The Role of Non-State Actors in the Development and Implementation of EU Foreign Assistance Programs for Belarus, 2020–2025

Belarus Beehive

The 2020 political crisis fundamentally altered the conditions of Belarusian society, as well as the policies of the EU and the US toward Belarus. A major role in this process was played by the reassessment of the position and role of non-state actors in maintaining connection between Western countries and Belarusian society, supporting democratic initiatives, and implementing various assistance and support programs.

The role of non-state actors, such as the Belarusian democratic forces and civil society organizations (CSOs), has grown significantly, yet remained fragile and often ad hoc. Within the scope of this document, we will attempt to:

1. Analyse general trends in foreign aid allocated by the EU to society of Belarus between 2020 and 2025, and assess the extent to which these trends align with the advocacy efforts of civil society organizations representing the sector's interests.
2. Examine assistance strategies through the case of key donor countries for Belarus.
3. Illustrate the mechanisms of interaction between donors and CSO, and demonstrate the extent to which such practices are sustainable and productive.

KEY TRENDS IN EU FOREIGN ASSISTANCE

With the onset of the 2020 political crisis, the US and particularly the EU faced the issue of shifting their approaches toward the Belarusian state and society. Prior to this, amid warming relations with the Belarusian authorities, foreign aid funds were being reallocated toward supporting projects and initiatives controlled by the Belarusian state. This was especially true for EU countries, which had transitioned to large-scale cooperation through a wide range of mechanisms. In 2019, the total project portfolio, including involvement from banking institutions, exceeded one billion euros (see Fig. 1)

Інстытут палітычных даследаванняў ПАЛІТЫЧНАЯ СФЕРА
EASTERN PARTNERSHIP CIVIL SOCIETY FORUM
Funded by the European Union
GREEN NETWORK
EUROBELARUS
RADA

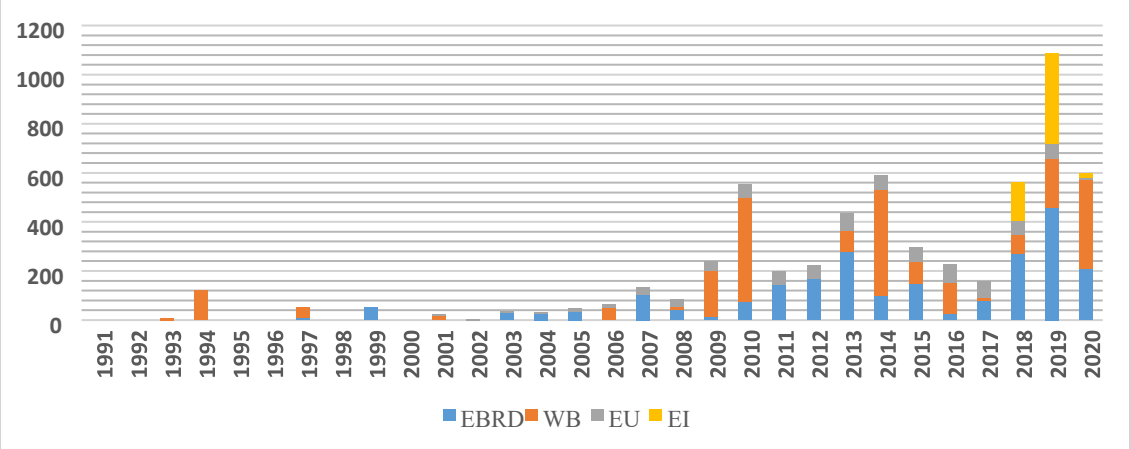


Figure 1. Funds (€ million) raised by Belarus through European institutions and the World Bank, 1992-2020 (source: Kazakevich, 2021)

Following the suppression of the 2020 peaceful protests, and especially after the onset of Russia's war against Ukraine, the implementation of the vast majority of programs became impossible. Donor countries were faced with a dilemma: whether to completely suspend support or to develop alternative approaches and mechanisms.

A major challenge was the continuation of cooperation with Belarus, but in the form of direct support for Belarusian society. In this domain, it was essential to shift EU assistance away from Belarusian authorities and state-owned enterprises towards non-state actors, whose role had to be changed significantly.

As a result, Belarusian democratic forces and civil society organizations carried out extensive work to maintain attention to the problems of Belarus, to highlight the importance of preserving the EU's influence on Belarusian society, and to emphasize the value of cooperation with Belarusian civil society in countering external hybrid threats, disinformation, and other security risks.

According to official statements by the European Commission, up to €170 million has been allocated from 2020 through the end of 2025 to support Belarusian CSOs and key sectors of Belarusian society (youth, media, SMEs, etc.). Additional package (€30 million) was announced in December 2025 (European Commission, 2025). Thus, support for key sectors of Belarusian civil society and society at large averaged approximately €28 million per year. The main areas of support included civil society institutions, human rights defenders, independent media, educational and cultural institutions, and small and medium-sized businesses in exile. In 2016–2019, the volume of EU foreign assistance to Belarus amounted to €23 million per year, considering cooperation with state authorities.

It should be noted that estimates of total support may vary depending on what is included in the domain of "civil society" and which programs are considered targeted at Belarus. For instance, according to EU foreign assistance statistics, the total amount of funds directed to Belarus in 2020–2024 reached €530 million, or approximately €106 million per year.[1] However, this obviously includes expenditures that are not directly linked to civil society. Before the crisis (2015–2019), the level of overall support was around €80 million per year.

The most clearly positive dynamics were reflected in the field of education as a mechanism for direct engagement with Belarusian society, youth support, and mobility. While in 2011–2015 the average annual EU support for all educational programs was around €19 million, during the period of normalization of relations with official Minsk in 2016–2019 it grew to €35 million. After 2020, the volume of support was successfully increased to €50 million per year (2020–2024), and this high figure persists to this day. Poland is the absolute leader in support in this area, allocating around €29 million per year for these purposes, followed by Germany (up to €8 million) and the European Commission (around €4.5 million).

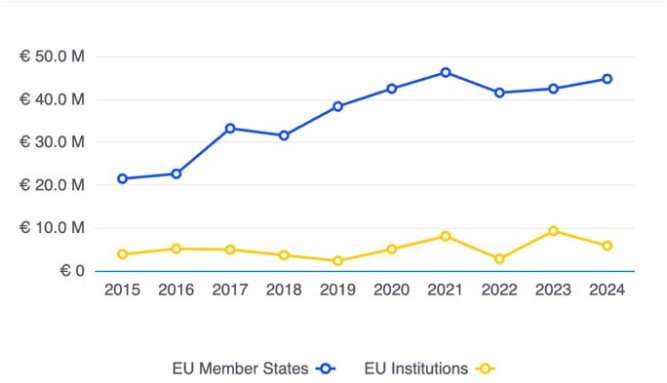


Figure 1. Total expenditure for Belarus, 2015–2024

Other areas related to Belarusian society and civil society also demonstrated relatively positive trends. For example, expenditures in the field of "Government & Civil Society General" averaged around €21.3 million per year in 2016–2019, whereas in 2021–2024 expenditures here amounted to about €29.2 million per year, reflecting an increase despite the cessation of cooperation with official Minsk.

If we consider direct support to civil society in the narrow sense (civil society institutions and human rights), in 2016–2019 approximately €8.5 million per year was directed to this sector, whereas in 2021–2024 this figure rose to €10.8 million per year. This also reflects positive dynamics, even considering that relocation entailed additional living expenses and a higher tax burden.

[1] Here and below, unless otherwise indicated, data from Team Europe Explorer are used as the source of statistics https://team-europe-explorer.europa.eu/

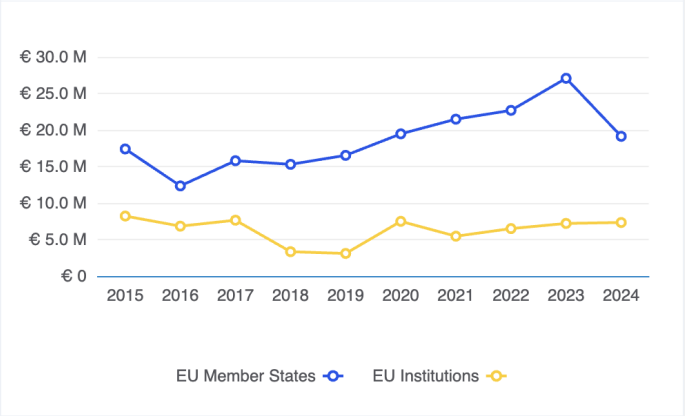


Figure 2. Expenditure for Belarus (Government & Civil Society General), 2015–2024

Thus, in cooperation with Belarusian non-state actors, the European Commission largely managed to maintain and, in certain sectors, even increase support for Belarus.

ASSISTANCE BREAKDOWN BY COUNTRY

To analyse the impact of the 2020 events on the policies of individual countries, we calculated the increase or decrease in average annual expenditures for Belarus in 2021–2024 compared with 2015–2019. That is, how much a given country's expenditures for Belarus increased or decreased before and after the 2020 political crisis. The year 2020 itself was excluded from the analysis as a transitional year, as it contained both expenditures on cooperation projects with the Belarusian state and the initial emergency assistance packages for civil society following the onset of mass repressions.

2015–2019: A period of relative normalization of relations between Belarus and the EU, including both cooperation projects with civil society and a significant share of cooperation projects with the Belarusian state, in particular infrastructure projects. 2021–2024: A period of winding down cooperation with the Belarusian state and reallocating funds towards cooperation with Belarusian society and civil society. Countries were divided into three groups: 1) Major donors with average annual expenditures exceeding €1 million in at least one of the selected periods; 2) Medium donors with expenditures in the range of over €100 thousand up to €1 million; 3) Minor donors with expenditures over €5 thousand up to €100 thousand. Countries with expenditures under €5 thousand in at least one of the periods were not included in the analysis.

The table data demonstrate various strategies of adaptation to the situation following the 2020 crisis. Looking at total expenditures, only two countries were able to increase their spending on Belarus by shifting their priorities after the 2020 crisis. These were Poland (+51%) and Austria (+41%). All other major donors actually reduced their level of support, and the funds withdrawn from state-related projects were not redirected to civil society.

Germany's level of support decreased by 16.5%, Lithuania's by 17.2%, France's by 42%, and the European Commission's overall by 39.3%. The most critical situation occurred in the case of Sweden, whose role as a major donor was significantly reduced, with its support level falling by 76.8%.

Among medium donors, a significant growth in support was demonstrated by five countries from Eastern and Western Europe (Belgium 31 times, the Netherlands 120%, Hungary 114%, Slovakia +74.6%, and Estonia +36.8%). Meanwhile, the Czech Republic, Finland, and Italy significantly reduced their projects. At the same time, Denmark (-58.7) and Spain (-94%) virtually ceased cooperation. Among minor donors, five countries significantly increased their expenditures, while two significantly reduced them.

Decline or Growth in 2021–2024 Compared to 2015–2019	**Large donors**	**Medium donors**	**Minor donors**
More than +100%	Poland, Austria	Belgium, Netherlands, Hungary Slovak Republic, Estonia	Luxembourg, Croatia, Ireland, Romania, Latvia
More than +50%			
Plus up to 50%			
Minus up to 50%	Germany, Lithuania, European Commission, France	Finland, Czechia, Italy	
Minus over 50%	Sweden	Denmark, Spain	Slovenia, Greece

Figure 3. Support by Country: Increase or Decrease in Average Annual Expenditures in 2020–2024 Compared to 2015–2019. Projects Across All Sectors Included.

If we consider not total expenditures, but only spending on 'government and civil society', the strategies of individual countries also varied. Here, it is worth noting the growing role of the European Commission, which occurred partly due to the reallocation of a portion of national funds from direct assistance to support provided through European institutions. Nevertheless, even considering this, a significant increase in expenditures was observed for Poland (+202%). At the same time, support from such traditionally key major donors as Germany (-11.6%) and Sweden (-71%) decreased. As in the case of overall funding, there was a significant rise in spending among medium donors in this sector: Belgium (47 times), Estonia (+256%), Lithuania (149%), the Netherlands (+135), and the Czech Republic (+9.7%). Meanwhile, a critical drop in support occurred for Denmark (-75.7%). Among minor donors, seven countries demonstrated a significant increase in contributions to Belarusian civil society, while two showed a decline.

Decline or Growth in 2021–2024 Compared to 2015–2019	**Large donors**	**Medium donors**	**Minor donors**
More than +50%	Poland, European Commission	Belgium, Estonia, Lithuania, Netherlands, Czechia	Croatia, Romania, France, Ireland, Austria, Slovak Republic, Latvia
Plus up to 50%	-	-	-
Minus up to 50%	Germany	-	Finland
Minus over 50%	Sweden	Denmark	Italy

Figure 4. Support by Country: Increase or Decrease in Average Annual Expenditures in 2020–2024 Compared to 2015–2019. Government and Civil Society.

And for the sake of completeness, let us perform a brief analysis of expenditures in the most significant sector for the allocation of foreign assistance funds—all projects related to education. Among major donors, Poland, Austria, and the European Commission demonstrated growth here. However, Germany, France, and Sweden showed a noticeable decline. Among medium donors, expenditures increased significantly for Estonia and

Slovakia, and to a lesser extent for Italy and Lithuania. Only the Czech Republic demonstrated a decrease. Among minor donors, four countries showed growth in the education sector.

Decline or Growth in 2021–2024 Compared to 2015–2019	Large donors	Medium donors	Minor donors
More than +50%	Poland, Austria, European Commission	Estonia, Slovak Republic	Luxembourg, Finland, Romania
Plus up to 50%		Italy, Lithuania	Hungary
Minus up to 50%	Germany, France, Sweden	Czechia	
Minus over 50%			

Figure 5. Support by Country: Increase or Decrease in Average Annual Expenditures in 2020–2024 Compared to 2015–2019. Education.

Thus, the analysis of overall assistance, as well as in such crucial sectors as education and civil society support, allows us to state that Poland is the absolute leader and a country that has genuinely restructured its foreign assistance policy toward Belarus, significantly increasing its volume overall. Among other major donors, the declining role of Germany is noteworthy, which is at least partially related to the reallocation of funds to European institutions. A critical drop across all analyzed areas of support was observed for Sweden. Analyzing medium donors, a negative trend can be seen in Scandinavia as a whole (Denmark and Finland), alongside positive dynamics in certain countries of Eastern Europe (Estonia, Slovakia, the Czech Republic) and Western Europe (particularly Belgium and the Netherlands)

Belarus in the Strategic Documents of Major Donors.[2] As a distinct line of activity, Belarus and Belarusian civil society are particularly prominent in the strategic documents of

[2] The analysis is based on strategic and reporting documents (hereinafter referred to as strategic documents) devoted to the outcomes and implementation plans of foreign aid, published by the governments of: Germany (29

Lithuania, Poland, and the United States. They are also noted as a significant focus in the documents of Germany and Sweden. The active stance of civil society organizations influenced individual countries' approaches to foreign assistance, although such influence on strategic documents and policies was limited and requires further advocacy work.

Unfortunately, several negative trends can also be observed: following the outbreak of Russia's war against Ukraine, support for Belarusian civil society for Lithuania largely ceased; there are also trends toward excluding Belarus from the European policy context (grouping it together with Russia or Azerbaijan), the disappearance of cooperation with Belarus from the national agenda (signs of which can be seen in Germany and Sweden), and the delegation of this issue exclusively to the level of EU foreign policy.

Germany is a major donor with significant resources that could serve as a growth point for Belarusian civil society. The level of support in 2015–2019 was approximately €11.8 million, and later €11.3 million. The decline can be explained by the cessation of work on projects with the Belarusian state, as well as the redirection of a portion of new spending on Belarus not directly, but through EU bodies.

In its foreign assistance policy, the country emphasizes humanitarian aid, the formation of a 'multipolar world', international solidarity, and taking into account the interests of the 'Global South'. This scope of topics is complemented by human rights and particularly women's rights, but without highlighting the idea of expanding democracy and other forms of political influence. At times, it treats any manifestations of Eastern European nationalism, the strengthening of national identity, sovereignty, and similar themes with suspicion. The new German government is expected to shift its foreign assistance priorities toward security issues, combatting illegal migration, and countering hybrid threats.

Despite the surge of interest in Belarus after 2020, overall it can be stated that interest in Belarus has declined. Civil society organizations managed to maintain, but not increase, their support.

Poland. Poland maintains a special interest in Belarus, and the 2020 political crisis was reflected in Polish strategic documents. The 2020 crisis drew renewed attention to flagship projects related to Belarus: the provision of student and academic scholarships (in particular the Kalinouski Program), educational services, and support for the Belsat TV channel. Poland also made a significant contribution to Emergency Response. Unlike Germany, this country demonstrates a significant increase in spending on Belarus. While prior to 2020 expenditures amounted to around €25 million per year, in 2020–2024 they grew to over

documents), Lithuania (22 documents), Poland (18 documents), Sweden (35 documents), and the USA (17 documents).

€50 million per year. The higher education sector serves as the main direction of support. Thus, including through the work of civil society organizations, it was possible to increase spending on Belarus.

Poland is the only donor country that favorably views the strengthening of Belarusian identity and sees a strategic interest in the development of Belarusian culture and the consolidation of independent statehood. This is, above all, crucial in the context of weakening Russia's influence in Belarus and the region. Based on the narratives of strategic documents, when working with Poland, the main emphasis in seeking support should be placed on the importance of Belarusian civil society for Poland's security, preventing hybrid threats, ensuring a safe neighborhood, and containing Russian influence.

Sweden. Sweden remains an important country of support for Belarusian civil society, but at the same time is one of the countries where the level of direct support for Belarusian projects has significantly declined since 2020. This is partly related to support provided through EU institutions, but there is also a general drop in attention following the termination of projects involving the Belarusian state. While in 2015–2019 expenditures amounted to around €7.6 million, after 2020 they dropped to just €2.8 million. Thus, in this country, civil society representatives and democratic forces failed to maintain attention at an adequate level.

Sweden intentionally does not pay explicit attention to Belarus in its strategic documents, doing so only in operational-level documents. It is one of the major European donors actively advocating the idea of expanding democracy, democratic practices, and values, including in Eastern Europe, while also focusing on protecting the rights of vulnerable groups and minorities. Recently, at the political level in Sweden, security issues and foreign policy challenges have gained increasing significance, though the influence of this topic on foreign assistance policy does not seem obvious. Moreover, in Sweden's strategic vision, security primarily means security in the Baltic Sea region. Appealing to security issues when seeking support for Belarusian civil society can be attempted, but alignment between this approach and the Swedish vision is far from obvious.

Lithuania. Lithuania is the only country where Belarusians and Belarus serve as an important factor in domestic politics, which actively influences the context of cooperation with Belarusian civil society. The level of support for Belarusian projects was around €1.4 million; after 2020, it remained at approximately the same level — €1.5 million. However, it

should be noted that this overall figure was achieved due to a significant growth spike in 2020–2021.

Since 2022, a substantial decrease in both the number of projects and total funding amounts has been observed. While in 2021 Lithuania supported 8 special bilateral projects, in 2022 their number dropped to 4, and in 2024 the last such project was completed. For 2025, support has been reduced to a single 'flagship project' — the European Humanities University. At the same time, Lithuania remains an implementer of EU assistance projects for Belarusian civil society.

At the level of communication with Belarusian organizations — and even more so in communications with the EU — continued support for democracy in Belarus and European values is voiced. Regrettably, Russia's war against Ukraine and the support given to Russia by the Belarusian authorities have dealt a major blow to Lithuania's cooperation with Belarusian civil society as well.

FRAMEWORKS OF INTERACTION BETWEEN BELARUSIAN CIVIL SOCIETY AND FOREIGN AID BODIES

After 2020, attempts were made to significantly transform relations between major EU/US donors and Belarus. As cooperation with state structures became impossible, the role of non-state actors increased substantially, and they began to be involved in various stages of policy formulation and implementation regarding Belarusian society.

Political Institutions and Needs Assessment. The political consolidation of democratic forces in the form of Sviatlana Tsikhanouskaya's Office, the United Transition Cabinet, and the Coordination Council became an important factor. These structures received partial recognition from democratic countries as representatives of society and gained significant capabilities to advocate for its interests through international meetings (including with heads of state), the establishment of delegations to international organizations (Council of Europe), bilateral cooperation frameworks (strategic dialogue with the US, the Ostrozhski Forum in Ukraine), parliamentary support groups for democratic Belarus, and other initiatives. All these structures opened up substantial opportunities for voicing and advocating the interests of democratic Belarus, including securing support for the most critical sectors from the EU, the US, and other nations.

In terms of organizing assistance to civil society, the practice of democratic forces developing roadmaps for the support and development of the civil society sector of Belarus, as well as preparing a Needs Assessment Report with a three-year strategic planning horizon, was of great positive significance.

Since 2022, on the initiative of the Office of Sviatlana Tsikhanouskaya, the Coordination Council, the United Transition Cabinet, and the European Commission's Directorate-General for Neighbourhood and Enlargement Negotiations (DG NEAR), annual consultations have been held to assess Belarus' needs for external assistance. The process consists of inclusive consultations with non-state actors across different sectors: human rights, civil society, education, culture, independent media, and business. Based on sectoral roadmaps, a comprehensive document titled 'Assessment of the Needs of Belarus for External Assistance' is formed, which serves as an analogue to a Country Strategy Paper.

As a result of joint expert work, surveys, and focus groups involving a broad range of Belarusian civil society representatives, these documents allow democratic forces to determine support priorities for the most critical sectors — recent documents cover civil society, human rights protection, media, education, and culture. For each sector, not only priorities are identified, but also challenges, structural change trends, recommendations, and current annual and three-year needs in EUR. Even though not all provisions of the documents are accepted by the EC and other donors, the practice itself can be considered a major achievement, as it allows bringing general trends and a baseline assessment of real needs and realistic priorities to light. However, communication could be improved.

	Evaluated by Belarusian CSO 2024-2026 million euros	**Evaluated by Belarusian CSO 2025-2027 million euros**	**Evaluated by Belarusian CSO 2026-2028 million euros**	**Actually, approved by the EU for 2026-2028 million euros**
Current annual needs	10	9,2	10,8	10
Cumulative needs (three years)	30	27,6	32,5	30

Figure 6. Comparison assessments and EU decisions

Coalitions and Sectoral Associations. An additional mechanism for the involvement of non-state actors after 2020 was the strengthening of the role of various forms of self-organization and consolidation of civil society structures in implementing assistance policy. Such structures have gained greater importance from a consulting perspective, as well as in the implementation of projects and programs. Examples include BAJ, Press Club, and Beehive in the sphere of general civil society support, the Belarusian Council for Culture in

the realm of cultural projects, the Belarusian Association of Research Centers, and others focused on sector advocacy.

The practices of such structures were vital for building competencies and capabilities within civil society organizations, enhancing their potential and experience. These practices themselves are extremely valuable, although not all were successful and require refinement. The most crucial mechanism is the management of sub-granting funds (FSTP) or the implementation of their own project programs by Belarusian organizations.

A successful outcome can be noted in the case of previously established institutions such as BAJ, the Council for Culture, and Beehive. Less successful was Belarusian Association of Research Centers, which was effectively disrupted by KAS, which initially was invited as a partner.

Consultative and Implementing Structures. After 2020, it also became standard practice to establish consultative and partially implementing coalitions representing civil society within major support programs. The most characteristic and successful example is the Clearing House within the SALT project. The program itself is implemented by the CPVA, but the CH was created as a primary point of contact. This structure conducts reviews of calls and mechanisms, proposes experts for evaluation organizes discussions, and identifies issues. It also carries out the implementation of specific components, networking, community building, and other activities. This significantly enhances the overall program as well as communication with students and organizations.

Membership in Supervisory Boards. The inclusion of civil society representatives in the governing boards of major projects or organizations. This is frequently practiced in some areas with varying degrees of effectiveness. As an example of an ineffective setup, EHU can be cited, where the structure cannot exert even partial influence. This practice should become broader, with a supervisory board accompanying virtually every large project to ensure transparency and strengthen ties with civil society.

The general trend toward decreasing attention to such procedures and increasing control by traditional implementers and donor structures cannot be considered a positive development. Despite certain challenges, when it comes to expanding the influence of non-state actors on EU policies regarding Belarus — and specifically on assistance policy — the pros significantly outweigh the cons, and focus should be placed on refining these formats rather than phasing out the practice itself.

RECOMMENDATIONS FOR DONORS AND PARTNERS INVOLVED IN SUPPORT, IMPLEMENTATION, AND SUB-GRANTING FOR THE BELARUSIAN CIVIC SECTOR.

The EU, in cooperation with Belarusian civil society organizations, managed to maintain and in some areas even increase expenditure on Belarusian projects. This is unequivocally positive, but requires further effort both from the European Commission and Belarusian organizations to keep the Belarusian topic high on the agenda.

Dynamics among individual donors indicate that a significant growth in allocations for Belarus was characteristic only of Poland, where advocacy efforts can be considered successful. In many other countries, no growth was observed after 2020, although pre-2020 support levels were successfully maintained and projects formerly directed at state entities were redirected (e.g., Germany and EU institutions). At the same time, certain countries failed to restructure aid in this manner, leading to a decline in their support levels (Sweden). Additionally, the 2022 war negatively impacted support from specific countries, most notably Lithuania. Significant focus on advocating Belarusian issues across most EU member states remains essential.

Institutional cooperation between the EU and non-state actors boasts numerous positive achievements that require continued support and development. Recently, a trend toward diminishing the role of the civic sector in organizing external aid has emerged, which represents a negative development that needs to be counteracted.

In specific sectors, excessive involvement of non-Belarusian implementers in executing external aid projects is evident. It is necessary to refine interaction practices and formulate clearer rules to foster constructive engagement."

REFERENCES

Kazakevich Andrei (2021). The Price of Falling-out. Belarus and its cooperation with European institutions and the World Bank. Konrad Adenauer Stiftung.

European Commission (9 December 2025). EU support for people of Belarus reaches €200 million since sham 2020 elections. https://enlargement.ec.europa.eu/news/eu-support-people-belarus-reaches-eu200-million-sham-2020-elections-2025-12-09_en