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EU SANCTIONS POLICY TOWARDS BELARUS FROM 2010 TO 2020

ABSTRACT: *Restrictive measures (sanctions) are an important instrument of the European Union's Common Foreign and Security Policy (CFSP), used in response to political crises and human rights violations. The EU maintains almost 40 sanctions regimes, covering a wide range of restrictive measures from targeted individual sanctions to more comprehensive sectoral measures. In the face of rising geopolitical tensions, the role of sanctions is becoming increasingly important, and they are being systematically expanded in scope and intensity and implemented with increasing dynamism. The case study of Belarus presented in this article is an illustration of the long-term, variable and cyclical nature of the EU's sanctions policy towards this country over the past two decades, involving a wide range of applied measures. The aim of these measures has been to put pressure on the Belarusian regime to force democratic reforms and improvements in the human rights situation. The sanctions policy was not limited to their imposition, but also included their suspension and lifting, in response to both the changing political conditions inside Belarus and the wider geopolitical context. The article analyses the EU's sanctions policy from 2010 to 2020, focusing on the factors influencing its decision-making process. Particular emphasis is placed on a comparative analysis of the two periods: 2010–2013 and 2014–2020. The article also attempts to determine the extent to which the nature of the EU sanctions policy pursued during the period under review may have influenced both the Belarusian regime's decision to apply repression after the 2020 presidential election and the subsequent support provided to Russia in its aggression against Ukraine.*

KEYWORDS: European Union; Belarus, sanctions (restrictive measures); Common Foreign and Security Policy (CFSP).

1. Introduction

Sanctions are one of the most commonly used instruments of the Common Foreign and Security Policy (CFSP), enabling the EU to respond to political challenges and developments that are contrary to its values and objectives, as set out in Article 21 of the Treaty on European Union (TEU, 2009).

From theoretical and practical perspectives, the analysis of the EU sanctions policy gains particular relevance in the context of the ongoing geopolitical transformation and its impact on the global balance of power.¹ An indecisive and ineffective sanctions policy weakens the EU's foreign policy, undermines its credibility as an important actor on the international stage and threatens democratisation processes.

The analysis of the EU's sanctions policy towards Belarus is illustrative, as the policy is characterised by its long duration, its volatility and cyclicity (measures were introduced, suspended and lifted) and the wide range of measures applied, from travel restrictions and asset freezes to arms embargoes and targeted economic measures.

¹ The overhaul of US foreign policy implemented by the Donald Trump administration, including changes in strategy towards Russia and the EU, have a significant impact on the shaping of the global geopolitical configuration. In addition, further developments in Ukraine and the role of Belarus as an ally of Russia and a direct neighbour of the EU, pose challenges for the EU.

The main objective of this article is to identify the factors determining the decision-making process of the EU sanctions policy from 2010 to 2020 in the context of the Belarusian regime's increasing repression after the period under review and its support for a full-scale Russian invasion of Ukraine.

The article attempts to answer the following research question: what factors (axiological-normative or pragmatic) determined the decision-making process regarding the EU sanctions policy towards Belarus between 2010 and 2020?

The author formulates the hypothesis that the EU's sanctions policy towards Belarus between 2010 and 2020 was pragmatic, driven by the EU's pursuit of its economic interests and the changing geopolitical context, particularly in the context of the political rivalry between the EU and Russia.

This article offers a novel perspective on the analysis of the European Union's sanctions policy towards Belarus, focusing on the factors that shape its formulation in the context of an evolving geopolitical landscape. In particular, it examines the interactions between EU institutions and Member States within the decision-making process, highlighting both the constraints and opportunities for shaping the Union's sanctions policy.

The following structure of the article has been adopted: first, an explanation of the methodology used and the research framework will be presented. This will be followed by a discussion of the role of key EU institutions in shaping sanctions after the entry into force of the Lisbon Treaty. Next, the article will analyse the evolution of EU sanctions against Belarus from 2010 to 2020, divided into two periods, and identify the factors determining the decision-making process of this policy. The final section of the article will attempt to verify the hypothesis and answer the question of how the nature of the EU sanctions policy pursued during the analysed period might have influenced A. Lukashenko's decision on post-election repression in 2020, as well as his decision to support Russian aggression against Ukraine.

2. Methodology and research framework

The analysis of the EU's sanctions policy towards Belarus between 2010 and 2020 is particularly relevant from the current perspective, as it allows an assessment of the long-term effects of the Union's actions towards authoritarian regimes and the effectiveness of its policy instruments in crisis situations. Understanding these mechanisms is crucial for adapting the EU's sanctions policy to new challenges in the face of growing threats to regional stability, particularly a full-scale Russian invasion of Ukraine and the involvement of Belarus on the side of Russia.

The study is based on the following research methods: content analysis, process tracing method and comparative method.

A content analysis was conducted to critically assess selected EU documents, both individual and collective institutional actors on sanctions. Resolutions and recommendations of the European Parliament (EP),

conclusions of the European Council (EUCO) and the Council of the European Union (Council), statements of the High Representative of the Union for Foreign Affairs and Security Policy/Vice-President of the European Commission (HR/VP), the European External Action Service (EEAS), judgments of the Court of Justice of the EU (CJEU), as well as Council decisions and implementing regulations on sanctions, were analysed.

The process-tracing method was used to analyse the evolution of the sanctions policy and to identify the reasons for its changes over a specific timeframe. The comparative method was employed to analyse the two periods in the EU's sanctions policy towards Belarus.

The analysis of sanctions policy was carried out using the following variables: values (“human rights”, “democracy”), pragmatism (“economy”, “geopolitics/security”) and institutional aspects (positions of both collective institutional and individual actors towards the transformation of sanctions policy).

In order to carry out a coherent analysis of the EU's sanctions policy in relation to Belarus, it is necessary to divide the research framework into two chronological stages:

1. 19 December 2010 – 8 July 2014: the period from the presidential elections in Belarus after the entry into force of the Lisbon Treaty to the Council's first decision to suspend part of the sanctions in response to the new geopolitical situation (the annexation of Crimea and armed conflict in Eastern Ukraine) and the role of Belarus in the region.
2. 9 July 2014 – 9 August 2020: the period between the suspension of EU sanctions and the presidential elections in Belarus in August 2020.

In this article, the EU's sanctions policy towards Belarus between 2010 and 2020 will be analysed from the perspective of the liberal intergovernmentalism (Tosiek, 2016, 2020). This approach allows for the consideration of the national interests of Member States – both those maintaining strong economic relations with Belarus and those advocating a more principled, pro-sanctions, value-based approach. The analysis covers economic, investment and energy security issues, as well as the wider geopolitical context, including the EU's relations with Russia. This perspective also allows for an assessment of the functioning of the institutional mechanisms of the CFSP and of the role of key institutional actors – such as the HR/VP, the EUCO and the EP – in shaping the trade-off between the normative dimension of EU policy and the pursuit of its strategic interests.

3. The role of key EU institutions in the decision-making process on sanctions policy after the entry into force of the Lisbon Treaty

In order to analyse the EU's policy towards Belarus and identify the factors influencing it, it is essential to critically assess the role of various EU institutions in this process, particularly in the context of institutional changes resulting from the entry into force of the Lisbon Treaty.

The Treaty of Lisbon established the EUCO as a fully-fledged EU institution (TEU, Art. 13), defining its tasks as “giving impetus to the EU's development and defining its general policies and priorities” (TEU, Art. 15). It also created the position of President of the EUCO for a term of two and a half years, which may be renewed once. Further changes were made to the remit of the HR/VP. Additionally, a subordinate body of the HR/VP, the EEAS, was established to support the EU's external action (Council, 2010).

The main foreign policy decision-making body, including sanctions, is the Foreign Affairs Council (FAC). The FAC is responsible for developing, deciding on the imposition, extension or lifting of sanctions and implementing CFSP actions by unanimous vote (TEU, Art. 24, Art. 31).

The Lisbon Treaty strengthened the position of the HR/VP by defining its responsibility for the implementation of the CFSP and the implementation of decisions taken by the Council and the EUCO. As far as sanctions are concerned, it has been granted the right to formulate and initiate proposals, as well as to submit relevant proposals to the Council (TEU, Art. 30; TFEU, Art. 215). However, there are indications that may point to some shortcomings in the institutional arrangements adopted. The treaty-based triple empowerment of the HR/VP, serving at the same time as Vice-President of the EC (supranational institution) and President of the FAC (intergovernmental institution), although intended to enhance the effectiveness and coherence of the EU's foreign policy, may in practice lead to complications of a political nature due to the unclear demarcation of competences and responsibilities within the CFSP (Korska, 2018, p. 364; Zajączkowski, 2014, p. 13).

Similarly, the division of competences concerning the external representation of the EU is imprecise (Zheltofsky, 2022, p. 666). The HR/VP plays a key role in representing the EU in matters related to the CFSP on the international stage. However, the President of the EUCO, acting “at his level and in that capacity” and “without prejudice to the powers of the HR/VP” (TEU, Art. 15), also represents the Union in CFSP matters. Authors point out that such an arrangement can generate disputes over competences, potentially undermining the coherence and effectiveness of EU foreign policy, particularly when the HR/VP and the EUCO President hold divergent positions (Przybylska-Maszner, 2012, p. 54; Skolimowska, 2014, p. 114; Zajączkowski, 2014, p. 14). The leadership capabilities of those individuals in these roles, as well as the dynamics of their interactions, also play a crucial part in this issue.

Decision-making in the field of CFSP remains intergovernmental (TEU, Art. 24) and the role of supranational institutions such as the EP and the European Commission (EC) is limited by treaty provisions.

As stipulated in the EU Treaties, the EP's role in the CFSP is limited to monitoring, advisory functions and providing a forum for discussion. The EP must be informed of sanctions regulations adopted by the Council (TFEU, Art. 215). The EP also has the possibility to address questions and make recommendations to the Council and HR/VP. Twice a year, the EP holds a debate on the progress of the CFSP and also consults the

HR/VP on this issue. The HR/VP in turn has a duty to ensure that the EP's position is duly taken into account (TEU, Art. 36).

However, as the only EU institution with democratic legitimacy, the EP has a significant impact on sanctions policy-making by exerting political pressure on other EU institutions, such as the Council and EC. This includes organising debates, adopting resolutions, recommendations and reports (Staszczyk, 2013, p. 258).

The EP's work under the CFSP primarily takes place in the Committee on Foreign Affairs (AFET), which analyses, evaluates and makes recommendations on the CFSP, presenting these recommendations in the form of reports and opinions. The AFET cooperates with other institutions, such as the EEAS, the Council, the EC and the diplomatic services of the Member States in an effort to ensure policy coherence and effectiveness. The work of specialised delegations is an important complement to the EP's activities, and in the context of Belarus, the Delegation for relations with Belarus is of particular significance. Although the EP does not have official relations with the Belarusian parliament or government, this delegation facilitates direct dialogue with representatives of the Belarusian democratic opposition and NGOs (European Parliament, 2014).

The EC (together with HR/VP) submits a draft regulation on economic sanctions to the Council, such as asset freezes or export bans, which require implementation at EU level (Treaty on the Functioning of the European Union (TFEU), 2009, Art. 215). The EC also provides the necessary economic and legal analysis in this regard. Effective implementation and enforcement of EU sanctions, as well as ensuring their compliance with existing EU laws and regulations, are a key priority for EC action. Additionally, the exit of the United Kingdom – a country with considerable expertise in sanctions design and consensus-building on the issue – from EU decision-making as a result of Brexit has meant that this role has been taken over to a greater extent by the EC (Jokela & Aula, 2020, pp. 61-69; Portela, 2023, p. 1126).

Persons and entities subject to sanctions may challenge the Council's decision before the Court of Justice of the European Union (CJEU) in accordance with the conditions laid down in the second paragraph of Article 275 and the fourth and sixth paragraphs of Article 263 of the TFEU (TFEU, 2009).

To conclude, the Lisbon Treaty, along with the transformation of the institutional framework of the CFSP, has also introduced changes that may give rise to conflicts of competence between EU institutions. Despite the Treaty's limitations, arising from the division of competences outlined in the Treaty, decision-making on sanctions results from a complex interaction between intergovernmental and supranational institutions.

This process requires taking into account the diverse preferences of Member States which possess veto power and the effective management of the consensus-building process, which further complicates CFSP decision-making.

4. EU sanctions policy towards Belarus in 2010–2013

Geopolitical tensions stemming from the 2008 Russian-Georgian conflict and the deteriorating economic situation of Belarus – resulting from the reduction of Russian subsidies to the Belarusian economy and Moscow's political pressure on Minsk to establish an integral Union State – forced the Belarusian regime to pursue a balancing policy between the EU and Russia (Mironowicz, 2011, p.171). An example of this policy was Belarus' failure to recognise the independence of Abkhazia and South Ossetia.

Political conditionality, combined with gestures from the regime, such as the release of political prisoners, the approval of state distribution of two independent newspapers and the declared liberalisation of the political system, influenced the EU's decision to suspend most of the sanctions in place at the time (Bosse, 2012; Council, 2008).

However, the presidential elections in Belarus on 19 December 2010, deemed by international organisations to have failed to meet democratic standards, along with the post-election repression – including mass detentions, disproportionate use of force against demonstrators, criminal trials against candidates, activists and independent media – marked a turning point in the review of EU foreign policy towards the country (Amnesty International, 2011; Human Rights Watch, 2011; Kubin, 2011, p. 140; OSCE/ODIHR, 2010).

The first significant EU political signal, which emerged a few days after the elections, was the article *“Lukashenko the Loser”* by the foreign ministers of the Czech Republic, Poland, Germany and Sweden. The ministers unequivocally emphasised the need for a thorough review of relations with the Belarusian regime, stating that “there can be no business-as-usual between the EU and Belarus' president, A. Lukashenko, after what has happened since the presidential election in Belarus” (Bildt et al., 2010). Furthermore, they sought to take a leadership role in shaping the EU's agenda towards Belarus, including sanctions policy.

In response to these developments, the Council introduced several sanctions packages between 2011 and 2013, systematically expanding the list of restricted individuals and entities. These sanctions included an arms embargo, visa bans, asset freezes and, for the first time, financial sanctions were imposed on Belarusian entities supporting the regime. In addition, to include more persons and entities responsible for the situation in Belarus in the sanctions and to prevent them from challenging the measures, the criteria for inclusion in the EU sanctions list were expanded in January 2012 (Council, 2012a).

To illustrate the course of the decision-making process on the EU's sanctions policy towards Belarus between 2010 and 2013, and to highlight the factors influencing this process – including the positions of the various EU actors on consensus-building in the Council – the table below presents it in chronological order.

Table 1. EU sanctions against Belarus (2011 – 2013)

Date	Type of sanction	Number of individuals/entities	Triggering situation	Consensus in the Council
31.01.2011	Travel ban Freezing of assets (including the reinstatement of sanctions suspended in 2008)	158/157 individuals ¹	The presidential elections of 19 December 2010 and subsequent post-election repression	Italy's initial opposition to visa sanctions. Opposition from most EU Member States to economic sanctions (except Poland, Germany, Sweden).
21.03.2011	Travel ban Freezing of assets	19 individuals		Opposition from Lithuania, Italy, Austria and Cyprus; no support from HR/VP C. Ashton for economic sanctions.
23.03.2011	Travel ban Freezing of assets	13 individuals		Follow-up to the conclusions of the EUCO of 4 February 2011.
20.06.2011	Travel ban Freezing of assets	4 individuals		Opposition by Italy, Latvia and Lithuania to sanctions against oligarch V. Peftiev.
	Financial sanctions	3 entities		
	Embargo on weapons and			

¹ The list of persons subject to the asset freeze measure turned out to be shorter than the list of those subject to the travel ban – former Interior Minister Yuri Sivakov was not on it. Such a situation may have been the result of a technical error or a deliberate act within the framework of a political compromise worked out by one of the EU Member States. However, his assets were subject to a freeze in the next round of sanctions.

	repression equipment			
10.10.2011	Travel ban Freezing of assets	16 individuals	Annual review of sanctions	Bulgarian foreign minister's unsuccessful at- tempt to mediate in Minsk for release of political prisoners in exchange for EU financial support
	Extension of sanctions	208 individu- als, 3 entities		
16.12.2011	Travel ban Freezing of assets	2 individuals		
23.01.2012	Extension of criteria		Protecting the EU institutions from lawsuits brought against them	
28.02.2012	Travel ban, Freezing of assets	21 individuals	Repression of civil society and the opposition Response to the Council of Eu- rope's call for economic sanc- tions (Parliamen- tary Assembly, 2012) US sanctions against Belarus (U.S. Congress, 2011)	Slovenia's veto, sup- ported by Latvia and Lith- uania, on sanctions against oligarch Y. Chyzh and his entities
23.03.2012	Travel ban	12 individuals		

	Freezing of assets		Belarus' diplomatic conflict with the EU	Removal of 4 entities following objections from Latvia and Slovenia. Follow-up to the Conclusions of the EUCO 1-2 March 2012.
	Financial sanctions	29 entities		
15.10.2012	Extension of sanctions	243 individuals 32 entities	Annual review of sanctions; a policy of critical engagement (Council, 2012e)	
29.05.2013	Removal from the list	1 person 2 entities		
24.06.2013	Suspension until 31.10.2013	Minister of Foreign Affairs of Belarus, Vladimir Makey	A policy of critical engagement	Lithuania's initiative to participate in the Eastern Partnership Summit 28-29.11.2013 in Vilnius
29.10.2013	Removal from the sanctions list	13 individuals, 5 entities	Action brought by V. Peftiev before the CJEU	
	Travel ban Freezing of assets	3 individuals		
	Extension of the sanction list	232 individuals, 25 entities	Annual review of sanctions	

Source: Author's own analysis based on EU decisions and regulations, available at <https://eur-lex.europa.eu/oj/direct-access.html>

The extent of the sanctions imposed during the period under review can be attributed to the difficulties of Member States in reaching a common position in the Council. This was primarily due to countries such as

Lithuania, Latvia, Slovenia, Italy and Austria maintaining significant economic and investment interests with Belarusian entities. Furthermore, the positions of these countries were influenced by the Belarusian regime's successful strategy of undermining EU unity through behind-the-scenes negotiations with selected Member States.

Slovenia, supported by Latvia and Lithuania, played a key role in blocking the adoption of the sanctions list. The economies of Latvia and Lithuania were closely linked to Belarus, particularly in the energy and trade sectors, while Slovenian companies were engaged in costly construction contracts in Belarus (Czwołek, 2016, pp. 45-52; Kadlubovich, 2013, p. 17; Kłysiński, 2013; Solash & Jozwiak, 2012).

Lithuania, pursuing a transactional policy towards Belarus since 2008, mainly influenced through lobbying and business channels, especially through the Lithuanian Confederation of Entrepreneurs, thus influencing the final shape of sanctions (Kłysiński, 2013). In addition, Lithuania, holding the Council Presidency in the second half of 2013, played a key role in shaping the policy of critical engagement with Belarus.

Lithuania initiated the lifting of visa sanctions against the Belarusian Foreign Minister Vladimir Makey to enable him to participate in the 2013 Eastern Partnership Summit in Vilnius and called on other EU institutions to review the sanctions policy, suggesting its easing (Czwołek, 2016, pp. 41-43). The controversial proposal by Lithuanian MEP Justas Paleckis, drafted after his visit to Belarus, suggested an alleged improvement in the human rights situation in the country. It advocated for dialogue with key representatives of the Belarusian authorities and the suspension of sanctions against them (Paleckis, 2013). This proposal aligned with Lithuania's pragmatic approach towards the situation in Belarus at the time.

Regarding the role of institutional actors in the sanctions policy towards Belarus, it should be emphasised that the EP, as the main advocate of human rights in the EU (Smith, 2014), had presented a strong and consistent position since the onset of the presidential election crisis. Through resolutions and recommendations, the EP exerted pressure on other EU institutions to introduce and extend sanctions, including economic sanctions (European Parliament, 2011a, 2011b).

In addition, the EP repeatedly highlighted the threat to the credibility of the EU's foreign policy posed by bilateral initiatives undertaken by some Member States towards the Belarusian authorities which bypassed EU institutions. This factor undermined the unity and coherence of actions of the entire Union. Despite the EP's strong and unequivocal position in the political discourse on sanctions, the other EU institutions – particularly the Council, HR/VP and EC – remained more cautious about tightening them.

Taking into account the principle of unanimity in Council decision-making, it should be pointed out that the HR/VP's ability to build consensus by securing the support of Member States is crucial to her effectiveness. HR/VP Ashton's actions in the area of sanctions have been characterised by a low level of initiative and a

preference for consensual decision-making mechanisms, despite her treaty powers enabling her to take more proactive action in this area (Smutek, 2016, p. 82).

During the parliamentary debates on the situation in Belarus, the HR/VP opposed the introduction of harsh economic sanctions, arguing this on the grounds that it feared a deterioration in the living conditions of Belarusian society and the risk of discouragement towards the EU (European Parliament, 2011c). Nevertheless, these concerns did not prevent the imposition of economic sanctions in subsequent years, especially after the 2020 presidential elections and in response to the Belarusian regime's support for Russia in its aggression against Ukraine. According to some authors, the aforementioned argument is partly justified, as these decisions were also the result of the economic interests of individual EU Member States and the difficulty of reaching a consensus within the EU institutions (Czwołek, 2017, p. 156). Moreover, the low level of activity of C. Ashton may have been due to both a lack of clear leadership qualities and her previous lack of experience in foreign policy management (Zięba, 2014, p. 34).

Analysing the conclusions of the EUCO it should be noted that between 2011 and 2019 the situation in Belarus, despite the difficult human rights situation, was discussed in the EUCO only twice: on 4 February 2011 and 1-2 March 2012 (European Council, 2011, p. 11; 2012, p. 14).

The conclusions adopted on 4 February 2011 underlined the FAC's readiness to "consider the application of sanctions in various areas". In contrast, in its conclusions of 1-2 March 2012, in light of the Minsk-EU diplomatic conflict and the difficulty of reaching a consensus within the Council on the introduction of economic sanctions, the FAC called on the Council to "continue working on further sanctions", without specifying the type of sanctions. The above may suggest that the Belarus issue was not a priority at the political level of the EU and in its foreign policy at the time¹.

In summary, the sanctions imposed between 2010 and 2013 were symbolic in that they did not cover major Belarusian exporters to EU markets and were thus unable to have a real impact on regime change. They only represented a temporary problem for sanctioned companies and their counterparties to adapt, including by circumventing the restrictions (Hyndle-Hussein & Kłysiński, 2012). Despite declarations of the need to strengthen sanctions, most Member States and institutional actors lacked the political will to implement this transition, primarily due to their desire to maintain economic and business relations with Belarus.

Actions taken by the EU, such as the removal from the sanctions list in October 2013 of 13 individuals and 5 companies linked to a key Belarusian businessman supporting the regime at the time, are mainly evidence of an ad hoc response to current events. The aim of these actions was to force concrete concessions,

¹Analysing the conclusions of the European Council from 2011 to 2019, it can be concluded that the situation in Belarus was not a priority issue, and its presence on the EU agenda was limited by a number of complex geopolitical and internal challenges faced by the Union. These challenges included the economic crisis related to the problems of the Eurozone, the Arab Spring, the civil war in Libya, the migration crisis and growing tensions in relations with Russia.

such as the release of political prisoners, rather than to implement strategic systemic changes or develop a long-term policy concept towards Belarus.

Such actions could have been treated by the Belarusian regime as barter deals in its negotiations with the EU. Moreover, the EU's incoherent, reactive foreign policy, lacking a long-term strategy, undermined its credibility as a collective actor – not only in the perception of Belarus, but also in that of its key ally Russia, which was very likely taken into account by the Russian authorities when deciding on the illegal annexation of Crimea in 2014 and the military intervention in eastern Ukraine.

5. EU sanctions policy towards Belarus in 2014–2020

Tensions in the region in 2014, related to the growing threat from Russia (such as Russia's illegal annexation of Crimea in 2014 and military intervention in eastern Ukraine), had a key impact on the continuation of the EU's pragmatic policy towards Belarus, which had been initiated in 2012 -2013. Belarus, seeking to maintain a balance between Russia and the EU and declaring the need for a peaceful resolution of the conflict, became the negotiating platform for the Minsk I and Minsk II agreements to resolve the Ukrainian crisis (Minsk Agreement, 2015).

Geopolitical circumstances, combined with the regime's actions – such as the release of political prisoners on the eve of the 2015 presidential elections (without restoring their full civil rights) – and the declared liberalisation of the political system along the lines of the 2008 measures, prompted the EU to first gradually suspend and then lift most of the sanctions in place at the time (Bakunowicz, 2015).

To illustrate the evolution of the sanctions policy and the factors determining the decision-making process for its mitigation, the table below presents it in chronological order.

Table 2. EU sanctions against Belarus (2014 -2020)

Date	Number of individuals/entities	Triggering situation	Consensus in the Council
8.07.2014 Removal from the list	8 individuals	Amnesty for human rights defender Ales Bi-aliatski on 21 June 2014 Geopolitical situation (the conflict in Ukraine)	"The decision does not reflect a change in EU policy towards Belarus based on critical engagement, as set out in the Council conclusions of 15 October 2012" (Council, 2012b).
Addition to the list	1 person	A policy of "critical engagement"	

30.10.2014 Removal from the list	24 individuals, 7 entities	Minsk's role as a negoti- ating platform 5 Septem- ber 2014 on the resolu- tion of the conflict in eastern Ukraine	
One-year ex- tension	201 individu- als, 18 entities	Annual review of sanctions	
13.07.2015 Removal from the list	2 individuals, 4 entities	Belarus' constructive role in the region: Minsk's role as a negoti- ating platform on 11-12 February 2015 during the meeting of the so- called "Normandy Four" (leaders of France, Ger- many, Russia and Ukraine)	The role of France and Germany in building con- sensus on the suspension and lifting of sanctions
31.07.2015 Removal from the list	24 individuals		
29.10.2015 Removal from the list	4 entities	Judgment of the General Court of the EU of 6.10.2015 in case T- 257/12, T-276/12 (Gen- eral Court of the EU, 2015)	
Suspension for 4 months	170 individuals, 3 entities	Belarus' constructive role in the region	Release of all political prisoners on 22 August 2015. Improving relations be- tween the EU and Belarus. Holding the 2015 presi-
25.02.2016 Abolition of sanction	170 individuals, 3 entities		

			dential election “in a violence-free atmosphere”
Extensions of sanctions for one year:	4 individuals responsible for political disappearances 1999-2000. Arms embargo	Annual review of sanctions	
27.02.2017			
23.02.2018			
25.02.2019			
17.02.2020			

Source: Author's own analysis based on EU decisions and regulations, available at <https://eurlex.europa.eu/oj/direct-access.html>

In response to the release of all Belarusian political prisoners on 22 August 2015, on the eve of the presidential elections, and in light of the “improvement in relations between the EU and Belarus”, wishing to encourage the country to make further positive changes, on 29 October 2015, the Council suspended most of the sanctions then in force against Belarus (Council, 2015b). Subsequently, in February 2016, "as a goodwill gesture aimed at fostering a policy of engagement encouraging Belarus to respect human rights and the principles of democracy and the rule of law", the EU finally lifted them (Council, 2016b).

In justifying the decision to lift sanctions, the Council pointed to the release of political prisoners and the holding of the 2015 presidential elections “in an environment free from violence” (Council, 2015a; Council, 2016a). The EU also acknowledged “Belarus' constructive role in the region” in the context of efforts to reach a ceasefire agreement in Ukraine. It also highlighted Belarus' commitment to modernisation, the launch of negotiations on visa facilitation and readmission agreements, the Mobility Partnership and cooperation in the energy sector.

Nevertheless, while lifting sanctions, the Council expressed "concern about the human rights situation in Belarus" (also condemning the use of the death penalty), stressing that EU-Belarus relations should be based on common values, notably respect for human rights, democracy and the rule of law.

However, the final OSCE monitoring report on the October 2015 presidential election pointed out numerous cases of violations of the voting process and a lack of transparency in the counting of votes and tabulation of results.

As a result, the election was not recognised as free and democratic (OSCE/ODIHR, 2016). The EU's decision to lift sanctions was also at odds with the report of the UN Special Rapporteur's report on the situation

of human rights in Belarus, which pointed to a lack of systemic progress on the part of the Belarusian authorities in respecting human rights (including in the period between the suspension of sanctions in 2015 and their lifting in 2016), describing the situation as “the dismal state of human rights” (Haraszti, 2016a; Haraszti, 2016b; Viasna Human Rights Center, 2016).

None of the political prisoners released in 2015 were included in the rehabilitation procedure, meaning they did not regain their full civil and political rights, and some of them were forced to emigrate as a result of strong pressure and direct threats from the authorities. Furthermore, the Belarusian authorities then introduced a new form of repression – financial repression – by imposing disproportionately high fines on opposition activists and representatives of NGOs, with the aim of suppressing any attempts to oppose the regime (Kłysiński, 2016).

Belarusian opposition circles and human rights organisations have criticised the EU's decision to suspend or lift sanctions, describing it as resulting from behind-the-scenes talks without the participation of human rights defenders, deeming it unfortunate and constituting a “capitulation to the Belarusian regime”, as well as a “European vanity that ruins any decent enterprise” (The Guardian, 2016).

The main objective of the sanctions, i.e. to achieve significant progress in democracy and the political system, was not realised (Miadzvetskaya & Challet, 2022, p.14). The initial suspension and subsequent lifting of sanctions was not due to the achievement of the intended goals, but was motivated by the changing geopolitical context, including the growing role of Belarus in resolving the Ukrainian crisis.

According to the researchers, the EU's decision marked a significant departure from its long-standing principle of conditionality, whereby deepening relations with the regime was conditional on progress in democracy and human rights (Bosse, Höpner & Vieira, 2022, p. 295). In contrast, as in 2008, the EU focused on short-term geopolitical gains, prioritising them over normative values, which allowed the regime to instrumentalise political prisoners as bargaining chips in its relations with the EU.

It is also worth noting that some of the sanctions imposed on the entities were overturned as a result of court proceedings brought by the oligarchs against the Council, mainly due to insufficient evidentiary basis proving that these individuals actively supported or directly benefited from the regime (General Court of the EU, 2014; 2015; 2016).

Between 2016 and 2020, despite the deteriorating human rights situation, including the lack of electoral reform, the non-democratic parliamentary elections in 2016, local elections in 2018 and parliamentary elections in 2019, as well as the violent dispersal of peaceful demonstrators, the wave of detentions on Freedom Day in 2017 and the harassment by the Belarusian authorities of independent media outlets (particularly Charter'97), the EU did not impose new sanctions, limiting itself only to the annual extension of the then existing

sanctions against four persons responsible for political disappearances in 1999-2000. Despite calls from human rights defenders in connection with the repression of peaceful demonstrations in 2017, the meeting of the EU-Belarus Coordination Group aimed at strengthening bilateral relations was not cancelled. This Group's meetings had led, among other outcomes, to the conclusion of visa facilitation and readmission agreements with Belarus in 2020 (Bosse, 2021, p. 203; Eastern Partnership Civil Society Forum, 2017).

At the same time, the EU continued its process of rapprochement with Belarus, intensifying meetings with the Belarusian authorities both at the EU institutional level (with increased EC activity) and at the level of individual Member States (Italy, Austria), focusing on sectoral and economic cooperation, including within the framework of the Eastern Partnership¹. The declaration by the then Polish Foreign Minister W. Waszczykowski during his meeting with A. Lukashenko in Minsk in 2016, regarding the initiation of dialogue with Belarus "without any preconditions" (Bornio, 2017, p. 69), was part of the broader concept and dominant narrative of EU policy towards Belarus during the analysed period.

Referring to the role of institutional actors in the process, HR/VP Federica Mogherini denied that the geopolitical context influenced the Council's decision to lift sanctions, describing the situation in Belarus as "definitely not a rosy or ideal picture" and the EU's actions themselves as "encouraging" (EEAS, 2016). Despite calls from Belarusian opposition leaders (Andrei Sannikov, Ales Bialiatski and Mikalai Statkevich) to maintain restrictions on the regime, F. Mogherini took no action on this issue (Spring96, 2015). The situation is reflected in the broader context of the transactional approach of EU Member States towards Russia and its satellites (Zheltovsyy, 2023, p. 33).

It is worth noting that F. Mogherini's role in the Belarusian issue raised doubts about her impartiality as a mediator, especially in the context of her conciliatory rhetoric towards Russia and her opposition to the introduction of further sanctions (Kaca, 2019, p. 213; Panichi, 2014). F. Mogherini's stance on the situation in Belarus can also be seen as a product of Italy's national preferences, which exhibited greater openness towards the Belarusian authorities. This was the result of pragmatism and Italy's long-standing desire to maintain stable economic and investment relations with Belarus².

Referring to the role of EU institutions in the context of the changing geopolitical situation and pragmatism in foreign policy towards Belarus, the discourse of the EP— despite the continued emphasis on human rights violations – in terms of the possibility of sanctions remained in line with the general direction of EU

¹ The EU focused its efforts primarily on developing economic and development cooperation, with priority given to border control issues, countering irregular migration and negotiating visa facilitation and readmission agreements. This approach, given the documented human rights violations by the Belarusian border and police services, caused serious controversy.

² Lukashenko's first foreign visits to EU countries, following the suspension of sanctions in 2008 and their lifting in 2016, were to Italy.

policy. Additionally, the number of MEPs and Eurosceptic factions increased during the 8th parliamentary term, which had a significant impact on the nature of the discourse on Belarus. This can be observed both in the decreasing number of resolutions (5 resolutions in 2014-2019 compared to 8 resolutions and 1 EP recommendation in 2011-2013) and in the content of the political discourse, which started to place more emphasis on sectoral cooperation with Belarus, dropping references to the possibility of re-imposing sanctions (European Parliament, 2016; 2017; 2018a; 2018b).

In summary, the EU's sanctions policy towards Belarus between 2014 and 2020, characterised by the gradual suspension and then lifting of sanctions despite unresolved human rights and democracy issues, was driven by the wider geopolitical context, including Belarus' role in resolving the Ukrainian crisis and the EU's political rivalry with Russia. The inconsistent policy undermined the credibility of the EU as a collective actor in the perception of Belarus, as well as its key ally Russia. An analysis of the regime's subsequent actions shows that Belarus' subsequent actions, supported by Russia, may have been based on an assessment of the inconsistency of EU policy, as illustrated by the post-election repression in 2020, as well as A. Lukashenko's decision to support Russia's aggression against Ukraine.

The EU's policy of sanctions against Belarus between 2014 and 2020 may also have sent a signal to the Belarusian regime, suggesting that it could continue its authoritarian practices without fear of more serious international consequences, while treating political prisoners as part of a bargaining chip in negotiations with the EU.

6. Conclusions

The analysis of the EU's sanctions policy towards Belarus between 2010 and 2020 provides arguments for the confirmation of the hypothesis put forward by the author that this policy was pragmatic in nature. Indeed, it resulted from the EU's pursuit of its economic interests with Belarus and was also part of a broader political rivalry between the EU and Russia. The policy was characterised by a discrepancy between the declarations made (both in the political discourse of institutional actors and individual Member States regarding transformational changes) and the actual actions taken by them.

The sanctions, which were introduced with delay and considerable caution between 2011 and 2013, did not pose an immediate threat to the Belarusian regime or lead to a deeper political transformation in the country. Economic issues were key determinants of the decision-making process regarding sanctions. Despite the pro-sanctions approach of individual Member States (such as Poland and Sweden), as well as the EP, it was not possible to achieve a policy transformation towards Belarus during this period due to difficulties in reaching a consensus within the Council. This was largely dictated by the desire of a group of countries (Latvia, Slovenia, Lithuania, as well as Italy, Austria and Cyprus), to maintain the status quo with regard to Belarus,

by preserving existing economic relations, especially in the energy sector, and using Belarus as a transit country. As a result, the sanctions were largely symbolic and did not lead to political change in Belarus. Despite the high priority of human rights in the EU discourse, political pragmatism ultimately determined the course of action, and the concept of civilian power gave way to the dominance of state preferences over the promotion of democratic values.

The EU's further decisions to ease its sanctions policy between 2014 and 2016 and then to continue this process between 2016 and 2020, despite the lack of progress on democratic reforms, were the result of the geopolitical situation, related to the growing threat from Russia and the “constructive” role of Belarus in this process.

The EU's pragmatic and inconsistent sanctions policy – both in terms of the scope of sanctions, the dynamics of their introduction and their lifting in response to apparent concessions by the Belarusian regime, in the absence of real changes in human rights and democratisation – may have been taken into account by the Belarusian regime in its decision on post-election repression in 2020, reinforcing its belief that the Union was not taking effective action. This policy may also have contributed to the regime's decision to support Russia in its aggression against Ukraine.

In view of the above, a consistent, coherent, and effective EU sanctions policy towards third countries, including Belarus as an ally of Russia and a direct neighbour of the EU, is a key factor for the credibility of the Union as a relevant and independent actor, as well as a promoter of values in the international arena and for the future of democratisation processes.

An important challenge for the EU's future sanctions policy towards Belarus will be the ability of Member States to reach a sustainable consensus in maintaining a transformative approach to EU-Belarus relations. An important element of this process also remains the role of the veto power of Member States, especially those with a eurosceptic orientation (such as Hungary under Viktor Orbán and Slovakia under Robert Fico), which may constitute a serious barrier to the sanctions decision-making process.

In the context of the current geopolitical challenges, it seems advisable to reform the EU's decision-making process, including the possibility of introducing qualified majority voting in foreign policy, particularly on sanctions issues, as called for by the EU's supranational institutions. Additionally, reforms should include clarifying the division of competences and improving cooperation between EU institutions, which could strengthen Member States' confidence in the effectiveness and role played by institutions such as the HR/VP, the EEAS and the President of the EUCO.

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