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BELARUS: Concern and secrecy surround compulsory re-registration process

By Olga Glace, Forum 18 (<https://www.forum18.org>)

Officials and most religious leaders Forum 18 reached refuse to discuss how the compulsory re-registration of the more than 3,500 registered religious communities by the deadline of 5 July 2025 is proceeding. The Religious Board of Muslims, a registered religious association, will have to be liquidated as it does not meet new legal requirements. Nor will many village religious communities. Officials so far re-registered only one religious organisation. Officials are to go to court to liquidate all registered communities that fail to gain re-registration by the deadline.

Five months into the one-year timeframe for Belarus' more than 3,500 registered religious communities to undergo compulsory re-registration by 5 July 2025, concern and secrecy surround the process. Any community that has not submitted a re-registration application by the deadline is to be liquidated through the courts. Officials are known to have granted re-registration so far only to one organisation: the Belarusian Orthodox Church under the Moscow Patriarchate as a national religious association.

Against Belarus' international human rights commitments, any exercise of freedom of religion or belief without state permission is illegal. Individuals and communities can be punished. Criminal Code Article 193-1 punishes "organisation of or participation in activity by an unregistered political party, foundation, civil or religious organisation" with a fine or imprisonment for up to two years (see below).

Compulsory re-registration follows the adoption of the repressive new Religion Law, signed on 30 December 2023 and which came into force on 5 July 2024 (see below).

On 20 February 2024, three United Nations Special Rapporteurs denounced the "climate of intimidation for religious leaders, communities or activities deemed to be unwelcome by the State" created by the new Religion Law. They repeated earlier complaints that provisions in it violate the country's obligations under the International Covenant on Civil and Political Rights (see below).

In her annual report to the UN Human Rights Council on the human rights situation in Belarus, made public on 9 May, the then Special Rapporteur Anaïs Marin noted that the regime has severely reduced freedom of association in recent years, particularly after the contested 2020 presidential election. "The purge targeted human rights defence organizations in 2021, followed by independent trade unions in 2022 and political parties in 2023, and continues in 2024 against religious organizations" (see below).

Officials of the Office of the Plenipotentiary for Religious and Ethnic Affairs in Minsk – which is overseeing the re-registration of regional and national religious organisations – and of local Administrations – which are overseeing the re-registration of local religious communities – refused to give Forum 18 any information about how the process is going (see below).

"At the moment the re-registration of religious organisations is proceeding in accordance with the law within the established time frame in an amiable atmosphere," Tatiana Shevchik, the Head of the Ideology and Religious Affairs Department of Minsk Executive Committee, claimed. She refused to say how many religious organisations have obtained re-registration and how many have applications in process (see below).

Many religious community leaders were very cautious in discussing the re-registration process, declining to tell Forum 18 how far they have been able to get. Others did not wish to discuss the problems of re-registration for fear of reprisals (see below).

The few representatives of religious communities who were prepared to speak to Forum 18 on the record – the Catholic spokesperson, the head of the Baptist Union, and a Muslim leader - remarked that re-registration is an ordinary procedure which should not cause concern (see below).

The new Religion Law requires that religious teaching of children and adults, sharing faith and publishing religious literature does not contradict "the ideology of the Belarusian state". This ideology is never explained (see below).

One Protestant Pastor complained that, to get re-registration, "religions will have to support state ideology". He also lamented to Forum 18: "This means they will have to place the state above God. When we lodge re-registration applications, it will look like we support the government in this. If I sign, I have to agree. Or we'll have to lie to the government when we sign applications" (see below).

Under the new Religion Law, national religious associations now require 15 religious communities operating in all seven Regions of Belarus. The Religious Board of Muslims in Belarus, currently a registered religious association, will have to be liquidated as it does not meet the new legal requirements, a member who asked not to be identified for fear of state reprisals told Forum 18 (see below).

Concerns remain about religious communities in small settlements that will no longer qualify to apply for re-registration, as the new Law requires a community to have at least 20 locally-resident members who are over the age of 18 (see below).

A Pastor who asked not to be identified expressed his fears to Forum 18 before the re-registration process began that many small religious communities in villages would have to close. "Our experience of registration in the past is that central and local authorities pressure people who are founders not to sign an application," the Pastor told Forum 18. "When people live in a small town or village, with only one place of work – such as a state farm – officials can fire you if you don't agree" (see below).

Repressive new Religion Law imposes compulsory re-registration

The non-freely elected Aleksandr Lukashenko signed into law the repressive new Law covering religion on 30 December 2023, exactly one year after he first announced it. The final text was officially published on 5 January 2024. The largest part of the new Law was a new version of the Religion Law, which came into force (https://www.forum18.org/archive.php?article_id=2884) on 5 July 2024. It requires all registered religious communities to seek re-registration between 5 July 2024 and 5 July 2025.

Religious communities that fail to gain re-registration will be liquidated and deemed illegal and any activity they undertake will – like any exercise of freedom of religion or belief without state permission - risk criminal or administrative punishment.

Among numerous restrictions, the new Religion Law (https://www.forum18.org/archive.php?article_id=2884):

- continues to require all religious communities to gain state registration before they are allowed to exist;
- continues to ban the activity of unregistered religious organisations;
- imposes compulsory re-registration within one year on all registered religious organisations, paralleling earlier demands on political parties and other public associations;
- imposes even tighter registration restrictions and conditions;
- makes extensive and arbitrary use of the undefined terms "extremism", "terrorism", and "the ideology of the Belarusian state" to justify restricting the exercise of freedom of religion or belief and related fundamental freedoms;
- continues powers for the regime to inspect and monitor religious communities;
- gives greater "legal" possibilities for the regime to forcibly close religious communities;
- continues and increases censorship and restrictions on religious literature and items;
- imposes new restrictions on religious education by religious communities, including requiring teaching to be in Belarusian or Russian;
- aims to separate religious communities from involvement with wider society;
- and imposes new restrictions on religious charitable activity, allowing no religious organisations except monasteries from running children's homes.

The new Law – which replaced the restrictive 2002 Religion Law - was prepared by the regime's chief religious affairs official, Plenipotentiary for Religious and Ethnic Affairs (https://www.forum18.org/archive.php?article_id=2806) Aleksandr Rumak. The regime allowed only 10 days for public consultation in June 2023 after making public the then draft text. It handed the proposed Law to the non-freely elected parliament in September 2023. Both chambers of parliament approved it by 13 December 2023.

The regime's justification for the new Religion Law, published with the draft text of the Law (https://www.forum18.org/archive.php?article_id=2839) on 2 June 2023, falsely claimed it "does not affect" international human rights obligations. Exiled human rights defender and Orthodox priest Fr Aleksandr Shramko described the aim as "to somehow

extinguish any pockets of not only possible resistance, but also any uncontrolled life", saying the Law is "playing on the formal appearance of legality".

Officials repeatedly refused to discuss with Forum 18 why the new Law might be needed or to discuss its content. While the new Law was in the lower chamber of the non-freely elected parliament, the assistant to deputy Lyudmila Zdorikova of the Human Rights, Ethnic Relations and the Media Commission, who was overseeing its adoption, refused to put Forum 18 through to her (https://www.forum18.org/archive.php?article_id=2868) or to discuss the draft.

Both while the Law was in parliament and once it was adopted, no-one from the Plenipotentiary's office was prepared to discuss it with Forum 18. "Aleksandr Rumak does not give interviews by phone," an official told Forum 18 on 4 January 2024 (https://www.forum18.org/archive.php?article_id=2884).

Burdensome and intrusive documentation

Almost every religious leader Forum 18 spoke to as officials were preparing the Law pointed out that many religious communities would face problems with re-registration (https://www.forum18.org/archive.php?article_id=2884). Exiled Orthodox priest Fr Aleksandr Shramko feared that when religious communities apply for re-registration, "those objectionable to the authorities may not get through". The leader of the Religious Board of Muslims in Belarus, Ali Voronovich, commented that in many places it may be impossible to find the required number of members to register a community. "Many communities in villages and small towns will cease to exist, and it does not concern only Muslim communities," he told Forum 18 in June 2023.

For re-registration, each religious community must submit an application to its local Administration's Ideology Department (for local communities) or the Plenipotentiary's Office in Minsk (for regional and national religious communities, monastic communities and religious educational establishments).

Under Article 16 of the Religion Law, religious communities have to supply with a registration application not only their statute, but a certificate confirming a place to conduct their activity (which can be difficult in small towns and villages). They also need to submit a list of the 20 or more adult founding members who live in one locality or neighbouring localities, with each person's date of birth, citizenship, address, place of work or study, phone number and signature.

Article 12 of the new Religion Law requires leaders of registered religious communities to be Belarusian citizens who are permanent residents of Belarus.

Individuals who are on either the "List of organisations and individuals involved in terrorist activities" or the "List of citizens of the Republic of Belarus, foreign citizens or stateless persons involved in extremist activities" (<https://humanconstant.org/en/overview-of-the-fight-against-extremism-in-belarus-for-january-march-2023/>) are banned from being leaders or founders of registered religious organisations.

Higher level organisations are divided into national and regional religious communities, which both require registration by the Plenipotentiary's Office in Minsk.

Article 14 of the new Religion Law requires national religious communities to have at least 15 member communities in all seven regions of the country, at least one of which had had state registration for at least 30 years.

Regional religious communities have to have at least 10 religious communities in one or several regions, at least one of which had had state registration for at least 30 years.

By 1 January 2026, the state authorities are to add re-registered religious organisations to the Justice Ministry's Uniform State Register of Legal Entities and Private Entrepreneurs.

More than 3,500 religious organisations to undergo compulsory re-registration

A total of 3,592 religious organisations had registration on 1 January 2024, according to the Office of the Plenipotentiary for Religious and Ethnic Affairs. Of these, 3,419 were local religious communities and 173 were hierarchical bodies, associations, monastic communities and religious educational establishments.

Of the registered religious organisations identified by the Plenipotentiary's office, 1,819 are Orthodox, 1,086 from various Protestant communities, about 530 Roman Catholic, 16 Greek Catholic, 54 Jewish in three separate organisations, 34 Old Believers, 23 Sunni Muslim, 1 Shia Muslim and 1 Buddhist. Others include Jehovah's Witness, Baha'i, Hare Krishna and Armenian Apostolic registered religious organisations.

Organisations that do not gain re-registration to be liquidated

Amendments to the Civil Code adopted as part of the new Law specify that registered religious organisations that do not apply for re-registration by the deadline of July 2025 or which fail to get it will be liquidated. Regional administrations or the Plenipotentiary's Office are to go to court to have them liquidated if they do not liquidate themselves.

Early threats for opposing new restrictive Religion Law

Throughout January, Ideology Department officials summoned clergy "to conduct explanatory and preventive work with them" following the adoption of the new Religion Law, the Christian Vision group (which documents violations of freedom of religion or belief and other human rights, and whose social media sites and logo the regime has declared to be "extremist" (https://www.forum18.org/archive.php?article_id=2874)) noted on 31 January (<https://belarus2020.churchby.info/monitoring-presledovaniy-hristian-v-belarusi-za-yanvar-2024-goda/>). "Information was received from the clergymen about warnings in the form of threats of prosecution - administrative and criminal - in connection with a possible violation of repressive legislation on their part and expression of disagreement with the current policy of the regime."

Religious leaders risk detention, fines and imprisonment for activities that the state perceives as political in nature.

UN describes "climate of intimidation for religious leaders, communities or activities"

On 28 August 2023, three United Nations (UN) Special Rapporteurs - Anaïs Marin (then Special Rapporteur on the situation of human rights in Belarus), Clément Nyaletsossi Voule (then Special Rapporteur on the rights to freedom of peaceful assembly and of association), and Nazila Ghanea (Special Rapporteur on freedom of religion or belief) - wrote to the regime (BLR 7/2023 (<https://spcommreports.ohchr.org/TMResultsBase/DownloadPublicCommunicationFile?gId=28342>)) expressing concerns that provisions in the then proposed new Law "would fail to meet Belarus' obligations under international human rights law".

The three Special Rapporteurs expressed specific concerns about: mandatory state registration; compulsory re-registration; tighter registration restrictions and conditions; increased monitoring and surveillance of religious organisations; restrictions on religious literature and items; monitoring and inspection of religious organisations; expansion of legal grounds allowing state authorities to dissolve religious organisations; and new restrictions on religious charitable activity. As of 3 December 2024, the UN website records no response to the communication from the regime.

On 20 February 2024, the three Special Rapporteurs, Marin, Voule and Ghanea, denounced (<https://www.ohchr.org/en/press-releases/2024/02/belarus-un-experts-concerned-about-new-law-freedom-conscience-and-religious>) the "climate of intimidation for religious leaders, communities or activities deemed to be unwelcome by the State" created by the new Religion Law. They repeated that provisions in it violate the country's obligations under the International Covenant on Civil and Political Rights.

In her annual report to the UN Human Rights Council on the human rights situation in Belarus (A/HRC/56/65 (<https://undocs.org/Home/Mobile?FinalSymbol=A%2FHRC%2F56%2F65>)), made public on 9 May, the then Special Rapporteur Marin noted that freedom of association has been severely reduced in recent years. This happened "notably after the contested 2020 presidential election, with methodical purging of all 'undesirable' associations, often under the pretext of fighting alleged mass disorder, extremism or terrorism. The purge targeted human rights defence organizations in 2021, followed by independent trade unions in 2022 and political parties in 2023, and continues in 2024 against religious organizations."

Marin complained of the new Law's provisions that "maintain stringent conditions for registration". She warns of the broader legal grounds for the regime to liquidate religious communities, including under "vague motives".

Marin noted the reintroduction in 2022 (https://www.forum18.org/archive.php?article_id=2764) of Criminal Code Article 193-1, which punishes "organisation of or participation in activity by an unregistered political party, foundation, civil or religious organisation" with a fine or imprisonment for up to two years.

Re-registration "a standard process"?

Many religious community leaders were very cautious in discussing the re-registration process, declining to tell Forum 18 how far they have been able to get. Others did not wish to discuss the problems of re-registration for fear of reprisals.

Some religious communities have held internal debates over how they should proceed. Forum 18 learned of tensions among Protestant Pastors over their approach to re-registration. "Pastors are talking about it, but are not allowed to do so in public," one Protestant Pastor who wished not to be named told Forum 18.

The few representatives of religious communities who were prepared to speak to Forum 18 on the record remarked that re-registration is an ordinary procedure which should not cause concern.

Fr Yuri Yasevich, the new spokesperson for the Catholic Bishops' Conference, assured Forum 18 on 19 November that "the

re-registration process of Catholic communities is in progress and there are no problems even with small communities".

The Head of the Baptist Union, Leonid Mikhovich, said that to his knowledge no Baptist Union church has got registration or even submitted the documents. "There is not much progress with re-registration," he told Forum 18 on 4 November. "Only a month ago we agreed a standard Statute with the Plenipotentiary's Office and now the churches collect the documents for re-registration, hold meetings and prepare meeting minutes."

Many Muslim communities within the Muslim Religious Association in Belarus submitted their Statutes for approval to local administrations, the leader of the Association's Council of Imams, Dmitri Radkevich, told Forum 18 on 14 November. The official Association website separately announced that two Minsk Region communities - in Molodechno and Myadzyel - submitted their documents in November. "Everything is proceeding in accordance with the law. The authorities do not cause any obstructions," Radkevich remarked.

A Protestant pastor who asked not to be identified for fear of state reprisals told Forum 18 that his church has not submitted the re-registration documents to the authorities. But he is concerned that the process of approving the documents may take the authorities up to six months. "The procedure involves several steps, such as Statute approval and submitting information," he explained to Forum 18 on 25 November. "But it is a standard process, and I do not see any complications. So far not all church members gave their personal data."

Orthodox Church gains re-registration, but not yet individual dioceses or parishes

While other religious communities struggle to meet the re-registration requirements, the Belarusian Orthodox Church under the Moscow Patriarchate was the first to complete the re-registration procedure, official news agency Belta.by reported on 20 September. That day, Plenipotentiary for Religious and Ethnic Affairs Aleksandr Rumak "ceremonially" handed the re-registration documents to Minsk Metropolitan Veniamin (Tupeko).

No other Orthodox diocese or parish appears to have been re-registered so far. Representatives of various dioceses reached on 3 December either appeared to be unaware of the re-registration requirement or declined to give information.

A representative of the Grodno Diocese told Forum 18 on 3 December that the diocese is preparing its application to submit to the Plenipotentiary's Office in Minsk. Only when that has been processed will individual parishes submit applications to local Administrations. However, some parishes are not waiting for the diocese to get re-registration and are already preparing their applications, the representative added.

In an interview published on the Orthodox Church's official website church.by on 21 September, Plenipotentiary Rumak highlighted "the active cooperation of the State and the Orthodox Church in various topical social issues". The Orthodox Church is the only religious organisation which has a Co-operation Agreement with the State, signed in 2003, which gives advantages in dealing with the authorities on both state and local level.

Officials refuse to discuss re-registration progress

Officials at national and local level refused to discuss the process of re-registration and give any information on its progress. Officials at the Office of Plenipotentiary for Religious and Ethnic Affairs Aleksandr Rumak in Minsk refused to discuss the process with Forum 18 in late November.

Tatiana Shevchik, the Head of the Ideology and Religious Affairs Department of Minsk Executive Committee, refused to say how many religious organisations have obtained re-registration and how many have applications in process. "At the moment the re-registration of religious organisations is proceeding in accordance with the law within the established time frame in an amiable atmosphere," she claimed to Forum 18 on 27 November.

The Deputy Head of Grodno Regional Department of Cooperation with Mass Media, Religion and Ethnic Affairs, Vladimir Skripko, refused to give any information. "We do not comment on the phone, please, send us an official letter," he told Forum 18 on 28 November. The same day, Vladimir Lyubchenko, chief specialist for cooperation with public associations and religious organisations of Mogilev Regional Ideology Department, said that he is not authorised to answer Forum 18's questions without his superiors' approval.

Officials of other Regional Ideology Departments did not answer the phone when Forum 18 repeatedly called in late November to discuss the re-registration process.

Re-registration = supporting "state ideology"?

The new Religion Law requires that religious teaching of children and adults, sharing faith and publishing religious literature does not contradict "the ideology of the Belarusian state". This ideology is never explained. Religious organisations are to be banned if

they oppose "the basic directions of domestic and foreign policy of Belarus".

One Protestant Pastor complained that, to get re-registration, "religions will have to support state ideology". He also lamented to Forum 18: "This means they will have to place the state above God. When we lodge re-registration applications, it will look like we support the government in this. If I sign, I have to agree. Or we'll have to lie to the government when we sign applications."

The Pastor notes that the regime has not identified what "state ideology" is, except for saying that religious communities must support the government's domestic and foreign policies. "This gives the government leeway on how to apply it."

Which national associations will lose state registration?

The new Religion Law changes the rules of registration for national religious associations. They now require 15 religious communities operating in all seven Regions of Belarus (including the city of Minsk). At least one of these communities must have been active in the country for 30 years. Under the 2002 Religion Law, only 10 communities operating in at least four of Belarus' six regions, with one community active for the last 20 years were sufficient to register an association.

Prior to registering constituent communities, an Association's general Statute must be agreed with the Plenipotentiary's Office and the local Ideology Department.

The Religious Board of Muslims in Belarus, currently a registered religious association, will have to be liquidated as it does not meet the new legal requirements, a member who asked not to be identified for fear of state reprisals told Forum 18. "The communities of our Association started preparations to submit the documents, but the religious association, the Muftiate, will not be re-registered as we do not have enough communities," he complained to Forum 18 on 6 November.

The nationwide Jewish Association in the Republic of Belarus gave its draft Statute to the Plenipotentiary's Office and to Minsk Central District Executive Committee for approval, but it has not yet been formally submitted, the leader of the Beis Isroel Jewish religious community, Itskhak Arie Karpelev, notes.

"Officials wanted to see it so there won't be errors and to ensure it is in accordance with the law," Karpelev told Forum 18 on 25 November. "Officials are well disposed towards us, work normally, check the documents and give their observations." He confessed that some elements of how they will apply are not yet clear, but he did not specify the issues.

Karpelev added that his Beis Isroel community has not yet applied for re-registration, though it has held a preparatory meeting.

What will happen to small religious communities?

During discussion of the draft Law, there were concerns about religious communities in small settlements as the new Law requires a community to have at least 20 locally-resident members who are over the age of 18. This allows the authorities to reduce the number of religious communities and keep them under control.

A Pastor who asked not to be identified expressed his fears to Forum 18 before the re-registration process began that many small religious communities in villages would have to close as they would not have enough members to apply for re-registration. "Our experience of registration in the past is that central and local authorities pressure people who are founders not to sign an application," the Pastor told Forum 18. "When people live in a small town or village, with only one place of work – such as a state farm – officials can fire you if you don't agree."

The Head of the Baptist Union, Leonid Mikhovich, told Forum 18 that they decided not to register small communities in sparsely-populated villages. "We believe they'll be able to gather 'under the roof' of regional divisions," he explained.

A Protestant Pastor from Minsk also confirmed that re-registration of small religious communities, especially in rural areas, is likely to be difficult. "I don't know how this problem will be solved. Probably they will consider each case individually, we'll see in spring."

The leader of the Council of Imams, Dmitri Radkevich, thinks that in small villages the lack of community members can be remedied with believers from a nearby village. "It will allow us to maintain the number of communities," he told Forum 18.

Fear of disclosing founders' personal information?

For compulsory registration, a religious community has to submit - among other documents - its members' personal information to the local administration's Ideology Department or the Plenipotentiary's Office. This includes their full names, phone numbers, and home and work addresses.

The Religion Law also gives the regime extensive powers to monitor religious communities

(https://www.forum18.org/archive.php?article_id=2884).

Current pressure on civil society raises concerns that the government may misuse the information to target religious community members or that some communities might withhold the information due to those fears, resulting in their re-registration application being rejected.

A member of the Minsk community of the Church of Jesus Christ of Latter-day Saints (commonly known as the Mormons), who asked not to be identified for fear of state reprisals, told Forum 18 in October 2023

(https://www.forum18.org/archive.php?article_id=2868): "Some of our believers might feel uneasy to disclose their personal information, which is demanded at re-registration."

Asked whether people are willing to disclose personal information, a Protestant Pastor who wished to remain anonymous told Forum 18 that some church members are concerned about disclosing their place of employment, but in general the reaction is "very calm".

Leonid Mikhovich of the Baptist Union also noted concerns. "It is rare when people are not ready to provide their personal details including the place of work, while for example in our church (near Minsk) this never happened," he told Forum 18. He maintained that for large churches it is not a problem "because it is not hard to get the required number of founders". (END)

More reports on freedom of thought, conscience and belief in Belarus (<https://www.forum18.org/archive.php?country=16>)

For background information, see Forum 18's Belarus religious freedom survey

(https://www.forum18.org/archive.php?article_id=2806)

Forum 18's compilation of Organisation for Security and Co-operation in Europe (OSCE) freedom of religion or belief commitments

(https://www.forum18.org/archive.php?article_id=1351)

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