

## Policy brief for local and regional leaders

*When passports become weapons: Local authorities' response to transnational repression against Belarusians abroad*

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### 1. The nature of the crisis: political exiles, not economic migrants

Understanding the unique context is paramount. Belarusians fleeing the Lukashenka regime since 2020 are:

- **Victims of state repression:** They are political exiles fleeing a systematic purging of civil society, with “ideological officers” controlling loyalty and the militarisation of youth. They cannot return without risking arbitrary detention or politically motivated imprisonment.
- **Integrated residents:** Many are highly skilled IT specialists, entrepreneurs, and professionals who have built new lives in Europe, paying taxes and contributing to local economies. They represent a valuable asset to local communities.
- **Not seeking asylum as a primary solution:** Only an estimated 5% have sought asylum. The international protection system is severely overloaded, with lengthy processing times (6 months to 5 years) and high rejection rates (30 to 90%) often due to outdated Country of Origin Information (COI). Forcing integrated individuals into this system would create dependency and overload resources unnecessarily.

### 2. The weapons of transnational repression: Three walls of insecurity

The Belarusian regime’s strategy is multifaceted, creating distinct “walls” that undermine the security and stability of its citizens abroad:

- **The paper wall (weaponised passports):** Through **Decree 278**, the Belarusian regime has made it impossible to renew passports or obtain vital documents (birth/marriage certificates, apostilles) from embassies abroad. This directly threatens the legal status of Belarusians abroad, creating a situation where residents cannot work, run businesses, or even register newborns.
- **The visa wall (forced family separation):** European countries’ visa restrictions, often a blanket measure, punish victims by preventing visits from elderly parents or denying student visas. This impedes family unity and access to education, despite the democratic values of the applicants.
- **The knowledge wall (threat of persecution and misinformation):** The regime actively misuses Interpol Red Notices, placing local law enforcement in a difficult position. Simultaneously, a lack of up-to-date COI and lack of training for frontline officers have led to dangerous errors, such as wrongful deportations or denial of protection for those fleeing state terror. This “knowledge wall” common across European countries is as damaging as the “paper wall” from Minsk.

### 3. The European mandate: A clear framework for local action

The Council of Europe provides a strong mandate to strengthening democracy, human rights and the rule of law:

- **PACE Resolution 2499 (2023):** This landmark resolution known as “The Luxembourg Solutions” recognises Belarus as an **unsafe country**, calls for providing **alternative documents**, and urges states **not to demand documents obtainable only from Belarusian channels**.
- **PACE Resolution 2433 (2022) and Contact Group on Belarus:** The Council of Europe has formally committed to intensifying the engagement with Belarusian democratic forces and civil society, framing support as a strategic investment in a democratic future.
- **Local action as implementation:** European local and regional authorities have a core role in the implementation of the above framework, demonstrating practical solidarity.

### 4. A Checklist for local action

The following are practical, tested actions that municipalities may wish to take:

#### *Direct administrative actions*

- Adopt a “Presumption of risk”:** Issue internal guidance for staff to **stop requiring refusal letters** from the Belarusian embassies, thereby treating the inability to obtain a passport as a given fact due to Decree 278. (*Model: Sweden*)
- Streamline the issuance of alien’s passports:** Create a clear, prioritised procedure for legally resident Belarusians to obtain a substitute travel document (*Model: Slovenia*). Belarusian citizens who cannot renew their passports at embassies and cannot safely return home could be issued alien passports or travel documents without additional requirements or evidence.
- Establish **transparent and realistic processing timelines**, aiming for completion before national passports expire, and especially – before the residence permit expires.
- Waive impossible document requirements:** Accept a **sworn declaration** in lieu of unobtainable documents like a new criminal record check or an apostilled certificate. (*Model: Austria, Czechia, Lithuania*)
- Implement flexible identity verification:** For local services, allow a recently expired passport **in combination with a valid residence permit** to serve as sufficient proof of identity. This prevents disruption to vital services during administrative transitions.
- Newborns – Register first, verify later:** Instruct civil registries to accept hospital notification plus a parent declaration when foreign civil status papers are unobtainable; and schedule a clear second-stage verification date for full documentation. This ensures that no child becomes stateless at birth.

### *Make the process supportive and efficient*

- Implement **dedicated processing lanes or online appointment systems** for travel documents (alien's passport) applications. Commit to transparent and realistic processing timelines and ensure efficient notification when documents are ready.
- Prevent outdoor queuing:** To ensure a predictable, dignified administrative process, replace physical queuing to get appointments in the local administration with a system of (a) online appointments, (b) a small daily walk-in quota without appointment, or (c) late openings for pick-ups. Local administrations should also avoid opening new batches of appointments outside working hours, even if online. This would remove process-induced harm and reduces stress.
- Implement two-channel notifications:** Mandate sending every update on an application by email and SMS with a case reference.

### *Proactive support and training*

- Create an information hub:** Dedicate a page on the city's official website with clear, multilingual information and FAQs for Belarusian residents.
- Formalise diaspora partnerships:** Designate an official liaison to meet regularly with local Belarusian civil society organisations, recognising them as expert partners. This channel is for real-time information exchange, co-developing solutions, and co-creating training materials based on lived experiences.
- Fund legal aid:** Municipalities can fund local NGOs that provide the specialised legal help needed to apply for complex statuses and documents.
- Mandate frontline training:** Implement short, regular briefings for all relevant staff. Training must cover:
  1. The up-to-date "**unsafe country**" **assessment** for Belarus.
  2. Specific **legal exceptions** that apply to Belarusians.
  3. How to handle document issues with **empathy and efficiency**.

### *Political advocacy*

- Advocate for national clarity:** Formally request national governments to issue clear, legally binding guidance on these issues, in line with PACE Resolution 2499 (2023).
- Advocate for longer-term alternative travel documents** (e.g., valid for 3 years): Current alternative travel documents are issued for one year maximum. Issuance of longer-term travel documents would reduce the administrative burden on local authorities, free up staff time, and provide greater stability and predictability for residents, preventing unnecessary anxiety and repeated bureaucratic cycles.
- Pass a local resolution:** A resolution from a city or regional council acknowledging the crisis provides crucial political support for the administration's flexible actions.
- Share successes:** Use networks, including the Congress of Local and Regional Authorities, to turn local solutions into a European standard.

## Resources and Contacts



**Office of Sviatlana Tsikhanouskaya**  
Leanid Marozau, Adviser on Legal Affairs  
[legal@tsikhanouskaya.org](mailto:legal@tsikhanouskaya.org)



**Legal Commission of the Coordination Council**  
Head: Mikhail Kiryliuk, [skarga@belarus-nau.org](mailto:skarga@belarus-nau.org)

**Deputation of the Belarusian Democratic Forces to the Congress**  
Head: Iryna Khalopitsa, [iryna.khalopitsa@belarus-nau.org](mailto:iryna.khalopitsa@belarus-nau.org)

### People's Embassies of Belarus

[www.belarusabroad.org](http://www.belarusabroad.org)

General contact: [info@belarusabroad.org](mailto:info@belarusabroad.org)

Co-ordinator: Alexandra Mamaeva, [alexandra.mamaeva@belarusabroad.org](mailto:alexandra.mamaeva@belarusabroad.org)



### Offices and Missions of the Belarusian Democratic Forces

**Czechia:** Kryscina Shyjanok, [czechia.office@tsikhanouskaya.org](mailto:czechia.office@tsikhanouskaya.org)  
Signal / Telegram: @OfficeBLRinCZE

**Estonia:** Vital Malchanau, [estonia.representative@tsikhanouskaya.org](mailto:estonia.representative@tsikhanouskaya.org)

**Ukraine:** Sviatlana Shatsilina, [ukraine@tsikhanouskaya.org](mailto:ukraine@tsikhanouskaya.org)  
+380 93 715 7095 (WhatsApp)

**Italy:** Yuliya Yukhno, [segreteria@talaka.it](mailto:segreteria@talaka.it)  
Telegram: @huliganka\_bel

**Belgium:** Uladzimir Astapenka, Maryna Liavachenka, [info@freebelarus.eu](mailto:info@freebelarus.eu)  
Facebook / Instagram: [freebelarus.eu](http://freebelarus.eu)

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[www.coe.int/Congress-CEMG](http://www.coe.int/Congress-CEMG)

**Congress's support for Belarusian democratic forces**  
[congress.cemq@coe.int](mailto:congress.cemq@coe.int)

Albert Flores-Herrera, [albert.flores-herrera@coe.int](mailto:albert.flores-herrera@coe.int)  
Marie Bousquié, [marie.bousquie@coe.int](mailto:marie.bousquie@coe.int)