidence collection, arrest warrants, victim support.

5.3. Activities relating to the sustainability of databases

In order to ensure the sustainability of the IAPB's closed and open-source databases, during the reporting period the IAPB liaised with its partners to discuss how security and accessibility of the databases can be ensured, including in case the IAPB is not extended beyond September 2026.

The increase in knowledge of Belarusian partners in handling, accessing and searching both the closed-source database and the open-source repository will constitute the focus of capacity-building activities in Year 3 of Phase III, building on already provided trainings in earlier project phases.

6. Outreach and advocacy

The IAPB's outreach and advocacy aim to raise awareness of breaches of international criminal law in Belarus and among the exiled Belarusian population, while highlighting the Platform's work on accountability for these crimes. They seek to inform States, intergovernmental organisations, and civil society about ongoing developments, increase the Platform's visibility—particularly with national investigation and prosecution authorities—and foster collaboration with relevant institutions to avoid duplication and build synergies. These efforts also amplify the voices of victims

[60] This project is separate from but complementary to the work of the IAPB and aims to strengthen the capacity of key actors, including local partner organisations and representatives of relevant national and international authorities, to ensure justice and accountability for crimes committed by Belarusian authorities.

and survivors, ensuring their experiences inform accountability processes. By disseminating the Platform's publications, recommendations, and lessons learned, outreach and advocacy promote coordination and sustained international engagement on justice for Belarus.

6.1. Conferences, briefings and events

The IAPB was invited to present the platform at the Working Party on Eastern Europe and Central Asia (COEST) meeting in Brussels on 5 March 2025, an event facilitated by the European External Action Service (EEAS). This provided a valuable opportunity to brief EU delegations on the platform's progress, future plans and strategic direction. Another briefing for State delegations was held on 17 June in the context of the OSCE in Vienna, where—at the invitation of the EU Delegation to the International Organisations—the IAPB delivered an update to EU representatives on current activities and priorities.

Participation in key conferences increased the platform's visibility, expanded strategic networks and enabled the IAPB to gather relevant insights into ongoing initiatives by other institutions working on Belarus. This included:

- participation at a conference on perpetrator tracking in The Hague in June 2025, organised by FIDH and REDRESS,
- participation at the OSCE Supplementary Human Dimension Meeting in Vienna (5-6 May 2025) on "Protecting Civic Space - the Role of Human Rights Defenders and Freedom of Peaceful Assembly"
- presenting at a side event at the UN Human Rights Council on 15 September 2025, organised by the Belarusian Helsinki Committee and co-sponsored by Human Rights House Foundation; and
- an intervention at a high-level side event in the margins of the UN General Assembly in New York organized by the EU Delegation to the UN in New York, co-sponsored by Germany, Denmark, Estonia, Lithuania and Latvia, on 25 September 2025 titled "Time for Accountability and Justice: Rule of Law under Threat in Belarus".


Time for Accountability and Justice:
Rule of Law under Threat in Belarus
Side event – UNGA80
Concept note
Thursday 25 September 2025, 1.45PM – 3.00PM
Delegation of the European Union to the United Nations
666 Third Avenue, 31st floor

On 27 August 2025, the Permanent Mission of Denmark to the United Nations in Geneva and IAPB hosted an event for UN missions in Geneva and the EU Delegation in the run-up to the UN Human Rights Council's Universal Periodic Review of Belarus, '*Accountability for Human Rights Violations in Belarus: Avenues, Challenges and Achievements'*.

In addition, the IAPB actively engaged with relevant organisations and institutions to exchange information, strengthen coordination, communicate the platform's mission and build strategic networks. This included meetings with:

- the UN Group of Independent Experts on Human Rights in Belarus
- the UN Special Rapporteur on Belarus
- representatives of Eurojust, including the EU Genocide Network team in The Hague
- a representative of Europol,
- the Danish Chair of the EU Genocide Network Meeting in the second half of 2025.

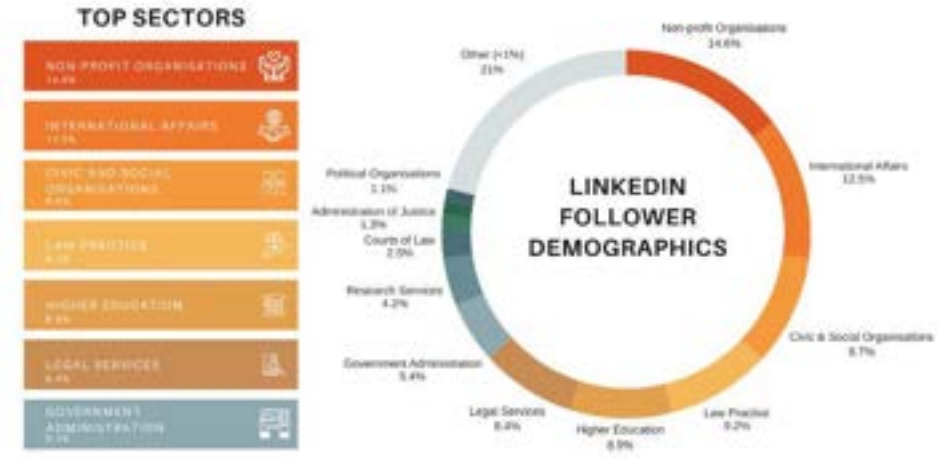
Relations with Belarusian and international non-governmental organisations were also actively fostered throughout the reporting period.

7. Communication

7.1. Social Media

Since January 2025, the IAPB has established a presence on LinkedIn and BlueSky following a review of its communication strategy. LinkedIn was chosen to facilitate professional networking and enable direct advocacy with senior policy and diplomatic stakeholders worldwide. Bluesky was selected as an emerging online space where the IAPB could become an early leader, particularly among academics and journalists that had publicly left X/Twitter due to recent controversy.

Before migrating, the IAPB invited its X/Twitter followers to join its LinkedIn and Bluesky accounts via posts and direct messages to key stakeholders. We also mapped key stakeholders active on LinkedIn, invited them to follow the page, and directly engaged with their profiles. As a result, a high percentage of followers work in International Affairs, Civil Society, and Law, as reflected in the graph below.



The IAPB's LinkedIn account currently has 756 followers, a 35% increase from the 560 on X (see the graph below for comparison). Between 1 April 1 and 30 September 2025, the account gained 24,616 impressions, 545 post reactions, and achieved an engagement rate of 21.2% - well above the 3% benchmark for non-profits on LinkedIn.

One particularly successful campaign was the promotion of our practice note on a Survivor-Centred Approach to Documentation, that featured a carousel graphic explainer and Bluesky thread and gained almost 12,000 impressions and 3,172 engagements.

The IAPB's X account had 150,000 impressions and 4,955 engagements during the almost three years it was active (March 2022 – January 2025), averaging 25,714 impressions and 860 engagements (3.3% engagement rate) over a six-month period. The migration to LinkedIn has therefore been effective at significantly increasing both followers and engagement.

The IAPB Bluesky account has performed less successfully. Despite early signs that Bluesky could be an emerging online space for civil society, many of the IAPB's partners and stakeholders are still

not active on the platform. Our account currently has 91 followers, and while Bluesky does not yet offer consolidated analytics, during the reporting period the account made 62 posts, receiving 196 engagements.

7.2. Video clips featuring experts on international criminal law

IAPB used the opportunity of a capacity-building event in the format of a mock trial in May to conduct short interviews with five renowned international criminal law experts and produced short video clips for communication on the IAPB's social media platforms.


Capture of video "Why are international trials important?", Judge David Re

The clips feature Sir Howard Morrison (KCMG, CBE, KC, form Judge of the International Criminal Court), Judge David F (former Presiding Judge of the Trial Chamber for the Speci Tribunal for Lebanon), Filippo de Minicis (Prosecutor, Speciali Prosecutor's Office & Kosovo Specialist Chambers), Kirsty Sutherland (Barrister, 9BR Chambers) and Megan Hirst (Barriste Doughty Street Chambers), and relate to "Why are internation trials important?", "The role of the International Accountabili Platform for Belarus and its documenters" and "The importanc of international trials for victims".

8. Staff and Infrastructure

8.1. Staff

The IAPB Secretariat team consists of both staff members and consultants, including IAPB Head, Project Manager, as well as investigators and analysts.

8.2. Advisory Council

On 10 April 2025, at an online meeting of the Advisory Council gathering ten of the 12 Advisory Council (AC) members, the IAPB provided updates on its ongoing work and plans. Participants shared their advocacy priorities and discussed recent developments on UJ cases, issues related to immunities and modes of liability, and strategies on accountability, and discussed how the accountability landscape for Belarus been impacted by USAID cuts. An in-person meeting of the Advisory Council is prepared for October 2025 and will include discussion of the report on accountability mechanisms.

8.3. Evaluation

In April 2025, Dignity published a tender for applications of external evaluators with the deadline of 24 April 2025. The selection panel subsequently considered 13 applications as per the Terms of Reference's qualification criteria.

Following contracting, the evaluator was briefed on the project by the IAPB partners and was provided with a comprehensive set of documents. He submitted an inception report on 12 May 2025, including a reflection of the IAPB's Theory of Change based on the briefing and project materials, as well as an evaluation matrix.

Subsequently, in May 2025, the IAPB Secretariat provided a list of relevant interlocutors comprising inter-governmental bodies, criminal justice interlocutors. In order to ensure engagement in the evaluation, the IAPB Head introduced the evaluator and the IAPB's initiative of an external evaluation to all interlocutors through individualised emails. Subsequently, the correspondence was taken over by the external evaluator.

9. Risks and challenges

Risks identified in previous progress reports continued during this reporting period, most notably, the ongoing pressure faced by Belarusian co-lead organisations, which are forced to carry out their work under extremely challenging and often hostile conditions.

Survivors remain deeply affected by security concerns both for themselves and their families. These concerns often lead to hesitation in sharing evidence or granting consent for their testimonies to be submitted to accountability bodies. This highlights the continued tension between their desire to contribute to justice and the need to protect their safety.

Competition for attention and resources in a highly volatile global situation with numerous political and human rights crises continues. A decline in donor funding has placed increased pressure on the broader civil society ecosystem that supports NGO-led justice and accountability initiatives. The U.S. funding freeze in January 2025, followed by reductions in Overseas Development Assistance (ODA) from several European ministries, has created additional uncertainty. These developments may adversely affect funding for Year 3 of Phase III of the Platform. IAPB seeks to mitigate this risk by increased outreach activities and by maintaining dialogue with donors and other stakeholders.

New US-sanctions on four judges of the International Criminal Court imposed in early June confirm the risk indicated in previous reports, of a possible negative impact on the court as well as civil society organisations engaging with the Court.

END.