

INFORMATION AND ANALYTICAL BRIEF

The role of OJSC Belaruskali in the system of unlawful removal, placement and ideological indoctrination of Ukrainian children in Belarus.

Prepared in connection with the discussion of a possible easing or lifting of European Union sanctions on potash products originating from the Republic of Belarus.

Summary

OJSC Belaruskali — a state-owned enterprise of the Republic of Belarus and one of the world's largest producers of potash fertilizers — is not a bystander, but a documented participant in the infrastructure used by the Russian Federation and the regime of Alexander Lukashenko for the removal, placement and ideological indoctrination of children from the occupied territories of Ukraine.

This brief systematizes the body of evidence coming from independent sources — primarily the own investigation of the National Anti-Crisis Management (NAM), led by Pavel Latushka, as well as the report of the Humanitarian Research Lab of the Yale School of Public Health (Yale HRL), prepared with the support of the U.S. Department of State.

Main conclusion: any decision to ease trade restrictions on Belarusian potash products must take into account that the producing enterprise has been directly named by independent researchers among the structures that played a key role in the transfer of Ukrainian children, including orphans — activity that the international community is investigating as a war crime and a potential crime against humanity.

1. Context: the system of removal of children by Russia and Belarus

Since the start of Russia's full-scale invasion of Ukraine on 24 February 2022, the Russian Federation, in coordination with the authorities of the Republic of Belarus, has been carrying out a systematic programme of removing children from the occupied territories of Ukraine. According to the Yale HRL report published on 16 November 2023, at least 2,400 children from Ukraine aged six to 17 were transported to Belarus between 24 February 2022 and 30 October 2023 to at least 13 facilities [1].

The transfer is coordinated at the level of the Union State of Russia and Belarus. The report indicates that the process was jointly directed by Russian President Vladimir Putin and the head of the Belarusian regime Alexander Lukashenko [1].

In March 2023, the International Criminal Court issued arrest warrants for Russian President Vladimir Putin and the Presidential Commissioner for Children's Rights of the Russian Federation, Maria Lvova-Belova, in connection with the unlawful deportation of children from Ukraine, qualifying these acts as a war crime [2].

2. Evidence of the involvement of OJSC Belaruskali

2.1. Direct ownership of the main placement facility

The Dubrava children's health camp (Soligorsk District, Minsk Region) is owned by OJSC Belaruskali. It was to this facility that more than 2,050 of the over 2,400 children identified by Yale HRL were transported — i.e. more than 80% of the entire documented flow — between September 2022 and May 2023 [1]. The remaining approximately 392 children were placed in 12 other facilities.

2.2. Direct identification of the enterprise's role by Yale University researchers

In the consolidated Yale HRL report of 16 November 2023, in the section on the structures that facilitated the transfer of children, the researchers directly state:

Quotation from the primary source (Yale HRL, 16 November 2023, section “Key Findings”, item 4)

“The Yale University Humanitarian Research Lab established that Belarusian public figure Alexei Talai (and his eponymous foundation), the Belarusian state-owned potash producer OJSC Belaruskali, and Olga Volkova, the purported director of the Donetsk-based non-governmental organization ‘Dolphins’, played a key role in transporting children from Ukraine to Belarus” [1].

This is wording from the main text of the official report of a research centre working in partnership with the U.S. Department of State.

2.3. Status and personal role of the enterprise's management

- Ivan Golovaty (Halavaty) — Director General of OJSC Belaruskali throughout the period covered by the investigation.
- According to the official website of the Council of the Republic of the National Assembly of the Republic of Belarus (a source referenced by the Yale HRL report itself), Ivan Golovaty is a sitting member of the upper house of the Belarusian parliament [3].
- The Wall Street Journal, in its investigation “Ukrainian Children Brought to Camps in Belarus, Exposed to Pro-Kremlin Propaganda” (21 August 2023), reported that buses of the Shakhtyor (Soligorsk) football club, which is owned by OJSC Belaruskali, were used to transport the children to the camps [4].

2.4. Public acknowledgement by the enterprise of its participation

Open sources record the enterprise's practice of publishing materials about hosting children from the occupied territories as a humanitarian action — in line with the general state rhetoric of Belarus, which characterizes the removal as “health improvement” and “rehabilitation” [5].

2.5. Ideological indoctrination on the premises of a facility owned by the enterprise

The following have been documented on the premises of Dubrava: performances by pro-Russian/pro-regime artists in front of Ukrainian children, including public statements wishing death upon the then-incumbent heads of state of Ukraine and the United States [6]; military-patriotic events with the participation of security agencies; children being compelled to give interviews to state television channels and required to repeat narratives of Russian aggression [1]. According to the Yale HRL report, at least nine groups of children were subjected to pro-regime “re-education” in at least eight of the 13 facilities involved, and at least six groups underwent military training, including with the participation of the Internal Troops of the Ministry of Internal Affairs of Belarus [1].

2.6. The role of the National Anti-Crisis Management (NAM) in building the body of evidence

A significant part of the body of evidence, including the initial identification of the role of OJSC Belaruskali, was formed as a result of the National Anti-Crisis Management’s (NAM) own investigation:

- Materials provided by NAM and comments by Pavel Latushka served as the basis for The Wall Street Journal’s investigation, which for the first time covered in detail the role of OJSC Belaruskali — as a state-owned company and the country’s largest taxpayer — and personally of its director in organizing the unlawful removal of Ukrainian children [8].
- NAM has established facts of the unlawful deportation of more than 3,500 Ukrainian children — this figure relates to a separate, ongoing NAM investigation [9].
- NAM submitted the relevant materials in the form of two separate communications to the Office of the Prosecutor of the International Criminal Court, as Pavel Latushka personally stated on air on the FREEDOM TV channel [9].
- The materials were also transmitted, in accordance with procedure, to the Office of the Prosecutor General of Ukraine and to the Prosecutor General’s Office of Lithuania, which, within their national jurisdictions, opened separate criminal cases on this matter [9].
- In June 2026, following Pavel Latushka’s working visit to Kyiv, NAM transmitted additionally collected data on the transfer of Ukrainian children to Belarus to the Coordination Headquarters for the Treatment of Prisoners of War — documentation work is ongoing [10].
- Pavel Latushka has publicly demanded that sanctions be maintained specifically against OJSC Belaruskali and personally against Ivan Golovaty, directly linking lobbying for the lifting of sanctions to the figures behind the potash deals [11].

3. Legal qualification

In its report, the Yale University Humanitarian Research Lab concludes that the stated grounds for the transfer of children do not comply with Article 49 of the Fourth Geneva

Convention, which prohibits individual or mass forcible transfers and deportations of protected persons from occupied territory, regardless of their motive [1]. Under Article 8 of the Rome Statute of the International Criminal Court, the unlawful transfer of population, including children, from occupied territory may qualify as a war crime and a crime against humanity.

Materials documenting the activities of camps on the territory of Belarus, including video recordings from Dubrava, have already been submitted as evidence to the International Criminal Court as part of the general documentation of Belarus's involvement in the deportation process [6].

As a result, by Council of the EU Decision No. 2026/426 of 26 February 2026, the grounds for applying restrictive measures against OJSC Belaruskali were substantially strengthened. In addition, individual sanctions of the EU, the United States and Canada were imposed on key accomplices in this programme (I. Golovaty, A. Talai and his foundation, the BRSM [Belarusian Republican Youth Union], A. Lukyanov, D. Mezentsev).

4. Significance for the decision on EU trade restrictions

The argument against easing or lifting EU sanctions on Belarusian potash products, based on the facts set out above, is as follows: OJSC Belaruskali is not a neutral commercial entity that has been incidentally mentioned in the context of an international investigation. The enterprise (a) owns the facility to which more than 80% of the documented flow of removed children was sent; (b) has been directly named by independent Yale University researchers among the structures that played a key role in transporting the children; and (c) its former head is simultaneously a sitting member of the highest legislative body of Belarus and personally provided transport infrastructure for transporting the children.

Any decision on financial or trade relief for the Belarusian potash industry would mean the direct or indirect unblocking of resources of an enterprise whose infrastructure and management are documentarily linked to a process recognized by the international community as the subject of a war crimes investigation.

Sources

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