

Roadmap of Reciprocal Steps for a Limited De-escalation between Belarus and the EU:

An Expert View

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1. Roadmap: necessity, risks, implementation mechanism

The depth of the crisis between Belarus and the European Union is well known. The difficulty is that it encompasses diverse issues: grave human rights violations in Belarus; Minsk's support for Russia's war in Ukraine; provocations by the regime of Aliaksandr Lukashenka against neighboring states, including the engineered migration crisis; and violations of civil aviation rules in 2021 when a Ryanair flight was diverted for political reasons.

Since mid-2024, however, the Belarusian regime has been sending limited but clear signals that it wants to improve ties with the West. Hundreds of political prisoners have been pardoned and released in groups. Some of those pardons coincided with visits by high-level U.S. delegations to Minsk. Since the visit by the U.S. President's Special Envoy Keith Kellogg in June 2025, Minsk has been open – even in its public rhetoric – about the transactional nature of its “humanitarian” gestures. It has also signaled its willingness to continue them in exchange for concessions from the West.

Avoiding illusions and maximalist expectations

No one should be under the illusion that Minsk is consistently seeking de-escalation. First, repression inside the country continues; in some areas, it has expanded and taken new forms. Second, provocations at EU borders using migrants have not stopped. Third, military cooperation with Russia is growing, including deeper integration of both countries' military-industrial complexes.

Letting go of illusions should not obscure the value of limited progress toward the three core goals guiding this Roadmap:

- To alleviate, as far as possible, the human rights and humanitarian crisis in Belarus.
- To reduce the regional security risks emerging from Minsk's actions.
- To lower Minsk's dependence on Moscow and improve the chances of Belarus's future democratization and Europeanization.

This strategic paper focuses on how to organize and structure a limited de-escalation between Belarus and the EU, while keeping in view the risks of engaging an authoritarian regime whose agency is constrained by dependence on Russia.

This paper is not a blueprint for the full normalization of relations between Minsk and the EU. Without a profound transformation of the Belarusian regime and changes in the regional – and possibly geopolitical – environment there are fundamental barriers to full normalization. To keep the Roadmap practical, we do not include concessions that would be unrealistic all the while Russia's aggression against Ukraine continues, or that are incompatible with the political survival of Lukashenka's regime. The West does not have, and for the foreseeable future will not have, sufficient resources to force Lukashenka into actions that would amount to “political suicide”, for example by agreeing to hold free and fair elections.

At the same time, postponing any attempts at de-escalation until ideal conditions arise inside and around Belarus will worsen both the present and the future situation. The more progress that can be achieved now, the faster and more durable full normalization can be after a regime change in Minsk and an end to the war in Ukraine.

It is essential to look beyond Lukashenka and his personalist regime, and consider what will come after him. Today the regime seeks to offset sanctions by tightening institutional bonds with Russia and the degree of that dependence on Russia will strongly shape Belarus's post-Lukashenka path. If the EU ignores Belarus's growing attachment to Russia, it raises the odds that the regime's successors, and even their domestic political competitors, will keep orienting toward Moscow and act accordingly.

Given the current, very high dependence on Russia, it is important not to delay creating preconditions for alternative scenarios in a post-Lukashenka Belarus. Minsk needs incentives to loosen its institutional ties to Russia. Reducing Belarus's dependence on Russia is therefore a strategic task that matters for Belarus's democratic neighbors as much as for Belarus itself. Otherwise, the West in effect accepts that Belarus and its potential – military, human, and economic – remain fixed in Russia's orbit indefinitely.

The consistent implementation of the Roadmap will also signal to parts of the Belarusian elite that retain sympathies for the EU, as well as to the pro-European segment of society, that Belarus's path to a European future, although it may be far ahead, is not closed.

The effectiveness of EU efforts to implement the Roadmap will be enhanced through coordination with partners. The United States, Canada, the United Kingdom, and other European and democratic states can pursue shared priorities on Belarus.

The risk of missing opportunities

A step-by-step strategy of limited de-escalation has only one real alternative: the status quo. For the EU this means staying on the path of recent years – tightening sanctions, supporting Belarus's democratic movement, and waiting for these efforts and the passage of time to deliver results. For decision-makers, they may feel that this approach puts them “on the right side of history”, but it does not create sufficient incentives for Minsk to change its policy here and now.

The Roadmap is not a cure-all, but it can speed up progress. If Minsk and the EU both see significant concrete outcomes from their first limited steps, their motivation will grow to take more ambitious steps. If one's own concessions look like weakness – an advance unlikely to be “matched” by the other side – enthusiasm for de-escalation declines.

Without some form of roadmap for gradual de-escalation, the EU risks missing the chance of using its diplomatic and sanctions leverage fully. In the long run, any future peace settlement in Ukraine, whenever it comes, is likely to include the lifting of Western sanctions imposed since 2022 on Russia and Belarus. In that scenario, Minsk could shed the most painful sanctions with little effort. It would not need to make reciprocal moves that could have been secured in the meantime. That outcome would be a missed opportunity for European diplomacy. Given the acute crisis of political prisoners in Belarus, missed opportunities also carry humanitarian costs.

The war factor

Minsk's support for Russia's invasion of Ukraine seriously constrains Western diplomacy when it comes to Belarus.

First, the deepening military alliance with Russia places the Lukashenka regime among the potential military threats to the EU and Ukraine. This forces the EU, especially Belarus's immediate western neighbors, to view high-level contacts with Minsk through a securitized lens.

Second, most sanctions, including the most sensitive sectoral ones, were imposed because of Minsk's role in Russia's aggression against Ukraine. This creates political obstacles to lifting them while equivalent measures remain in place on Russia, or unless Belarus exits its military alliance with Russia – something unlikely in the foreseeable future.

Third, were sanctions eased on Belarus alone, there are serious concerns that Russia could use Belarus to bypass its own restrictions, given the close economic ties between the two countries. This risk is especially relevant for a wide range of sanctioned goods used in the military-industrial sector, and therefore in Russia's aggression against Ukraine and military rebuilding.

These arguments severely narrow the “menu” of reciprocal steps that can be proposed for the Roadmap. Strengthening Russia's capacity to wage war would run counter to the goals of EU foreign policy and to the political and humanitarian logic behind this paper.

Yet waiting for the full elimination of the reasons for war-related sanctions on Russia and Belarus before moving to limited de-escalation with Minsk would, in practice, paralyze EU policy on Belarus.

This paper offers a balanced response. If we assess Belarus's complicity in Russia's aggression objectively, some of the important elements that triggered sanctions in 2022 are no longer relevant today. Unlike the first year of the full-scale war, Belarusian territory is not used as a rear base for a Russian offensive grouping. Missiles and drones are no longer launched from Belarus into Ukraine. Belarusian training grounds do not host a thousands-strong Russian contingent.

Minsk continues to support Moscow in other ways, as do some of Russia's other partners – for example, by supplying military technologies and equipment. But the most egregious forms of complicity are, for now, in the past. In recent years, both of the warring parties have even used Belarus for exchanging prisoners and the bodies of fallen soldiers.

We should harbor no illusions. If necessary, Russia may again use Belarus as it did in the first months of the invasion – or even go further. If Minsk significantly increases its involvement in Russia's aggression, the EU should immediately exit the limited de-escalation process described here. However, as long as the regime refrains from such involvement, there is – albeit narrow – room to address other tasks.

Section three of this paper will explain the principles used here to identify, within the overall EU sanctions on Belarus, those measures whose suspension would not strengthen Russia's war machine.

Sanctions snapback mechanism

The depth of confrontation and mutual distrust between Belarus and the EU necessitates a step-by-step approach outlined in the Roadmap.

Actions by Minsk – for example, releases of political prisoners, allowing them to remain in Belarus rather than be deported (as at present), an end to the migration crisis, and reduced political repression – should be accompanied by interim EU decisions. These would expand diplomatic contacts with Minsk and include the selective suspension of certain sanctions.

The suspension of sanctions, rather than their complete lifting, will provide “insurance” for the EU. If the Belarusian regime resumes direct politically motivated persecution (such as searches of dissidents’ property, detentions on political grounds, or opening new criminal cases against opponents) leading to new political prisoners – or if it revives broader repressive policies – the EU can respond by restoring sanctions. Without commitments from the regime to end politically motivated persecution and repeal repressive laws, the whole process could derail.

The mechanism and legal formulas for such EU decisions were tested in 2013 with Council Decision 2013/308/CFSP of 24 June 2013, which suspended restrictive measures against Foreign Minister Uladzimir Makei. The decision was reviewable at any time: “This Decision shall apply until 31 October 2013. It shall be kept under constant review. It may be renewed or amended, as appropriate, if the Council deems that its objectives have not been met.” The same logic applies to the other sanctions as well, not only to personal ones. In other words, if Lukashenka backtracks on his part of the Roadmap, the EU can promptly restore sanctions.

Verification of implementation of the Roadmap

Indicators

Effective tracking under the Roadmap requires indicators for specific measures. These rely on the presence or absence of information regarding concrete violations by the Belarusian side, as well as information about current legislation. Such information can be verified from both public and non-public sources, including official data from Minsk, data from neighboring states in the context of the migration crisis, independent media reports, and reports and monitoring by human rights organizations.

However, as part of its repressive policy, the authorities have made several official public sources once used by human rights defenders no longer available. Since 2024, a database of anonymized court decisions has not been publicly available, whereas it was in the past. Since March 2025, public access to the electronic court hearing schedule has also been discontinued. These measures drastically limit the ability to monitor court proceedings and, therefore, politically motivated prosecutions. The public availability of comprehensive, disaggregated data on criminal and administrative prosecution will, however, be necessary to implement the Roadmap. Its availability itself will be an indicator of movement in the right direction by Belarus’s authorities.

To avoid overburdening the Roadmap, we do not list all human rights-related indicators in this document. They are instead detailed in the document “Key Measures and Indicators for Monitoring Changes in the Situation with Political Repressions in Belarus” (hereafter, “Repression Benchmarks”).¹ That document underpins the specific steps proposed to exit the humanitarian crisis (see sections 2 and 4).

Within the monitoring mechanisms described below, and in consultations with human rights defenders, these indicators should be used to verify results.

Monitoring compliance with agreements to exit the humanitarian crisis

A format to control the parties’ actions could be set up through contact or monitoring groups between the EU and Minsk. For example, a group could include representatives

1. Prepared in 2025 by a coalition of Belarusian human rights organizations. The document is not public and is provided by Belarusian human rights organizations upon request.

of the European External Action Service (EEAS) (the managing director for the region), the EU Delegation in Minsk, and the Belarusian authorities. Minsk's group could include: representatives of the security agencies (the KGB and the Ministry of Internal Affairs), which implement repressive policies; the State Secretariat of the Security Council, which coordinates the security agencies; and the Ministry of Foreign Affairs.

The frequency of meetings should be agreed in advance by the parties – for example, monthly, alternating between Minsk and Brussels. There should be an expectation that “positive progress” by Minsk toward implementation of the Roadmap precedes each meeting. This would prevent the regime from stalling while continuing repression and migration pressure.

Ahead of meetings with Minsk, the EEAS and the European Commission could consult the coalition of Belarusian human rights organizations. Based on input from these consultations, they would prepare negotiating positions on human rights. Including Belarusian human rights defenders in the process – even indirectly, as direct participation is hardly possible at present – is essential. It ensures not only verification of data from the Belarusian side, but also public oversight of the process.

Monitoring compliance with agreements to end the migration crisis

To oversee compliance with resolving the migration crisis at the Belarus-EU border, a special monitoring group should be created. It could include representatives from the border services of Latvia, Lithuania, Poland, and Belarus, with participation from Frontex (the European Border and Coast Guard Agency) and the International Organization for Migration (IOM). The IOM should convene and host this group. The Belarusian side must assume a clear commitment to end, within agreed-upon timelines, the practice of facilitating irregular migration into the EU.

2. Steps by Minsk: realistic expectations and sequencing

Under the current Belarus regime, it is hard to expect a complete halt to repressions, comprehensive legal reform in line with recommendations of international human rights mechanisms and organizations, and accountability for those responsible for violations.

At the same time, the Roadmap sets an upper bound of what may be achievable now. We recognize that the authorities are unlikely to meet all the requirements immediately. Even so, the demands are substantially less than those required by international obligations. Finally, to achieve meaningful results, lowering expectations too far would be diplomatically short-sighted.

We propose two groups of steps that the EU should seek from official Minsk in exchange for potential concessions under this Roadmap:

1. Exiting the humanitarian crisis – gross and systematic human rights violations linked to the 2020 election and its aftermath and other repressive policies.
2. Steps in the sphere of mobility and migration (including ending the migration crisis at the EU border and rebuilding trust in civil aviation).

Exiting the humanitarian crisis – gross and systematic human rights violations

Over the past five years, the authorities have implemented a consistently repressive policy that has become the state's new modus operandi. This has resulted in a humanitarian crisis that now extends far beyond the direct persecution of dissenters. The policy has the following features:

- It is consistently formalized through legislation. Between 2021 and 2025, the authorities amended or adopted approximately 60 legal acts to legalize human rights violations and political repression. Norms are introduced at all levels of law. This both expands and entrenches prior unlawful practices and adds many new restrictions.
- It affects all spheres of public life: education, labor relations, culture, sports, religion, social protection, policy toward national minorities, and property relations. Across these areas, laws restrict freedoms and create constant risks and pressure on people depending on their loyalty to the regime.
- It potentially affects not only those who oppose the authorities and/or speak out against them. Since repressive norms are systemic, a much wider circle of people is at risk than those who meet the formal grounds for politically motivated prosecutions.
- It is actively implemented across international borders, making Belarusians who left the country for their own safety even more vulnerable in addition to their migrant status. The “Passport Decree” adopted by Lukashenka in September 2024 made many Belarusians who cannot return de facto stateless. It also hinders the

exercise of several rights in host countries, including the ability to dispose of property inside Belarus. Legal rules that formalize cross-border repression continue to expand.

Belarus thus has a stable, systemic base for latent repression at a vast scale, beyond direct persecution and the best-known forms of repression (detentions, property searches, arrests, torture and ill-treatment, and being added to “extremist” and “terrorist” lists).

For the Roadmap, this implies:

- First, even a mass release of people detained for political reasons – even all those officially recognized as political prisoners – would transform the lives of those people and their families. However, it would change almost nothing for Belarusian society as a whole. A large part of society lives with constant fear, pressure, and a lack of basic personal security.
- Second, the release of political prisoners and the “easing” of repressions are not equivalent or interchangeable demands. They are different requirements from the perspective of monitoring compliance and must be clearly separated. At the same time, releases and better conditions in detention are priorities if Belarus is to exit its humanitarian crisis.

Based on the document “Key Measures and Indicators for Monitoring Changes in the Situation with Political Repressions in Belarus” (Repression Benchmarks),² the Roadmap proposes a concrete, sequential list of steps that the Belarusian authorities must take to obtain reciprocal concessions (see section 4).

Measures to exit the humanitarian crisis include:

- Release of people held for political reasons.³
- Ending unlawful practices toward such people before their release.
- Ending unlawful practices toward a broader circle: arbitrary criminal and administrative prosecution; pressure related to border crossing; repressive practices in hiring and at workplaces; pressure due to holding foreign residence permits or similar documents.
- Ending unlawful practices against civil society organizations.
- Repealing the legislation introduced after 2020 that formalize politically motivated persecution.

Steps in the sphere of mobility and migration

Since 2021, the Belarusian authorities have instrumentalized migrant flows for political aims, including regional destabilization. They have facilitated the unlawful movement of migrants into EU countries and have failed to take necessary measures at the border to prevent and detect such movement. Border guards, state aviation companies, and state-linked tourism companies have been complicit in the crisis.

The humanitarian dimension is central to the Roadmap. By instigating and encouraging irregular crossings into the EU, the authorities expose migrants to higher risks and greater vulnerability. Their actions have caused many people, including children, to spend long periods outside in harsh conditions – living in forests without

2. Prepared in 2025 by a coalition of Belarusian human rights organizations. The document is not public and is provided by Belarusian human rights organizations upon request.

3. Individuals recognised by human rights defenders as political prisoners: <https://prisoners.spring96.org/en>, as well as others not yet known to human rights defenders, who have been convicted of so-called “extremist crimes”.

proper medical care or access to food and water. Many migrants have died, and deaths continue at the border.⁴ Cases of ill-treatment aimed at forcing migrants to keep trying to cross irregularly have been recorded.

Resolving the migration crisis includes:

- Measures to prevent severe humanitarian consequences – loss of life, exposure to inhumane conditions, and ending the ill-treatment of migrants.
- Ending support for, and encouragement of, irregular border crossings by restoring proper border control, resuming information exchange with neighboring states in line with international obligations, and ending the facilitation of irregular migration by state bodies and tourism companies.

We also include other mobility-related steps among our expectations from Minsk: rebuilding trust in civil aviation, which was lost following the 2021 Ryanair incident, and allowing European embassies to restore pre-crisis numbers of consular officers to expand visa issuance for Belarusians.

Sequencing and prioritization

We propose sequencing the steps expected from Minsk by the following principles:

Priority for the humanitarian track: people first

Steps to exit the humanitarian crisis come first because they affect lives, health, and the ability to exercise basic rights without fear. Measures in this group follow the same logic and fall into three clusters: urgent measures, first-tier measures, and second-tier measures. **Urgent measures** aim to release all people deprived of liberty for political reasons and end the torture and other ill-treatment of political prisoners. **First-tier measures** target enforcement practices – especially those that “generate” new political prisoners. **Second-tier measures** address the repeal or amendment of legislative provisions adopted mainly after 2020 to legalize politically-motivated persecution.

The same logic applies to ending the migration crisis. Urgent measures protect migrants’ lives and health, while first-tier measures minimize threats to the border services of Belarus’s neighbors and to regional security from trafficking migrants to EU borders.

Ending the migration crisis is technically and politically easier for the regime than curbing repressions. Such a step could also quickly and significantly reduce tensions with neighboring states. We therefore rank it relatively high among the steps expected from Minsk. Removing such a major irritant for neighbors and for the EU can also help subsequent talks on human rights issues. Early progress here can demonstrate to politicians in Belarus’s neighboring states – for whom border security is one of the main priorities – that limited de-escalation with Minsk yields results beyond the humanitarian track, and thus has broader EU relevance.

Operational options for quick effects: end practices first, then repeal legislation

Belarus’s administrative system, including its legal system, often prioritizes specific enforcement instructions, whether formal or informal, over laws. Such instructions are typically internal and not public.

4. As of the end of August 2025, human rights defenders have documented at least 165 deaths: 6 on the Lithuanian side, 12 on the Latvian side, 53 on the Polish side, and at least 113 in Belarus. Of these, 94 have been confirmed by the Belarusian Border Committee, while an additional 19 have been reported based on witness testimony.

The priority should therefore be to end unlawful enforcement practices first, and only then repeal or amend repressive laws. Operationally, changing or repealing legal acts takes time; ending a practice can be achieved quickly through high-level orders. A moratorium on the relevant legislative provisions should accompany such operational decisions until repeal, as an indicator that the practice has truly ended. Both sets of measures – ending enforcement practices and repealing repressive legal provisions – are ordered by their critical impact on people.

The importance of space for civil society: movement here is part of a minimal, sustainable package

Exiting the humanitarian crisis requires at least basic conditions for organizations working on human rights, humanitarian issues, and similar, to track and verify implementation “on the ground”. Without this, it will be hard to be assured of the sustainability of Belarus’s actions and the motivations behind them.

Sequencing and prioritization can change in practice, but it is important to be guided by this logic when presenting conditions to the Belarusian authorities. In essence, the measures included within each step form a kind of menu from which one can build proposal packages of varying priority, adjusted according to circumstances.

3. Steps by the European Union: available options and sequencing

The experience of U.S.–Minsk contacts in 2025 confirmed something well-known: even the tools of traditional diplomacy – official contacts and visits – can produce practical, albeit limited, results. The Belarusian regime values international contacts as such; they give Lukashenka a sense that he is escaping isolation. These contacts do not oblige Western governments to recognize Lukashenka's legitimacy, to lift sanctions later, or to scale back close cooperation with the democratic forces.

The EU can therefore use open or quiet diplomacy with Minsk to extract maximal humanitarian and other concessions while preserving the credibility and principles of its own position. The engagement itself will test the regime's seriousness about de-escalation and help assess the potential for next steps.

Recent U.S. practice also shows that direct contacts with Lukashenka are more effective than mediated formats. It is Washington's contacts with Lukashenka that led to the release of some political prisoners in Belarus. This implies that European states should also engage at the appropriate level, involving sitting heads of state or government, foreign ministers, and possibly former senior figures. High-ranking current and former European officials could initiate "humanitarian diplomacy" with Lukashenka even before the EU is institutionally ready for formal dialogue, let alone the selective suspension of sanctions.

In Germany, for example, former Chancellor Angela Merkel could take up the issue of releasing political prisoners in Belarus. She knows Lukashenka, having met and spoken with him after the 2020 election. In Austria, former Chancellor Sebastian Kurz – who has visited Minsk and also hosted Lukashenka in Vienna in November 2019 – could also engage. The Vatican played a significant role in releasing political prisoners in Belarus in 2014–2015 and Lukashenka met several times with Pope Benedict XVI (in 2009) and with Pope Francis. The Vatican helped secure the return of ten Ukrainian civilians from captivity in June 2024, including several detained in Belarus, as President Volodymyr Zelenskyy noted. Minsk opened an embassy to the Holy See for the first time and appointed an ambassador in June 2025. There are indications that the new nuncio to Belarus has experience in securing releases in Venezuela. Involving a senior Vatican representative in dialogue with Minsk could also help free political prisoners (including Catholic clergy and believers).

Reviving contacts with Belarus may also be aided by one of the EU member states and the EEAS initiating consultations with Minsk, in either a closed or open format, to agree on the Roadmap. Our proposed version includes packages of European steps in the political-diplomatic sphere, mobility, sectoral engagement, the resumption of air connections with Belarus, decisions on personal and economic sanctions, and sports.

Sanctions are the EU's strongest "trump cards" with the regime. Despite Minsk's bravado, many EU measures significantly affect the economy and specific companies and sectors. In 2023–2024, losses from sanctions were largely offset, sometimes more than offset, by the benefits from new cooperation mechanisms with Russia.

Yet the regime realizes three problems with this model. First, the status quo requires continual political and economic concessions to the Kremlin, which erodes Belarusian sovereignty. Second, even if Russia wants to maintain today's benefits, its evident stagnation will likely reduce them. Third, for certain sectors that gain little from deeper ties with Russia, sanctions relief is critical to their survival. For these reasons, the regime will be ready to negotiate if sanctions relief appears to be a realistic prospect.

The partial de-escalation proposed in the Roadmap sets limits on EU concessions. Not every sanction is on the table for the limited de-escalation proposed here. Still, it is important to show Minsk a trajectory for further progress that could open once relations move to a normalization track.

Also critical is a **tiered approach** to concessions and relaxations, aligned with the principle of step-by-step progress. On this basis, we divide the entire pathway of sanctions easing into **five tiers**.

Tier 1. Low-salience sanctions with no external risks. It is logical to use this tier in the early stages of implementing the Roadmap.

Tier 2. Sanctions whose lifting will bring limited positive effects for the regime, positive effects for civil society (CSO) and the private sector (PS), and few external risks. It is logical to use this tier as a reward for significant reciprocal steps by the regime.

Tier 3. Sanctions whose lifting will bring significant positive effects for the regime, tangible benefits for CSOs and PS, and an acceptable external risk. This tier is logical to use at the final stage of implementing the Roadmap.

Tier 4. Sanctions whose lifting will bring strong positive effects for the regime and significant external risks. This lies beyond the limited de-escalation outlined in the proposed Roadmap. It is logical to visualize such a step as an incentive that could be implemented in the event of sustained domestic democratization and a distancing from Russia in foreign policy.

Tier 5. Sanctions whose lifting will have significant effects on the regime and pose high external risks. This can be visualized as a step that could be taken after the war ends, after Belarus distances itself from Russia, after sustained democratization, and after it adopts a course of good-neighborly relations with the EU.

The first three tiers fall within the logic of limited de-escalation. The last two go beyond it and presuppose a trajectory of sustained progress in the regime's domestic and foreign policy, and in Belarus–EU bilateral relations.

To allocate current sanctions⁵ measures to the five tiers, we use the following criteria:

1. The extent to which suspending a specific sanction could translate into military gains for Moscow/Minsk.
2. The extent to which suspending a sanction could translate into repressive gains for the Belarusian regime.
3. The extent to which the risk of circumvention of sanctions on Russia would increase.
4. The extent to which Belarus's economic independence from Russia would be strengthened.
5. The extent to which suspension would benefit Belarusian civil society, the Belarusian people, and the Belarusian private sector.

5. In accordance with the version in force on 24 September 2025 of Council Regulation (EC) No 765/2006.

6. The magnitude of the economic effects of suspension for the EU.

7. The magnitude of the economic effects of suspension for the regime.

High scores⁶ on the first three criteria lower the rank of a given sanctions measure and place it in a **lower tier** (i.e. tiers 4 and 5). High scores on criteria 4-6, by contrast, raise a measure into a **higher tier** (i.e. tiers 1-3). In other words, the more advantageous the suspension of a specific measure is for Moscow's and Minsk's war-fighting capacity, for the regime's repressive apparatus, and for circumventing sanctions on Russia, the **lower** the tier to which that measure will be assigned. The more advantageous the suspension is for Belarus's independence from Russia, for civil society and people, and for the EU, the higher the tier. Finally, at the last step we balance these pros and cons against the magnitude of the economic effects for the regime (criterion 7): the greater that effect, the **lower** the final grading and the lower the tier for the corresponding measure. This approach allows the most important concessions for Minsk to be kept as a "carrot" for completing movement along the Roadmap.

We apply the same logic (now within a ranked sanctions measure) to specific designated companies⁷ and banks.⁸ For example, the prohibition on the use of specialized financial messaging services (SWIFT)⁹ is a general measure assigned to **Tier 3**, but the least macro-significant bank – **Bank Dabrabyt** – is assigned to **Tier 2**.

In addition to easing sanctions at various stages, reciprocal steps by the EU (subject to additional, specific sectoral conditions) may include:

- Access for Belarus (Belarusian students and faculty) to the Erasmus+ and Horizon Europe programs (within **Tier 2**);
- EU facilitation of the restoration of relations with international financial institutions, primarily the World Bank (**Tier 3**);¹⁰
- Belarus's return to the Bologna Process and to the European Higher Education Area (EHEA) (a separate roadmap within **Tier 3**);
- A joint digital project for cargo management at the border (**Tier 3**).

6. Each criterion is assessed by experts on a 1–10 scale. We then compute a composite index by simple summation: criteria 1–3 enter with a negative sign, while criteria 4–6 enter with a positive sign. If the composite index is negative, the sanctions measure is placed in Tiers 4 or 5 (i.e., outside the Roadmap). If the composite index is positive, its value is then compared with the assessed economic effect for the regime (criterion 7). The tiering decision is taken on the basis of the relationship between these two indicators. The higher the balance of benefits and costs (the composite index), the higher the tier to which we assign the sanctions measure.

7. Annex 1b to Council Regulation (EC) No 765/2006.

8. Annexes 9 and 15 to Council Regulation (EC) No 765/2006.

9. Article 1zb of Council Regulation (EC) No 765/2006.

10. In relations with the World Bank, the debt-resolution process is critically important.

4. Roadmap: a prototype de-escalation plan

We proceed from the premise that the EU takes the initiative to present the Roadmap to Minsk, and that EU steps are responsive – designed to encourage the regime to move along its side of the Roadmap.

The left column in the table below lists the steps expected from Minsk, beginning with the most important and urgent, followed by others in order of priority. The right column contains the EU's reciprocal steps, arranged by sector rather than by importance; its logic reflects a gradual de-escalation from diplomatic engagement toward sanctions. That said, the content, pace, and sequence of Western responses may vary with the “weight” of Minsk's decisions. The EU should itself determine which option, or combination of options, from the proposed “menu” and from which group, is appropriate, as well as which EU step is commensurate with a given decision by the regime in Minsk.

Each EU decision must be reversible, including any suspension of sanctions, which is tied to the release of all political prisoners, the easing of repression, and an end to the migration crisis.

In other words, control over the movement along the Roadmap remains in the EU's hands. It is also essential to account for the blind spots that became evident during recent Minsk–Washington negotiations. The releases of political prisoners amounted to de facto deportation, since people were forced to leave Belarus under the threat of being returned to a penal colony. In parallel with releases, new arrests continue and new political sentences are handed down, and repressive legislation continues to be used in full measure and is constantly updated. A comprehensive approach to talks with Minsk, as proposed in this Roadmap, will help mitigate these risks.

Even if Minsk implements only part of the specified steps, the mission of European diplomacy in this process can be regarded as successful, albeit partially.

Steps by Minsk

Steps by the EU

Start of the process

Humanitarian crisis: release and conditions of detention

- Simultaneous and unconditional release of about 200 individuals included in the **humanitarian list** (those with serious health conditions or other life-threatening situations), as well as other individuals known to the authorities who meet the criteria of that list, including women with underage children.
- Ensuring proper **access to medical care** for all, regardless of place of detention, with priority given to individuals on the humanitarian list, including lifting restrictions on receiving parcels containing medications and vitamins.
- Cessation of the **incommunicado detention regime** (deprivation of phone calls, visits, correspondence, and access to lawyers) for political prisoners, and an end to discriminatory practices that deprive other political prisoners of contact with the outside world.
- Cessation of discrimination, additional repression, torture, and ill-treatment against political prisoners,¹¹ through use of: punishment cells or solitary-confinement, transfers to prisons or stricter regimes, limits on access to food parcels and basic necessities, deprivation of mattresses and bedding, deprivation of 24-hour lighting, and night-time checks in detention facilities.

Diplomatic steps

- Propose that Minsk host a visit by a representative of the EU, Germany, Austria, the Vatican, or any other European country at a sufficiently senior level to meet with Lukashenka and deliver the “Roadmap.” The UN High Commissioner for Human Rights may also be involved in the process. The meeting may be public or non-public, depending on the parties’ agreement.

11. As of the beginning of October 2025, the list includes at minimum five individuals: Maryia Kalesnikava, Maksim Zhak, Viktor Babaryka, Mikalai Statkevich and Uladzimir Kniha.

Humanitarian crisis: practices that must be stopped

- The practice of **forced deportation** (expulsion) of individuals on release from prison and/or penal colonies.

Both sides, during the visit (and in subsequent technical communications), agree on the Roadmap's content, the sequence of actions, coordination mechanisms, and timelines, as well as the frequency of meetings to assess progress.

Humanitarian crisis: release and conditions of detention

- Release of individuals prosecuted for their professional activities and for assisting others in exercising their rights (including **human rights defenders, trade union leaders, other representatives of CSOs, lawyers, journalists, and media workers**).
- Release of political prisoners under the terms of Article 91 of the Criminal Code,¹² provided they have served: at least one-third of the sentence for minor or less serious offences; one-half for serious offences (especially with prior convictions or offences committed while serving a sentence); and two-thirds for particularly serious crimes.
- Release of individuals who have submitted a request for pardon.
- Suspension of pre-trial investigations and court proceedings with regard to so-called "extremist" offences, including the cancellation of detention as a preventive measure for the accused, and halting the transfer of convicted persons to penal colonies.
- Release of remaining political prisoners through a broad range of existing legal mechanisms: early conditional release, conditional substitution of custodial sentences with non-custodial penalties, reduction of sentences through supervisory review, and pardons granted without a formal request from the convicted person.

12. Article 91 gives provisions for converting unserved parts of a sentence into softer forms of punishment

Political-diplomatic actions

- High-level visits to Minsk for **meetings with Lukashenka**.
- High-level telephone conversations with Lukashenka.
- Targeted **exchanges of visits** at the level of **foreign ministers**.
- Telephone conversations at the level of foreign ministers.
- Use of **OSCE** and **UN multilateral platforms** for contacts with Belarus at the level of MFA leadership.
- Resumption of **inter-ministerial consultations** at the level of deputy ministers.
- A public **expert meeting in Minsk** under the auspices of an EU member state with participation of officials and analytical communities from both sides; participation by the diplomats involved in implementing the Roadmap and a **meeting with Lukashenka**.
- A visit to Minsk by the **Swiss Foreign Minister** (Switzerland will chair the OSCE in 2026) and by the **OSCE Secretary General** (former Foreign Minister of Türkiye).
- An invitation to the Belarusian deputy foreign minister to a **multilateral event in Brussels**, with meetings at the EEAS and the European Commission.
- **Gradual accreditation of EU ambassadors** to Minsk and of Belarusian ambassadors in EU member states.
- Gradual **resumption of technical dialogue** between the EU and the Minsk in international financial institutions (**IMF, World Bank, EBRD**).

Until the release:

- Lifting restrictions on receiving money transfers for individuals labelled as “extremists” or “terrorists”.
- Ending the use of “yellow tags” that automatically classify political prisoners as “prone to extremism” and impose significant restrictions.
- Annuling previously imposed disciplinary sanctions that have worsened the conditions of political prisoners.
- Stopping the repeated extension of prison terms for alleged disobedience to prison administration (Article 411 of the Criminal Code).

Humanitarian crisis: practices that must be stopped

- Pressure, excessive control, and restrictions imposed on released political prisoners.
- Arbitrary prosecution under the following articles of the Criminal Code: Articles 123, 130, 130-1, 130-2, 293, 341-1, 342, 357, 361, 367, 368, 369-1, 369-2, 369-3, and 370.
- Arbitrary use of administrative detention under Articles 19.8, 19.10, 19.11, 24.15, 24.22, and 24.23 of the Code of Administrative Offences.
- Of particular importance: termination of unjustified administrative prosecution **for dissemination of so-called “extremist materials”**.

Steps in the sphere of mobility and migration (the migration crisis and consular issues)

- Ending situations in which **migrants’ lives and health are put at risk**: providing adequate shelter and medical care, and refraining from the use of violence against migrants.

Actions in the spheres of mobility and migration

- Sequential **re-opening of blocked border crossings** for passenger traffic between the EU and Belarus.
- **Resumption of passenger rail services** between the EU and Belarus.
- Streamlining of **customs controls** at the EU–Belarus border to speed up crossings.
- Increased issuing of **multi-entry visas** valid for 2–5 years to Belarusian citizens.
- Establishment of working-level **contacts between the border services** of Belarus and of Poland, Lithuania, and Latvia to combat cargo smuggling.
- Unfreezing of the EU–Belarus agreements on **visa facilitation and readmission**.

Sports and targeted personal measures:

- Adjustment of EU countries’ sports federations’ voting positions in international sports bodies to broaden Belarusian **athletes’ access to international competitions**, and to enable the hosting of international **sporting events in Belarus**.
- Suspension of **entry bans** into the EU with respect to:
 - The Minister of Foreign Affairs of Belarus, **Maksim Ryzhankou**, and the former MFA spokesperson (now ambassador to Türkiye), **Anatoliy Glaz**;
 - The current Prime Minister, **Aliaksandr Turchin**;
 - **Viktar and Dzmitry Lukashenka**, and **Liliya Lukashenka** (Viktar’s spouse).

Sectoral engagement

- Inclusion of Belarusian representatives from **non-law-enforcement ministries** (energy, transport, environment, economy, finance) in **multilateral events** organized by the European Commission or EU member states.

- Establishing and holding regular meetings of a **monitoring group to end the migration crisis** at the EU–Belarus border, consisting of representatives of the border services of Latvia, Lithuania, Poland, and Belarus, with the participation of Frontex (the European Border and Coast Guard Agency) and the International Organization for Migration. As a result, the Belarusian side undertakes, within a timeframe agreed with the EU, to “**wind down**” flows of irregular migrants from Belarus into EU countries.
- Lifting **limits on the number of consular officers** in EU member-state embassies in Belarus.

Humanitarian crisis: practices that must be stopped

- Arbitrary prosecution under **terrorism-related provisions** of the Criminal Code, including: Arts. 290-1, 290-2, 290-3, 290-4, and 290-5; and under **extremism-related provisions**: Arts. 361-1, 361-2, 361-4, and 361-5. “Extremist” and “terrorist” materials, organizations, and individual designations are no longer to be added to, or used in, legal practice – except in cases involving individuals listed on United Nations Security Council sanctions lists.
- Ongoing criminal proceedings and the practice of initiating criminal cases against individuals forced to leave the country, carried out under **in absentia (special) proceedings**; lifting **asset freezes** imposed on such individuals.

Humanitarian crisis: practices that must be stopped

- Heightened and **politically motivated border-control measures**, including interrogations by KGB officers, phone checks, and similar practices, and a moratorium on use of the Ministry of Internal Affairs’ “BESporiadki” database (Russian: “БЕСпорядки”) during

- Resumption of bilateral **sectoral dialogues** between Commission directorates-general and the Belarusian ministries of energy, transport (including aviation matters), and environment on practical issues of mutual interest.
- Restoration of **cooperation between regional authorities** of neighboring EU states and Belarus.

Step-by-step resumption of air connection with Belarus

- Suspension of **the sanctions on Belavia** and on the **use of EU airspace** by Belarusian air carriers (see Tier 1 of sanctions suspension).
- Allowing up to **10 Belavia flights** to the EU at the first stage.
- Lifting of the EU ban on air services with Belarus.
- Restoring full air connectivity between Belarus and the EU to its status prior to the Ryanair incident.

Suspension of sanctions in the following categories (article references to Regulation No 765/2006 in parentheses)

Tier 1:

- A prohibition on the sale, supply, transfer or export to Belarus of goods that may be used by **the tobacco industry**, as well as on the provision of related technical assistance, brokering services, financing or financial assistance (1g).
- A prohibition on participating in ownership, operations, investment in, or **lending to Belarus’s energy companies** (1gb).
- A prohibition on **accepting deposits** of more than EUR 100,000 from Belarusian residents (per credit institution) (1u).
- A requirement for EU credit institutions to provide information on deposits held by Belarusian residents in connection with the above deposit cap (1z).

passport control to identify individuals detained in connection with the events of 2020.

- Discriminatory **dismissals** (including forced resignations) of individuals seen by the authorities as dissenters or disloyal – such as those prosecuted for participation in protests, for expressing criticism, or for supporting alternative candidates in the 2020 election.
- Discriminatory **refusals to hire** individuals perceived as dissenters or disloyal – such as those prosecuted for protest participation, criticism, or support for alternative candidates during the 2020 election.
- Politically motivated **pressure and harassment in the workplace**.
- Discriminatory practices targeting individuals who hold a foreign residence permit or similar documents.

Humanitarian crisis: legislation that must be repealed

- Presidential Decree No. 278 “On the Procedure for Issuing Documents and Performing Actions” of 4 September 2023 (“**Passport Decree**”).
- Provisions of **criminal and administrative law** introduced after 2020 to enable arbitrary, politically motivated prosecution (specific provisions, see Repression Benchmarks – §§ 4.1, 4.2).

Steps in the sphere of mobility and migration (restoring trust in civil aviation)

- Introduce corrective **administrative and legal measures** to ensure that Belarusian **civil aviation bodies** (air-navigation services, air-traffic control, airport authorities) operate under procedures that preclude political exploitation.
- Provide access for international technical cooperation in the aviation sector to **restore confidence with international aviation partners**.

- A prohibition on the sale, supply, transfer or export to Belarus of **banknotes of any official EU currency** (1za).
- A prohibition on the **use of EU air-space** by Belarusian air carriers (8b).
- The freezing of all funds and economic resources belonging to, owned, held or controlled by OJSC **Belavia Airlines** (2).

Tier 2:

- A prohibition on the sale, supply, transfer or export of **software** to Belarus, and on the provision of related technical assistance, brokering services, financing or financial assistance, including transfers of intellectual property rights (1gd).
- A prohibition on the acquisition, sale, or provision of investment services for the issuance of **securities** with a maturity exceeding 90 days, issued by the Government of Belarus and by public bodies and agencies (1j).
- A prohibition on listing and on the provision of **financial services** to any companies or entities with more than 50% state ownership (1jb).
- A prohibition on providing **auditing, accounting, management consulting, engineering, architectural and certain other services** – together with related software – to the Government of Belarus, public bodies and agencies, and to companies or natural persons acting on their behalf or at their direction (1jc).
- A prohibition on providing new **loans or credit** with a maturity exceeding 90 days to the Government of Belarus, public bodies and agencies, major credit institutions, and companies with more than 50% state ownership (1k).
- A prohibition on providing **insurance and reinsurance services** to the Government of Belarus, public bodies and agencies, major credit institutions, and companies with more than 50% state ownership (1l).
- A prohibition on the **European Investment Bank** making funds available or processing payments in relation to Belarus, and on the provision of any technical assistance (1n).

Humanitarian crisis: practices that must be stopped

- End the campaign of forced **liquidation of civil society organizations** and restore the ability of non-profit organizations liquidated between 2020 and 2024 to operate legally in Belarus.

Humanitarian crisis: legisla- tion that must be repealed

- Provisions of **extremism legislation** introduced after 2020 that enable arbitrary, politically motivated prosecution (specific provisions, see Repression Benchmarks – § 4.3).
- Legislation that enables discriminatory practices and systemic **persecution of LGBTQ+ individuals**, including systemic discrimination based on sexual orientation, gender identity, and reproductive choices (specific provisions, see Repression Benchmarks – § 4.7).
- Repressive provisions of legislation on **ties with a foreign state** (specific provisions, see Repression Benchmarks – § 4.4).
- Repressive provisions of labor legislation, including **professional bans** (specific provisions, see Repression Benchmarks – § 4.5).
- Repressive provisions regulating the **functioning of civil society** – public associations, trade unions, political parties, and religious organizations (specific provisions, see Repression Benchmarks – § 4.6).
- Repressive provisions regulating the rights of **national minorities** (see specific provisions, Repression Benchmarks – § 4.8).
- Repeal the 2023 Law “**On the Confiscation of Property**”.
- A prohibition on the purchase (direct or indirect), transport, or the provision of related technical, financial or other assistance for transactions concerning **cement** and cement products produced in or exported from Belarus (1p).
- A prohibition on EU central securities depositories providing services to Belarusian residents in respect of **transactions in securities** within the EU (1x).
- A prohibition on the **sale to Belarusian residents of securities** denominated in an EU currency, as well as of units or shares in EU investment funds (1y).
- The freezing of all funds and economic resources belonging to, owned, held or controlled by the following designated entities: OJSC **Minsk Automobile Plant**; Republican Unitary Enterprise “**TSENTRKURORT**”; OOO **Oskartur**; Republican Subsidiary Unitary Enterprise “**Hotel ‘Minsk’**”; OJSC “**Hotel Planeta**”; OJSC **Grodno Azot**; OJSC **Belshina**; Open Joint-Stock Company “Managing Company of the Holding ‘**Belkommunmash**’”; RUE “**Belarusian Lotteries**” (2).
- A prohibition on the provision of specialized financial messaging services (SWIFT) to **Bank Dabrabyt** (1z).

Tier 3:

- A prohibition on the sale, supply, transfer or export to Belarus of **luxury goods**, as well as on the provision of related technical assistance, brokering services, financing or financial assistance (1ga).
- A prohibition on the sale, supply, transfer or export to Belarus of **goods and technology for oil refining** and for liquefaction of natural gas, as well as on the provision of related technical assistance, brokering services, financing or financial assistance (1gc).
- A prohibition on the acquisition (direct or indirect), transport, or the provision of related technical, financial or other

assistance for transactions concerning **potash fertilizers** produced in or exported from Belarus (1i).

- A prohibition on transactions related to the management of the reserves and/or **assets of the National Bank of Belarus** (1ja).

- A prohibition on the acquisition (direct or indirect), transport, or the provision of related technical, financial or other assistance for transactions concerning **wood products** produced in or exported from Belarus (1o).

- A prohibition on the acquisition (direct or indirect), transport, or the provision of related technical, financial or other assistance for transactions concerning **rubber products** produced in or exported from Belarus (1r).

- A prohibition on the acquisition (direct or indirect), transport, or the provision of related technical, financial or other assistance for transactions concerning a broad group of goods (predominantly **intermediate goods**) (1ra).

- A prohibition on providing public **financing** or other financial assistance **for trade** with Belarus, as well as on **investment** in Belarus (1t).

- A prohibition on the provision of specialized financial messaging services (**SWIFT**) to designated Belarusian credit institutions and to companies in which such institutions hold more than 50% of the capital (1zb).

- A prohibition on the **carriage of goods** by road within the EU, including in transit, by road haulage vehicles registered in Belarus (1zc).

- Visa ban suspension for **remaining officials**, as well as for certain **businesspersons** not involved in supporting the war in Ukraine. The exemption **does not cover judges, law enforcement staff, or others implicated in repression**.

Outside of the Roadmap, we propose maintaining the following two tiers of sanctions, which are to be lifted only after sustained and far-reaching reforms of Belarus's domestic and foreign policy (see Section 3). Baseline **domestic indicators** of such change would include a law implementing a broad political amnesty and state-level measures to rehabilitate former political prisoners and other persons subjected to political persecution. Baseline **external indicators** would include a comprehensive Ukraine peace settlement, or Belarus's unequivocal disengagement from alignment with Russia regarding the war.

Tier 4:

- A prohibition on the purchase from Belarus of **items and technology listed on the EU Common Military List** (1aa).
- A prohibition on the sale, supply, transfer or export to Belarus – and on the provision of related technical assistance, brokering services, financing or financial assistance – of **goods for industrial production** (1bb), telecommunications equipment, technology and software (1c); any technical, financial or other assistance for the supply of **telecommunications equipment**, technology and software without prior authorization by the competent authorities of EU Member States (1d); as well as a prohibition on the supply to Belarus of goods and services that could contribute to **strengthening military and technological capacity** (1f).
- A prohibition on the purchase (directly or indirectly), transport, and the provision of technical, financial or other services facilitating transactions in **mineral products** (1g); **iron and steel products** (1q); gold, **gold products and jewellery** (1rb); and **diamonds** and items containing diamonds (1rc).
- A prohibition on the sale, supply, transfer or export to Belarus of **machinery** (1s) and of **aeronautics, aviation and space-industry goods** (1sa).
- The freezing of all funds and economic resources of natural persons who are residents of Belarus. The exemption does not cover judges, law enforcement staff, or others implicated in repression or in supporting the war in Ukraine. (2).
- The freezing of funds and economic resources of **companies from the list of 55 entities** in Annex 1b of the Regulation, excluding those companies proposed for removal from sanctions no earlier than Package 5 (see below) (2).

Tier 5:

- A prohibition on the sale, supply, transfer or export to Belarus – and on assistance to such supplies – of **equipment** that may be used **for internal repression** (1a); items and technology on the EU Common Military List (1ab); equipment from the EU Common Military List and equipment that may be used for repression (1b); **firearms** (1ba); and **maritime navigation** goods and technology (1fd).
- The freezing of all funds and economic resources belonging to the designated entities in Annex 1b of the Regulation, covering the following **Belarusian defense and engineering enterprises**: Beltechexport; Agat Electromechanical Plant; 140th Repair Plant; MZKT – Minsk Wheel Tractor Plant; the Central Election Commission of the Republic of Belarus; the State Foreign Trade Unitary Enterprise Belvneshpromservice; Research-and-Production LLC “OKB TSP”; LLC KB Display; Belarusian Helicopters; OJSC “Vistan”; and LLC Ruskhersmotor (Annex 1b).