

## SCIENTIFIC DEBUTS

KATARZYNA JEROMINEK<sup>1</sup>

DOI : 10.14746/rie.2025.19.22

University of Warsaw

ORCID: 0009-0009-9513-4549

### The Evolution of EU Sanctions Policy Towards Belarus Between 2020 and 2022

#### Introduction

Sanctions are a key instrument of the EU's Common Foreign and Security Policy (CFSP), enabling it to respond to global challenges and to the actions of foreign governments, that are contrary to the values and objectives set out in Article 21 of the Treaty on European Union (TEU, 2009). The examination of the EU's sanctions policy takes on particular relevance in the context of ongoing geopolitical changes shaping the global balance of power<sup>2</sup>. Indecisive and ineffective sanction measures may undermine the EU's credibility as an independent normative actor in the international arena, while posing a serious threat to democratisation processes.

The case of Belarus is an illustrative case study in the analysis of the EU's sanctions policy due to its long-term nature (spanning over two decades), its cyclical nature (sequential introduction, suspension and lifting of sanctions) and its wide range of restrictions such as travel bans, asset freezes, arms embargoes and targeted economic sanctions. The rigged presidential elections in Belarus in August 2020, the repression of civil society and the regime's actions, which posed a threat to regional security, prompted the EU to review its sanctions policy towards Belarus.

The main objective of this article is to explain the EU sanctions policy towards Belarus from 2020 to 2022, taking into account the key factors that determine the decision-making process and to identify the transformation of this policy. In addition, in the context of changing geopolitical conditions, the article seeks to identify potential directions for the development of the EU sanctions policy towards Belarus in the perspective of the next decade.

The article attempts to answer the following research question: what factors determined the decision-making process of the EU's sanctions policy towards Belarus after the 2020 presidential elections? Accordingly, the following research hypothesis



<sup>1</sup> This article is licensed under the Creative Commons Attribution-NonCommercial-ShareAlike License (CC-BY-SA 4.0).

<sup>2</sup> The redefinition of US foreign policy priorities under the Donald Trump administration, particularly the revision of its approach towards Russia and the EU, combined with further developments in Ukraine and Belarus's support for Russia in its military aggression, poses serious challenges for the EU in terms of foreign policy, security and regional stability.

has been formulated: the transformation of the EU sanctions policy, understood as an expansion of sanctions towards Belarus between 2020 and 2022, was the result of the regime's post-election actions, that posed a threat to regional security.

The article is structured as follows. The first part will present the methodology and research framework of the article. This will be followed by an analysis of the EU sanctions policy towards Belarus in 2020–2022, divided into two stages, and the identification of the factors determining the decision-making process of this policy and their transformation. Subsequently, an attempt is made to verify the hypothesis and identify potential directions for the future of the EU's sanctions policy towards Belarus, taking into account the possibility of the EU's return to a transactional policy in the context of changing geopolitical conditions.

### **Conceptual and Methodological Framework**

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

A content analysis was conducted to critically assess EU documents on sanctions policy, including resolutions and recommendations of the European Parliament (EP), conclusions of the European Council (EUCO) and the Council of the European Union (Council), statements by the EU High Representative for Foreign Affairs and Security Policy/Vice-President of the European Commission (HR/VP), communications from the European External Action Service (EEAS), as well as Council decisions and implementing regulations concerning EU sanctions against Belarus. The process-tracing method was used to analyse the evolution of the sanctions policy and to identify the reasons for its transformation over a defined period.

The comparative method allows for an analysis of the distinct stages of the EU's sanctions policy towards Belarus, taking into account the following factors:

- normative: issues related to the protection of human rights, democratic principles and compliance with international legal standards;
- pragmatic: geopolitical, economic and security issues;
- institutional: the positions and reactions of various institutional and individual actors towards the application of sanctions.

The study conducted is based on the liberal-intergovernmental approach (Tosiek, 2016, 2020), which takes into account the national preferences of EU Member States in areas such as economy, security and foreign policy, as well as the broad geopolitical context – with a particular focus on the EU's relations with Russia. This approach also allows for an analysis of the functioning of the institutional mechanisms of the CFSP, especially in the context of negotiations in the Council aimed at achieving the consensus required by the principle of unanimity when taking decisions on sanctions. In practice, this leads to the need to work out compromises between the promotion of values and the pursuit of the EU's strategic objectives, in the context of the differing interests of its Member States.

Additionally, this approach takes into account coordination mechanisms within the EU institutions, in particular the role of the HR/VP, who plays a key role in formulat-

ing a unified EU position. The EUCO is also crucial, giving strategic direction to the Union's foreign policy, which often proves necessary to achieve consensus. This analysis also considers the role of the EP, which, despite its limited treaty competences in the field of CFSP, as the only EU institution with democratic legitimacy, can influence other institutions by, *inter alia*, organising debates, adopting resolutions, recommendations and reports (Staszczyk, 2013, p. 258).

In analysing the decision-making process of sanctions policy and its transformation, the following variables were considered: values ("human rights," "democracy"), pragmatism ("economy," "geopolitics/security") and institutional aspects (the positions of collective institutional actors and individuals towards sanctions).

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

- 9 August 2020 – 23 May 2021: from the 2020 presidential election to the 2021 incident with the Ryanair plane in Minsk;
- 24 May 2021 – 24 February 2022: from the Ryanair plane incident to the start of the full-scale Russian invasion of Ukraine<sup>3</sup>.

The adopted time frame also allows for an analysis of the impact of the sanctions policy towards Belarus on Alexander Lukashenko's decision to support the Russian invasion of Ukraine. Changes in the sanctions policy after 24 February 2022 constitute an important element in the formulation of scenarios for future policy development, taking into account normative, pragmatic and institutional factors.

### EU Sanctions Policy Towards Belarus 2020–2021

The EU's sanctions policy in the years leading up to the 2020 presidential elections was characterised by pragmatism and limited effectiveness in promoting democratic change. Faced with changing geopolitical circumstances, such as the 2008 Russian–Georgian conflict, the annexation of Crimea and the Russian military intervention in eastern Ukraine in 2014, the EU decided to suspend sanctions or even lift them. These actions undermined the coherence and consistency of the sanctions policy, as its primary objective – to induce significant changes in terms of democracy and the functioning of the political system – was not achieved (Miadzvetskaya, Challet, 2022, p. 14).

The presidential elections held on 9 August 2020 were deemed undemocratic and rigged by Belarusian independent observers (Belarusian Helsinki Committee, Human Rights Centre "Viasna", 2020).<sup>4</sup> The official results indicated that the main opposition candidate, Sviatlana Tsikhanouskaya, received only around 10 per cent support, which

<sup>3</sup> During the period under review, EU sanctions focused on the Belarusian regime, treated as a separate political entity responsible for violations of international law and internal repression. Following the launch of Russia's full-scale invasion of Ukraine on 24 February 2022, the EU's sanctions policy towards Belarus was integrated into the broader context of the EU's strategy towards Russia.

<sup>4</sup> The Belarusian authorities blocked the arrival of OSCE international observers by delaying the issuing of an invitation to prevent independent and objective observation of the elections (OSCE, 2020).

raised doubts about the integrity of the entire electoral process (Szabaciuk, 2020; Kłysiński, Chawryło, 2020). In addition, both the election campaign and the post-election period were characterised by intense scrutiny by the authorities, restrictions on basic civil liberties, repression and mass arrests of those who criticised the regime, including independent candidates. Mass protests organised by civil society calling for re-elections in accordance with international standards were suppressed (Amnesty International, 2021; Bosse, 2021, p. 203).

In response to the events in Belarus, a number of political declarations and calls were issued by key EU actors – both individual and collective institutional – regarding the non-recognition of the election results, the condemnation of the repression of protests, as well as the need to review the EU’s foreign policy towards Belarus up to that point. On 11 August 2020, HR/VP Josep Borrell, on behalf of the EU, issued a statement noting that the elections were “neither free nor fair,” highlighting the possibility of imposing sanctions on those responsible for the events (Council, 2020a). Subsequently, the EU introduced three packages of sanctions, gradually extending them to individuals and entities (Council, 2020b, 2020d, 2020e). In order to illustrate the decision-making process of the sanctions policy and to indicate the factors determining the process – including the positions of key EU actors towards consensus building in the Council – the table below presents the policy in chronological order.

Table 1

EU policy towards Belarus (2020–2021)

Date / Type of Sanctions	Number of Individuals/Entities	Triggering situation	Developing consensus in the Council
2 October 2020 Travel ban Freezing of assets (1 package)	44 individuals	Presidential elections and post-election repression	Council Decision of 14 August 2020. Cyprus’ initial veto. Opposition by France, Germany and Italy to sanctions on Lukashenko – attempt to settle the situation through diplomatic means. Follow-up to the conclusions of the European Council, 1–2 October 2020
6 November 2020 Travel ban Freezing of assets (2 packet)	15 individuals		Follow-up to the Conclusions of the European Council, 1–2 October 2020
17 December 2020 Travel ban Freezing of assets Financial sanctions (3 packet)	29 individuals 7 entities		Failure to agree to sanctions on key Belarusian businessmen as a result of lobbying efforts.

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

Faced with the need to maintain a balance between supporting the Belarusian democratic opposition and remaining open to dialogue with the Minsk authorities, while taking into account Russia’s unequivocal support for the regime, the EU encountered a serious challenge in developing a coherent and effective policy response (Korostelova, Petrova, 2021, p. 7). The cautious exertion of pressure, involving a limited range

of sanctions and their gradual introduction, stemmed from the difficulty in reaching a consensus among Member States, particularly on the issue of economic sanctions.

The delay in the implementation of the first sanctions package was the result of a veto by Cyprus, which made its support for sanctions conditional on the introduction of restrictions against Turkey, linked to Turkish drilling in the disputed waters of the Eastern Mediterranean. In addition, Cyprus was one of the largest EU investors in Belarus, acting as a key intermediary for Russian investment in the country, which further influenced its approach to EU sanctions policy towards Belarus (Rettman, 2020). Hungary was also within the group of countries opposing the imposition of severe sanctions on Belarus. This position was reflected in the political rhetoric of Prime Minister Viktor Orbán, who, despite ongoing mass protests against the regime, expressed support for lifting the existing restrictions during an official visit to Minsk a few weeks before the 2020 presidential elections.

Germany, France and Italy, on the other hand, initially opposed the imposition of restrictions on Alexander Lukashenko, seeking to resolve the situation through mediation, including with the participation of Russia (DW, 2020). According to the Belarusian democratic opposition, the EU's reaction to the post-election events was motivated by fear of confrontation with Russia, which, despite the tensions in EU-Russia relations at the time<sup>5</sup>, had a significant impact on individual Member States (Szoszyn, 2021). This kind of approach reflects the broader context of EU Member States' transactional policy towards Russia and its "satellites" (Zheltofskiy, 2023, p. 33). In this context, Belarus was seen as Russia's sphere of influence, which had important implications for the shaping of EU foreign policy towards that country.

The most decisive position was taken by the Member States directly bordering Belarus – Poland, Lithuania and Latvia – supported by Estonia and the Czech Republic. Despite the pro-sanctions stance of a group of countries seeking to play a key role in shaping the EU agenda – as demonstrated by the convening of an Extraordinary European Council Summit on 19 August 2020 on the initiative of Poland – and an intense political debate, sanctions against businesses and entities supporting or benefiting from the regime were not imposed until the third package (Council, 2020e). It should be noted that the decision-making process on sanctions was also shaped by lobbying efforts undertaken by key Belarusian supporters of the regime, resulting in the exclusion of key Belarusian businessmen, Aliaksei Alexin and Alexander Moshensky from the original draft version of the third package of sanctions<sup>6</sup> (Budzisz, 2020; Seljan, 2022).

Regarding the role of collective institutional actors, the EP and EUCO played a key role in the decision-making process on sanctions and in shaping the transformation of this policy.

---

<sup>5</sup> Despite the tensions in relations with Russia, caused, among other things, by the attempted poisoning of Russian opposition figure Alexei Navalny in August 2020 and Russian support for the Belarusian authorities during the elections, Member States recognised that direct dialogue with Moscow remained a key route to resolving contentious issues and preserving regional stability. This decision was conditioned by long-standing, comprehensive relations at both the political and economic levels, particularly in the energy and investment sectors.

<sup>6</sup> Iceland used its lobbying capabilities in EU institutions to prevent the imposition of sanctions on Alexander Moshensky, a Belarusian oligarch and Iceland's Honorary Consul in Belarus, who benefited from close ties to the Belarusian authorities.

Faced with the difficulty of forging a consensus on sanctions, the issue was placed on the EUCO agenda, which not only set a strategic direction for the Union, but also identified sanctions as a concrete tool for immediate implementation, while calling on other institutions to reach agreement on the issue. In doing so, it should be noted, the EUCO's political discourse has evolved – from relatively balanced calls to the Belarusian authorities “to find a solution to the crisis by ending the violence” (European Council, 2020a) to a more assertive position on the issue of taking decisive action, including the imposition of sanctions and calling on the Council to adopt a decision on the matter without delay (European Council, 2020b).

An analysis of the dynamics of the EP debates shows a significant intensification of political activity compared to the pre-election period, which was characterised by a relatively low level of engagement. What is also noticeable is the evolution of the political discourse, which shifted towards a stronger position, focusing on the demand for immediate implementation of EU sanctions in response to human rights violations, with a clear reference to the Magnitsky Act model. The EP also adopted a position in support of sectoral sanctions, which was in close correlation with the demands of the Belarusian democratic opposition (European Parliament, 2020).

Although Eastern policy, and the Belarus issue in particular, had not been at the top of HR/VP Josep Borrell's agenda, it is important to note a marked increase in his activity compared to his predecessors, Catherine Ashton and Federica Mogherini. Despite Borrell's numerous statements both in the run-up to and after the controversial 2020 Belarusian presidential elections, and his insistence that the absence of sanctions undermined the EU's credibility (Barigazzi, Herszenhorn, 2020), he failed to achieve consensus in the Council on broad economic sanctions. This situation highlights the structural difficulties involved in agreeing on a common position within the CFSP.

In summary, the EU's sanctions policy after the 2020 elections revealed a discrepancy between political declarations and actual actions taken. The sanctions, introduced late and with caution, did not pose an immediate threat to the Belarusian regime or contribute to the political transformation in the country. They also overlooked the demands of the Belarusian democratic opposition, including its leader Sviatlana Tsikhanouskaya, who called for tougher measures, such as the imposition of severe economic sanctions or the exclusion of Belarus from the SWIFT international bank transfer system. Nevertheless, the sanctions policy laid the groundwork for further efforts to transform the policy, playing a key role in applying long-term pressure on the authorities in Minsk.

### **EU Sanctions Policy Towards Belarus 2021–2022**

The transformation of the EU's sanctions policy towards Belarus followed the events of 23 May 2021, when Belarusian authorities forced a Ryanair plane, operating a flight between two EU capitals, Athens and Vilnius, to land in Minsk in order to arrest Raman Pratasevich, co-founder of the opposition news channel NEXTA (Miadzvetskaya, 2022, p. 7). This incident, which posed a threat to regional security, provided the direct impetus for a fundamental shift in the EU's sanctions approach towards Minsk.



Despite initial opposition from Austria, which at the time was the second-largest investor in Belarus, particularly in the banking and investment sectors, the EU introduced targeted economic sanctions<sup>7</sup> (Noyan, 2021). In addition, a ban on flights through EU airspace and a ban on access to EU airports for all Belarusian carriers were introduced (Council, 2021).

Another key stage in the evolution of EU policy towards Belarus was the migration crisis, triggered by the Belarusian regime’s instrumental use of migrants from non-European countries (including Iraq, Afghanistan and Syria) as a tool of pressure on the Union and a means to force political concessions, including the easing of sanctions. In the EU political discourse, this event has been unequivocally defined as a “hybrid attack by Belarus on the EU” (European Commission, 2021; Euronews, 2021).

In response to the “continuing human rights violations and instrumental treatment of migrants,” the Council first expanded the criteria for inclusion on the sanctions list, to include “persons organising or supporting the regime’s activities that facilitate the illegal crossing of EU borders,” and then introduced a fifth package of sanctions, adding 17 individuals and 11 entities to the list (Council, 2021d). The explanatory memorandum emphasised the regime’s full responsibility for creating and escalating the migration crisis on the EU-Belarus border, declaring Minsk’s actions a “hybrid attack.” Although the EU did not introduce targeted economic sanctions covered by the fourth package, the new restrictions extended to key companies and entire sectors, including Belavia airlines, tour operators and hotels, passport and visa service providers and the petrochemical sector.

The table below provides a chronological overview of the evolution of the EU sanctions policy from 2021 to 2022 and the factors influencing it, including the positions of key EU actors in relation to the consensus in the Council, and illustrates its transformation.

Table 2

EU policy towards Belarus (2021–2022)

Date/Type of Sanctions	Number of Individuals/Entities	Triggering situation	Developing consensus in the Council
1	2	3	4
4 June 2021 Transport sanctions	Ban on Belarusian carriers using EU airspace and airports	Further human rights violations in Belarus  Forced landing of a Ryanair plane in Minsk on 23 May 2021	
21 June 2021 Travel ban, Freezing of assets (4 packet)	78 individuals, 8 entities		Follow-up to the conclusions of the European Council, 24–25 May 2021
Targeted economic sanctions: Export restrictions	Ban on the export of Internet and electronic communications surveillance software		Initial opposition from Austria defending the interests of

<sup>7</sup> The sanctions targeted key Belarusian producers, such as Belshina (a tyre manufacturer), Grodno Azot (nitrogen fertilisers), Grodno Chimvolokno (man-made fibres) and Belorusneft (oil extraction). In addition, sanctions were imposed on a joint-stock company, the airline Belavia, tourist companies, hotel operators and other entities supporting the regime’s activities, including those facilitating the illegal crossing of the EU’s external borders. However, the sanctions did not apply to contracts in place at the time or to potassium chloride containing 40 to 62% potassium, which accounted for approximately 80% of potassium fertilisers (Żochowski, 2021).

1	2	3	4
	Ban on exports of tobacco goods Ban on imports of oil and potash products from Belarus		Priorbank (Raiffeisen Group)
Financial sanctions	Restriction of access of Belarusian financial institutions to EU capital markets (Belarusbank, Belagriprombank, Belinvestbank)		
15 November 2021 Broadening the criteria for inclusion of persons and entities on the sanctions list	Persons organising or supporting regime activities that facilitate illegal border crossings into the EU.	Hybrid attacks and instrumental treatment of migrants	
2 December 2021 Travel ban Freezing of assets	17 individuals, 11 entities		Follow-up to the conclusions of the European Council, 21–22 October 2021
24 February 2022 Extension of the sanitation list for one year	Total: 183 individuals, 26 entities	Annual review of sanctions	

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

The EP and EUCO played a key role in the decision-making process leading to the transformation of sanctions policy, as they did after the elections.

In response to threats created by the Belarusian regime, such as the forced landing of the Ryanair plane and the triggering of the migration crisis at the Belarus–Poland and Belarus–Lithuania borders, the political discourse of the EUCO sharpened, focusing on the need for sectoral sanctions. On the basis of the EUCO conclusions, a consensus was reached in the Council and all its demands were fully implemented (European Council, 2021a; 2021b; 2021c).

It is noteworthy that the role of the EUCO in the decision-making process on sanctions has clearly been strengthened, especially in the context of the need for a rapid response and consensus-building. EU Heads of State and Government have gained significant influence in shaping foreign policy directions, with conclusions adopted identifying sanctions as a tool for external action and expecting the EC and the Council to prepare specific legislation in this regard (Eggermont, 2012; Szép, 2021, pp. 90–91). The above reflects the evolution of the EU's internal institutional dynamics and the increasing dominance of the EUCO in the decision-making process, especially compared to earlier stages of the development of the CFSP (Lehne, 2015).

The EP's political discourse also became more assertive. In a resolution of 10 June 2021, the incident of the forced landing of the Ryanair plane was described as “a horrendous act, a violation of international law, constituting an act of international terrorism” (European Parliament, 2021). Additionally, the EP called for sectoral sanctions to be introduced “as soon as possible,” which was consistent with the demands of the Belarusian democratic opposition, including its leader Sviatlana Tsikhanouskaya, who called for stronger action against the Lukashenko regime.



Just as after the 2020 presidential election in Belarus, when the leaders of Germany, France and Italy advocated a mediated solution to the crisis involving Russia, Germany and France continued the same strategy during the migration crisis. As a result, in an attempt to resolve the situation on the Belarusian-EU border, there were two telephone conversations between the then German Chancellor Angela Merkel and Alexander Lukashenko, which preceded two of her conversations with Vladimir Putin, as well as one conversation between French President Emmanuel Macron and Putin (“*Gazeta Prawna*”, 2021; Szabaciuk, 2021).

In conclusion, the analysis carried out indicates that, in response to growing threats to regional security, the EU’s sanctions policy towards Belarus during the period under review has undergone a significant transformation. It focused on expanding the scope of sanctions, taking into account both the moral dimension of the actions and the long-term objectives of political change in Belarus. This process also highlighted an evolution of the role of the European Council in shaping the EU sanctions policy, manifested by a clear increase in the influence of Member State leaders, which was a key step towards a more coherent and decisive EU policy.

### Conclusions

The analysis of the EU’s sanctions policy towards Belarus from 2020 to 2022 confirms the author’s hypothesis that the transformation of the sanctions policy, particularly its significant expansion, was a direct response to the regime’s post-election actions, which were considered a serious threat to regional security.

Despite the intense political debate and sharpening of its discourse – both within key EU institutions (EP, EUCO, HR/VP) and Member State governments, especially those neighbouring Belarus – on the need to revise EU foreign policy towards Belarus, the transformation of the sanctions policy did not take place immediately after the elections. The main reason was the lack of unanimity among the Member States, which maintained a pragmatic approach that took into account economic ties and the strategic role of Belarus as a transit country, especially in the energy sector. Furthermore, the perception of Belarus as a country within Russia’s sphere of influence limited the EU’s ability to take stronger action.

Following the regime’s post-election actions, such as the forced landing of the Ryanair plane and the triggering of the migration crisis, there has been a transformation of the sanctions policy. Despite this transformation, which included a broadening of the scope of restrictions and a sharpening of political discourse, the effectiveness of these actions remained limited in terms of triggering real changes in regime behaviour.

The slow dynamics of the decision-making process, due to difficulties in reaching consensus in the Council and mediation by individual Member States (France and Germany) with Russia’s participation, led to a situation where the regime was taking steps to prevent losses from sanctions, and EU sanction pressure was perceived by the Belarusian authorities as moderate and predictable. Moreover, analysing the cyclical nature of sanctions and the transactional dependencies involved in their suspension or lifting in the years leading up to the 2020 elections, Lukashenko continued to strength-

en cooperation with Russia, viewing it as the only source of political and economic stability. This tactic has ultimately contributed to his decision to support the Russian invasion of Ukraine.

Following Belarus' support for Russia in its military aggression against Ukraine, including by making its territory available, the EU extended sectoral sanctions against the country between 24 February 2022 and 2025. These sanctions began to be seen as an integral part of the EU's broader policy towards Russia. Sanctions coordinated with those against Russia were also introduced to prevent circumvention of previously imposed restrictions, taking into account the strong economic and political integration between Belarus and Russia.

Given the long-term and cyclical nature of the EU's sanctions policy towards Belarus, the shaping of which has largely depended on the changing geopolitical context, it is advisable to take into account current developments in the international environment. The changes in the Donald Trump administration's foreign policy towards Russia and the EU, developments in Ukraine, and the growing divergence between US and EU positions on conflict resolution are of particular importance. In this context, it becomes crucial to strengthen the EU's credibility as an independent geopolitical actor, promoting values and seeking to maintain coherence in action.

In view of the above, two main directions of further EU policy towards Belarus can be distinguished. The first one assumes continuation of the transformation policy aimed at supporting democratisation in Belarus with probable maintenance and possible extension of sanctions. With the maintenance of a tough US policy towards Belarus and Russia, the EU could synchronise its actions with the US policy, which could lead to a tougher course towards the Lukashenko regime. In the long term, this policy could evolve into a comprehensive transformation strategy.

In the event of a review of US foreign policy, seen as part of a broader reset of US-Russian relations, the EU could adopt a more transactional approach to sanctions policy, involving their gradual suspension or lifting, provided the Belarusian regime demonstrates a willingness to make progress on human rights, release political prisoners or take steps towards policy liberalisation, as it did in 2008 and 2015.

The EU's ability to act as an independent actor on the international stage, combined with the long-standing transformative nature of its policy towards third countries, including Belarus, is a key factor influencing the Union's credibility as a significant player and the future of democratisation processes in the region. However, ensuring a consistent position among Member States on continuing the transformative approach remains a serious challenge. This is particularly the case for countries with a Eurosceptic orientation and a preference for a transactional model of relations with Russia, such as Hungary under Viktor Orbán or Slovakia under Robert Fico, whose stances may significantly hinder reaching consensus on sanctions.

In the context of contemporary geopolitical challenges, it seems reasonable to reconsider the reform of the EU decision-making mechanism – in particular the introduction of qualified majority voting in sanctions policy matters – a demand repeatedly articulated by supranational institutions. In addition, it would be advisable to improve cooperation between key EU institutional actors, such as the HR/VP, the EEAS and the EUCO President, as well as to clarify the division of their competences under the

Lisbon Treaty, which would enable better coordination of activities and increase the efficiency and coherence of EU foreign policy.

### Bibliography

- Amnesty International (2021), *Belarus: You Are Not Human Beings. State-Sponsored Impunity and Unprecedented Police Violence Against Peaceful Protesters*, <https://eurasia.amnesty.org/wp-content/uploads/2021/01/belarus-you-are-not-human-beings.pdf>, 30.03.2022.
- Barigazzi J., Herszenhorn D. M. (2020), *Borrell admits EU's credibility 'at stake' over failure to sanction Belarus*, "Politico", 21.09.2020, <https://www.politico.eu/article/borrell-admits-eu-credibility-is-at-stake-in-failure-to-sanction-belarus/>, 2.05.2021.
- Belarusian Helsinki Committee, Human Rights Centre "Viasna" (2020), *2020 Presidential Election. Preliminary Report on Election Observation*, 11.08.2020, <https://spring96.org/en/news/98942>, 11.11.2020.
- Bosse G. (2021), *Authoritarian consolidation in Belarus: What role for the EU?*, "European View", 20(2), DOI:10.1177/17816858211061839.
- Budzisz M. (2020), *Europejskie sankcje wobec reżimu Łukaszenki rozczarowują białoruską opozycję. Wywołały sporo emocji*, <https://wpolityce.pl/swiat/532122-europejskie-sankcje-wobec-rezimu-lukaszenki>, 2.03.2024.
- Council of the EU (2020a), *Belarus: Declaration by the High Representative on behalf of the European Union on the presidential elections*, 11.08.2020, <https://www.consilium.europa.eu/en/press/press-releases/2020/08/11/belarus-declaration-by-the-high-representative-on-behalf-of-the-european-union-on-the-presidential-elections/>, 24.09.2020.
- Council of the EU (2020b), *Council Implementing Decision (CFSP) 2020/1388 of 2 October 2020 implementing Decision 2012/642/CFSP concerning restrictive measures against Belarus*, OJ L1 319/13, 2.10.2020.
- Council of the EU (2020c), *Council conclusions on Belarus*, 11661/20, 12.10.2020, <https://www.consilium.europa.eu/media/46076/council-conclusions-on-belarus.pdf>, 24.09.2021.
- Council of the EU (2020d), *Council Implementing Decision (CFSP) 2020/1650 of 6 November 2020 implementing Decision 2012/642/CFSP concerning restrictive measures against Belarus*, OJ L1 370/9, 6.11.2020.
- Council of the EU (2020e), *Council Implementing Decision (CFSP) 2020/2130 of 17 December 2020 implementing Decision 2012/642/CFSP concerning restrictive measures against Belarus*, OJ L1 426/14, 17.12.2020.
- Council of the EU (2021a), *Council Decision (CFSP) 2021/908 of 4 June 2021 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus*, OJ L1 197/3, 4.06.2021.
- Council of the EU (2021b), *Council Implementing Decision (CFSP) 2021/1002 of 21 June 2021 implementing Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus*, OJ L1 219/70, 21.06.2021.
- Council of the EU (2021c), *Council Regulation (EU) 2021/1030 amending Regulation (EC) no. 765/2006 concerning restrictive measures in respect of Belarus*, OJ L1 224, 24.06.2021.
- Council of the EU (2021d), *Council Decision (CFSP) 2021/1990 of 15 November 2021 amending Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus*, OJ L1 405/10, 16.11.2021.
- Council of the EU (2021e), *Council Implementing Decision (CFSP) 2021/2125 of 2 December 2021 implementing Decision 2012/642/CFSP concerning restrictive measures in view of the situation in Belarus*, OJ L1 430/16, 2.12.2021.

- DW (2020), *Macron offers EU mediation in Belarus including Russia*, <https://www.dw.com/en/merkel-macron-talks-france-offers-eu-mediation-in-belarus-including-russia/a-54639160>, 10.05.2023.
- Eggermont F. (2012), *The Changing Role of the European Council in the Institutional Framework of the European Union: Consequences for the European Integration Process*, Intersentia Uitgevers NV.
- Euronews (2021), *Belarus border chaos a 'hybrid attack not a migration crisis', says EU's von der Leyen*, <https://www.euronews.com/2021/11/10/dozens-of-migrants-detained-in-poland-after-breaking-across-belarus-border>, 3.12.2021.
- European Commission (2021), *Statement by President von der Leyen on the situation at the border between Poland and Belarus*, [https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT\\_21\\_5867](https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT_21_5867), 3.01.2022.
- European Council (2020a), *Conclusions by the President of the European Council on 19 August 2020*, <https://www.consilium.europa.eu/en/press/press-releases/2020/08/19/conclusions-by-the-president-of-the-european-council-following-the-video-conference-of-the-members-of-the-european-council-on-19-august-2020/>, 30.03.2021.
- European Council (2020b), *European Council conclusions on external relations*, 1 October 2020, <https://www.consilium.europa.eu/en/press/press-releases/2020/10/01/european-council-conclusions-on-external-relations-1-october-2020/>.
- European Council (2021a), *European Council conclusions on Belarus*, 24 May 2021, <https://www.consilium.europa.eu/en/press/press-releases/2021/05/24/european-council-conclusions-on-belarus-24-may-2021/>, 29.05.2021.
- European Council (2021b), *European Council meeting (24 and 25 June 2021). Conclusions*, <https://www.consilium.europa.eu/media/50763/2425-06-21-euco-conclusions-en.pdf>, 4.07.2022.
- European Council (2021c), *European Council meeting (21 and 22 October 2021). Conclusions*, <https://www.consilium.europa.eu/media/52622/20211022-euco-conclusions-en.pdf>, 24.10.2021.
- European Parliament (2020), *European Parliament recommendation of 21 October 2020 to the Council, the Commission and the Vice-President of the Commission / High Representative of the Union for Foreign Affairs and Security Policy on relations with Belarus*, OJ C 404/224, 6.10.2021.
- European Parliament (2021), *Resolution of 10 June 2021 on the systematic repression in Belarus and its consequences for European security following the abductions from an EU civilian plane intercepted by Belarusian authorities*, OJ C 67/118, 8.02.2022.
- „Gazeta Prawna” (2021), *Merkel z Łukaszenką, Macron z Putinem. Przywódcy europejskich państw rozmawiają o sytuacji na granicy z Białorusią*, <https://www.gazetaprawna.pl/wiadomosci/swiat/artykuly/8292626,merkel-z-lukaszenka-macron-z-putinem-przywodcy-europejskich-panstw-rozmawiaja-o-sytuacji-na-granicy-z-bialoruscia.html>, 20.12.2021.
- Kłysiński K., Chawryło K. (2020), *Obywatele przeciwko reżimowi – Białoruś po wyborach prezydenckich*, Komentarze OSW, <https://www.osw.waw.pl/en/node/28180>, 18.04.2021.
- Korosteleva E., Petrova I. (2021), *Community Resilience in Belarus and the EU Response*, “JCMS: Journal of Common Market Studies”, no. 59(2), DOI:10.1111/jcms.13248.
- Lehne S. (2015), *Are Prime Ministers Taking over EU Foreign Policy*, Carnegie Endowment for International Peace, <https://www.jstor.org/stable/resrep12974>, 19.04.2022.
- Miadzvetetskaya Y. (2022), *Designing Sanctions: Lessons from EU Restrictive Measures against Belarus*, “GMF Policy Paper”, DOI:10.2139/ssrn.4200743.
- Miadzvetetskaya Y., Challet C. (2022), *Are EU restrictive measures really targeted, temporary and preventive? The case of Belarus*, “Europe and the World: A Law Review”, no. 6(1), DOI: 10.14324/111.444.ewlj.2022.03.

- Noyan O. (2021), *Austria ends opposition to EU-Belarus sanctions*, [https://www.euractiv.com/section/politics/short\\_news/austria-ends-opposition-to-eu-belarus-sanctions/](https://www.euractiv.com/section/politics/short_news/austria-ends-opposition-to-eu-belarus-sanctions/), 15.05.2024.
- OSCE (2020), *ODIHR will not send an election observation mission to Belarus due to the lack of an invitation*, <https://www.osce.org/odihr/elections/457309>, 9.04.2022.
- Portela C. (2018), *Targeted sanctions against individuals on grounds of grave human rights violations – impact, trends and prospects at EU level*, European Parliament, Policy Department for External Relations, Directorate General for External Policies of the Union, [https://www.europarl.europa.eu/thinktank/en/document/EXPO\\_STU\(2018\)603869](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2018)603869), 19.05.2023.
- Rettman A. (2020), *Lukashenko-linked firms active in EU member Cyprus*, <https://euobserver.com/eu-and-the-world/ar7c67b531>, 30.06.2022.
- Seljan H. (2022), *Ísland hringdi hátt í þrjátíu sinnum í ESB fyrir Moshensky*, Heimildin, <https://heimildin.is/grein/15037/moshensky-var-eina-heimildin-um-samband-hans-og-lukashenko/>, 4.05.2024.
- Staszczuk A. (2013), *Rola Parlamentu Europejskiego w procesie kształtowania Wspólnej Polityki Zagranicznej i Bezpieczeństwa UE po zawarciu Traktatu z Lizbony*, „Rocznik Integracji Europejskiej”, no. 7, DOI: 10.14746/rie.2013.7.17.
- Szabaciuk A. (2020), *Wybory prezydenckie z 9 sierpnia 2020 r. na Białorusi: przebieg i konsekwencje*, Instytut Europy Środkowej, <https://ies.lublin.pl/komentarze/wybory-prezydenckie-z-9-sierpnia-2020-r-na-bialorusi-przebieg-i-konsekwencje/1>, 8.04.2023.
- Szabaciuk A. (2021), *Kryzys na granicy polsko-białoruskiej w kontekście rosnących napięć w Europie Wschodniej (część 1)*, Instytut Europy Środkowej, 23.11.2021, <https://ies.lublin.pl/komentarze/kryzys-na-granicy-polsko-bialoruskiej-w-kontekście-rosnących-napięć-w-europie-wschodniej-czesc-1/>, 19.04.2023.
- Szép V. (2021), *The Framework for Collective Decision-Making in EU Foreign Policy: The Case of the Sanctions Imposed Against Russia*, Centre for Social Sciences, Eötvös Loránd Research Network, Hungarian Academy of Sciences Centre of Excellence, Institute for Political Science, 2.03.2024.
- Szoszyn R. (2021), *Spóźniony pomysł Unii Europejskiej na Białoruś*, „Rzeczpospolita”, <https://www.rp.pl/swiat/art8592651-spozniony-pomysl-unii-europejskiej-na-bialorus>, 12.04.2022.
- Tosiek P. (2016), *Administracja rządowa państwa członkowskiego w organach przygotowawczych Rady Unii Europejskiej. Perspektywa politologiczna*, Wydawnictwo UMCS, Lublin.
- Tosiek P. (2020), *The Prospects for Institutional Reforms of the European Union: a Liberal Intergovernmentalist Perspective*, „Srpska Politička Misao”, no. 27(68), DOI: 10.22182/spm.6822020.6.
- Treaty on European Union (2009), *Consolidated version of the Treaty on European Union*, OJ C 83/1, 30 March 2010.
- Zheltonovskyy V. (2023), *From Transaction to Transformation: Explaining the Leadership Shift on EU Sanctions Policy Against Russia*, „Studia Europejskie – Studies in European Affairs”, 4/2023, pp. 27–40, DOI: 10.33067/SE.4.2023.2.
- Żochowski P. (2021), *Painful EU sectoral sanctions against Belarus*, OSW Analyses, <https://www.osw.waw.pl/en/publikacje/analyses/2021-06-25/painful-eu-sectoral-sanctions-against-belarus>, 30.06.2022.

## Summary

This article analyses the sanctions policy as a key instrument of the European Union's Common Foreign and Security Policy (CFSP) towards Belarus between 2020 and 2022. The case of Belarus represents a particularly illustrative study in the field of EU sanctions policy due to

its longevity, complexity and cyclical nature. The study focuses on identifying the main factors shaping the decision-making process concerning the transformation of the EU's sanctions policy, both in response to changes in the political situation in Belarus and within a broader geopolitical context. The article also outlines potential directions for the future development of the EU's sanctions policy towards Belarus, considering the potential return to a transactional approach in light of evolving geopolitical condition

**Key words:** European Union, Belarus, sanctions (restrictive measures), Common Foreign and Security Policy (CFSP)

## **Ewolucja polityki sankcji UE wobec Białorusi w latach 2020–2022**

### **Streszczenie**

Niniejszy artykuł analizuje politykę sankcji jako kluczowy instrument Wspólnej Polityki Zagranicznej i Bezpieczeństwa (WPZiB) Unii Europejskiej wobec Białorusi w latach 2020–2022. Przypadek Białorusi stanowi szczególnie istotne studium w zakresie polityki sankcyjnej UE ze względu na jej długotrwałość, złożoność i cykliczny charakter. Analiza koncentruje się na identyfikacji głównych czynników determinujących proces decyzyjny w zakresie transformacji polityki sankcyjnej UE zarówno w reakcji na sytuację polityczną w tym kraju, jak i w szerszym kontekście geopolitycznym. Artykuł wskazuje również potencjalne kierunki dalszego rozwoju polityki sankcyjnej, uwzględniając możliwość powrotu Unii Europejskiej do podejścia transakcyjnego w obliczu zmieniających się uwarunkowań geopolitycznych.

**Słowa kluczowe:** Unia Europejska, Białoruś, sankcje (środki ograniczające), Wspólna Polityka Zagraniczna i Bezpieczeństwa (WPZiB)

### **Author Contributions**

Conceptualization (Konceptualizacja): Katarzyna Jerominek

Data curation (Zestawienie danych): Katarzyna Jerominek

Formal analysis (Analiza formalna): Katarzyna Jerominek

Writing – original draft (Piśmiennictwo – oryginalny projekt): Katarzyna Jerominek

Writing – review & editing (Piśmiennictwo – sprawdzenie i edytowanie): Katarzyna Jerominek

Competing interests: The authors have declared that no competing interests exist (Sprzeczne interesy: Autor oświadczył, że nie istnieją żadne sprzeczne interesy): Katarzyna Jerominek