



HUMAN RIGHTS DEFENDERS FOR FREE ELECTIONS

Elections*2025. Analytical report on the formation of territorial election commissions

*The expert elections*2025¹ observation mission is organized by the Belarusian Helsinki Committee and the Viasna Human Rights Center as part of the "Human Rights Defenders for Free Elections" campaign. The mission collects and analyzes information about the election campaign based on open sources and messages from voters from Belarus.*

CONCLUSIONS.

The general conditions and the actual procedure of the formation of territorial election commissions (TECs), which are an important mechanism of the electoral process, demonstrate the state dirigisme of all electoral processes with the imitation of the active participation of civil society, which gives the current executive power full control over the formed commissions.

- The formation of territorial election commissions takes place in the conditions when among the two main actors of civil society - political parties and other public associations - there are no organizations that could show independent initiative. The "labor collectives" inherited from the Soviet times are not political subjects, and the electoral processes on their behalf are organized by administrative methods. Citizens, who have the right to participate in the formation of territorial election commissions, are intimidated by the general atmosphere of terror; those who have been active in previous election cycles are subjected to preventive repression.
- The possibilities of public control, independent observation of the process of formation of the territorial election commissions are not only reduced to zero, but they are persecuted activity.
- In favor of the administrative-command management of the whole process is also the general rush: 1,725 people were allegedly nominated by parties, public associations, labor collectives and citizens in just one week in the number necessary to form virtually all commissions with the maximum number of members.
- At the same time, the informing of citizens about the possibility of nomination, as in the previous campaign of 2024, was minimal, which allows us to conclude that the authorities were not interested in the active participation of voters in the formation of territorial election commissions and predetermined decisions on their composition.
- Only minimal information is available to the public, both about the opportunities for nomination to the territorial election commissions and about the meetings of the bodies forming the commissions, as well as their results: the process of holding meetings remained non-transparent and non-competitive. The lists of names of members of the commissions have still not been published.
- The four largest public associations (BRSM, Belaya Rus, Union of Women, Union of Veterans, Fund for Peace), which have legislatively established special relations with the state since 2023, and the trade unions, which are members of the FPB, remain the main source of the clerks, ensuring the conduct of elections* at the level of territorial election commissions (in addition to four political parties remaining after re-registration, all of which support the

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

course of the current government). The percentage of "acceptability" of candidates from these pro-government parties and public associations imitating civil society, which together make up 63% of the composition of all commissions, tends to 100%.

- Thus, given the general atmosphere of intimidation, the lack of effective information and the extremely tight deadlines, it can be said that active citizens did not really have the opportunity to nominate their representatives to the TECs. The goal of the TEC formation phase was rather the opposite: to conduct it as quickly and quietly as possible.

I. LEGAL FRAMEWORK

The commissions are responsible for the direct processes of organizing the electoral process. Territorial commissions check the validity of signatures collected in support of the nomination of presidential candidates, supervise the activities and assist the precinct election commissions, which in turn work with voter lists, organize voting and determine its results at the precinct level. The Electoral Code (EC) defines the procedure for the formation of commissions and their composition.

Commission system. The preparation and conduct of the presidential elections are ensured by the permanent Central Election Commission (CEC)², as well as by territorial commissions (TECs) and precinct election commissions (PECs) formed for the presidential elections³. Certain issues related to the formation of TECs and PECs are regulated by the CEC Resolution No. 69 of October 24, 2024 "On Explanation of the Procedure of Formation of Commissions for the Election of the President of the Republic of Belarus".

Formation of Commissions. Regional TECs and the Minsk City Commissions consisting of 9-13 commission members are formed by the presidiums of regional, Minsk city councils of deputies and regional, Minsk city executive committees⁴. District, city (in cities of regional subordination without district division) and district commissions in cities are formed by the corresponding district, city executive committees and councils of deputies. Amendments to the Electoral Code adopted in 2023 reduced the maximum number of members of district and city election commissions from 13 to 11 persons.

Deadline for the formation of election commissions. Given that the elections are scheduled for January 26, 2024, TECs should have been formed no later than November 6, 2024.⁵

Formation of the composition of commissions. Election commissions shall be formed by representatives of political parties, other public associations, labor collectives, as well as by representatives of citizens nominated to the commission by submitting an application.

The commissions may not include: judges, prosecutors, heads of local executive and administrative bodies. A close relative of a presidential candidate, a spouse of a presidential candidate, a person directly subordinated to a presidential candidate cannot be the chairman of the commission.

Representatives to the regional commissions are entitled to be nominated by:

1. The governing body of the corresponding regional organizational structure of a political party, other public association;
2. Meeting of the labor collective of an organization or collective of a structural subdivision with at least 10 employees and located on the territory of the respective region;
3. A group of citizens with the right to vote (hereinafter referred to as a group of voters) in the number of at least 10 persons - to the regional commission of the region, on the territory of which they reside (registered at the place of residence or place of stay).

Representatives to the Minsk City Commission may be nominated by:

1. Governing body of the Minsk city organizational structure of a political party, other public association;
2. Meeting of the labor collective of the organization or the collective of a structural subdivision, which has at least 10 employees and is located on the territory of Minsk;

² Electoral Code of the Republic of Belarus, Art. 26

³ Electoral Code of the Republic of Belarus, Art. 27

⁴ Electoral Code of the Republic of Belarus, Art. 34

⁵ See Art. 34 of the Electoral Code: TECs must be formed no later than 80 days prior to elections.

3. A group of voters of at least 10 persons residing in the territory of Minsk (registered at the place of residence or place of stay).

Representatives of district, city (in cities of regional subordination, except for cities with district division), city district commissions have the right to be nominated by:

1. The governing body of a district, city (in a city of regional subordination, except for cities with district division), district in the city organizational structure of a political party, other public association - to the district, city (in a city of regional subordination, except for cities with district division), district in the city commission, on the territory of which the corresponding organizational structure is located;

2. Meeting of the labor collective of the organization or the collective of the structural subdivision with at least 10 employees - to the appropriate district, city, district in the city commission of the district, city, district in the city, on the territory of which the organization or structural subdivision is located;

3. A group of voters in the number of at least 10 people - to the district, city (in a city of regional subordination, except for cities with district division), district in the city commission of the district, city, district in the city, on the territory of which they reside (registered at the place of residence or place of stay).

Joint decisions of the Presidium of the relevant local Council of Deputies and the Executive Committee shall be adopted by a majority vote of the members. At least two thirds of the presidium of the local Council of Deputies and the executive committee shall participate in the joint meeting of these bodies.

The commissions shall be formed by the presidiums of regional, Minsk city, district and city councils of deputies and the corresponding executive committees, as well as district and city executive committees, administrations of districts in cities. Representatives of political parties, other public associations, labor collectives, citizens, who have nominated their representatives to the commission, may participate in the meeting of the bodies forming the commissions.

The decision on the formation of commissions shall specify the surname, first name, patronymic (if any) of each member of the commission, the method of appointment to the commission, the location and telephone numbers of the commission.

According to the amendments to the EC, decisions on the formation of commissions are not published in the print media. Instead, only the announcement on the formation of commissions is publicized not later than 7 days after the formation of commissions. **The list of commission members is no longer available**, but only the fact of formation and the total number of commission members. The information on the formation of city (cities of district subordination), village commissions within the same period of time can be brought to the attention of citizens in another way, which is not specified by the legislation.

The decision of the authorities forming the commission may be appealed within three days from the date of its adoption, respectively, to the regional, Minsk city, district, city court by the subjects who appointed their representatives to the commission. The appeal shall be signed by the head of a political party (organizational structure), another public association (organizational structure), the head of another organization (structural subdivision), citizens who nominated a representative to the commission by filing an application. The court considers the complaint within three days and its decision is final.

II. NOMINATION OF REPRESENTATIVES TO THE TECs

According to the calendar, the nomination of representatives to TECs was scheduled to take place by October 31, 2024. Given the October 23 as date of calling elections, the time allotted for the nomination of representatives was extremely short: only one week⁶. Nevertheless, the authorities

⁶ This is not the first time the authorities have set tight deadlines for nominating candidates to the commissions - in the 2020 presidential election, 9 days were allotted from the decree appointing the election on May 8 to the filing deadline on May 17; in 2015, June 30 and July 19 (19 days), respectively; in 2010 - September 14 and September 26 (12 days), but in this campaign this period is the shortest.

met the tight deadline, and on November 2, the CEC published statistics on nominated candidates for TEC membership⁷.

Official data on the nomination of representatives to territorial commissions show⁸ that 1,725 people were nominated to 153 TECs (6 regional and one Minsk city TEC, 118 district and 4 city TECs in cities of regional subordination, 24 district TECs in cities) (2,171 people were nominated in the previous presidential elections), of which 755 persons were nominated, according to the CEC, by citizens through the collection of signatures⁹. The 20% decrease in the number of TEC candidates and the complete absence of independent candidates can be explained by the repressive suppression of public activism, the establishment of tight control over the nomination process, and the widespread atmosphere of fear resulting from the repression of disloyalty¹⁰. Activists who have participated in previous election campaigns are subjected to preventive repression, while other citizens read in the news about arrests of "oppositionists" and police drills on coordinating combat and releasing hostages¹¹. All this has a deterrent effect on people's decision to participate in election commissions.

In fact, the stage of nomination to the election commissions turned into a stage of compiling an almost final list of those who had been vetted for loyalty during the previous election campaigns. The overwhelming majority of representatives - 68.35% - were nominated by pro-government public associations, including 15.88% by the four pro-government political parties remaining after the re-registration¹²; 16.35% were nominated by trade unions belonging to the pro-government Federation of Trade Unions of Belarus (FTUB). 25.68% of representatives were allegedly nominated by citizens through applications. Since all independent political parties were forcibly liquidated¹³, they had no access to nominate their representatives to the commissions.

⁷ CEC of Belarus Telegram Channel: <https://t.me/cikbelarus/2843>

⁸ CEC, Information on nomination of representatives to territorial commissions: <https://www.rec.gov.by/uploads/files/Pdf/2024/stat1-2.pdf>

⁹ Human Rights Defenders for Free Elections, Analytical Report on Observation of the Formation of Territorial Election Commissions, 2020: <https://elections2020.spring96.org/ru/news/97095>

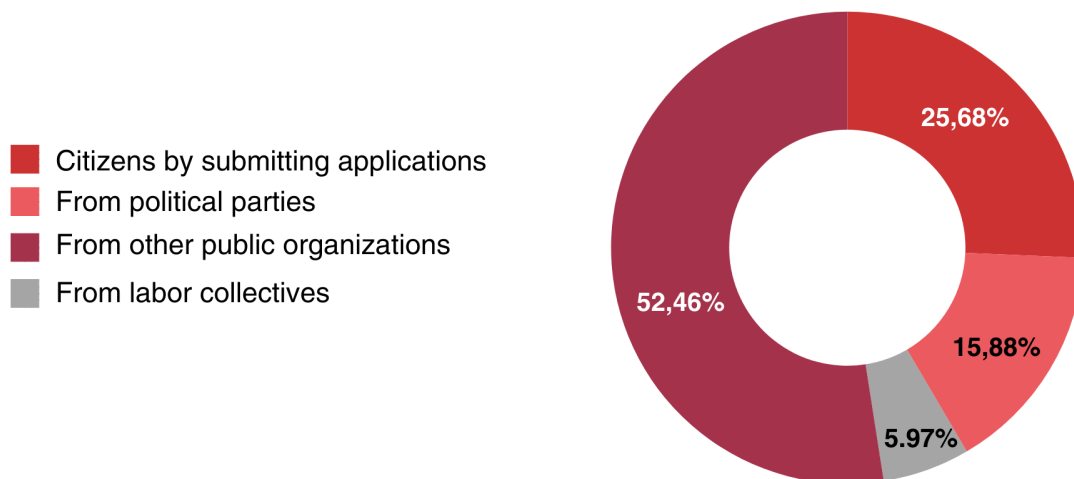
¹⁰ Human Rights Defenders for Free Elections, The Situation Before Elections*2025: <https://spring96.org/ru/news/116615>

¹¹ Kubrakov: The Interior Ministry will start actively preparing for elections from November: <https://sputnik.by/20241025/kubrakov-mvd-s-noyabrya-nachnet-aktivno-gotovitsya-k-vyboram-1090594105.html>

¹² It is noteworthy that previously the role of parties in the nomination process was marked by an even lower level of participation. 8.2% of party nominees were nominated in 2020: <https://elections2020.spring96.org/ru/news/97095>; 7.1% in 2010: <https://spring96.org/files/misc/2010tvkru.pdf>, and at that time 3-4 opposition parties were also able to nominate candidates.

¹³ Viasna, Human Rights Situation in Belarus. September 2023 <https://spring96.org/ru/news/112958>

Candidates for Membership in the TEK



As in previous election campaigns, the CEC limited itself to establishing only formal requirements for the placement of information on the websites of local executive and administrative bodies. It includes only the time and place for accepting nomination documents¹⁴. In turn, A. Lukashenko publicly set a task for local authorities not to relax and to prepare for the worst scenario, obviously meaning the civic activity seen in the previous presidential elections.¹⁵

In the context of a diluted socio-political field, the only way to ensure some degree of public control over the work of TECs remained the nomination of individual citizens through the collection of signatures. The effective and mass use of this opportunity should be ensured by sufficient informing of citizens through popular information channels, including the preparation of relevant manuals and leaflets, as well as the availability of sufficient time for the collection of the collection of signatures. In the end, however, information about this stage was minimal and reduced to the formalities¹⁶ defined by the CEC. In addition, as noted above, potential nominees had only one week from October 24 to October 31 - and only two days off - to collect signatures and submit nomination documents. Therefore, there is every reason to assume that the formal nomination of commission members "from citizens" was also of an administrative and organized nature.

¹⁴ Resolution of the CEC of October 24, 2024 No. 69 "On Clarification of the Procedure of Formation of Commissions for the Election of the President of the Republic of Belarus": <https://www.rec.gov.by/uploads/files/Calendar/post69-2025.pdf>.

¹⁵ Brest Regional Executive Committee, How the presidential election in Belarus should be held and who should not relax. Details of the meeting with Lukashenka, 06.11.2024 <https://www.brest-region.gov.by/ru/news-ru/view/kak-dolzhen-projti-prezidentskie-vybory-v-belarusi-i-komu-nelzja-rasslabljatsja-podrobnosti-2000017589-2024>

¹⁶ The only sources of specific information remain the websites of local executive and administrative bodies, and the relevant data are not in the newsfeed, but behind the banner "Elections", which may not be perceived as an independent tab with relevant information: see examples here: <https://grodno-region.gov.by/ru>, <https://minsk.gov.by/ru/>.

Thus, given the atmosphere of general intimidation, the lack of effective communication, and the extremely tight deadlines, it can be concluded that active citizens actually had no opportunity to nominate their representatives to the TECs. The goal of the nomination phase was rather the opposite: to conduct this phase as quickly and quietly as possible.

III. MEETINGS OF THE BODIES RESPONSIBLE FOR THE FORMATION OF COMMISSIONS

In contrast to the 2020 campaign, the CEC has closed the possibilities to observe the formation of commissions: neither online broadcasts nor subsequent full video recordings of the session are available to the general public, nor are invitations to sessions without online broadcasts and recordings¹⁷. CEC Resolution No. 69 also does not provide for the possibility for representatives of public associations whose observers are accredited by the CEC to attend sessions¹⁸. Formally, the possibility of participation is reserved only for representatives of political parties, other public associations, labor collectives and citizens who have nominated their representatives to the commission¹⁹.

The information about the meetings of the bodies forming the commissions was also purely formal: a few lines about the date and time of the meeting, often without explaining the purpose of the meeting and informing the citizens that they have the right to attend the meeting if they nominate their representatives to the commission²⁰. In addition, even the mentioned minimal notes on the websites of executive committees and administrations should have appeared "no later than two days before the meeting"²¹ - some bodies ignored²² this norm, which once again allows us to note the lack of transparency of procedures, lack of publicity and orientation towards citizens, which does not allow them to effectively realize their rights to participate in the process of formation of TECs.

The absence of any public control and complete non-transparency of the decision-making process at such sessions make it impossible to say that citizens, political parties and other public associations were given an effective opportunity to participate in the formation of commissions on a competitive basis. The formality of this process is also evidenced by the ratio of candidates to TEC members and "selected" representatives provided by the CEC: according to the CEC, at least the Minsk City TEC and 4 city TECs (in cities of regional subordination) were filled with all candidates without any competition, while the competition for other commissions was minimal²³.

IV. COMPOSITION OF FORMED TECs

According to the CEC²⁴, 153 TECs had 1,689 members or 97.9 percent of the nominated candidates. While the commission-forming bodies have the possibility to vary the number of commission members from 9 to 11 or 13 depending on the type of commission, the vast majority of TECs (all regional, Minsk City, all municipal (in cities of regional subordination) and all district

¹⁷ See regulation of the 2020 elections: CEC Resolution No. 13 of May 8, 2020 (as amended by Central Commission Resolution No. 24 of 15.05.2020), para. 8: <https://rec.gov.by/files/2020/post13.pdf>

¹⁸ Resolution of the CEC of October 24, 2024 No. 69 "On Clarification of the Procedure of Formation of Commissions for the Election of the President of the Republic of Belarus": <https://www.rec.gov.by/uploads/files/Calendar/post69-2025.pdf>.

¹⁹ Ibid. para. 8

²⁰ Among others, see information on the website of the Vitebsk City Executive Committee (<https://vitebsk.gov.by/ru/obrazovaniekom/view/4-nojabrja-2024-goda-v-1400-po-adresu-g-vitebsk-ul-lenina-3-2-zal-zasedanij-5-etazh-sostoitsja-sovmestnoe-34619/>), Grodno Regional Executive Committee (https://grodno-region.gov.by/ru/ter_komissii-ru)

²¹ Annex 2 to the Resolution of the Central Election Commission of the Republic of Belarus No. 75 of 24.10.2024: <https://www.rec.gov.by/uploads/files/Calendar/post75-2025.pdf>

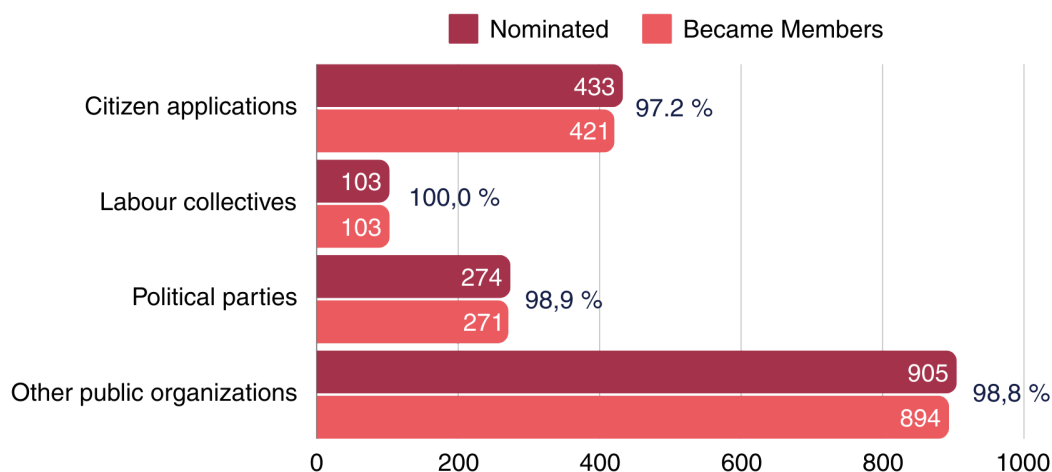
²² For example, the announcement of the meeting of the Oktyabrskaya District Commission in Vitebsk was published one day before the scheduled date of the meeting: <https://vitebsk.gov.by/ru/obrazovaniekom/view/6-nojabrja-2024-goda-sostoitsja-zasedanie-oktjabskoj-rajonno-j-v-g-vitebske-komissii-po-vyboram-prezidenta-34653/>.

²³ CEC, Information on the composition of the territorial commissions: <https://www.rec.gov.by/uploads/files/Pdf/2024/stat3-4.pdf>

²⁴ Ibid.

commissions) are formed in equal, maximum legally permissible composition, which may serve as further evidence of the artificial nature of the commission formation process.

Pass Rate for Candidates



The share of representatives of political parties in the commissions has slightly increased²⁵, but remains traditionally low for Belarus - 16.04%, which is much lower than the share of representatives of other public associations - 52.93%. This is a proof of the insignificant role of political parties in the political system of the country, as well as, perhaps, an indicator of the authorities' attempt to depoliticize all the processes around the 2025 elections, even in the conditions of the formation of commissions by fully loyal representatives.

Compared to the previous election campaign,²⁶ the gender imbalance in the composition of the commissions has slightly decreased: the share of women is 67.85%, the share of men is 32.15%. At the same time, the trend of women's representation decreases as the level of commissions increases: at the lower levels, their representation is significantly higher, with the CEC at 33.3%.

The names of appointed commission members are not published and in most cases a veil of secrecy is created around them. In some cases, when the names of appointed commission chairpersons appear in the media or a photo of the composition of the commission is published, it can be seen that the composition of TECs remains virtually unchanged compared to previous election campaigns.

²⁵ In the previous three presidential elections, representation from all political parties in TECs was below 8%

²⁶ Human Rights Defenders for Free Elections, Elections*2024. Analytical report on the formation of territorial and district election commissions, p. 14 <https://elections2024.spring96.org/ru/news/113675>