



Office for Democratic Institutions and Human Rights

# REPUBLIC OF BULGARIA

## EARLY PARLIAMENTARY ELECTIONS

2 April 2023

ODIHR Election Observation Mission  
Final Report



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**REPUBLIC OF BULGARIA**  
**EARLY PARLIAMENTARY ELECTIONS**  
**2 April 2023**

**ODIHR Election Observation Mission Final Report<sup>1</sup>**

**I. EXECUTIVE SUMMARY**

Following an invitation from the authorities of the Republic of Bulgaria, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) deployed an Election Observation Mission (EOM) for the 2 April 2023 early parliamentary elections. For election day, the ODIHR EOM was joined by delegation of the Parliamentary Assembly of the Council of Europe (PACE) to form an International Election Observation Mission (IEOM). The electoral process was assessed for compliance with OSCE commitments, other international standards for democratic elections, and with national legislation.

The IEOM's Statement of Preliminary Findings and Conclusions issued on 3 April 2023 concluded that: "The 2 April early parliamentary elections were competitive with fundamental freedoms respected, and well managed by the election administration. While the legal framework is adequate for the conduct of democratic elections, frequent changes erode trust, undercut efficiency and pose challenges to timely preparations. In particular, controversial legal amendments, reducing the use of voting machines, reignited concerns about the secrecy and integrity of the ballot and undue influence on voters in socially vulnerable communities. The numerous contestants were able to campaign freely, though overall campaign environment was marked by voters' fatigue, and persisting allegations of vote-buying and controlled voting. The media offered diverse and extensive coverage which allowed voters to hear a plurality of views, however, it remained susceptible to political and corporate influences that reduced critical reporting. The underrepresentation of women in political office and the campaign demonstrates a need for greater commitment to ensure gender equality in politics. Election day was orderly and generally positively assessed by the IEOM observers, however, inadequate protection of ballot secrecy was noted, and machine ballots presented challenges for the election administration."

The legal framework provides an overall adequate foundation for the conduct of democratic elections. The December 2022 amendments to the Election Code, which re-introduced voting by paper ballot, did not enjoy broad political consensus and were adopted with little consultation with the relevant stakeholders. The debates highlighted partisan divisions based on the perceived advantages of the different voting methods. These frequent changes pose challenges for the election administration and weaken voters' familiarity with the voting procedures. Positively, the number of parliamentary mandates elected from each constituency was adjusted based on the most recent census, improving equality of the vote. Despite the frequent revisions, a number of legal provisions inconsistent with international standards and longstanding recommendations by ODIHR and the Council of Europe remain to be addressed.

Elections are jointly administered by the election commissions, which oversee preparations, as well as state ministries, local authorities, and technical providers. Overall, the election administration organized technical aspects of the elections adequately and complied with the legal deadlines, despite the compressed timeframe and changes to the voting process. The Central Election Commission (CEC) held regular sessions, open to observers and live-streamed, with recordings also made publicly available, contributing to transparency. A number of responsibilities assigned to the CEC under the law are not matched by the provision of the requisite administrative and technical capacities, hindering its institutional performance. Lower-level election commissions were appointed within the legal deadlines and were largely supplied with appropriate resources and logistical support by the local authorities. However, commission members did not receive standardized training and the high number of replacements of polling staff before election day diminished the value and impact of the training.

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<sup>1</sup> The English version of this report is the only official document. Unofficial translation is available in Bulgarian.

The December 2022 amendments re-introduced the opportunity to vote using either touchscreen voting machines or paper ballots in all polling stations with at least 300 registered voters, in country and abroad. The use of the voting machines was reduced to the printing of ‘machine ballots’, cast and counted in the same way as paper ballots. These changes were criticized by many IEOM interlocutors for their negative impact on the counting process and the resulting loss of the benefits associated with the use of voting machines, such as greater accuracy of the vote count and the reduction of invalid votes. While the voting machines were certified as required by law, their operation with the newly manufactured paper rolls could not be certified, as the paper rolls were not made available.

Citizens over the age of 18 are allowed to vote but the law maintains excessive restrictions on suffrage rights of prisoners and persons under guardianship, contrary to international standards. Based on a passive voter registration system, before each election, municipal administrations compile voter lists using the data extracted from the permanent population register. All eligible voters with a permanent address in Bulgaria are automatically added to the voter list. The voter lists included over 6.5 million voters, exceeding the number of citizens living in Bulgaria with the right to vote according to the recent census, which was attributed by the authorities to unreported emigration. While most IEOM interlocutors expressed confidence in the accuracy of voter lists, outdated records of voters who *de facto* reside abroad pose a risk of an inflated voter register. At the same time, disenfranchisement of eligible voters who reside in housing deemed illegal, particularly in Roma communities, challenges international commitments.

Eligible voters of at least 21 years of age have the right to stand as candidates, nominated on the lists of registered political parties or coalitions, or independently. In an overall inclusive process, 4,566 candidates, including two independents, on 652 candidate lists were registered. Candidates could be nominated in up to two constituencies, and 1,035 candidates stood on two candidate lists. Some 30 per cent of candidates were women.

Contestants were able to conduct their campaigns freely and without hindrance, and fundamental freedoms of assembly and expression were generally respected. Parties mainly relied on small gatherings, with the exception of several large-scale events, as well as face-to-face meetings and social media. The campaign centred around topics of the rising prices, fiscal and social policies, prospective membership in the Eurozone, gender issues, and politics of memory related to a monument of the Soviet Army. Longstanding concerns over vote-buying and controlled voting were present and reported to the IEOM with allegations made about the ties between certain enterprises and local authorities which entice or pressure voters, affecting the level playing field and the voters’ ability to cast their votes freely.

The law does not contain any special measures to promote women’s participation and women are underrepresented in elected and appointed public offices. With some notable exceptions, the visibility of female candidates remained low, and they were underrepresented in televised debates. A number of interlocutors pointed to misleading and harmful narratives spread by political actors in relation to the use of the term ‘gender’. Women were well-represented in election commissions. Both in the outgoing and in the newly elected parliament, 24 per cent of members are women.

Campaigns are funded from public and private sources. Political parties which receive annual public subsidies may use them to fund election campaigns. Parties and coalitions not entitled to public funding may receive state subsidies for media advertising. During the campaign, contestants were required to disclose all private donations, as well as information on contracts concluded with media and public relations agencies, contributing to transparency. The law does not limit individual donations, which might create dependence on wealthy private interests, but sets limits on campaign expenditures. The National Audit Office (NAO) cross-checks the information submitted by the media outlets with the contestants’ reports, however, it does not have the mandate and resources to investigate unreported

expenses, limiting the effectiveness of its oversight. Ahead of these elections, the dismissal of the NAO president raised questions in relation to its institutional independence.

The media environment is diverse and offers content plurality, partly reflecting political polarization. With a wide range of media operating in a limited advertising market, many are financially fragile and rely on subsidies and state advertising, exposing them to political and economic influences. Strategic court proceedings on defamation grounds against media create a climate of fear and weaken media freedom. The media provided extensive coverage of the elections, mainly granting direct access to candidates, mostly abiding by the law and allowing voters to hear a plurality of views. However, strict rules on the equal participation of contestants and on all possible formats of election broadcasts reduced editorial content and journalistic intermediary role of the public broadcasters. Under a higher degree of editorial freedom, private media provided a more diverse coverage, albeit mainly during non-prime time hours. During the campaign, the Council for Electronic Media monitored 26 broadcasters and sent alerts of potential breaches of law to the CEC, which established violations by candidates in 5 cases and none by media outlets.

There are no legal provisions fostering the participation of persons belonging to minorities in elections. Platforms of the political parties and coalitions generally did not include any policy proposals specifically related to minorities. Roma representatives informed the IEOM that campaign activities in Roma communities were rare and voiced concerns that police operations against vote-buying, conducted predominantly in Roma communities, were often perceived as intimidating.

The law provides an expedited procedure for election-related complaints. However, petitions challenging the outcomes of parliamentary elections cannot be made to the Constitutional Court by election contestants directly, contrary to OSCE commitments and other international standards. During the campaign, the CEC and district election commissions maintained online registers of complaints and appeals, contributing to transparency. The CEC and the Supreme Administrative Court resolved election disputes timely and decisions were reasoned. However, the sanctioning for electoral violations established by election commissions is lengthy, as it is not covered by an expedited electoral procedure, and the protracted process diminishes the effectiveness of sanctions and compromises accountability.

Election day was orderly, and the voting process was positively assessed in 97 per cent of the IEOM observations. The IEOM observers noted that the required machine voting was not available in some of the polling stations visited, and during the day additional guidance needed to be issued by the CEC related to the misprinted machine ballots. Less than half of the polling stations visited were assessed as suitable for independent access by voters with reduced mobility. Secrecy of the ballot was compromised in a substantial number of the IEOM observations, both due to the inadequate polling station layout and voters' choice being revealed. The vote count was assessed largely positively, however, important procedures were often omitted, and polling staff had difficulties with filling the results protocols, in part due to the complexities related to the dual voting method. The tabulation of voting results was generally well-organized, and the CEC began posting preliminary results at 23:00 on election night, contributing to transparency.

This report offers a number of recommendations to further align elections in Bulgaria with OSCE commitments and other international obligations and standards for democratic elections. Priority recommendations relate to the stability of electoral law, the use of machine voting, enhancing representation of women, the accountability for undue influence on voters, the effectiveness of campaign finance oversight, protection of media from abusive court proceedings, and the reporting of voting results. ODIHR stands ready to assist the authorities to improve the electoral process and to address the recommendations contained in this and previous reports.

## II. INTRODUCTION AND ACKNOWLEDGMENTS

Following an invitation from the Bulgarian authorities to observe the 2 April 2023 early parliamentary elections, and in accordance with its mandate, ODIHR deployed an Election Observation Mission (EOM) on 28 February. The EOM, headed by Tana de Zulueta, included 11 experts based in Sofia and 14 long-term observers who were deployed throughout the country from 8 March. The EOM remained in Bulgaria until 12 April to follow post-election developments.

For election day, the ODIHR EOM was joined by the delegation of the Parliamentary Assembly of the Council of Europe (PACE) to form an International Election Observation Mission (IEOM). Andrej Hunko (Germany) headed the PACE delegation. Both institutions involved in the IEOM have endorsed the 2005 Declaration of Principles for International Election Observation. On election day, 179 observers from 34 countries were deployed, including 158 long-term and short-term observers deployed by ODIHR and a 21-member delegation from the PACE. Opening was observed in 69 polling stations and voting was observed in 699 polling stations across the country. Counting was observed in 66 polling stations, and the tabulation of votes in all 31 District Election Commissions (DECs).

The IEOM assessed the compliance with OSCE commitments, other international obligations and standards for democratic elections, and with national legislation. This Final Report follows the Statement of Preliminary Findings and Conclusions, which was released at a press conference in Sofia on 3 April.<sup>2</sup>

The ODIHR EOM wishes to thank the Ministry of Foreign Affairs for the invitation to observe the elections and to the Central Election Commission (CEC) for its assistance. The ODIHR EOM also expresses its appreciation to other institutions, candidates, political parties, media, civil society organizations, and the resident international community for their co-operation.

## III. BACKGROUND

On 2 February, after several months of post-election negotiations and following three returned mandates to form a government by the Coalition of Citizens for the European Development of Bulgaria and the Union of Democratic Forces (GERB-SDS), We Continue the Change (PP), and the Bulgarian Socialist Party (BSP) for Bulgaria, the president dissolved the parliament and set early parliamentary elections for 2 April 2023. These were the fourth early parliamentary elections in the last two years. Repeated inability of elected parliaments to form a stable government has resulted in prolonged periods of interim governments appointed by the president.

As a result of 2 October 2022 early parliamentary elections, six previously represented political parties and one new party gained representation. Of these, GERB-SDS won 67 seats and PP obtained 53 seats.<sup>3</sup> Adoption of amendments to the Election Code, reverting to the use of voting both by paper ballot and voting machines, and the law authorizing the provision of arms to Ukraine were among the most debated decisions of the outgoing parliament. These elections took place against a backdrop of inflation and rising prices, and international attention to the issues of corruption and judicial reform.<sup>4</sup> The election

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<sup>2</sup> See also previous ODIHR election [reports](#) on Bulgaria.

<sup>3</sup> In addition, Movement for Rights and Freedoms (DPS) received 36, *Vazrazhdane* (Revival) 27, BSP for Bulgaria 25, Democratic Bulgaria (DB) 20, and the newcomer Bulgarian Rise (BV) 12 mandates.

<sup>4</sup> [European Union](#) and [United States](#) officials made public statements encouraging Bulgaria to strengthen its judicial system and the accountability of its Prosecutor General. On 10 February, the US government [imposed sanctions](#) on five prominent Bulgarian former public officials and businesspersons for acts of significant corruption, also targeting associated legal entities. On 27 February, the [European Public Prosecutor's Office](#) carried out searches and seizures in cooperation with Bulgarian authorities in 11 cities, probing possible fraud in Bulgarian thermal power plants related to the EU emissions trading system.

environment was affected by voters' disenchantment with the political establishment and weariness of repeated elections, and lack of confidence that these elections will resolve the protracted political crisis.

The law does not contain any special measures to promote women's participation and women are underrepresented in elected and appointed public offices. In the outgoing parliament, 58 out of 240 members were women (24 per cent). Out of 20-member interim government appointed after the October 2022 elections, only three were women. Two out of 28 governors appointed by two interim governments and 37 of 228 elected mayors are women. At the same time, women were well-represented in the election administration, including in the CEC.

#### IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Parliamentary elections are primarily governed by the 1991 Constitution, the 2014 Election Code and the 2005 Political Parties Act, supplemented by other relevant laws and the CEC decisions.<sup>5</sup> Electoral legal framework has been revised a number of times in the recent years, with significant changes adopted every year since 2019. Bulgaria is party to the key international instruments related to the holding of democratic elections.<sup>6</sup>

The legal framework provides an overall adequate foundation for democratic elections. However, despite its frequent revisions, a number of provisions inconsistent with international standards and related to longstanding recommendations by ODIHR and the Venice Commission remain to be addressed. Some of these include the blanket disenfranchisement of prisoners and persons under guardianship, restrictions on the right to stand for those holding dual citizenship, the lack of measures to promote the participation of women and minorities, and the limited possibility to challenge election results.<sup>7</sup>

The December 2022 amendments to the Election Code re-introduced voting by paper ballot and reduced the use of voting machines to the printing of 'machine ballots', to be cast and counted in the same way as paper ballots. These amendments also introduced voting screens instead of polling booths, as well as video monitoring and streaming during the vote count. The amendments did not enjoy broad political consensus and were adopted with little consultations with the stakeholders.<sup>8</sup> The debates highlighted partisan divisions based on the perceived advantages of the different voting methods.<sup>9</sup> The President vetoed the amendments, reasoning that they posed challenges to the secrecy of the vote and effectively denied voters the benefits of voting machines, but the same parliamentary majority overturned his veto.

The legislative procedure leading to the December 2022 amendments was not in line with the ODIHR's and the Council of Europe Venice Commission's longstanding recommendation that electoral

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<sup>5</sup> Provisions of the 1990 Assemblies, Rallies and Manifestations Act, the 1969 Administrative Violations and Penalties Act, the 2006 Code of Administrative Procedure, and the 1968 Criminal Code are applicable.

<sup>6</sup> Including the [1966 International Covenant on Civil and Political Rights](#), the [1979 Convention on the Elimination of All Forms of Discrimination Against Women](#), the [1965 International Convention on the Elimination of All Forms of Racial Discrimination](#), the [2003 Convention against Corruption](#), the [2006 Convention on the Rights of Persons with Disabilities](#), and the [1950 European Convention on Human Rights](#). Bulgaria is a member of the Council of Europe's Group of States against Corruption (GRECO) since 1999 and of the Commission for Democracy through Law (Venice Commission) since 1992.

<sup>7</sup> See also [2017 ODIHR and Venice Commission Joint Opinion on Amendments to the Election Code](#).

<sup>8</sup> The parliament adopted the amendments with 125 votes in favour and 101 against. Views of the relevant government ministries and other stakeholders were not requested during the legislative process, as such consultations are not required when a draft law is initiated by members of parliament (MPs). Over 70 MPs challenged the amendments in the Constitutional Court.

<sup>9</sup> While GERB, DPS and BSP stood against machine voting, citing security risks and the allegedly negative effect on the turnout, PP, DB and Revival objected to re-introducing the paper ballot due to the risk of manipulations.

legislation should be adopted through a public, inclusive, and effective consultative process, facilitating consensus-building among the key stakeholders.<sup>10</sup> Frequent changes in the voting methods pose challenges for the election administration (see *Election Administration*) and weaken voters' familiarity with the electoral procedures.

*Any substantial amendments to electoral legislation should be adopted through an inclusive and consultative process, well in advance of the next elections.*

The 240 members of the National Assembly are elected for a four-year term, under a proportional representation system in 31 multi-member constituencies, with 26 constituencies corresponding to the administrative districts and the remaining five in Sofia and Plovdiv, defined before each parliamentary election.<sup>11</sup> The number of seats in each constituency is based on the last census but must comprise at least four seats. For these elections, the seats were re-allocated between constituencies based on the most recent census, improving equality of the vote and addressing a prior ODIHR recommendation.<sup>12</sup> Creation of a separate constituency for out-of-country voters envisioned in the Election Code was further postponed by the December 2022 amendments until January 2025.

Parties and coalitions are eligible for seat allocation if they obtain at least four per cent of the valid votes cast nationwide and abroad, while independent candidates must surpass the constituency quota.<sup>13</sup> Candidates are elected in the order on the lists; however, voters may indicate one preference.<sup>14</sup> Where no preference is indicated, the vote goes to the listed carrier.

## V. ELECTION ADMINISTRATION

Elections are jointly administered by the election commissions, which oversee preparations, as well as state ministries, local authorities, and technical providers.<sup>15</sup> The election administration bodies comprise the CEC, 31 DEC's and nearly 12,900 Precinct Election Commissions (PECs).<sup>16</sup> The CEC is a permanent body of 15 members appointed for a five-year term, with its current composition established in May

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<sup>10</sup> See [Compilation of Venice Commission Opinion and Reports concerning the Stability of the Electoral Law](#).

<sup>11</sup> By law, the President defines the constituencies' names, boundaries and numbering no later than 56 days before election day. In line with the law, constituencies for these elections were defined by a presidential decree on 31 January 2023.

<sup>12</sup> On 2 February, the CEC determined the new allocation of seats based on the October 2021 census. Based on the new average ratio of population per seat, the revision resulted in districts of similar size (not deviating from the average by more than 12 per cent), with the exception of the Vidin district, which deviates by nearly 30 per cent due to the legal requirement of the four-seat minimum. In particular, the number of seats in Sofia increased from 16 to 19, in Varna from 15 to 16, and in Plovdiv from 11 to 12, while it decreased in Ruse from 8 to 7, in Montana from 5 to 4 and in Pleven from 9 to 8.

<sup>13</sup> The constituency electoral quota is defined as the number of valid votes cast divided by the number of seats in a given constituency.

<sup>14</sup> To obtain a preferential seat, a candidate must receive at least seven per cent of the votes cast for the respective list in the constituency.

<sup>15</sup> The Council of Ministers delegated to the MoI the co-ordination of electoral preparations with other ministries, including the Ministry of Justice, the Ministry of Foreign Affairs (MFA), and the Ministry of Electronic Government (MEG). Local authorities provided administrative and technical support for DEC's and PEC's and arranged for the compilation of the voter lists; Directorate General of Civil Registration and Administrative Services at the Ministry of Regional Development (GRAO) verified the signatures and the eligibility of individual candidates; state-controlled company "Information Services" partly verified the eligibility of candidates, processed the tabulation of voting results, and provided the CEC with other technical and IT support; *Ciela Norma*, a private company, supported the operation of voting machines.

<sup>16</sup> These included 302 PEC's for mobile voting, 216 PEC's for special polling stations in hospitals and social institutions, and 19 pre-trial detention centres, and 737 PEC's abroad.



2021.<sup>17</sup> Members of DEC and PECs, including leadership positions, are appointed upon nominations by political entities, in proportion to their representation in the outgoing parliament. While the CEC did not publish any gender-disaggregated data on the election commission membership, the ODIHR EOM noted that women were well-represented.<sup>18</sup>

Overall, the election administration managed the organizational and technical aspects of the preparations adequately and complied with all legal deadlines, despite the compressed timeframe and changes to the polling process. The lack of proper co-ordination between the Ministry of Interior (MoI) and the CEC over the equipment of polling stations with voting screens, which replaced the polling booths, left the local administrations responsible for their procurement with little time and no specific technical guidance. Delays in decision-making in relation to the new features of voting machines and the newly introduced video recording of the count adversely affected the preparations, including the delivery of voter information and training of election personnel.<sup>19</sup>

The CEC enjoyed varied levels of confidence among stakeholders, weakened by controversies surrounding some of its decisions.<sup>20</sup> Some IEOM interlocutors expressed concerns over the limited capacity of the CEC to duly supervise the implementation of all election preparations. The CEC acknowledged to the ODIHR EOM that many responsibilities assigned to it under the law, such as handling of machine voting and public procurement, including in respect to the printing of ballots, are not matched by the provision of the requisite administrative and technical capacities, and their implementation takes away resources from the comprehensive implementation of other responsibilities such as training and voter education.

*To fulfil its mandate and ensure independence and efficiency, the CEC should be provided with the resources corresponding to its legal responsibilities, which should be aligned with its supervisory role over the electoral process.*

The CEC held regular sessions, open to observers and live-streamed online, with recordings also made publicly available, contributing to transparency. Contrary to a previous ODIHR recommendation, the sound of livestream was often muted without prior announcement of the reason, or such discussions were held during non-public meetings, which limited access to information of public interest.<sup>21</sup>

The DEC and PECs are appointed for each election by the respective upper-level commissions, following consultations among the nominating parties and coalitions within the constituency or

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<sup>17</sup> The CEC composition reflects the political representation after the April 2021 parliamentary elections. Prior to these elections, one political party, Revival, voiced dissatisfaction over its lack of representation in the CEC.

<sup>18</sup> Eight out of 15 CEC members are women, including the chairperson. Some 57 per cent of DEC members were women, out of which 16 chaired the DEC (52 per cent). Nearly two-thirds of the polling staff were women and some 73 per cent of the polling stations visited by the IEOM observers on election day were chaired by women.

<sup>19</sup> Installation of the final software version on voting machines for the in-country polling stations started less than a week before election day, with limited time for testing. Guidelines for election personnel for the polling and counting procedures were adopted on 16 and 18 March, respectively, allowing limited time for training. On 31 March, the CEC amended voting procedures asking PECs to recommend that voters fold machine ballots twice, in order to preserve the secrecy of the vote.

<sup>20</sup> On 20 February, the CEC Deputy Chairperson resigned as a spokesperson in protest of the CEC decision to not include separate reporting lines for the voting results from machine voting and paper ballot. This decision was later overturned by the Sofia Administrative Court, after an appeal was brought by political parties PP, DB, and The Left. On 4 March, the CEC adopted a new results protocol template, disaggregating voting results according to the voting method.

<sup>21</sup> The CEC Rules of Procedure allow for partially closed sessions only for data protection and require public announcement of the reasons.

municipality.<sup>22</sup> All DEC members and most PECs were appointed within the legal deadlines.<sup>23</sup> Consensus among local political representatives on the commission composition was not reached for 24 of the 31 DECs, and the CEC decided on these.<sup>24</sup> With the exception of standardized voting screens, DECs and PECs were supplied with appropriate resources and logistical support by the local authorities. While the law sets a deadline for the replacement of PEC members abroad, nominating parties and coalitions are permitted to substitute their PEC members for the in-country polling stations at any time before and on election day, contrary to prior ODIHR recommendations. A significant number of PEC members resigned or were replaced shortly before election day, which diminished the value and impact of the training provided.

*To enhance stability and performance of the election administration, replacement of precinct election commission members should not be permitted after a reasonable deadline prior to election day. Creation of a register of experienced poll workers should be considered to replace those resigning after the deadline.*

While the law mandates DECs to train the lower-level commissioners, DEC members did not receive any standardized training themselves and were only briefed by the CEC in mid-March, relatively late in the process. The first training programme for PEC members took place in the last week of March, with in-person and online sessions. The ODIHR EOM observed that while these training sessions focused mainly on the changes in the election day procedures, including filling the result protocols, the sessions were inconsistent in terms of methodology and quality, including with respect to content, the use of teaching aids, and interactivity.<sup>25</sup> This training was complemented by online instruction on the operation of voting machines delivered by *Ciela Norma*, and on the functioning of the video monitoring devices by Information Services.<sup>26</sup> The CEC had launched an online protocol simulator to assist PEC members in filling the results protocol, however, the training manual did not make a reference to this tool.

*To ensure consistent training on election procedures, the CEC should develop standard methodology for the preparation, delivery and assessment of election commissioners training.*

Starting from 1 March, the CEC carried out voter information campaign mostly in broadcast media and online, with sign language interpretation, enhancing access for people with hearing impairments. It covered voter registration options, including abroad, the use of voting machines and paper ballot, and accessibility of polls for voters with disabilities. The CEC also launched an online touchscreen voting machine simulator, and a handful of voting machines were provided to some contestants upon request within ten days prior to election day.

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<sup>22</sup> DECs have either 13 or 17 members, depending on the number of parliamentary mandates in the constituency; PECs have five to nine members, depending on the number of registered voters. DECs were appointed by 10 February, with some 31 per cent of members without recent election experience. Appointment deadlines for PECs varied according to the type of the polling stations, with in-country PECs appointed by 7 March.

<sup>23</sup> For out-of-country PECs, the parties and coalitions nominated only 1,900 from some 4,000 PEC members required; the remaining members were appointed by the MFA from among its employees and resident Bulgarian citizens. The December 2022 amendments required one state employee to be a member in each PEC abroad, necessitating some 500 civil servants to travel abroad.

<sup>24</sup> Five CEC decisions on DEC appointment were appealed by the PP, asserting that the distribution of the leadership positions had not respected the required ratio. All five appeals were dismissed by the Supreme Administrative Court (SAC).

<sup>25</sup> Paragraph 84 of the 2002 Venice Commission's [Code of Good Practice in Electoral Matters](#) (Explanatory Report) states that "[m]embers of electoral commissions have to receive standardised training at all levels of the election administration. Such training should also be made available to the members of commissions appointed by political parties".

<sup>26</sup> In some localities, political parties provided additional training to the PEC members they nominated.

By law, several polling stations within each constituency should be accessible for voters with visual impairments and reduced mobility. Despite efforts made by local administrations and civil society organizations, some ODIHR EOM interlocutors pointed to the longstanding difficulties with physical access, the limited number of these polling stations, and insufficient information about their locations. Homebound voters could be served by mobile polling stations, however, occasional challenges were reported to the ODIHR EOM.<sup>27</sup> Most voter information and election materials, as well as the voting machines, were not adapted for voters with visual or cognitive impairments, at odds with international standards and good practice.<sup>28</sup>

*Relevant state and local authorities should, in co-ordination with civil society organizations, undertake further measures to ensure independent access of persons with disabilities to the entire election process.*

## VI. NEW VOTING TECHNOLOGIES

The December 2022 amendments re-introduced the opportunity to vote using either touchscreen voting machines or paper ballots in all polling stations with at least 300 registered voters, in country and abroad. The use of the voting machines was reduced to the printing of ‘machine ballots’, cast and counted in the same way as paper ballots.<sup>29</sup> Many IEOM interlocutors from government institutions, political parties, and civil society organizations criticized these changes, including their negative impact on the counting process, and the resulting loss of the benefits associated with the use of voting machines, such as greater accuracy of the vote count and the reduction of invalid votes. The current dual voting method generates inefficiencies, such as printing large amounts of surplus ballots in addition to providing paper rolls for the voting machines.<sup>30</sup>

The CEC is mandated to supervise machine voting, and the December 2022 amendments provided for creation of a machine voting unit within the CEC, in line with a prior ODIHR recommendation. However, due to limited preparation time, including for the recruitment of experts, the unit was not established. The CEC used the machines purchased for previous elections and contracted the same private company, *Ciela Norma*, to provide the software, IT support, logistics and training for the election personnel.

Due to late preparation and delivery of the voting machines and documentation by the CEC, the certification process for six randomly selected devices, performed by the Ministry of Electronic Government (MEG) and other state organizations took place between 21 to 24 March.<sup>31</sup> This process was carried out in accordance with an updated methodology, following consultations with experts and stakeholders. The MEG arranged the opportunity for registered party representatives and citizen observers to review the source code of the voting machine software, as required by law.<sup>32</sup> For the first

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<sup>27</sup> In the rural areas, the requirement to have a minimum of 10 voters to establishing a mobile polling station could present a challenge for those who need such services. In some localities, the local authorities reportedly carried out extensive checks of the medical certificates used to request mobile voting.

<sup>28</sup> While the law requires the system for machine voting to ensure easy and understandable access, the voting machines were not equipped with accessibility functions to enable voters with certain disabilities to vote secretly and independently. See Articles 9 and 29 of the 2006 [UN CRPD](#).

<sup>29</sup> Voting machines, one per polling station, were used in 9,366 polling stations in the country and in 245 polling stations abroad. Paper ballots were used in all polling stations.

<sup>30</sup> Criticisms were also voiced with respect to the inefficient use of public resources for the administration of elections, following recent substantial investment made in the acquisition of voting machines (over BGN 40 million). EUR 1 is approximately BGN 1.96.

<sup>31</sup> The installation of the software took place between 24 March and 30 March.

<sup>32</sup> The CEC has removed the professional and educational requirements which it previously imposed for accessing the certification process.

time, all parliamentary parties participated in the process, but international observers were excluded.<sup>33</sup> The final certification report, establishing full compliance of the devices with the required technical specifications, was published on 29 March, allowing limited time for the assessment of its findings prior to election day. However, the report noted that the operation of the voting machines with the paper rolls could not be certified, as the paper rolls were not made available.<sup>34</sup>

*Any introduction or change to election technologies should allow sufficient time for piloting, auditing, and certification of equipment and its functioning. The supporting documentation should be publicly available and election observers should have access to all aspects of introduction and use of the election technology.*

As specified by law, processing of voting results was assigned to the state-controlled company Information Services (IS).<sup>35</sup> On 17 March, a brief demonstration of the results management system was conducted at the CEC, in the presence of several party representatives, observers, and the media. In response to questions from one political party representative, the IS and the CEC opined that a certification mechanism for this system was not needed as the software processes open data and security is ensured through a closed network, reducing transparency of the process.<sup>36</sup>

*Considerations could be given to conducting independent verification and certification of information and communication technology based (ICT) systems to ensure confidence in the process.*

As required by the December 2022 amendments, the vote count in regular in-country polling stations was to be conducted under video monitoring, recording and livestreaming. The law did not provide for the opportunity to pilot such technology before its full deployment. The Council of Ministers instructed the MEG to implement the video monitoring system, and the MEG signed a contract with the IS on 1 March to develop a mobile application and create an online platform to host the videos. On 8 March, after reports about uncertainties with the implementation circulated in the media, the MEG revealed that the monitoring will be carried out using mobile phones. The IS contracted all three mobile providers in Bulgaria to supply mobile phones with the stands, and the network coverage for nearly 12,000 devices. The implementation of this system represented a significant increase of election costs for no evident benefit (see also *Election Day* below).<sup>37</sup>

## VII. VOTER REGISTRATION

Citizens over the age of 18 are allowed to vote. The law maintains excessive restrictions on suffrage rights for those deprived of legal capacity by a final court decision, including those with intellectual or

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<sup>33</sup> As per a CEC decision, ODIHR EOM was denied access to this process on the grounds that international observers were not explicitly listed in the respective provisions of the law. See [Recommendation CM/Rec\(2017\)5 of the Committee of Ministers to member States on standards for e-voting](#), Explanatory Memorandum, at paragraphs 96-99, which stipulate that access of observers to relevant documents and meetings is essential, including possibility to verify that the e-voting system is designed and operated based on principles of democratic elections.

<sup>34</sup> Specific paper with security features was used, produced by a Bulgarian National Bank's sub-contractor, but the law did not provide for access to it in advance. After having received the sample of voting machines, the MEG had issued an explanation that certification of the paper roll could not be performed. On 31 March, the CEC considered a request from *Ciela Norma* to test the functioning of the voting machines with the paper rolls, but as the CEC had no access to the paper rolls, the request could not be granted.

<sup>35</sup> This included data entry, adjusting and scanning the results protocols, uploading results data, correcting errors, as well as managing publication of the results.

<sup>36</sup> See paragraphs 4, 7 and 8 of [the 2022 Council of Europe's Guidelines on the use of information and communication technology \(ICT\) in the electoral processes](#).

<sup>37</sup> The deployment of the video monitoring system – hardware and software – was announced to cost some BGN 6.6 million (about EUR 3.3 million).

psychosocial disabilities, as well as those serving a prison sentence, regardless of the gravity of the crime, contrary to international standards, the case law of the European Court of Human Rights (ECtHR), and previous ODIHR and Venice Commission's recommendations.<sup>38</sup> The Constitutional Court pointed to the need to amend the Constitution to comply with international obligations.<sup>39</sup>

*Restrictions on voting rights on the basis of intellectual or psychosocial disability, as well as blanket disenfranchisement of prisoners should be removed.*

Voter registration system is passive. Before each election, municipal administrations compile voter lists using the data extracted from the permanent and continuously updated population register maintained by the Directorate General of Civil Registration and Administrative Services (GRAO) of the Ministry of Regional Development and Public Works. All eligible voters with a permanent address in Bulgaria are automatically added to the voter list. On 16 February, before public scrutiny of the preliminary voter lists, the CEC announced the number of eligible voters at 6,651,182, a figure that significantly exceeded the number of voting age citizens living in Bulgaria according to the recent census.<sup>40</sup> The ODIHR EOM interlocutors explained the disparity between the number of registered voters and the estimated number of eligible resident citizens by the emigration of Bulgarians who do not notify local administrations before leaving. The final voter lists submitted to the PECs included 6,594,593 voters.<sup>41</sup>

Several IEOM interlocutors expressed concerns about the disenfranchisement of eligible voters who reside in housing which is deemed illegal, particularly in Roma communities, and face administrative challenges in obtaining or renewing their identity cards, a situation which challenges international commitments.<sup>42</sup> Additionally, the CEC previously reported obstacles to voter registration for citizens with incomplete, erroneous or officially deleted addresses, and has indicated that these problems have not been rectified.<sup>43</sup>

The preliminary voter lists were made available for public inspection online and at polling stations between 20 February and 25 March, and were displayed at the polling stations visited by the ODIHR EOM.<sup>44</sup> Until 18 March, voters could request inclusion on the voter lists at their current registered address, and certain voters could apply for absentee voting certificates to vote at any polling station of their choice. Municipalities published lists of the citizens removed from the voter list and the reasons for their removal by 23 March.

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<sup>38</sup> See Articles 12 and 29 of the [CRPD](#). See also the ECtHR judgements in [Kulinski and Sabev v. Bulgaria](#), [Marinov v. Bulgaria](#) and [Dimov and others v. Bulgaria](#).

<sup>39</sup> In response to the government's request to interpret Article 42(1) of the Constitution, the Court ruled on 18 October 2022 that implementing ECtHR judgements on prisoners' voting rights and persons with mental disabilities requires constitutional amendments. No such amendments have been tabled so far.

<sup>40</sup> The National Statistical Institute informed the ODIHR EOM that the Bulgarian population over 18 was 5,367,708 as of 7 September 2021.

<sup>41</sup> As reported by the CEC after the election day, voters who registered abroad were removed from the preliminary voter list and citizens who acquired voting age after the initial data submission by the GRAO to the CEC were added. On election day, 240,396 voters were registered in the supplementary voter lists, according to PEC protocols.

<sup>42</sup> Changes to the Civil Registration Act in 2011 and 2012, including the requirement to present documents demonstrating the ownership or use of the property, have resulted in inability for those not meeting these requirements to renew their expired identity documents. According to research by the Bulgarian Helsinki Committee, over 110,000 Bulgarian citizens over 14 years of age in-country do not have identity cards. See paragraph 11 of the [1996 UN Human Rights Committee \(HRC\) General Comment No. 25](#) and the [Action Plan on Improving the Situation of Roma and Sinti within the OSCE area](#).

<sup>43</sup> For example, on 2 March and 10 March, the CEC discussed the lack of data on existing addresses of voters in several municipalities in Blagoevgrad, Burgas, Pernik, Varna, and regions.

<sup>44</sup> Voters could check their data online via municipal administrations' or the GRAO websites.

Voters abroad may register in advance for their preferred polling station or vote without prior registration.<sup>45</sup> Special voter lists were compiled for voters who requested mobile voting, voters in healthcare and social service institutions, and those in pre-trial detention.<sup>46</sup> Certain categories of voters may be added to the lists on election day without submitting a prior request.<sup>47</sup> These voters are later included in voter lists of their permanent registration, with their declaration being the only safeguard against multiple voting.<sup>48</sup> While most IEOM interlocutors expressed confidence in the accuracy of voter lists, outdated records of voters who *de facto* reside abroad pose a risk of an inflated voter register.

*Relevant authorities should consider auditing the voter registration system with a view to eliminating any erroneous and duplicate entries and adopting suitable legal provisions for citizens residing in illegal addresses and voters abroad.*

## VIII. CANDIDATE REGISTRATION

Eligible voters of at least 21 years of age have the right to stand as candidates. Citizens holding dual citizenship were not eligible to stand, at odds with the case law of the ECtHR.<sup>49</sup> Candidates may be nominated on the lists of registered political parties or coalitions, or run independently in a constituency, supported by nomination committees.<sup>50</sup>

Registration of election contestants took place in two stages. First, between 9 and 20 February, the CEC received requests to register political parties, coalitions, and nomination committees.<sup>51</sup> The CEC denied registration to two political parties and one coalition, due to irregularities with the supporting signatures or their insufficient number. As required by law, voters were given the opportunity to check whether their signatures appeared in any of the lists of supporting signatures.<sup>52</sup> Contrary to a previous

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<sup>45</sup> By 9 March, 47,389 voters in 77 countries had submitted their applications to cast ballots outside of Bulgaria, according to the MFA and the CEC. On March 11, the CEC decided that out-of-country voting would be conducted in 737 polling stations in 61 countries. Voters with Bulgarian identity documents may vote at any PS abroad. According to the CEC, 184,683 citizens voted in polling stations abroad.

<sup>46</sup> Homebound voters may submit applications to the local administration to be served by mobile polling stations. Such polling stations are established by the DEC's if at least 10 voters have applied within a locality. The CEC informed the ODIHR EOM that 12,553 voters were served by 302 mobile polling stations and 12,596 voted in the 216 polling stations established in hospitals, medical and social centres. Additionally, 1,456 citizens voted at the 19 polling stations established in detention centres. According to the Union of Persons with Disabilities, about 670,000 individuals were receiving social benefits due to their disability status and about 32,000 individuals above 18 years of age required assistance due to their disability.

<sup>47</sup> PEC members and security officers may vote at their duty polling station; students may vote in the municipality where they live, and persons with disabilities may vote in any suitable polling station without submitting a prior request. Voters not found on the voter list for their registered address may be added on election day if they present residency documentation issued by the respective municipality. On 14 March, the MoI published a voter information notice recalling the procedures for receiving an identity document for election day purposes in case of a loss or damage.

<sup>48</sup> Such voters must sign a declaration that they haven't voted and won't vote at another polling place. The GRAO is required by law to check all voter lists for multiple voting following election day. The GRAO informed the ODIHR EOM that following 2 October 2022 elections it identified that some 30 citizens voted more than once.

<sup>49</sup> See *Tănase v. Moldova*. Bulgaria reserved the right not to apply Article 17 of the [1997 European Convention on Nationality](#), which guarantees equal rights to nationals with dual citizenship.

<sup>50</sup> A nomination committee is established by three to seven voters in order to nominate an independent candidate.

<sup>51</sup> To register, political parties and coalitions had to submit a minimum of 2,500 supporting signatures from voters and a deposit of BGN 2,500. Nomination committees had to provide supporting signatures of at least one per cent of registered voters in the constituency, but not more than 1,000 signatures, and a deposit of BGN 100.

<sup>52</sup> When the CEC received citizens' alerts of misuse of their signature, they referred to the Commission for the Protection of Personal Data for further investigation.

ODIHR recommendation and international good practice, voters could sign in support of only one contestant in the elections.<sup>53</sup> The CEC had initially registered 16 political parties and seven coalitions.<sup>54</sup>

In the second stage, candidate lists were registered by the DEC's until 28 February and verified at the central level by the GRAO.<sup>55</sup> Several candidates were de-registered for not meeting the legal criteria.<sup>56</sup> On 1 March, the CEC held a draw to determine place on the ballot for 21 contestants: 14 parties and 7 coalitions. In an overall inclusive process, 4,566 candidates, including 2 independents, on 652 candidate lists were registered to contest these elections. Candidates could be nominated in up to two constituencies, and 1,035 candidates stood on two candidate lists. Some 30 per cent of candidates were women.<sup>57</sup>

## IX. ELECTION CAMPAIGN

Official campaign started on 3 March and ended 24 hours prior to election day.<sup>58</sup> Contestants were able to conduct their campaigns freely and without hindrance, and fundamental freedoms of assembly and expression were generally respected. The campaign was moderate, with considerable presence online, and generally perceived as a continuation of almost two-year-long campaign activities. The campaign tone was calm overall, but instances of racist, xenophobic and anti-Roma rhetoric were noted, and reacted to by the authorities.<sup>59</sup>

A number of interlocutors pointed to misleading and harmful narratives spread by political actors in relation to the use of the term 'gender', which delayed or blocked the adoption of improved legislation to combat domestic violence.<sup>60</sup> Of the few civil society actors working on enhancing gender equality in politics, several informed the ODIHR EOM that they experienced attacks on social media and feared for their safety. With some notable exceptions, the visibility of female candidates remained low. Before the start of the election campaign, one of the PP-DB leading candidates was targeted by a derogatory song linked to the There is Such a People (ITN) leader, exemplifying challenges faced by women

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<sup>53</sup> See paragraph 196 of the [2020 ODIHR and Venice Commission Guidelines on Political Party Regulation](#).

<sup>54</sup> Subsequently, one registered party withdrew and another one had not registered candidate lists in any electoral constituency.

<sup>55</sup> In case of withdrawal or rejection of registration of candidates, the nominating entities could submit replacements to the DEC's until 2 March.

<sup>56</sup> One candidate was de-registered due to holding another citizenship and four for not complying with the age requirement. In two cases, candidates were nominated in more than two constituencies, hence, their registration was cancelled in the constituencies following the second registration.

<sup>57</sup> Women led 20 per cent of candidate lists. Among the parliamentary parties and coalitions, women were included in the top three positions in 30 per cent of DPS candidate lists, in 27 per cent of GERB-SDS lists, in 26 per cent of each BSP and BV lists, in 19 per cent of Revival lists, and in 18 per cent of PP-DB coalition candidate lists.

<sup>58</sup> The silence period applies the day before and on election day, and extends to the publication of opinion polls related to election results.

<sup>59</sup> The CEC established several breaches of the law relating to "violation against the good morals" in cases of anti-Semitic and anti-Roma messages and calls for violence against certain politicians and groups of people by a candidate of the People's Party of the Truth and Only the Truth and a candidate of the Bulgarian National Union – New Democracy. In his Facebook post, the Revival leader accused a PP candidate and a director of a non-government organization, both of Jewish origin, of being anti-Bulgarian. An LGBTI organization informed the ODIHR EOM that it had to cancel a seminar, organized together with the Bulgarian Judges Association, after the Revival leader shared the agenda of the event in a Facebook post, making a comment that he was disgusted.

<sup>60</sup> The outgoing parliament rejected a draft law which included amendments to the Protection against Domestic Violence Act, in preparation since 2020. Many ODIHR EOM interlocutors perceived this as a continuation of the debate around ratification of the Council of Europe Convention on preventing and combating violence against women and domestic violence, which was deemed unconstitutional by the Constitutional Court in 2018 for using the term 'gender'. The Council of Europe's Commissioner for Human Rights [called](#) on the authorities to improve the legal and institutional protection of victims of violence against women and domestic violence in 2022.

candidates.<sup>61</sup> In their electoral platforms, four contestants mentioned some of the issues that have additional relevance for women voters.<sup>62</sup>

*Special temporary measures should be introduced to promote women's representation in elected office. These could include legislative requirements to place women in electable positions, gender-based assessments, training and capacity building programmes, and incentives for media and political parties to promote and increase gender equality.*

In a competitive campaign, parties mainly campaigned online and relied on face-to-face meetings and small gatherings, with the exception of several large-scale events organized by GERB. The campaign centred around topics of the rising prices, fiscal and social policies, prospective membership in the Eurozone, gender issues, and politics of memory related to a monument of the Soviet Army. Three parties integrated calls for referendums in their campaign.<sup>63</sup> The legal framework contains some regulations aiming to prevent the misuse of administrative resources during the campaign but does not address campaigning by public officials who are not candidates.<sup>64</sup> Several instances of mayors' involvement in the campaign were observed by the ODIHR EOM.<sup>65</sup>

*To uphold a level playing field and equality of opportunities, the legal framework should cover the conduct of all public officials during the campaign, and contain provisions safeguarding against the abuse of state resources that amount to intimidation of voters. Timely and effective sanctions should be duly imposed.*

During the campaign, longstanding concerns over vote-buying and controlled voting were present and reported to the IEOM. A number of ODIHR EOM interlocutors, including representatives of MoI, voiced concerns over ties between businesses and local authorities which resulted in enticing, pressuring

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<sup>61</sup> According to NGO "Ekaterina Karavelova Foundation" 2022 report, "alongside candidate list sequencing, challenges include traditional gender roles [...], the lack of political party recognition and support of and for women's problems, and systemic factors like economic inequality [...]. Direct discrimination and a complex system of invisible barriers impede women's selection as candidates and their attaining a fair share of political influence". The Commission for Protection Against Discrimination informed the ODIHR EOM that it opened a case related to the derogatory song.

<sup>62</sup> GERB and PP-DB addressed the issue of domestic violence, National Movement for Stability and Rise addressed the issue of combining family and professional life, while Conservative Union of the Right made a mention of financial support to pregnant women.

<sup>63</sup> BSP was gathering public support for a referendum against the "introduction of gender ideology in schools", while Revival was collecting signatures for the preservation of the Bulgarian currency instead of the adoption of the Euro. ITN made a call for a referendum to change the form of government into a presidential republic.

<sup>64</sup> See the [2016 ODIHR and Venice Commission's Joint Guidelines for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes](#) which state that "the legal framework should provide effective mechanisms for prohibiting public authorities from taking unfair advantages of their positions by holding official public events for electoral campaigning purposes, including charitable events, or events that favour or disfavour any political party or candidate... Where necessary, public authorities could make clear statements and issue written instructions that no pressure on civil servants will be tolerated and that no civil servant or citizen should fear for their employment or social services as a result of supporting or not supporting any political party or candidate."

<sup>65</sup> The ODIHR EOM interlocutors alleged that the mayor of Kostenets organized GERB campaign meetings with directors and schoolteachers, pensioner clubs, and women forums. In Vidin, a BSP interlocutor alleged that in GERB-run municipalities in the region, the municipal administration pressures its employees and villagers that benefit from the "Warm Lunch" and "Personal Assistance" programmes to vote for GERB. In Blagoevgrad, a complaint was made to the DEC regarding alleged pressure on voters exerted by the DPS mayor of Yakoruda, claiming that he used mobile voting and the social programme "Warm Lunch" to influence voters. The mayor of Kardzhali held campaign meetings with DPS voters. PP-DB activist from Bregovo municipality informed the ODIHR EOM that due to citizens' dependence on GERB-affiliated local mayors, voters feared to attend campaign events of other parties.



voters or practices of vote buying, at odds with OSCE commitments and international standards.<sup>66</sup> The MoI introduced a hotline for reporting election-related irregularities and conducted a number of related operations. Several ODIHR EOM interlocutors pointed out that police operations against vote buying were being conducted predominantly in Roma communities and were often perceived as intimidating by members of these communities.

*Allegations of intimidation, coercion and vote buying should be examined promptly and effectively, and those responsible should be held accountable. Relevant authorities should educate voters on their rights and safeguards in place, and adopt measures to encourage reporting and providing evidence of any pressure, inducements, or other unlawful interference.*

Out of 21 parties and coalitions contesting in the elections, 19 established official Facebook accounts.<sup>67</sup> In general, party leader pages had more followers than those of their respective parties and coalitions. Online and offline campaign focused on the same issues. The campaign tone online was often accusatory and at times aggressive. Topics that generated most interactions related to gender issues, the potential removal of a Soviet Army monument in Sofia, as well as membership in the Eurozone.

## X. CAMPAIGN FINANCE

Campaign finance is mainly regulated by the 2014 Election Code and the 2005 Political Parties Act. The third and fourth evaluation rounds of the Council of Europe’s Group of States against Corruption (GRECO) related to transparency of political party funding and corruption prevention amongst officials, including MPs, concluded that most recommendations have been largely addressed.<sup>68</sup> At the same time, a number of prior ODIHR recommendations remain unaddressed, including the lack of reporting on expenditures before election day and the limited scope of oversight by the National Audit Office (NAO).

Political parties and coalitions that received, respectively, at least one and four per cent of valid votes nationwide in the previous elections are entitled to annual public funding, which may be used for election campaigns.<sup>69</sup> Parties and coalitions that are not entitled to public funding and have registered candidate lists in all electoral districts receive BGN 40,000 for their media advertising costs, while independent candidates receive BGN 5,000.<sup>70</sup> The campaign may be financed by the party’s or candidate’s own funds as well as monetary and in-kind donations from private individuals.<sup>71</sup> Donations

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<sup>66</sup> In Paragraph 7.6 of the [1990 OSCE Copenhagen Document](#), the participating States committed to “enable [parties] to compete with each other on a basis of equal treatment before the law and by the authorities”. Paragraph 7.7 requires “political campaigning to be conducted in a fair and free atmosphere in which neither administrative action, violence nor intimidation bars the parties and the candidates from freely presenting their views and qualifications, or prevents the voters from learning and discussing them or from casting their vote free of fear of retribution”.

<sup>67</sup> ODIHR EOM monitored 21 official Facebook accounts of the political parties and coalitions with prospects of entering the parliament according to the polls, their respective leaders, as well as the President and the Council of Ministers.

<sup>68</sup> GRECO’s final compliance report related to the [Third Evaluation Round](#) published in February 2016 concluded that out of the 16 recommendations, 13 have been implemented, and three partially implemented. In the [Fourth Evaluation Round](#) on corruption prevention in respect of members of parliament, judges and prosecutors (December 2019), the Bulgarian authorities had satisfactorily implemented 16 and partially – 3 recommendations out of 19. The initial report from the [Fifth Evaluation Round](#) was published on 19 January 2023.

<sup>69</sup> According to the State Budget Act, in 2023 the amount of the state subsidy for each vote received is BGN 8. For the first three months of 2023, four political parties and five coalitions were entitled to BGN 4,651,796 in total.

<sup>70</sup> For these elections, ten political parties, four coalitions and two independent candidates were entitled to these ‘media packages’. Contestants choose where to be advertised, but the contracts are approved by the CEC, which transfers the funds directly to the respective media.

<sup>71</sup> In April 2021, the possibility for legal entities to donate to election campaigns introduced in 2019 was declared unconstitutional by the Constitutional Court.

over one minimum monthly wage (BGN 780) must be accompanied by the donor's declaration of the source of donated funds. The law does not limit individual donations, which leaves room for dependence on wealthy private interests. Donations from non-residents, religious institutions, anonymous and foreign sources, and legal entities are prohibited. Campaign expenditures are limited to BGN 3 million for parties and coalitions and BGN 200,000 for independent candidates.

The NAO is mandated to supervise party and campaign financing. During the campaign, contestants were required to report to the NAO all donations within seven days from receipt, as well as information on contracts concluded with media and public relations agencies.<sup>72</sup> These data were timely published by the NAO. Media outlets were required to publish all contracts with contestants online, increasing transparency, and to submit such information to the NAO within 30 working days after election day.<sup>73</sup> Within the same period, contestants submit reports on campaign incomes and expenditures to the NAO, which are to be published within 15 days and audited by the NAO within six months from the submission. The law does not address third-party spending on behalf of eligible contestants.<sup>74</sup> Conducting and reporting on campaign on social networks is not regulated by the law.<sup>75</sup>

The NAO cross-checks the information submitted by the media outlets with the contestants' reports and audits the reported data for prohibited donations or other irregularities. However, it does not have the mandate and the investigative capacity to ascertain actual campaign spending, limiting the effectiveness of its oversight.<sup>76</sup> Ahead of these elections, the dismissal of the NAO president raised questions in relation to its institutional independence.<sup>77</sup>

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<sup>72</sup> According to the NAO public registry, as of 18 April, nine parties and coalitions and one independent candidate declared donations (one party only in-kind), with totalling BGN 1,366,570, with the highest amounts declared by PP (over BGN 990,196), followed by the Left (BGN 137,230), Revival (BGN 92,470 and Bulgarian Rise (BGN 86,101). The highest number of contracts concluded with media and public relations agencies were declared by GERB-SDS (297), followed by BSP (112), the Left (109), Revival (77) and Bulgarian Rise (70). Based on published information, NGO Institute for Public Environment Development estimated the total value of contracts signed between political parties and the media by 30 March 2023 at BGN 2,395,882.

<sup>73</sup> However, as the contract reporting requirement does not extend to social networking and internet search platforms, advertising on these platforms, even if reported, cannot be cross-checked.

<sup>74</sup> Paragraph 256 of the 2020 ODIHR and Venice Commission Guidelines on Political Party Regulation recommends that "Third parties should be subjected to similar rules on donations and spending as political parties to avoid situations where third parties can be used to circumvent campaign finance regulations".

<sup>75</sup> According to published data, PP-DB spent the most on Facebook advertising, accounting for more than half of all expenditures on political ads. Meta's Ad Library data disclosed the total spending on political ads during one month of campaigning at some EUR 316,000, excluding expenditures less than EUR 100.

<sup>76</sup> Article 14.b of [Recommendation Rec\(2003\)4](#) of the Council of Europe's Committee of Ministers on common rules against corruption in the funding of political parties and electoral campaigns advises that: "The independent monitoring should include supervision over the accounts of political parties and the expenses involved in election campaigns as well as their presentation and publication." See also Recommendation xiii from the GRECO's [Third Evaluation Round](#): "to provide for an adequate and consistent supervision over the financing of election campaigns of political parties, candidates and other campaign participants, under the clear responsibility and leadership of the National Audit Office". See also Paragraph 268 of [the 2020 ODIHR and Venice Commission Guidelines on Political Party Regulation](#).

<sup>77</sup> On 20 January, the President of the NAO was dismissed by the parliament, with the votes of GERB-SDS, DPS, BSP and BV. This decision was challenged in the Constitutional Court by 71 MPs, who argued that it was contrary to the rule of law and the NAO's independence. On 22 June, the Court agreed with the petitioners and pronounced the parliament's decision unconstitutional.

The NAO decisions on establishing campaign finance violations are not made public, limiting transparency.<sup>78</sup> The maximum amount of a fine that may be imposed by the NAO is BGN 15,000, which may not amount to an effective deterrent for the well-funded political parties. The deadlines for NAO to impose sanctions are lengthy, and the enforcement process to collect fines was described by a number of ODIHR EOM interlocutors as protracted and ineffective.<sup>79</sup> These shortcomings undercut the effectiveness and dissuasiveness of sanctions that may be imposed, at odds with international standards.<sup>80</sup>

*To ensure effective campaign finance oversight, the National Audit Office mandate and resources should be expanded to include monitoring of campaign finance and enquiry into potential breaches, such as unreported income and expenditure. Where this results in the identification of violations, effective, proportionate and dissuasive sanctions should be imposed for any violations.*

## XI. MEDIA

### A. MEDIA ENVIRONMENT

The media environment is diverse and offers content plurality, also reflecting political polarization. With a wide range of media operating in a limited advertising market, many are financially fragile and rely on subsidies and state advertising, exposing them to political and economic influences.<sup>81</sup> Limits to media sustainability, according to IEOM interlocutors, may induce self-censorship of critical coverage of businesses and political parties. Television dominates the media market and remains the primary source of news, while online media has overtaken print media. Social networks provide a digital public sphere for political parties and candidates to engage voters.<sup>82</sup> Despite some improvements in the regulatory and general media environment, longstanding concerns challenging the media sector remain, including insufficient transparency of media ownership and of allocation of state advertising, media concentration, and lack of safeguards to protect media from political interference.<sup>83</sup>

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<sup>78</sup> NAO has a six-month deadline to complete the audit of the information provided by parties in their final report. Still, there's no time limit for publishing the report with the audited information. The last audit published by NAO applies to elections in November 2021. Paragraph 263 of the 2020 ODIHR and Venice Commission Guidelines on Political Party Regulation states that "transparency in reporting requires the timely publication of parties' financial reports". According to NAO, 15 cases related to possible administrative violations were initiated for the period of January-June 2023, as opposed to only 2 cases initiated throughout 2022.

<sup>79</sup> While there are no special deadlines for campaign finance violations, the Administrative Violations and Penalty Act provides for between three months and two years for the initiation of administrative penalty proceedings.

<sup>80</sup> Article 16 of the [CoE Recommendation Rec\(2003\)4](#) stipulates that "States should require the infringement of rules concerning the funding of political parties and electoral campaigns to be subject to effective, proportionate and dissuasive sanctions".

<sup>81</sup> An overview of the [media market](#) by the Media Club Agency shows the total advertising market in 2022 was EUR 291.4 million, 63 per cent less compared to 2021 (EUR 782.2 million).

<sup>82</sup> According to the 2022 [Flash Eurobarometer](#), TV is the most used media to access news in Bulgaria. By [Internet World Stats](#) of 2022, Bulgaria had 67.9 per cent Internet and 67 per cent Facebook penetration.

<sup>83</sup> Previous ODIHR recommendations on these issues remain unaddressed. The 2022 [EU Report](#) on the rule of law situation in Bulgaria states that "The lack of a clear regulatory framework to ensure transparency in the allocation of state advertising remains a concern, despite some measures having been taken to improve transparency. As regards media ownership transparency, reflections are ongoing about a more effective enforcement of media ownership obligations". Nevertheless, Bulgaria improved its ranking in the 2022 Reporters Without Borders [World Press Freedom Index](#) to 91<sup>st</sup> from 112<sup>th</sup> in 2021. The [Annual Survey on Freedom of Speech in Bulgaria](#) (2022), processed by Alpha Research for the Association of European Journalists Bulgaria (AJE), stated that "In 2022, positive attitudes in the sector prevailed", with 19.6 per cent of respondents rating freedom of speech good or very good in 2022 compared to 8.9 per cent in 2020 and 4.5 per cent in 2017.

The public service media Bulgarian National Television (*BNT*) and Bulgarian National Radio (*BNR*) are among the most trusted news outlets. Their funding mechanism, based on outdated criteria such as the hours of broadcasting, expose the amount of funding to uncertainty and discretion of the parliament, which, according to several IEOM interlocutors, does not guarantee sufficient resources to accomplish the public remit properly, nor to fence off government and political influence. Changes in media regulation to revise the funding model, albeit widely publicly debated and recommended by prior ODIHR reports, are not yet implemented. Two media groups (*bTV* and *Nova*) largely dominate the media market and lead the audience shares.<sup>84</sup>

Whilst not punished with imprisonment, defamation is still a criminal offence, which is at odds with international standards.<sup>85</sup> Attacks against journalists decreased in the past years, however the lack of speedy and effective investigations faced criticism.<sup>86</sup> On 8 March, a private online media outlet was sued for BGN 1 million by an insurance company on defamation claims. National and international associations of journalists characterised this as legal harassment against critical media coverage, with potential negative effects on investigative reporting on issues of public interest.<sup>87</sup> Charges against media leading to disproportionate fines create a climate of fear and weaken the media freedom. On 31 March, last day of election campaign, a *BNT* reporter was insulted and forced to leave a public campaign event of Revival party.<sup>88</sup>

*To uphold the freedom of expression, legislative measures should be taken to protect journalists and media workers from abusive court proceedings on defamation grounds, including early dismissal of manifestly unfounded lawsuits, the award of legal costs, compensation of damages, and proportionate and dissuasive penalties on the party who initiated abusive court proceedings.*

## B. LEGAL FRAMEWORK FOR THE MEDIA

The legislation provides safeguards to protect freedoms of expression and the media and generally complies with international standards. The Constitution protects freedoms of opinion and expression,

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<sup>84</sup> According to the 2022 [Reuters Institute Digital News Report](#), public broadcasters (*BNR* and *BNT*) are the most trusted news sources, followed by *Darik*, *Nova TV News*, and *bTV News*. The same report, however, revealed low trust in the news (35 per cent), with more people saying they distrust rather than trust the news, which was attributed to a deeply polarized media system. A [survey](#) on media preferences during election campaigns conducted for the Council for Electronic Media (CEM) found in 2022 an increasing decline of interest in news about the elections, pointing to an alleged election fatigue.

<sup>85</sup> See the Council of Europe's [CM/Rec\(2016\) on the Protection of journalism and safety of journalists and other media actors](#), the [PACE Resolution 1577 \(2007\) Towards decriminalisation of defamation](#) and its [Recommendation 1814 \(2007\)](#), as well as paragraph 47 of the 2011 UN Human Rights Committee [General Comment 34](#) on Article 19 of the ICCPR and the [2003 OSCE Bishkek Declaration](#).

<sup>86</sup> On 15 February 2021, the OSCE Representative on Freedom of the Media [noted](#) the refusal by the Prosecutor General's Office to fully investigate the reported beating of the freelance journalist Dimitar Kenarov by the police in September 2020. Paragraph 23 of the 2011 [General Comment 34 to the ICCPR](#) calls all attacks on the journalists to be "vigorously investigated in a timely fashion and the perpetrators prosecuted".

<sup>87</sup> The [Association of European Journalists-Bulgaria](#) (AEJ) promptly denounced the case of Mediapool as a classic example of SLAPP (strategic lawsuits against public participation), as well as the incident occurred to the *BNT* reporter, adding that "attempts to humiliate and threaten journalists are absolutely unacceptable". In April 2022, the European Commission issued a proposal of [anti-SLAPP Directive](#) aimed at providing "safeguards against manifestly unfounded or abusive court proceedings in civil matters with cross-border implications brought against natural and legal persons, in particular journalists and human rights defenders, on account of their engagement in public participation".

<sup>88</sup> In addition to these two episodes, the [Council of Europe safety of journalist platform](#) recorded one more alert in 2023: on 7 February, activists of Revival party threatened a *Deutsche Welle* journalist while reporting about them collecting signatures for an anti-Eurozone referendum, and police forced her to delete the photos she took; a reply from the Bulgarian authorities to the Council of Europe on 6 April informed that the police issued a written order restricting the journalist from publishing personal data of individuals.

including the right to seek, obtain, and disseminate information, and freedom of the media from censorship. The Radio and Television Act (RTA), which after 2020 amendments complies with the regulatory framework of the EU Directive 2010/13, inter alia establishes tasks and duties of the Council for Electronic Media (CEM), the media regulator responsible for licensing, registering and supervising the media service providers. In June 2022, the CEM did not succeed with appointing a new general director of *BNT*; a new appointment procedure is still pending due to a court appeal.<sup>89</sup>

The Election Code regulates broadcast media during the election campaign, providing a set of detailed rules for paid and free airtime. The May 2021 amendments reinforced the ‘equal participation’ principle for the political contestants on the public service media. As required by law, agreements on the election broadcasts were signed by *BNT* and *BNR* with political parties, and approved by the CEC on 1 March. These agreements, whilst in line with the law, rigidly define all possible formats of election broadcasts, including timing, schedule, order of appearances, presenters and topics, which limited the editorial freedom of *BNT* and *BNR* in their election campaign coverage. Private broadcasters and online media, on the contrary, have a higher degree of editorial freedom.

*To foster editorial freedom of public service media, consideration could be given to revising the strict equal participation rule or limiting its application to special election broadcasts only, granting public service media greater editorial independence in covering the election campaign in regular news and information programmes.*



### C. MEDIA COVERAGE OF THE CAMPAIGN [Click Here to Read Media Monitoring Results](#)

The media provided extensive coverage of the elections, mainly granting direct access to candidates and allowing voters to hear a plurality of views. While media reporting was generally in line with the law, strict rules on equal participation of contestants reduced editorial content and journalistic intermediary role of the public broadcasters, used by political parties as vehicles to disseminate their electoral messages.

*BNT* and *BNR* granted all contestants free and paid airtime, in line with the election regulations.<sup>90</sup> In the monitored hours, *BNT* aired over 20 hours broadcasts of candidates in free (73 per cent) and paid airtime (27 per cent). *BNT* and *BNR* organised 42 debates at national and regional level, which featured 159 candidates, but major parties scarcely attended.<sup>91</sup> Furthermore, prominent political leaders mostly refused to face each other, depriving the voters of an opportunity to see them debating.<sup>92</sup> *BNT* and *BNR* did not cover any election campaign activities in their news bulletins, which mainly focused on members of government and the president in their official capacities. In case of regular governments, however, such extensive news coverage of government officials would lead to a systematic advantage of the incumbents.<sup>93</sup> The regular information programmes and talk shows of *BNT* and *BNR* fell under the same strict rules set by the agreements with the parties.<sup>94</sup> While clearly marked as such, the paid content of

<sup>89</sup> Out of five CEM members, two are appointed by the president and three by the parliament for a six-year term. The media regulator is funded by the state budget. Many IEOM interlocutors, however, indicated the need to revise the funding model in order to provide the media regulator with sufficient resources to fully accomplish its duties.

<sup>90</sup> Between 3 March and 2 April, the ODIHR EOM monitored political coverage of three television stations (*BNT*, *bTV* and *Nova TV*), daily between 16:00 and 23:00), two radio stations (*BNR* and *Darik*), daily between 07:00-09:00 and 17:00-19:00. In addition, it reviewed the election debates in the morning and afternoon blocks.

<sup>91</sup> Except for Revival, which attended 21 debates, the main competitors GERB-SDS and PP-DB attended respectively eight and four debates, respectively, aired by *BNT* and *BNR*.

<sup>92</sup> On 24 March, nevertheless, the *BNT* evening talk show *Panorama* held a debate with six prominent candidates, three of them party leaders (Asen Vasilev, PP-DB; Kostadin Kostadinov, Revival; and Stefan Yanev, BV).

<sup>93</sup> *BNT* and *BNR* devoted most of their prime-time news coverage to government (respectively 56 and 59 per cent) and president (26 and 10 per cent).

<sup>94</sup> The talk shows *Panorama* and *Referendum* were included in the agreements between *BNT* and the political parties.

*BNT* and *BNR* included interviews and campaign reports, engaging journalists in the preparation of campaign material for political parties, which is a debasement of the journalistic profession discouraged by international professional norms.<sup>95</sup>

*To protect the journalistic profession, to foster its watchdog role and to avoid confusion between journalism and political advertising, the public service media should consider avoiding the use of journalists in paid campaign material for electoral contestants, such as paid interviews and paid campaign reports.*

The monitored private broadcasters exhibited greater elasticity in their election coverage. *Nova TV* and *bTV* provided wide coverage of political contestants in a variety of formats, which included debates and interviews with representatives of parliamentary parties and leading competitors, though mostly aired outside of prime time.<sup>96</sup> The newscasts of *Nova TV*, *bTV* and *Darik* scarcely covered election campaign events, yet reported impartially on political issues, mainly hearing from parliamentary parties.<sup>97</sup> All monitored broadcasters extensively reported on election preparations and voter information. With political parties deciding on their representatives in the debates, women candidates were overall underrepresented, accentuating gender inequality in political life.<sup>98</sup>

During the election campaign, the CEM monitored 26 broadcasters (13 public media service providers and 13 private media service providers) and sent 16 alerts of potential violations to the CEC, mainly on the grounds of improper publication of opinion polls, incomplete information on paid advertisements, and harmful speeches by candidates. The CEC established violations by candidates in five cases and none by media outlets. In the election silence period, however, the CEM sent 13 additional alerts to the CEC, nine of which against media outlets due to publishing opinion poll results before the close of the polls, contrary to the law.<sup>99</sup> The actual fines for violations established by the CEC were not made public during the campaign period, undermining timely and effective legal remedies.

## XII. PARTICIPATION OF MINORITIES

The Constitution guarantees the right of self-identification but does not refer to national minorities.<sup>100</sup> There are no legal provisions fostering the participation of minorities in elections. The law prohibits

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<sup>95</sup> See paragraph 13 of the International Federation of Journalist (IFJ)'s [Global Charter of Ethics for Journalists](#) and paragraph 3.4 of the [Code of Ethics](#) of the Bulgarian media.

<sup>96</sup> *Nova TV* aired some 8 debates and 29 interviews, *bTV* some 9 debates and 61 interviews. However, only one of these programmes was in prime-time hours: on 25 March, *bTV* aired a debate with prominent representatives of five parties (GERB, PP-DB, BSP, DPS and Revival).

<sup>97</sup> *bTV*, *Nova TV* and *Darik* devoted respectively 86 per cent, 77 per cent and 91 per cent of their news coverage to the seven parliamentary parties.

<sup>98</sup> Out of all participants in the debates aired by *BNT* and *BNR*, only 9 per cent were women. On the other hand, women candidates enjoyed slightly broader coverage in the monitored private television channels (*bTV*, 21 per cent; *Nova TV*, 17 per cent).

<sup>99</sup> According to CEM, the following media outlets published results of opinion polls during the election silence period: *Economedia*, *Club Zebra*, *Pik Broadcasting*, *Dir.bg*, *Darik Radio*, *bTV Media Group*, *Nova Broadcasting Group*, *BNT*, and *Focus Media*.

<sup>100</sup> Persons belonging to minorities represent some 15 per cent of the country's population, with ethnic Turks and Roma being the most numerous groups, comprising some 8.4 per cent and 4.4 per cent of the population, respectively, according to the 2021 census.

campaigning in languages other than Bulgarian, at odds with prior ODIHR and Venice Commission’s recommendations and the European Convention on Human Rights.<sup>101</sup>

Platforms of the political parties and coalitions generally did not include any policy proposals specifically related to minorities.<sup>102</sup> The political parties informed the ODIHR EOM that they fielded few Roma candidates in electable positions. The civil society and Roma representatives met by the ODIHR EOM stated that campaign activities in Roma communities were rare.<sup>103</sup> According to Roma representatives, one Roma was elected to the parliament on the list of DPS. However, the ODIHR EOM was also made aware of frequent prejudice that exists against Roma.<sup>104</sup> Several Roma organizations and other interlocutors voiced concerns that during pre-election period police operations were being conducted predominantly in Roma communities, sometimes with use of derogatory language towards members of these communities, who often perceived these operations as intimidating.

*The relevant authorities, in co-operation with Roma organizations, should support election awareness campaigns among Roma communities to encourage meaningful and inclusive political participation. Legislative incentives for internal party measures should be adopted, promoting minority participation within party leadership and as candidates.*

### XIII. ELECTION DISPUTE RESOLUTION

Complaints against administrative acts or decisions may only be lodged with the electoral commissions by those applicants who can justify their legal interest. Any person may alert commissions about election-related violations.<sup>105</sup> The law provides an expedited procedure for election-related complaints, with deadlines from three days to one hour on election day, which is in line with good electoral practice. However, there are inconsistencies in the provisions regulating the deadlines for the CEC’s ruling on complaints and appeals.<sup>106</sup> Petitions challenging the outcomes of parliamentary elections can only be made to the Constitutional Court by one-fifth of the members of parliament, the President, the Council of Ministers, the Supreme Court of Cassation, the Supreme Administrative Court (SAC), and the

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<sup>101</sup> On 2 May, the ECtHR ruled that Bulgaria’s absolute ban on the use of unofficial languages in the campaign, coupled with the threat of administrative sanctions, disproportionately restricted the European Convention’s guarantee of the freedom of expression (see [Mestan v. Bulgaria](#), application No. 24108/15). Moreover, a number of the ECtHR decisions related to freedom of association of the Macedonian minority are still not implemented. In December 2022, the Council of Europe’s Committee of Ministers [called](#) on the competent authorities not to “refuse registration to associations aiming to achieve ‘the recognition of the Macedonian minority in Bulgaria’ on grounds, which contradict the European Court’s judgments in these cases”. See the ECtHR judgements in [Macedonian Club for Ethnic Tolerance in Bulgaria and Radonov v. Bulgaria](#), application No. 67197/13 and [Vasilev and Society of the Repressed Macedonians in Bulgaria Victims of the Communist Terror v. Bulgaria](#), application No. 23702/15).

<sup>102</sup> The platform of the Bulgarian National Union-New Democracy contained discriminatory remarks against Roma, while Revival and the Conservative Union of the Right included in their platforms that they were against policies based on minority or ethnic principles.

<sup>103</sup> On a positive note, the Roma Standing Conference movement organized an initiative “Roma for Fair Elections” envisaged as a national public dialogue with political parties, while NGO “Amalipe” organized debates with MP candidates. Roma NGO “Lider” fielded 267 citizen observers.

<sup>104</sup> See also 2019 [Report of the Commissioner for Human Rights of the Council of Europe](#). The 2022 [ECRI Report on Bulgaria](#) mentions mixed response of the authorities against hate speech in recent years.

<sup>105</sup> Complaints and alerts may be filed to the CEC and DECs. DECs decisions can be appealed to the CEC and local administrative courts or the Supreme Administrative Court as the final instance. DECs’ decisions upheld on appeal by the CEC can be challenged in district administrative courts under the general administrative procedure.

<sup>106</sup> Article 57.1.26 of the Election Code gives the CEC 24 hours to consider complaints and alerts. However, Article 73, which refers to appeals against decisions of election commissions, establishes that the CEC has three days.

Prosecutor General, which leaves election contestants without an effective legal remedy, contrary to OSCE commitments and other international standards.<sup>107</sup>

*The law should be amended to allow direct challenges against election results.*

While considering complaints and appeals, the CEC applied the law consistently and within the legally prescribed deadlines. During the campaign, the CEC deliberated on complaints and appeals in public sessions, and decisions were promptly published on its website. The CEC and DEC's maintained online registers of complaints and appeals, contributing to transparency. Some 140 complaints and alerts were registered with DEC's, primarily related to campaigning and the composition of PECs. The CEC published decisions on 29 complaints, alerts and appeals against DEC decisions.<sup>108</sup> The CEC also received four alerts from the CEM on hate speech, and administrative sanctioning procedures were initiated.

The SAC ruled on 12 appeals before election day and one appeal after election day, most of which were filed by the PP against the composition of DEC's. The SAC upheld CEC decisions in 11 cases and repealed 2. The SAC provided an adequate remedy and reasoned decisions, also referring to its case law. Upon appeal by the Left coalition, the PP and the DB, the Sofia Administrative Court annulled the decision of the CEC that provided for PEC voting result protocols to record the counts of paper ballots and machine ballots together. The CEC amended its decision accordingly.

The Election Code enables election commissions to punish electoral violations by establishing offences and issuing fines. The amounts of fines are determined by the CEC chairperson or regional governors, based on a DEC's findings.<sup>109</sup> The sanctioning for electoral violations is lengthy, as it is not covered by an expedited electoral procedure, and the protracted process diminishes the effectiveness of sanctions.<sup>110</sup>

*The legal framework should include effective mechanisms and remedies for ensuring compliance with the election law, such as clear sanctions for specific electoral offences and the enforcement of sanctions within appropriately expedited timeframes.*

An Inter-institutional Unit, including the Prosecutor's Office and the State Agency for National Security, co-ordinated both institutions' efforts to prevent and respond to criminal offences during the election period.<sup>111</sup> According to the Prosecutor General's Office, 859 alerts were received, and 140 pre-trial proceedings were initiated. The MoI received 789 alerts, initiated 143 criminal proceedings, and issued 2,100 warnings, primarily related to vote-buying.

Individuals identified as potential perpetrators of electoral offences received warning protocols which they were required to sign. While some ODIHR EOM interlocutors commended these preventive

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<sup>107</sup> Article 2.3 of the [ICCPR](#) states that “[a]ll persons whose rights or freedoms are violated shall have an effective remedy [...]”; see also paragraph 5.10 of the [1990 OSCE Copenhagen Document](#).

<sup>108</sup> Of these, 17 of were rejected or left without consideration, mainly related to allegedly illegal campaigning, mobile voting, and the composition of PECs.

<sup>109</sup> By law, the CEC chairperson is responsible for issuing penalties for violations related to campaigning, including in the media. The regional governors are authorized to issue decrees setting the sanctions in all other cases.

<sup>110</sup> For example, in Pazardzhik, despite administrative procedures initiated by the DEC and confirmed by the CEC, directing the mayor to remove a poster where she appeared with a candidate, the poster was not removed, and no penalty was imposed. According to the law, the CEC should send a penal decree to the mayor, requiring payment of a fine for the infringement, and if ignored, the infringement will be transferred to the National Revenue Agency. The penalty expires after two years.

<sup>111</sup> The MoI did not take part in this unit as it considers that the Election Code does not explicitly oblige it to do so. The MoI and the Prosecutor General co-operated at the regional and municipal levels.



efforts, others noted that police operations often had an intimidating effect on voters and candidates and that these efforts did not target the organizers of vote-buying. Law enforcement agencies noted to the ODIHR EOM that obtaining evidence of vote-buying remains challenging, and most cases do not go beyond the pre-trial phase.<sup>112</sup>

#### XIV. CITIZEN AND INTERNATIONAL OBSERVATION

The Election Code provides for citizen and international observation of the entire election process. Registered contestants are entitled to appoint their agents to follow the electoral process at all levels of the election administration and proxies to observe at polling stations. Between 22 February and 1 April, the CEC registered 1,181 observers from 19 non-governmental organizations, including 15 of them for out-of-country polling stations, and some 204 international observers. Regrettably, the ODIHR EOM was denied observation of some election preparations, in particular the printing of the voter lists at the GRAO and the certification of the voting machines software at the MEG, on the grounds that international observers were not explicitly listed in the respective provisions of the law.

#### XV. ELECTION DAY

##### A. OPENING AND VOTING

Election day was orderly, and polling was generally well-organized. The IEOM observers positively assessed the opening of all but 3 of the 69 polling stations observed. Most of the polling stations observed opened on time or shortly after. Delays in opening of several polling stations were noted due to PECs' insufficient knowledge of the procedures, including the set-up of the voting machines.

The voting process was positively assessed in 97 per cent of observations and was overall calm and smooth. Partisan observers were present in 35 per cent of the polling stations visited by the IEOM, while citizen observers were seen in 5 per cent of the polling stations. Procedures such as the identification of voters, signing of the voter list, and stamping of the ballots were nearly always followed, and voters who opted for voting machines were familiar with this voting method. In isolated cases, PEC members encouraged voters to use a particular voting method; several complaints on such conduct have also been filed with DECs.

While in most polling stations visited by the IEOM observers there were no issues with machine voting, in 4 per cent of observations the voting machine was reported to be not functional. During the day, the CEC had to issue additional guidance for the PECs on handling cases when machine voting ballots came out blank or were cut off too short, making the voter's choice unreadable.<sup>113</sup>

The layout of polling stations was assessed to be suitable for voters with reduced mobility in 71 per cent of the IEOM observations, but less than half of the polling stations visited (39 per cent) were assessed

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<sup>112</sup> Annual statistics shared by the Prosecutor General's Office with the ODIHR EOM show that in 2022, 83 vote-buying cases were prosecuted, in which 23 people were convicted. Of these, 20 offenders received suspended sentences and three were sentenced to imprisonment.

<sup>113</sup> The operation of voting machines with the separately supplied paper rolls was not tested before election day (see *Voting Technologies*). PECs were instructed to allow such voters to proceed with another ballot, and at the end of the day to complete a statement and attach the 'irregular' machine ballot to it. On 3 April, the CEC announced that in total 122 voting machines malfunctioned, including 102 on election day. The ODIHR EOM was informed by a representative of *Smartmatic* that a number of devices malfunctioned either due to usage of external drives from the previous elections or issues with the paper rolls, for instance when the core of the roll was disfigured during the transportation.

as suitable for independent access by such voters.

Negatively, secrecy of the ballot was compromised in 7 per cent of the IEOM observations. This was due to inadequate layout of polling stations (6 per cent of observations) or voters not marking their ballot in secrecy or properly folding their ballots.<sup>114</sup> These observations were made against the backdrop of the absence of the design and uniform implementation of the voting screens that replaced polling booths following the December 2022 amendments (see *Election Administration*). Ballot boxes being fully transparent, rather than translucent, also meant that ballot choices could at times be seen by PEC members. Further, the IEOM observers noted instances of people keeping track of voters (2 per cent of observations) and the presence of unauthorized persons in polling stations (some 3 per cent of observations). In 5 cases, indications of vote-buying were noted by the IEOM observers outside polling stations.<sup>115</sup>

*The Central Election Commission and the government should develop and provide the local authorities and election commissions uniform instructions and, as necessary, resources to ensure that the voting screens, the positioning of voting machines, the design of ballot boxes, and other elements of polling station set-up ensure ballot secrecy.*

## **B. COUNTING AND TABULATION**

All 64 polling stations where the IEOM observed the counting process closed on time or with a short delay. The vote count was assessed largely positively. However, in some polling stations the IEOM observers noted that important procedures were omitted or not followed in the prescribed order. In 11 observations the number of voters who voted was not established before the ballot boxes were opened and in 9 observations unused and spoiled ballots were not packed before the vote count began. In 20 observations IEOM noted that PEC members had difficulties with reconciling data in the results protocols, with some of these difficulties due to the PECs' procedural errors, as well as the complexity in reporting on both the machine and paper ballots. Copies of the PEC results protocols were not posted for public display at polling stations, as required by law, in more than half of the observations, detracting from transparency.

The IEOM observed all 31 DEC's and this process was generally assessed as orderly and well-organized. Overcrowding, which negatively affected the process, was reported in five observations, while in one DEC the IEOM observers were not allowed to closely follow the process. In 35 observations the DEC's encountered some discrepancies in PEC results protocols that needed to be resolved before the data entry, which indicates insufficient knowledge and reporting abilities of many PECs. The CEC began posting on its dedicated result webpage preliminary results at 23:00 on election night, contributing to transparency of voting results. Preliminary voter turnout was announced on 3 April at 40.63 per cent.

*Procedures for establishing and reporting voting results should be improved to eliminate inaccuracies in the results protocols. The counting procedures and the training of election commissioners could incorporate the use of appropriate assistive tools, including electronic results protocol.*

Based on the information provided to the ODIHR EOM by the MEG, just over half of the video monitoring devices live-streamed the counting process without interruption.<sup>116</sup>

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<sup>114</sup> Following a recommendation by its Public Council, on 31 March the CEC recommended PECs to ask voters to fold their machine ballots twice, in order to preserve the secrecy of the vote.

<sup>115</sup> Based on the information published by the MoI, during the election day it received 151 alerts and initiated 9 new pre-trial proceedings related to electoral offences.

<sup>116</sup> According to the MEG, 11,608 devices in total were deployed, of which 11,383 were activated on 1 April and successfully tested. Of the 8,969 devices that had sufficient network coverage to live-stream the vote count, 6,500

## XVI. POST-ELECTION DEVELOPMENTS

After the election, the CEC decided on some 12 appeals related to the voting process, which were either dismissed or DEC decisions were upheld. DECs posted information about 19 complaints, mostly related to the behaviour of PEC members, the filling of protocols, and alleged irregularities in voting and counting procedures.

The SAC upheld the Minister of Regional Development's appeal against the CEC's decision on the GRAO's investigation of cases of illegal voting. According to the SAC, it is the CEC's responsibility, not the GRAO's, to verify and alert the prosecutor's office of any infractions of the Election Code.

On 6 April, the CEC announced the final election results and the distribution of seats between the contestants. The number of unused ballot papers exceeded 5 million (some 2.6 million of citizens voted). Approximately 41 per cent of the votes were cast paper ballots and invalid paper ballot votes amounted to nearly 4 per cent of these votes.

Contrary to international good practice, the CEC does not have the legal authority to rectify discrepancies in the reported voting results.<sup>117</sup> Based on analysis carried out by the CEC, some 14,700 errors were found in 2,757 of the 12,916 PEC protocols received. While the CEC noted that the vast majority of these discrepancies concerned minor errors in the count of preference votes, it also requested the DECs to explain the reasons for accepting PEC protocols with discrepancies.

*To ensure consistency and transparency in the results tabulation process, clear procedures for correcting errors and discrepancies in the voting results protocols, including criteria for recounting ballot papers, should be established.*

Elected candidates were officially announced by the CEC on 8 April. Seven previously represented political parties and one party previously elected in 2021 gained representation in the new parliament (including in two coalitions).<sup>118</sup> Seven political parties and coalitions met the one per cent eligibility threshold to receive annual public funding. Representation of women in the new parliament remained the same as in the outgoing National Assembly, with 58 women out of 240 members. The new parliament was inaugurated on 12 April.

The constitutional procedure to form a government involves the president's consultations with parliamentary groups, followed by successive provision of mandates to prime-minister designates, nominated by the largest, the second largest, and a third parliamentary group chosen by the president. If all three attempts to form a government fail, the president is to dissolve the parliament and call early parliamentary elections within two months from the parliament's dissolution. While there is no legal deadline for the president's consultations, once a mandate is given, each of the three parliamentary

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worked without interruption. Within 36 hours from the start of the vote count, 116,000 individual visits had been registered on the designated platform. Internet-users watched the video for an average of 11 minutes.

<sup>117</sup> Paragraph II.3.3.i of the 2002 Venice Commission's [Code of Good Practice in Electoral Matters](#) provides that "[w]here the appeal body is a higher electoral commission, it must be able ex officio to rectify or set aside decisions taken by lower electoral commissions".

<sup>118</sup> GERB-SDS won 69 seats, followed by PP-DB with 64, Revival with 37, DPS with 36, BSP with 23, while ITN regained parliamentary representation with 11 seats. More than 4 per cent of votes were cast against all contestants, with some 21,000 more voters choosing this option compared to the October 2022 elections and some 73,000 more compared to the November 2021 elections.

groups has only seven days to form a government. This relatively short period may be insufficient for complex policy negotiations.<sup>119</sup>

## XVII. RECOMMENDATIONS

These recommendations, as contained throughout the text, are offered with a view to further enhance the conduct of elections in Bulgaria and to support efforts to bring them fully in line with OSCE commitments and other international obligations and standards for democratic elections. These recommendations should be read in conjunction with past ODIHR recommendations that Bulgaria has yet to address.<sup>120</sup> ODIHR stands ready to assist the authorities of Bulgaria to further improve the electoral process and address the recommendations contained in this and previous reports.

### A. PRIORITY RECOMMENDATIONS

1. Any substantial amendments to electoral legislation should be adopted through an inclusive and consultative process, well in advance of the next elections.
2. Any introduction or change to election technologies should allow sufficient time for piloting, auditing, and certification of equipment and its functioning. The supporting documentation should be publicly available and election observers should have access to all aspects of introduction and use of the election technology.
3. Special temporary measures should be introduced to promote women's representation in elected office. These could include legislative requirements to place women in electable positions, gender-based assessments, training and capacity building programmes, and incentives for media and political parties to promote and increase gender equality.
4. Allegations of intimidation, coercion and vote buying should be examined promptly and effectively, and those responsible should be held accountable. Relevant authorities should educate voters on their rights and safeguards in place, and adopt measures to encourage reporting and providing evidence of any pressure, inducements, or other unlawful interference.
5. To ensure effective campaign finance oversight, the National Audit Office mandate and resources should be expanded to include monitoring of campaign finance and enquiry into potential breaches, such as unreported income and expenditure. Where this results in the identification of violations, effective, proportionate and dissuasive sanctions should be imposed for any violations.

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<sup>119</sup> In its [2016 Joint Opinion on the Draft Electoral Code of Armenia](#), ODIHR and the Venice Commission remarked that “coalition building implies complicated negotiations” and advised that the short deadline (3 days) for coalition formation envisioned in the draft Code should be extended (paragraph 30).

<sup>120</sup> In paragraph 25 of the [1999 OSCE Istanbul Document](#), OSCE participating States committed themselves “to follow up promptly the ODIHR’s election assessment and recommendations”. The follow-up of prior recommendations is assessed by the ODIHR EOM as follows: recommendations 7 and 10 from the ODIHR [final report on the April 2021 parliamentary elections](#) (April 2021 Final Report), recommendations 3 and 8 from the ODIHR [final report on the July 2021 early parliamentary elections](#) (July 2021 Final Report), recommendations 2 and 9 from the ODIHR [final report on the November 2021 presidential and early parliamentary elections](#) (November 2021 Final Report), and recommendation 8 from the ODIHR [final report on the October 2022 early parliamentary elections](#) (October 2022 Final Report) are fully implemented. Recommendations 21 and 22 from the April 2021 Final Report, recommendation 16 from the July 2021 Final Report, and recommendation 5 from the November 2021 Final Report are mostly implemented. Recommendations 1, 2, 5, 9, 11, 14 and 20 from the April 2021 Final Report, recommendations 2, 6, 9, 10, 11, 21 and 25 from the July 2021 Final Report, recommendations 10, 11, 12, 13, 20, 21, 25 and 26 from the November 2021 Final Report, and recommendations 2 and 4 from the October 2022 Final Report are partially implemented. See also the ODIHR [electoral recommendations database](#).

6. To uphold the freedom of expression, legislative measures should be taken to protect journalists and media workers from abusive court proceedings on defamation grounds, including early dismissal of manifestly unfounded lawsuits, the award of legal costs, compensation of damages, and proportionate and dissuasive penalties on the party who initiated abusive court proceedings.
7. Procedures for establishing and reporting voting results should be improved to eliminate inaccuracies in the results protocols. The counting procedures and the training of election commissioners could incorporate the use of appropriate assistive tools, including electronic results protocol.

## **B. OTHER RECOMMENDATIONS**

### **Election Administration**

8. To fulfil its mandate and ensure independence and efficiency, the CEC should be provided with the resources corresponding to its legal responsibilities, which should be aligned with its supervisory role over the electoral process.
9. To enhance stability and performance of the election administration, replacement of precinct election commission members should not be permitted after a reasonable deadline prior to election day. Creation of a register of experienced poll workers should be considered to replace those resigning after the deadline.
10. Relevant state and local authorities should, in co-ordination with civil society organizations, undertake further measures to ensure independent access of persons with disabilities to the entire election process.
11. To ensure consistent training on election procedures, the CEC should develop standard methodology for the preparation, delivery and assessment of election commissioners training.

### **New Voting Technologies**

12. Considerations could be given to conducting independent verification and certification of information and communication technology based (ICT) systems to ensure confidence in the process.

### **Voter Registration**

13. Restrictions on voting rights on the basis of intellectual or psychosocial disability, as well as blanket disfranchisement of prisoners should be removed.
14. Relevant authorities should consider auditing the voter registration system with a view to eliminating any erroneous and duplicate entries and adopting suitable legal provisions for citizens residing in illegal addresses and voters abroad.

### **Election Campaign**

15. To uphold a level playing field and equality of opportunities, the legal framework should cover the conduct of all public officials during the campaign, and contain provisions safeguarding against the abuse of state resources that amount to intimidation of voters. Timely and effective sanctions should be duly imposed.

## Media

16. To foster editorial freedom of public service media, consideration could be given to revising the strict equal participation rule or limiting its application to special election broadcasts only, granting public service media greater editorial independence in covering the election campaign in regular news and information programmes.
17. To protect the journalistic profession, to foster its watchdog role and to avoid confusion between journalism and political advertising, the public service media should consider avoiding the use of journalists in paid campaign material for electoral contestants, such as paid interviews and paid campaign reports.

## Participation of Minorities

18. The relevant authorities, in co-operation with Roma organizations, should support election awareness campaigns among Roma communities to encourage meaningful and inclusive political participation. Legislative incentives for internal party measures should be adopted, promoting minority participation within party leadership and as candidates.

## Electoral Dispute Resolution

19. The law should be amended to allow direct challenges against election results.
20. The legal framework should include effective mechanisms and remedies for ensuring compliance with the election law, such as clear sanctions for specific electoral offences and the enforcement of sanctions within appropriately expedited timeframes.

## Election Day

21. The Central Election Commission and the government should develop and provide the local authorities and election commissions uniform instructions and, as necessary, resources to ensure that the voting screens, the positioning of voting machines, the design of ballot boxes, and other elements of polling station set-up ensure ballot secrecy.

## Post-Election Developments

22. To ensure consistency and transparency in the results tabulation process, clear procedures for correcting errors and discrepancies in the voting results protocols, including criteria for recounting ballot papers, should be established.

**ANNEX I: FINAL RESULTS<sup>121</sup>**

<b>Candidate Lists</b>	<b>Votes</b>	<b>Per cent</b>	<b>Mandates</b>
BSP for Bulgaria (BSP)	225,914	8.93	23
Citizens for European Development of Bulgaria-Union of Democratic Forces (GERB-SDS)	669,924	26.49	69
Revival	358,174	14.16	37
There is Such a People (ITN)	103,971	4.11	11
People's Party Truth and Only the Truth	7,776	0.31	0
Coalition Neutral Bulgaria	10,505	0.42	0
Bulgarian National Unification	2,328	0.09	0
Together	8,755	0.35	0
Bulgarian National Union – ND	1,753	0.07	0
National Movement for Stability and Progress	6,764	0.27	0
Conservative Union of the Right	7,739	0.31	0
We Continue the Change-Democratic Bulgaria (PP-DB)	621,069	24.56	64
Movement for Rights and Freedoms (DPS)	347,700	13.75	36
The Left!	56,481	2.23	0
Bulgarian Rise	77,420	3.06	0
Morality, Initiative, and Patriotism	3,894	0.15	0
Bulgarian Social Democracy – Euroleft	2,633	0.10	0
Bulgarian Union for Direct Democracy	2,517	0.10	0
People's Voice	5,560	0.22	0
Socialist Party Bulgarian Way	730	0.03	0
Out of EU and NATO	6,598	0.26	0
Veselin Naydenov Mareshki – Independent (DEC 3)	638	-	0
Milen Ganev Milev – Independent (DEC 11)	286	-	0
Option 'I do not support anyone'	109,095		

Total number of registered voters prior to election day	6,622,013
Total number of voters who voted on election day	2,682,338
Total number of voters included in supplementary voter lists	240,396
Total number of votes cast	2,683,606
Number of votes cast by voting machines	1,557,037
Number of votes cast by paper ballots	1,126,785
Number of invalid votes (cast by paper ballot)	44,617
Number of valid votes	2,638,024

<sup>121</sup> Based on final results [data published by the CEC](#).

## ANNEX II: LIST OF OBSERVERS OF THE INTERNATIONAL ELECTION OBSERVATION MISSION

### ODIHR Core Team

de Zulueta	Tana	Italy	Head of Mission
Vashchanka	Vasil	Belarus	
Imamović	Mišo	Bosnia and Herzegovina	
Rantanen	Mauno	Finland	
Noc	Xavier	France	
Zarkua	Sophio	Georgia	
Milazzo	Giuseppe	Italy	
Ramadani	Gent	Norway	
Stanojev	Ivana	Serbia	
Stefanović	Jelena	Serbia	
Mora	Rosa	Spain	
Ovezdurdyev	Ruslan	Turkmenistan	

### ODIHR Long-term Observers

Gjodede	Dhimiter	Albania
Blatakova	Olga	Czech Republic
Jakubec	Aleš	Czech Republic
Benz	Alexandre	France
Lasserre-Fy	Véronique	France
Hötger	Kati	Germany
Speidel	Jürgen	Germany
Rustad	Asgeir	Norway
Heyum	Nicolas	Sweden
Lindberg	Karl	Sweden
Estermann	Johanna	Switzerland
Giambonini	Monica	Switzerland
Drigot	Daniel	United States of America
Wilhelm	Degee	United States of America

### ODIHR Short-term Observers

Beja	Sokol	Albania
Tabaku	Gevio	Albania
Hasečić	Kemal	Bosnia and Herzegovina
Sekulić	Sanja	Bosnia and Herzegovina
Aeineh Chi	Omid	Canada
Balash	James	Canada
Feday	Oleh-Roman	Canada
Hossein	Laurie-Ann	Canada
Jeffery	Megan	Canada
Kabuye	Richard	Canada
Kagaoan	Lowella	Canada
Nortey	Janet	Canada



Penney	Nicole	Canada
Welsh	Jack	Canada
Gajar	Darab	Czech Republic
Šotola	Jan	Czech Republic
Stolina	Hani	Czech Republic
Vichova	Veronika	Czech Republic
Zárubová	Marcela	Czech Republic
Albert	Annely	Estonia
Desrumaux	Clément	France
Gallet	Laura	France
Kalladjou	Linda	France
Lallemand	Jean-Charles	France
Le Hel	Pascale	France
Mazal	Ambroise	France
Bornhoeft	Petra	Germany
Bosze	Izabella Brigitta	Germany
Dr. Dietz	Andreas	Germany
Dr. Gerstl	Sibylle	Germany
Enssle	Patricia	Germany
Hafensteiner	Julian	Germany
Kempken	Daniel	Germany
Knöbelspies	Karin	Germany
Kortlaender	Jochen	Germany
Lingenthal	Edel-Rainer	Germany
Mueller	Christa	Germany
Rogler-Mochel	Hildegard	Germany
Schatz	Stefan Johann	Germany
Seeger	Roland	Germany
Setili	Luca	Germany
Smale	Benjamin	Germany
Smolka-Gunsam	Sabine	Germany
Stöckle	Evelyn	Germany
Werner	Robert	Germany
Wieland	Bianca	Germany
Bakos	Gábor	Hungary
Baktai	Erik	Hungary
Cserhati dr.	Eszter	Hungary
Ćupić	Ana	Montenegro
Eshuis	Peter Henk	Netherlands
Martens	Maria Elisabeth	Netherlands
van den Heuvel	Esther	Netherlands
Verkerk	Maarten	Netherlands
Alimani	Firijalje	North Macedonia
Dimitrioski	Zlatko	North Macedonia
Dam	Thomas	Norway
Hoff	Kristin Taraldsrud	Norway
Lund	Toril	Norway
Lyseng	Marianne	Norway
Ranheim	Rolf Christian	Norway
Roine	Eldrid	Norway
Čolović	Ivo	Serbia

Nikolić	Mia	Serbia
Mistrić	Karol	Slovakia
Cortiñas-Guntín	Antonio	Spain
de Esteban Rodrigo	Maria Elena	Spain
de Miguel Garcia	Roberto	Spain
de Orbe Anton-Pacheco	Marina	Spain
Macua Sanchez	Luis	Spain
Moreno de Cózar Landahl	Iván	Spain
Rabade Rodriguez	Olga Maria	Spain
Vázquez Fontao	Borja	Spain
Carlberg Bengtsson	Yvonne Margareta	Sweden
Cederblad	Linda Sabina Helen	Sweden
Genneby	Nina	Sweden
Green	Monica	Sweden
Hammar skjöld	Erik Hjalmar Knutsson	Sweden
Mihl zén	Emma Karin Victoria	Sweden
Nareskog	Hans	Sweden
Nordin	Björn Fredrik	Sweden
Persson	Erik Magnus Ingemar	Sweden
Rimsten	Eva	Sweden
Rogalska Hedlund	Anna	Sweden
Tallberg	Bo Pontus	Sweden
Wramen	Marko	Sweden
D'Esposito	Daniele	Switzerland
Kuthan	Fiorenza	Switzerland
Minder	Martin	Switzerland
Rigolio	Gianluca	Switzerland
Barilla	Anthony	United States of America
Beck	Christopher	United States of America
Burke	Brian	United States of America
Downes	Robert	United States of America
Fawell	Blanche	United States of America
Gangwish II	Richard	United States of America
Helwig	Robert	United States of America
Kennedy	Marsha	United States of America
Kornblum	Helen	United States of America
Levine	Karen	United States of America
Martz	Michael	United States of America
McDonagh	Joseph	United States of America
McDonough	Gerald	United States of America
McLaughlin	Kemberly	United States of America
McMillen	Hannah	United States of America
Monti	Garrett	United States of America
O'Connor	Tara	United States of America
O'Rourke	Iris	United States of America
Pojman	Ruth	United States of America
Prophete	Ginette	United States of America
Quesenberry	Raleigh	United States of America
Richards	Jacquelyn	United States of America
Scroggin	Deborah	United States of America
Sofradzija	Haris	United States of America
Taxell	Shapari	United States of America

Thornton	Caleb	United States of America
Walsh	Teresa	United States of America
Weiner	Lauren	United States of America
Young	Steven	United States of America
Zulfikar	Namra	United States of America

### Locally-recruited Short-term Observers

Haagen Jensen	Christian	Denmark
Kraft	Emma	Denmark
O'Grady	Aisling	Ireland
Alchinov	Dragan	North Macedonia
Vanderwall	Patricia	United States of America

### Parliamentary Assembly of the Council of Europe

Pabel	Katharina	MP	Austria
Efstathiou	Constantinos	MP	Cyprus
Affholder	Sylvie	Secretariat	France
Clapot	Mireille	MP	France
Didier	Marie	MP	France
Goy-Chavent	Sylvie	MP	France
Roller-Kaufman	Carine	Secretariat	France
Hunko	Andrej	MP	Germany
Janssen	Michael	MP	Germany
Weyel	Harald	MP	Germany
Protasiewicz	Jacek	MP	Poland
Szejna	Andrzej	MP	Poland
Cegonho	Pedro	MP	Portugal
Bulai	Iulian	MP	Romania
Niculescu-Tagarlas	Christian-Augustin	MP	Romania
Giovagnoli	Gerardo	MP	San Marino
Milosevic	Jelena	MP	Serbia
Martinez Ferro	Valentina	MP	Spain
Heer	Alfred	MP	Switzerland
Blencathra	David	MP	United Kingdom
Blencathra	Tara	MP	United Kingdom
Ustinova	Oleksandra	MP	Ukraine

## ABOUT ODIHR

The Office for Democratic Institutions and Human Rights (ODIHR) is OSCE's principal institution to assist participating States "to ensure full respect for human rights and fundamental freedoms, to abide by the rule of law, to promote principles of democracy and (...) to build, strengthen and protect democratic institutions, as well as promote tolerance throughout society" (1992 Helsinki Summit Document). This is referred to as the OSCE human dimension.

ODIHR, based in Warsaw (Poland) was created as the Office for Free Elections at the 1990 Paris Summit and started operating in May 1991. One year later, the name of the Office was changed to reflect an expanded mandate to include human rights and democratization. Today it employs over 150 staff.

ODIHR is the lead agency in Europe in the field of **election observation**. Every year, it co-ordinates and organizes the deployment of thousands of observers to assess whether elections in the OSCE region are conducted in line with OSCE commitments, other international obligations and standards for democratic elections and with national legislation. Its unique methodology provides an in-depth insight into the electoral process in its entirety. Through assistance projects, the ODIHR helps participating States to improve their electoral framework.

The Office's **democratization** activities include: rule of law, legislative support, democratic governance, migration and freedom of movement, and gender equality. ODIHR implements a number of targeted assistance programmes annually, seeking to develop democratic structures.

ODIHR also assists participating States' in fulfilling their obligations to promote and protect **human rights and fundamental freedoms** consistent with OSCE human dimension commitments. This is achieved by working with a variety of partners to foster collaboration, build capacity and provide expertise in thematic areas including human rights in the fight against terrorism, enhancing the human rights protection of trafficked people, human rights education and training, human rights monitoring and reporting, and women's human rights and security.

Within the field of **tolerance and non-discrimination**, ODIHR provides support to the participating States in strengthening their response to hate crimes and incidents of racism, xenophobia, anti-Semitism and other forms of intolerance. ODIHR's activities related to tolerance and non-discrimination are focused on the following areas: legislation; law enforcement training; monitoring, reporting on, and following up on responses to hate-motivated crimes and incidents; as well as educational activities to promote tolerance, respect, and mutual understanding.

ODIHR provides advice to participating States on their policies on **Roma and Sinti**. It promotes capacity-building and networking among Roma and Sinti communities, and encourages the participation of Roma and Sinti representatives in policy-making bodies.

All ODIHR activities are carried out in close co-ordination and co-operation with OSCE participating States, OSCE institutions and field operations, as well as with other international organizations. More information is available on the ODIHR website ([www.osce.org/odihr](http://www.osce.org/odihr)).