



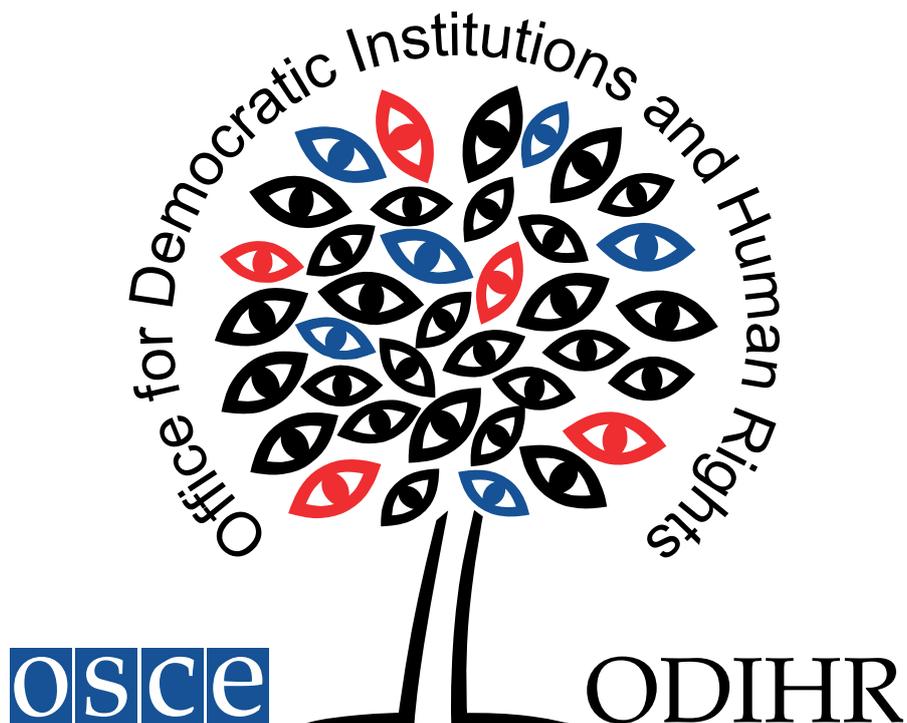
Office for Democratic Institutions and Human Rights

EUROPEAN PARLIAMENT ELECTIONS

6-9 June 2024

ODIHR NEEDS ASSESSMENT MISSION REPORT

November 2023 – January 2024



Warsaw
22 February 2024

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European Parliament Elections 6-9 June 2024

ODIHR Needs Assessment Mission Report November 2023-January 2024

I. INTRODUCTION

After expressions of interest from the European Parliament, in anticipation of official invitations from European Union Member States to observe the European Parliament elections scheduled to be held from 6 to 9 June 2024, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) to Brussels from 6 to 9 November 2023. In addition, ODIHR conducted a number of visits to meet with national-level authorities and other stakeholders in European Union Member States.¹ The NAM included Meaghan Fitzgerald, Head of the ODIHR Election Department, Keara Castaldo, ODIHR Senior Election Adviser, and Martina Barker-Ciganikova and Kseniya Dashutsina, ODIHR Election Advisers.

The purpose of the mission was to assess the pre-election environment and the preparations for the elections. Based on this assessment, the NAM recommends whether to deploy an ODIHR election-related activity for the forthcoming elections and if so, what type of activity best meets the identified needs. Meetings were held with officials from European and state institutions and the election administration, as well as representatives of European and national political parties, civil society organizations, media, and the international community. A list of meetings is annexed to this report.

ODIHR would like to thank the respective European and national institutions for their assistance in organizing the visit. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and for sharing their views.

II. EXECUTIVE SUMMARY

The European Union (EU) is an international organization constituting 27 European countries and governing common economic, social, and security policies; the European Parliament is its only directly elected institution. Voters across all 27 EU Member States will elect a total of 720 Members of the European Parliament (MEPs) between 6 and 9 June through proportional lists in 27 distinct nationally led electoral processes. Ahead of these elections, the number of seats was increased from 705 to 720, prompted by demographic changes in the EU since the 2019 elections.

The EU-level electoral legal framework remains largely unchanged since the previous elections to the European Parliament, which are regulated predominantly by national laws. Common principles for holding the European Parliament elections are outlined in the Treaty on European Union and include proportional representation, rules on thresholds, and positions incompatible with the mandate of an MEP. Several ODIHR NAM interlocutors indicated that they would support additional European regulations on certain aspects of the process, including decreasing the minimum voting age, creation of a transnational constituency, or legal quotas to promote women's participation as candidates, but existing draft amendments to this effect have not progressed in recent years. A new law, the Digital Services Act (DSA), applicable for the first time to these elections, aims to regulate the online information environment, including by limiting the spread of harmful content, such as disinformation and hate speech.

The elections will be implemented by the responsible institutions for managing electoral processes on the national level. Election management bodies vary in structure and composition across Member States,

¹ Representatives of the ODIHR NAM visited Latvia on 6-8 December 2023, Portugal on 9-12 January 2024, and Belgium on 22-26 January 2024.

which also diverge in the voting methods available, including whether alternative modes of casting ballots are possible and whether polling station procedures are exclusively paper-based or integrate any technologies. ODIHR has previously observed some efforts by Member States to facilitate the autonomous participation of persons with various types of disabilities in electoral processes, but ODIHR NAM interlocutors were generally of the opinion that considerable progress is needed across Member States to conform the conduct of elections with CRPD obligations. Interlocutors generally expressed a high level of confidence in the integrity and professionalism of the election management bodies and other institutions contributing to the administration of the elections at the European and national levels, as well as in the implementation of election-day procedures.

All EU citizens have the right to participate in European Parliament elections, and eligibility requirements for voters are legislated at the national level. Several ODIHR NAM interlocutors welcomed recent national-level initiatives to lower the minimum voting age to 16 in a few Member States. State practices vary on permitting their citizens to participate in their national election framework for European Parliament elections from abroad. A few interlocutors indicated potential weaknesses in the voter registration framework due to the decentralized control of voter lists across Member States and new but limited centralized mechanisms to prevent multiple voting, although most assessed that these risks would not impact the integrity of the election process.

The nomination of candidates is regulated by individual Member States within their national processes and only nationally registered parties may nominate candidates to the European Parliament. The eligibility of candidates is determined by European and national legislation, with States obligated to afford equal candidacy rights to citizens of other Member States, and other requirements such as a minimum age varying across States from 18 to 25 years. Given the proportional system of election and allocation of mandates across political party lists, many Member States do not permit independent candidates to stand for election to the European Parliament, despite previous ODIHR recommendations to facilitate this right in the context of national elections. Several ODIHR NAM interlocutors noted that further commitment is needed by most political parties to promote diversity in candidate lists.

No ODIHR NAM interlocutors expressed any concerns with respect to their ability to campaign freely. However, the European political parties only have a limited ability to campaign and the campaign regulations for contestants are primarily set by individual Member States and thus vary greatly. An institutional voter education and information campaign conducted primarily by the EU institutions focuses on encouraging participation rate and describing the impact of the European policies in the current geopolitical context. Interlocutors shared varying opinions on legislative initiatives to limit target advertising, acknowledging concerns related to personal data protection and the polarizing effect of such practices on political discourse. Threats related to disinformation and misinformation in election-related discourse were identified as a major concern by a large number of interlocutors, with many noting that existing strategies to counter these threats, including under the newly implemented Digital Services Act, are not yet fully effective and that additional co-ordinated efforts are needed.

Women represent almost 40 per cent of outgoing MEPs, but larger disparities remain common at the national level. The president of the outgoing Parliament is a woman as are 6 out of 14 vice-presidents, and only 6 out of 20 committee chairs. Several Member States have promulgated special temporary measures in the national electoral legislation to promote the participation of women in European elections by requiring parties to nominate a minimum number of candidates of each gender. Several European and national parties met by the ODIHR NAM described internal policies to advance the participation and visibility of women as candidates, though interlocutors generally emphasized that additional incentives are needed, including through amendments to electoral and political finance legislation.

The financing and oversight of activities of national political parties is exercised under applicable national law of respective Member States and vary significantly. Several ODIHR NAM interlocutors cited gaps in

regulations on the financing of European political parties, including an overlap of the competencies of various institutions involved in oversight, insufficient regulation of loans, contributions from member parties and organisations from outside the EU, and financing by European political parties of national referendum campaigns. Certain requirements are imposed on the expenditure of public funding by European-level political parties, which according to some interlocutors disproportionately affect smaller and new parties and their ability to campaign.

The media landscape across the Member States is diverse with distinct national and linguistic markets. Media freedoms and pluralism are provided for in the EU Charter on Fundamental Rights. ODIHR NAM interlocutors described a generally high standard of independent and investigative journalism available to citizens across Member States, and most did not anticipate major obstacles related to the access of national parties to respective media outlets, though some raised concerns related to media polarization and politicisation and a lack of transparency of media ownership and independence of media regulators in some Member States. A number of non-binding initiatives to improve the safety of journalists were recently launched, including to protect them from the observed growing practices of abusive litigation and other forms of harassment online and offline.

The EU-level legislation does not provide for a uniform election dispute resolution procedure within individual Member States. All disputes arising from the elections to the European Parliament are governed by the varied national rules and are subsequently adjudicated at the national level. While most ODIHR NAM interlocutors did not raise major concerns related to the accessibility and effectiveness of available appellate procedures, some interlocutors voiced concerns over the availability of effective remedy in certain Member States where there is a perceived lack of independence of the judiciary or lack of expedited review processes.

The electoral legislation across Member States provides differing levels of access of citizen, non-partisan and partisan, and international observers to various phases of electoral process, and in some cases, despite previous ODIHR recommendations, does not provide explicit rights of election observation. Practices likewise vary among political parties and civil society organizations and their efforts to observe election processes, including but not limited to election-day procedures, as well as public awareness of such initiatives and rights. All European Union Member States have facilitated previous ODIHR election-related activities.

All ODIHR NAM interlocutors emphasized the value of an ODIHR election observation activity and welcomed an external assessment and any potential recommendations to improve the European regulatory framework for the elections. No specific concerns were expressed regarding the respect for fundamental freedoms, or the work of election management bodies, in particular in conducting election day proceedings. However, a number of electoral issues were identified by interlocutors as meriting specific analysis. These include, in particular, the practical implementation of the legal framework, the conduct and regulation of online campaigns and political advertising, including in social networks, party and campaign finance and related controls, and lack of harmonization of certain administrative processes, in particular with respect to voter and candidate registration, across Member States.

On this basis, the ODIHR NAM recommends the deployment of a Special Election Assessment Mission (SEAM) for the upcoming 6-9 June European Parliament elections. Given the predominant role of EU Member States in the conduct of the elections, the ODIHR wishes to follow the elections on the level of individual States in a meaningful manner but with a focus on common challenges faced by Member States and the application of relevant European regulations at the national level. In addition to a core team of experts based in Brussels, the ODIHR NAM recommends deployment of regional experts who will undertake expert visits across a large number of the 27 EU Member States, taking into account available human and financial resources.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

The European Union (EU) is an international organization comprising 27 Member States that constitute a political, economic and policy group. According to its founding Treaties, the Union is based on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. The EU comprises four main administrative and legislative institutions with decision-making authority: the European Parliament, the European Council, the Council of the European Union and the European Commission. The European Parliament represents the citizens of EU countries and is the only EU institution that is directly elected. The Parliament shares equal legislative and budgetary powers with the Council of the European Union, but cannot initiate legislation, except related to its own elections. With the implementation of the Lisbon Treaty in 2009, the powers and role of the Parliament increased. The European Commission, which serves as the executive authority of the EU, can initiate legislation and is accountable to the Parliament. The main role of the Council of the European Union is to negotiate and put forward EU laws and co-ordinate policies; while the European Council defines the general policy direction and priorities of the EU, but does not pass any laws.

On 6-9 June 2024, elections will be held to elect 720 Members of the European Parliament (MEP) across all 27 EU Member States. The previous elections took place in June 2019 with MEPs from 190 national political parties gaining representation as members of seven political groups.²

The vast majority of ODIHR NAM interlocutors highlighted the importance of the elections given the current role and impact of European policies on global matters, including those related to security and the consequences of the war in Ukraine, climate, migration, as well as economic and social issues. Despite an increase in voter participation during the previous elections to the European Parliament, several interlocutors expressed concerns about the prospective participation rate for these elections, particularly relative to other national election contests. Many interlocutors identified the lack of public engagement, political polarization and associated trends of disinformation and harmful rhetoric, as well as concerns related to the state of the rule of law in a few Member States, as some of the main challenges for the upcoming elections.

While women are fairly well represented in political life at the European level, large disparities remain at the national level.³ As of 2023, 280 women (39.8 per cent) and 424 men (60.2 per cent) are members of the European Parliament.⁴ The president of the parliament as well as 6 out of 14 vice-presidents and 6 out of 20 committee chairs are women.⁵ In 2020, the European Commission adopted the EU Strategy for

² The political groups are organized not by nationality but by political affiliation. A minimum of 25 Members are needed to form a political group, and at least one-quarter of the Member States must be represented within the group. Members may not belong to more than one political group. Some MEPs do not belong to any political group and are known as non-attached Members. Currently these groups are EPP: Group of the European People's Party (Christian Democrats), 178 seats; S&D: Group of the Progressive Alliance of Socialists and Democrats in the European Parliament, 141 seats; Renew Europe, 101 seats; Greens/EFA: The Greens/ European Free Alliance, 72 seats; ECR: European Conservatives and Reformists, 66 seats; ID: Identity and Democracy, 60 seats; The Left: The Left – GUE/NGL, 37 seats, not attached MEPs, 50 seats.

³ As of 2023, 11 Member States legislated quota aimed to increase gender balanced representation at the European elections.

⁴ Data according to the [European Parliament website](#). Taking into consideration the varying numbers of MEPs elected across Member States, as of October 2023 the proportion of women MEPs varies from roughly 15 per cent (Romania, 5 of 33 members) to roughly 67 per cent (Luxembourg, 4 of 6 members).

⁵ See data on [vice-presidents](#) and on [committee chairs](#) according to the European Parliament's website.

Gender Equality.⁶ In June 2023, the Council approved the EU's accession to the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention).⁷

ODIHR has previously observed elections to the European Parliament in 2009.⁸ The expert group was deployed in 15 EU Member States and the Final Report included recommendations for the authorities on how electoral processes may be improved and brought more closely in line with OSCE commitments.

B. ELECTORAL SYSTEM AND LEGAL FRAMEWORK

By law, the European Parliament is composed of a maximum of 750 MEPs elected for a five-year term based on the principle of degressive proportionality, with a minimum threshold of six members per Member State. One Member State cannot have fewer than 6 or more than 96 seats. In September 2023, the Parliament approved the European Council's decision to increase the number of seats for the next legislative term, from 705 to 720, prompted by demographic changes in the EU since the 2019 elections.⁹ Several ODIHR NAM interlocutors stated that the current seat distribution formula does not ensure equality of the vote due to lack of proportionality between the population of Member States and the number of mandates received. A long-standing proposal to create a pan-European constituency with MEPs elected from transnational electoral lists, as supported by the Parliament's Constitutional Affairs Committee (AFCO) in its legislative proposals, was not supported by the European Council during its previous revision of the applicable legislation.

The European Parliament elections are regulated by EU-level legislation applicable to all Member States as well as national laws. Common principles for holding the EP elections are outlined in the Treaty on European Union (TEU), the Treaty on the Functioning of the European Union (TFEU), the EU Charter of Fundamental Rights, and the Electoral Act of September 1976, which was last amended in 2002.¹⁰ These common principles include proportional representation, rules on thresholds, and positions incompatible with the mandate of an MEP. Moreover, Council Directive 93/109/EC regulates suffrage rights of citizens of the EU residing in a Member State they are not nationals of. All other aspects are governed by national legislation of each Member State and vary considerably.

The EU-level electoral legal framework remains largely unchanged since the previous elections to the European Parliament. Most ODIHR NAM interlocutors underlined the need to review several regulatory gaps or inconsistencies at both the EU and national levels including related to voter and candidate registration, voting rights for voters abroad, provisions for alternative voting methods, controls on political finance and timelines for election dispute resolution. According to several ODIHR NAM interlocutors, repeated efforts to reform electoral legislation at the European level have failed due to the complexity and decentralized nature of the elections, and a lack of consensus and will among different stakeholders to address these issues.

⁶ See the [2020-2025 EU Strategy for Gender Equality](#), which states that “[t]he Commission will promote the participation of women as voters and candidates in the 2024 European Parliament elections, in collaboration with the European Parliament, national parliaments, Member States and civil society, including through funding and promoting best practices. European political parties asking for EU funding are encouraged to be transparent about the gender balance of their political party members”.

⁷ Currently, there is no specific EU legislation addressing violence against women and domestic violence. On 8 March 2022, the European Commission proposed a new directive on combatting violence against women and domestic violence. On 9 June 2023, the Council agreed on its position on the proposed directive. Among other things it intends to criminalise a number of offences across the EU such as non-consensual sharing of intimate images, female genital mutilation and cyber harassment.

⁸ See all previous [ODIHR reports on European Parliament elections](#).

⁹ Following these changes, France, the Netherlands, and Spain were each allotted two additional seats.

¹⁰ The rules governing operation of European Political Parties and foundations are set in Regulation 1141/2014, amended by the Regulations 2019/493 and 673/2018.

The need to modernize and harmonize certain elements of electoral legislation across all EU Member States was recognized through various legislative reforms processes. The 1976 Electoral Act was last amended by the European Council Decision 2018/994, which provides a set of obligatory and optional rules for the States to implement but has not entered into force as not all States have implemented it through their respective legislative procedures.¹¹ The obligatory rules include a minimum threshold of two per cent of votes cast in Member States which comprise more than 35 seats, a three-week deadline for candidate nomination processes, measures to prevent multiple voting, and designation of a responsible authority to facilitate information exchange on voters participating outside of their country of residence.¹² Several ODIHR NAM interlocutors indicated that they would support regulations on additional aspects of the process, including decreasing the minimum voting age, creation of a transnational constituency, or legal quotas to promote women's participation as candidates. These and other additional measures were included among draft amendments proposed by AFCO in 2018 and 2022, but the proposals were either not advanced by the European Council or have yet to progress.¹³

C. ELECTION ADMINISTRATION

The European Parliament elections will be implemented by the responsible institutions for managing electoral processes on the national level. Election management bodies vary in structure and composition across States, with electoral processes managed by relevant ministries or independent commissions or agencies, and comprised of nonpartisan and/or partisan appointees, public employees, or volunteers, and in some cases judicial representatives. National legislation also prescribes differing requirements on the diversity of composition of election management bodies, including on the basis of gender, and practices differ related to the collection of demographic data on participation in election management bodies.¹⁴ Amid this variability, ODIHR NAM interlocutors generally expressed a high level of confidence in the integrity and professionalism of the election management bodies and other institutions contributing to the administration of the elections at the European and national levels, as well as in the implementation of election-day procedures. No substantial concerns were raised to the ODIHR NAM related to the decentralization and lack of harmonization of the respective election management processes, though some acknowledged challenges related to non-harmonized timelines for voter and candidate registration.

On the European level, the European Commission's Directorate-General for Justice and Consumers facilitates a co-operative network of Member State election management bodies to exchange information on common challenges. The network holds semi-annual meetings, including in the run-up to the forthcoming European elections. The Directorate-General for Communications Networks, Content and Technologies likewise organizes activities with Member State authorities related to certain aspects of election administration, such as tabletop exercises related to rapid-response scenarios and cybersecurity strategies. These initiatives were assessed highly by various stakeholders met by the ODIHR NAM, including representatives of election management bodies and other national authorities.

¹¹ See a [2021 study](#), commissioned by the European Parliament's Policy Department for Citizens' Rights and Constitutional Affairs at the request of the AFCO, describing challenges in unifying European elections across States.

¹² Additional measures that Member States may implement include a maximum threshold of 5 per cent, ballots displaying names and logos of the European political parties affiliated with national parties, absentee voting, and the possibility of voting from countries outside the EU.

¹³ In 2022, AFCO proposed to introduce common minimum age requirements of 16 and 18 years to vote and to be elected, respectively; to guarantee rights to voting abroad including from outside the EU; to provide for alternative voting methods such as postal voting, early voting, or use of new voting technologies to facilitate voting. Other suggestions included introduction of a fixed election day for all Member States, a unified campaign period commencing eight weeks prior to election day, and creation of a Union-wide consistency where uniform electoral systems and procedures apply.

¹⁴ The European Commission, in its [2023 Recommendation](#) on inclusive and resilient electoral processes, recommended that Member States encourage the participation of women in election administration.

The voting methods available to participants in the upcoming elections vary by Member State, including whether alternative modes of casting ballots are possible outside of polling stations, such as postal voting for in-country or out-of-country voters, and whether polling station procedures are exclusively paper-based or integrate any technologies, including electronic identification or voting procedures as well as assistive technologies for persons with disabilities. Previous reports of the AFCO have advocated for Member States to explore alternative voting methods as well as the possibility to vote on designated early-voting days.¹⁵ ODIHR has previously observed some efforts by Member States to facilitate the autonomous participation of persons with various types of disabilities in electoral processes, but ODIHR NAM interlocutors were generally of the opinion that considerable progress is needed across Member States to conform the conduct of elections with CRPD obligations.¹⁶

Concurrent national or local elections will be held *inter alia* in Belgium, Ireland, Italy, Malta, and Romania during the European Parliament elections. ODIHR NAM interlocutors described both benefits and disadvantages of administering national elections concurrently with EP elections, citing the administrative and financial efficiency of the concurrent processes but potentially divergent timelines for the administrative deadlines as well as different rules and obligations related to campaigning and media coverage. Many interlocutors noted that public awareness and interest is generally higher in relation to national election processes in comparison to the European elections, and that holding the elections concurrently may help to bolster participation in the latter, or may result in the national campaign displacing information and debates related to European elections in the public discourse.

D. VOTER REGISTRATION

All EU citizens of voting age have the right to participate in European Parliament elections.¹⁷ Voter eligibility is otherwise regulated by national legislation and varies across Member States. The minimum age requirement for voting varies from 16 to 18 years.¹⁸ Several ODIHR NAM interlocutors expressed support for individual States to lower the voting age, and the AFCO has previously called for a harmonized minimum voting age of 16 across Member States.¹⁹ Many states restrict the voting rights of persons serving a prison sentence or with a criminal conviction and these restrictions range in scope; ODIHR has previously criticized blanket restrictions on voting rights on those serving prison sentences or on the basis of criminal conviction regardless of the severity of the crime. Voting is compulsory in Belgium, Bulgaria, Cyprus, Greece and Luxembourg.²⁰ Many Member States retain restrictions on voting rights in relation to legal incapacity. ODIHR has previously called on states to remove all restrictions on voting rights on the

¹⁵ In a [July 2023 report](#), the AFCO “[encouraged] the introduction of postal voting to ensure that the inability to go to the polling stations on Election Day does not prevent citizens of the Union from exercising their right to vote” and in a 2022 report noted that “obstacles accessing voting booths and polling stations should be addressed, the possibility for postal, proxy, advance and electronic voting should be revisited”.

¹⁶ The umbrella organization European Disability Forum, together with EU-ElectionWatch.org, has [published considerable data on various legal and practical measures](#) in place which positively or negatively impact the political participation of persons with disabilities in elections in Member States. The European Commission has initiated a subgroup on the preparation of a guide of good electoral practice on the electoral participation of citizens with disabilities.

¹⁷ European Union legislation requires all Member States to provide the right to vote in EP elections to all legal residents who are citizens of any Member State. States may permit the participation of legal residents who are not citizens of any EU Member State (see the [12 September 2006](#) decision of the European Court of Justice in *Spain v. United Kingdom*).

¹⁸ The minimum voting age is 16 years in Austria, Belgium (despite a minimum age of 18 for all other elections), Germany, and Malta, as well as in Hungary (for married persons, otherwise 18 years), and 17 years in Greece.

¹⁹ Paragraph 17 of the [July 2023 report](#) of the AFCO “[r]eiterates its call for the introduction of a harmonised age for the right to vote and stand as a candidate across Member States in order to avoid discrimination; recommends the introduction of a minimum voting age of 16, without prejudice to existing constitutional orders, to reflect current rights and duties that Europe’s young people already have in some Member States”.

²⁰ ODIHR has previously criticized compulsory voting policies as contrary to international good practice, which envisages a right to abstain; ODIHR NAM interlocutors were of mixed views, with some iterating that compulsory voting strengthens participation, including among youth.

basis of disability, including on the basis of an individualized court decision in connection with legal incapacity, as contrary to the objectives of the CRPD.

EU citizens may be eligible to participate in multiple Member States. EU regulations on the European Parliament elections prohibit the participation of the same voter in multiple Member States. Voter registration across Member States is generally passive or automatic, although many States require citizens who wish to participate from abroad to actively register. States vary on permitting their citizens to participate in their national election framework for European Parliament elections from abroad, in part due to existing national practices for elections and in part due to difficulties differentiating citizens who are eligible to participate in other Member States in which they are residents.²¹

The European Commission's Directorate-General for Justice and Consumers provides an encrypted tool through which, on a voluntary basis, Member States may bilaterally exchange data on citizens of another Member State who have requested to vote, so that each State can make efforts to communicate to such voters, potentially add a designation in voter lists as appropriate, and avoid duplicate registrations that can lead to the same individual voting in multiple countries. Some ODIHR NAM interlocutors indicated potential weaknesses in the voter registration framework due to the decentralized control of voter lists and limited central mechanisms or legal regulations to prevent or detect double voting, as well as incongruent timeframes and deadlines for voter registration across States which can complicate accurate exchange of information. However, most assessed that these risks would not impact the integrity of election day procedures or results. Several interlocutors emphasized that, given relatively low turnout rates in the European Parliament elections, they would not be supportive of additional controls on the registration of voters residing outside of their country of citizenship.

E. PARTY AND CANDIDATE REGISTRATION

The recognition of political parties with a specific European legal status is provided for by the Treaty on European Union and the Charter of Fundamental Rights of the European Union²² and their activities are primarily governed by the 2014 EU Regulation on the Statute and Funding of European Political Parties and European Political Foundations.²³ The Authority for European Political Parties and Foundations is in charge of registering, controlling and imposing sanctions on European political parties and their affiliated European political foundations.

To register as a European political party, the party must be based in an EU Member State according to its statutes, and must either have members in the European, national or regional legislative bodies in at least one quarter of Member States (seven), or its member parties must have received at least three per cent of the vote in at least seven states in the most recent European Parliament elections. Its member parties must have participated in elections to the European Parliament or have publicly expressed the intention to participate in the next elections.

European political parties may not nominate candidates for the European or national elections; the nomination of candidates is regulated by individual Member States within their national processes.

²¹ See [September 2023 research by the European Parliamentary Research Service](#) on existing policies for voting abroad. A European Parliament legislative resolution of 3 May 2022 on the proposal for a Council Regulation on the election of the members of the European Parliament by direct universal suffrage states: "not all Member States give their citizens the possibility of voting from abroad, and among those that do, the conditions for granting them the right to vote vary greatly; whereas granting all citizens of the Union residing outside the Union the right to participate in elections would contribute to electoral equality; whereas, however, Member States need to coordinate their administrative systems better in order to prevent voters from voting in two different Member States".

²² Article 10(4) of the TEU and Article 12(2) of the Charter state that "political parties at European level contribute to forming European political awareness and to expressing the political will of citizens of the Union".

²³ See Regulation (EU, Euratom) No 1141/2014 of the European Parliament and of the Council of 22 October 2014 on the statute and funding of European political parties and European political foundations.

European Union legislation requires all candidates to the European Parliament to be citizens of Member State and to be subject to the same conditions on length of citizenship and of residency as nationals of the Member State in which they want to stand. State authorities must bilaterally liaise to verify the eligibility of candidates who are nationals of another Member State than that in which they are applying to stand. Members of national parliaments and other elected or appointed officials of national governments cannot stand for election to the European Parliament, nor can employees of EU institutions.

Additional stipulations on candidate eligibility are regulated by national legislation, including the minimum required age of candidates, which varies from 18 to 25 across states.²⁴ The Parliament in its proposed electoral reforms has called for a harmonized minimum age “in order to avoid discrimination”, and several ODIHR NAM interlocutors expressed support for potential European and national efforts to lower the minimum age of eligibility, often citing the age of 18.²⁵ Given the proportional system of election and allocation of mandates across political party lists, many Member States do not permit independent candidates to stand for election to the European Parliament, despite previous ODIHR recommendations to facilitate this right in the context of national elections, in line with OSCE commitments and international standards.

The inclusivity and diversity of candidates nominated in party lists for the European Parliament generally remains the prerogative of political parties at the national level. Legal amendments proposed by AFCO in 2018 and in 2022 included mandatory gender quotas on candidate lists for European elections in all Member States, but these amendments have not progressed. Many Member States have promulgated special temporary measures in national electoral legislation to promote the participation of women in European elections by requiring parties to nominate a minimum number of candidates of each gender. Several European and national parties met by the ODIHR NAM described internal policies to advance the participation and visibility of underrepresented groups as candidates, usually focusing on women and youth, including practices such as diversity rapporteurs, voluntary quotas for gender representation on candidate lists, and designated campaign funds. Several ODIHR NAM interlocutors noted that further commitment is needed by most political parties to promote diversity in candidate lists and to improve the representation of ethnic and linguistic minorities as well as persons with disabilities in party activities.²⁶

Most ODIHR NAM interlocutors expected smooth administrative processes for candidate nomination with the national authorities. Some European parties met by the ODIHR NAM described challenges for their member parties to collect the requisite number of signatures in certain Member States, describing a resource-intensive exercise in certain environments to reach sufficient voters. Several interlocutors noted that the lack of harmonization of deadlines for candidate registration procedures, ranging broadly across Member States in the number of days prior to the voting day(s), creates different campaign conditions across Member States and impacts the pre-election experience of voters given varying amounts of time to acquaint with candidates. Other interlocutors were of the view that the *de facto* campaign timeframes created by the candidate nomination deadlines could differ across Member States without impacting the equal treatment of contestants within individual States’ contests.

The European political parties have an indirect role in the selection of the president of the European Commission, who is elected by the European Parliament on the basis of a nomination proposed by a qualified majority of the European Council, by putting forward lead candidates (*Spitzenkandidaten*) for the position during the elections to the European Parliament. While the TEU indicates that the European Council should “take into consideration the European Parliament elections” in nominating a president,

²⁴ According to the [European Parliamentary Research Service](#), Belgium, Bulgaria, Cyprus, Czechia, Estonia, Ireland, Latvia, Lithuania, Poland and Slovakia require a minimum age of 21, Romania - 23, and Italy and Greece - 25. All other states require a minimum age of 18 to stand. As of October 2023, members of the European Parliament range in age from 25 to 83.

²⁵ See the [14 September 2023 European Parliament resolution](#) on parliamentarism, European citizenship and democracy.

²⁶ The European Disability Forum has published a [checklist](#) for the accessibility and inclusivity of political campaigns.

there is no legal requirement that the nominee be among the lead candidates proposed by political parties, which some ODIHR NAM interlocutors assessed as potentially confusing or misleading voters as to the impact of the election results on the Commission presidency.²⁷

F. ELECTION CAMPAIGN

At the EU level, fundamental freedoms of association, peaceful assembly and expression are provided for by the Charter of Fundamental Rights of the European Union. No ODIHR NAM interlocutors expressed any concerns with respect to their ability to campaign freely.

As with regulations on administering the elections, rules on conducting election campaigns are primarily set by individual Member States and thus vary greatly. The European political parties only have a limited ability to campaign and to function as genuine political parties as they cannot field candidates or campaign in favour of associated national parties or candidates. Nonetheless, European political parties are allowed to promote their party manifesto, containing the main policy principles of their party.²⁸

The European political parties the ODIHR NAM met with, expressed their intention to adopt their manifestos and to hold a party congress to choose their lead candidates within the first quarter of 2024. All party representatives stressed the inclusive and consultative processes they have for the adoption of the manifesto together with member parties at the national level, civil society organizations, trade unions and other stakeholders. Some parties informed the ODIHR NAM that they aim to designate well-known party representatives to tour multiple Member States and appear at campaign events on behalf of the European political party. At the European level, a series of televised debates among the leading candidates is envisaged in the last two months of the campaign with the final debate being aired by the *Eurovision* TV channel in all 27 Member States.

Most national political parties informed the ODIHR NAM that they were still developing their campaign programmes and strategies, and that while traditional in-person canvassing remains important, particular prominence will be given to online promotion on social networks and media appearances in the form of televised debates. The focus of the campaign is expected to be country- and context-dependent, with attention both on local and European developments, including socio-economic issues, migration, together with the consequences of the war caused by the Russian Federation's invasion of Ukraine.

Ahead of the elections, the European institutions, in co-operation with European and national civil society organizations as well as business partners, are conducting an institutional voter education and information campaign mainly focused on encouraging voter participation. The ODIHR NAM was informed that beyond communicating the date of the elections and the voting methods, a main message of the information campaign is to highlight the increasing importance of the European Union and impact of its decision-making and policies on citizens' daily lives. The outreach strategy for the campaign was developed in consultation with civil society organizations, including the European Disability Forum, and materials are available in easy-to-read format. The campaign is subject to national legislation on such public communications within Member States. A few ODIHR NAM interlocutors raised concerns over the extent to which the campaign could be perceived as political and whether its messages would overlap with those of the dominant party in the EP.

Many ODIHR NAM interlocutors, representing both European and national-level institutions and organizations, expressed concerns about the spread of fake news and disinformation, including outside of the campaign period, and its potential impact on the quality of the information space for voters and other electoral stakeholders. While welcoming the multiple current strategies to prevent and control

²⁷ In 2019, following difficulties in the European Council to approve a majority candidate, the nominated and ultimately appointed president of the European Commission was not among the lead candidates put forward by political parties.

²⁸ The European political groups, which are associated with the parties have no right to campaign at all.

disinformation in electoral processes, interlocutors stressed that further co-ordinated efforts involving the EU institutions, individual Member States, online platforms as well as civil society organizations are needed.²⁹ In February 2024, a group of major technology companies signed an Accord in which they commit to make efforts to counteract AI-generated content that could cause election-related disinformation.³⁰ A vote on the EU Artificial Intelligence Act is expected in April.

The upcoming elections follow the adoption of the Digital Services Act (DSA) in November 2022, which aims to regulate the online information environment, including by limiting the spread of illegal and harmful content, such as disinformation and hate speech, by establishing a set of obligations for private actors, such as online platforms, social networks, application stores, and by providing user protections, such as requiring online platforms to provide more transparency on the use of algorithms and recommended content in presenting information to users. The new legislation, applicable to all platforms as of 17 February 2024, is expected to impact the conduct of online campaigns, as under the DSA rules, online platforms, including social networking platforms, must implement ways to prevent and remove posts containing illegal content, while simultaneously providing the means to report this type of content. Some companies, including Google and Meta, have announced new measures in place to comply with the DSA.³¹ On 8 February 2024, the Commission launched a public consultation to seek views on draft DSA guidelines which aim to present applicable online platforms with best practices and possible measures to “mitigate systemic risks that may threaten the integrity of democratic electoral processes”; the consultative process will last until 7 March.³² ODIHR NAM interlocutors generally welcomed the DSA as a step forward, and positively noted that it facilitates more institutionalized co-operation with online platforms, but some emphasized the need for clearer definitions of types of content and of what constitutes systemic risks. ODIHR NAM interlocutors also generally welcomed ODIHR’s assessment of the DSA’s application in the elections.

The enforcement of and compliance with the DSA is conducted by the Commission together with relevant national authorities, which are required to designate a Digital Services Co-ordinator to supervise the national implementation. In case of non-compliance, online platforms may be fined up to 6 per cent of their annual revenue. Continued refusal to comply with the legislation can lead to temporary suspension of services within the EU. In December 2023, the EU opened infringement proceedings into X, previously known as Twitter, related to non-compliance with DSA provisions on content moderation.³³

On 6 November 2023, a provisional agreement on the Regulation on the transparency and targeting of political advertising was reached by the European Parliament, Council and the European Commission.³⁴ The Regulation aims to achieve a higher level of transparency in political advertising and tackle

²⁹ Some of the efforts include *inter alia* the Commission’s 2018 [Code of Practice on Disinformation](#), followed by the [2022 Strengthened Code of Practice on Disinformation](#), which establish voluntary standards on preventing and reacting to disinformation; the Commission’s 2018 Communication [Tackling online disinformation: a European Approach](#), which outlines the specific measures to tackle disinformation effectively as well as actions to raise public awareness about disinformation; the 2018 [Action Plan against Disinformation](#), which envisaged a Rapid Alert System and was designed “with the aim of improving the capabilities of Union institutions to detect, analyse and expose disinformation as well as to strengthen co-ordinated and joint responses to disinformation”. The 2020 [European Democracy Action Plan](#), further updated by the December 2023 Defence of Democracy Package, set countering disinformation as one of its three specific priorities. The EU has also developed a specific [toolbox](#) to counter foreign information manipulation and interference (FIMI).

³⁰ See the text of the “[Tech Accord](#)”. See also [2023 research by Algorithm Watch](#) on the impact of AI on election-related misinformation.

³¹ See examples of measures implemented by [Google](#) and [Meta](#). The DSA applies to all providers that offer services in the EU, regardless of their place of establishment. Certain types of platforms with more than 45 million monthly users within the EU are obliged to conduct regular risk assessments, including related to disinformation campaigns, and to share information and user control of content algorithms.

³² See the [full Guidelines](#) on the website of the European Commission.

³³ See the [Commission’s press release on the matter](#).

³⁴ The agreement was based on the proposal of the EC as part of the European Democracy Action Plan to complement the Digital Services Act. The provisional agreement needs to be formally adopted by both the EP and EC.

information manipulation and foreign interference in elections.³⁵ It includes strict limits on the use of targeting and advertising techniques, harmonises requirements for political advertising and bans foreign actors from sponsoring political ads before elections.³⁶ Moreover, the draft defines political advertising, and establishes a blanket ban on profiling using special categories of personal data. The new rules will only apply 18 months after their entry into force, with the exception of definitions provided and a “non-discrimination clause”, which are applicable for the upcoming 2024 elections.³⁷ ODIHR NAM interlocutors shared varying opinions on potential European and national legislation to limit target advertising, with most welcoming the proposals as an improvement, acknowledging concerns related to personal data protection as well as the polarizing effect of such targeting on political discourse. Others described practical benefits of such targeting and expressed concerns that the regulations could hamper the freedom of expression. Several stated that further guidelines are needed to provide sufficient clarity.³⁸

G. POLITICAL PARTY AND CAMPAIGN FINANCE

To be entitled to public funding from the general budget of the European Union, European political parties must comply with certain criteria, including being represented in the EP at least by one MEP, registered by the APPF and not to be sanctioned by it.³⁹ According to some ODIHR NAM interlocutors these requirements disproportionately affect smaller and new parties and their ability to campaign.⁴⁰ Public funding can account for 90 per cent of the expenditures of the European political parties, and 10 per cent should be covered by parties’ own resources, including membership fees, donations and loans. Of the total funding amount, 90 per cent is distributed proportionately based on the number of affiliated MEPs, and 10 per cent is allocated in equal amounts to all parties. This funding cannot be used to fund campaigns of national political parties or candidates.

Requirements for income and expenditure, reporting, disclosure, and oversight of party and campaign finance of the European political parties are governed by the Regulation 1141/2014, last amended in 2018, and by national laws of each Member State applicable for national political parties’ campaigns.⁴¹ According to some ODIHR NAM interlocutors, Regulation 1141/2014 can benefit from further review to eliminate certain gaps, including overlap of the competencies of various institutions involved in oversight, insufficient regulation of loans, contributions from member parties and organisations from outside the EU, and financing by European political parties of national referendum campaigns.⁴²

³⁵ See the European Council [Press Release](#).

³⁶ The [agreement](#) bans provision of advertising services to third country sponsors three months before an election or referendum, and requires creation of a publicly accessible repository to collect all online political advertisements and related information for up to seven years.

³⁷ The non-discrimination clause stipulates that services cannot be restricted solely based on place of residence or establishment of the sponsor of political advertising.

³⁸ See, for example, [February 2024 analysis](#) by Access Now and [August 2023 analysis](#) by Algorithm Watch.

³⁹ Any party fulfilling these criteria can apply for funding for a given financial year and send to the EP by 30 September of the preceding financial year its application and an estimated budget.

⁴⁰ See the funding [amounts](#) allocated for the European Political Parties in 2023.

⁴¹ See the 2021 [2021 Report](#) on the application of Regulation (EU, Euratom) No 1141/2014 on the statute and funding of European political parties and European political foundations, which lists a number of issues and suggestions for improving the regulation.

⁴² See [Opinion 01/2022](#) of the European Court of Auditors concerning EC’s proposal for a Regulation on the statute and funding of European political parties and European political foundations. See ODIHR’s [Submission](#) to the European Commission and to the European Parliament on Preliminary Comments on Reforming Regulation 1141/2014 of the European Parliament and of the Council. See the EC’s [proposal](#) to amend Regulation 1141/2014, which includes regulating political advertising, enhancing transparency, strengthening the link between European political parties and their member parties, gender equality, regulating referendum campaigns, and allowing private funding with own resources.

Citizens and legal entities may annually donate to European parties up to EUR 18,000 per year and per donor.⁴³ The law prohibits donations from anonymous donors, from public authorities and entities over which such a public authority may exercise a dominant influence, third countries, and from country of residence or seat, and in case of legal entities, also by whom such entities are controlled.⁴⁴

The APPF is the primary body responsible for campaign finance oversight of the European political parties' funds.⁴⁵ The European Court of Auditors audits the EU's budgetary revenues and expenditures, including in relation to political party funds, and delivers opinions on the accuracy and compliance of annual accounts with applicable rules and regulations. European political parties submit reports on their income and expenditure on an annual basis, and for the six months prior to elections must report this information to the APPF in writing on a weekly basis. There are no time limits for APPF to review these reports.⁴⁶ Possible sanctions for violations of campaign finance rules by a European political party or foundation include de-registration, loss of public funding and fines. According to some ODIHR NAM interlocutors, these are often audited late and enforcement of the rules is lacking due to limited mandate of APPF to investigate possible violations.

The financing and oversight of activities of national political parties is exercised under applicable national law of respective Member States and vary significantly.

H. MEDIA

The media landscape across the Member States is diverse with distinct national and linguistic media markets. Media freedoms and media pluralism are provided for in the EU Charter on Fundamental Rights. ODIHR NAM interlocutors described a generally high standard of independent and investigative journalism available to citizens across Member States, and most did not anticipate major obstacles related to the access of national parties to respective media outlets, though some noted challenges related to polarization. The 2020-2022 Rule of Law Reports of the European Commission, and the Media Pluralism Monitor by the European University Institute, have raised some concerns about the politicisation of the media, safety of journalists and particularly women media professionals, lack of transparency of media ownership and lack of independence of media regulators in several EU Member States.⁴⁷ In a number of Member States, ODIHR has observed harassment and attacks on journalists online and offline and the growing use of strategic litigation against journalists. Since the last European Parliament elections, a number of non-binding initiatives to improve the safety of journalists, including by protecting them from abusive litigation, were launched.⁴⁸

⁴³ European political parties and European political foundations shall immediately report to the APPF "single donations" exceeding EUR 12,000.

⁴⁴ In [ACRE v Parliament, case T-107/19](#), the General Court of the European Union ruled that parties established outside the EU cannot donate to the European political parties as they cannot be considered as political parties under the Regulation 1141/2014.

⁴⁵ Moreover, the control is also exercised by the Authorising Officer of the European Parliament.

⁴⁶ According to [ODIHR's 2021 Submission of Preliminary Comments to the European Commission and European Parliament](#), "for the financial year 2019, information on donations was supposed to be provided by European parties and foundations by the end of June 2020 at the latest. Yet, it was not until late February 2021 that the list of donations and contributions provided by the ten European parties - virtually information that was merely copy-pasted into a single file - was published by the APPF". In the 25 January 2021 [Decision](#) in case 1094/2020/DL on how the APPF ensures transparency of information about European political parties and foundations, the European Ombudsperson stated information displayed by the APPF about some of the parties lacks transparency and recommended APPF to improve its website to ensure that the information provided is clear, complete, extractable and comparable.

⁴⁷ See the [2022](#), [2021](#) and [2020](#) Rule of Law reports as well as the [report](#) by the Media Pluralism Monitor.

⁴⁸ In 2021, the Commission issued a [Recommendation to strengthen the safety of journalists and other media professionals](#). In 2022, the Commission proposed new initiatives to improve the [protection of journalists and human rights defenders from abusive court proceedings \(SLAPPs\)](#).

In addition to national media regulations, the conduct of audio-visual media at the European level is governed primarily by the Audiovisual Media Services (AVMS) Directive, most recently amended in 2018, as well as the Digital Services Act. The revised Directive provides EU-wide media content standards for all audio-visual media, including television broadcasters as well as on-demand video services and video-sharing platforms.⁴⁹ A new European Media Freedom Act, proposed by the Commission in September 2022 with the intention to facilitate the operation of public and private media within the EU internal market and to build on the protection of online content envisaged by the DSA, is currently being legislated.⁵⁰ The law will not be applicable during the upcoming elections.

The European Regulators Group for Audio-visual Media Services (ERGA) constitutes a network of national-level audio-visual media regulators with a rotating chair from among Member States. Established in 2014 and empowered with the 2018 updates to the AVMS Directive, ERGA provides expertise and policy recommendations to the European Commission and guidance to its member entities on the implementation of European policies.⁵¹ ODIHR NAM interlocutors described positive and effective cooperation with ERGA and valued its role in facilitating the exchange of information and issuing recommendations related to EU policy directives, including on new digital policies in advance of the upcoming elections.

I. ELECTION DISPUTE RESOLUTION

The EU-level legislation does not provide for a uniform election dispute resolution procedure within individual Member States. All disputes arising from the elections to the European Parliament are governed by the varied national rules and are subsequently adjudicated at the national level. ODIHR has previously recommended to include the possibility of an appeal to a judicial body in cases of electoral disputes and appeals regarding decisions on results, notwithstanding the established legal basis for existing complaint procedures in Member States. While most ODIHR NAM interlocutors did not raise major concerns related to the accessibility and effectiveness of available appellate procedures, some interlocutors voiced concerns over the availability of an effective remedy in certain Member States, citing a lack of expedited review processes or a perceived lack of independence of the bodies adjudicating election-related disputes.

According to the TFEU, a national court can decide to initiate the preliminary reference procedure with the Court of Justice of the European Union (CJEU) when an issue of EU law or compatibility of national law with EU law is raised in a domestic case by one of the parties.⁵² However, the CJEU reviews cases according to lengthy deadlines, which do not provide for resolving election-related disputes within the timeframe of the electoral process.

J. ELECTION OBSERVATION

All Member States, as participating States of the OSCE, have recognized in the 1990 Copenhagen Document “the presence of observers, both foreign and domestic, can enhance the electoral process” and have committed to invite observers from other participating States and from relevant national and

⁴⁹ In May 2022, the Commission [referred](#) five Member States to the EU Court of Justice over the failure to transpose the revised Directive and thus not enabling citizens of the five countries to rely on the amended provisions.

⁵⁰ Once formally approved by the European Parliament and Council and adopted, the regulation will become binding and applicable in all Member States after 15 months. The new rules would include requirements on Member State legislation related to editorial freedom of media, protection of journalistic sources, transparency of media ownership and public advertising expenditures, and sustainable funding for public media. The law also envisages the establishment of an independent European Board for Media Services comprised of national media authorities, to support the Commission in issuing guidelines on media regulatory matters and promote consistent application of the EU media legislation across all Member States.

⁵¹ See, for example, ERGA’s [October 2021 recommendations](#) for updating the European Code of Practice for Disinformation as well as its [July 2023 assessment](#) of the 2022 Strengthened Code of Practice on Disinformation.

⁵² The Court confirmed to the ODIHR NAM that individual complainants may not submit such complaints directly.

international organizations to observe their election proceedings. The electoral legislation across Member States provides differing levels of access of citizen, non-partisan and partisan, and international observers to various phases of electoral process, and in some cases, despite previous ODIHR recommendations, does not provide explicit rights of election observation. Practices also vary among political parties and civil society organizations and their efforts to observe election processes, including but not limited to election-day procedures, as well as public awareness of such initiatives and rights. All European Union Member States have facilitated previous ODIHR election-related activities.

Existing citizen initiatives to observe the European Parliament elections include the Supporting Engagement in European Elections and Democratic Societies (SEEDS) Project, partially financed by the European Union, which comprises a network of non-governmental and international organizations, including Election-Watch.EU which has published a preliminary assessment report on the forthcoming elections and its intentions to observe across Member States, in co-ordination with other international organizations such as the European Disability Forum.⁵³ Several international organizations met by the ODIHR NAM indicated plans to conduct monitoring of certain aspects of the election process, such as the information space in online and traditional media as well as the participation of underrepresented groups including persons with disabilities. Various citizen-led organizations conduct election observation activities on the national level. In its 2023 Recommendation on inclusive and resilient electoral processes, the European Commission encouraged Member States and election management bodies to exchange best practices related to facilitating the work of election observers, and called on political parties to facilitate and co-operate with election observers.⁵⁴

IV. CONCLUSIONS AND RECOMMENDATION

All ODIHR NAM interlocutors emphasized the value of an ODIHR election observation activity and welcomed an external assessment and any potential recommendations to improve the European regulatory framework for the elections. No specific concerns were expressed regarding the respect for fundamental freedoms, or working of the election administration bodies, in particular in conducting election day proceedings. Based on the findings of the ODIHR NAM, a number of electoral issues were identified which could benefit from specific analysis. These include, in particular, the practical implementation of the legal framework, the conduct of the campaign, including on social networks, as well as the regulatory process for online campaign at both European and national levels, political and campaign finance and its controls, and lack of harmonization of certain administrative processes, in particular with respect to voter and candidate registration, across member states.

On this basis, the ODIHR NAM recommends the deployment of a Special Election Assessment Mission (SEAM) for the upcoming 6-9 June European Parliament elections. Given the predominant role of EU Member States in the conduct of the elections, the ODIHR wishes to follow the elections on the level of individual States in a meaningful manner but with a focus on common challenges faced by Member States and the application of relevant European regulations at the national level. In addition to a core team of experts based in Brussels, the ODIHR NAM recommends the deployment of regional experts who will undertake expert visits across a large number of the 27 EU Member States, taking into account available human and financial resources.

⁵³ See details on the [SEEDS Project website](#). See the [February 2024 EU-ElectionWatch.org Preliminary Election Assessment Mission Report](#).

⁵⁴ See the [2023 Recommendation of the Commission](#).

ANNEXE: LIST OF INTERLOCUTORS

European Institutions

European Parliament

Othmar Karas, First Vice-President of European Parliament, Member of European Parliament (MEP)
Oliver Schuster, Chief Policy Adviser, Deputy Head of Cabinet, Office of MEP Othmar Karas
Domènec Ruiz Devesa, Rapporteur, Committee on Constitutional Affairs
Markus Warasin, Head of Unit, Committee on Constitutional Affairs, European Parliament

European Commission Directorate-General for Justice and Consumers

Zuzana Dorazilová, Cabinet of Vice-President Jourova, on Values and Transparency
Marie-Helene Boulanger, Head of Unit, Union Citizenship and Free Movement (Democracy)
Harry Panagopulos, Policy Officer, Union Citizenship and Free Movement (Democracy)

European Commission Directorate-General for Communication

Stephen Clark, Director, Directorate for Liaison Offices
Philipp Schulmeister, Director, Directorate for Campaigns

Court of Auditors of the European Union

Wiktor Szymczak, Auditor, Chamber V
Colm Friel, Auditor, Chamber V

Court of Justice of the European Union

Juan Carlos González Álvarez, Head of Unit, Press and information Service, Communications Directorate

National Institutions

Federal Public Service of Foreign Affairs, Foreign Trade and Development Co-operation (Belgium)

William Roelants de Stappers, Amb., Director of Security Policy
Evy De Middelaer, Head of Population and Electoral Affairs Unit
Joris Beckers, Desk Officer, OSCE

Federal Public Service of the Interior (Belgium)

Régis Trannoy, Advisor, General Directorate of Population
Marlies Jaspers, Attaché, General Directorate of Population
David Van Kerckhoven, Project Manager for Electronic Voting Systems
Koen Schuyten, Communication Unit

Federal College of Experts (Belgium)

Emmanuel Willems, Member

Federal Parliament (Belgium)

Luc Baert, Advisor, Commission on Control of Campaign Expense

UNIA, National Equality Body (Belgium)

Marie Horlin, Policy and Monitoring Department
Marie-Ange Vandecandelaere, Policy and Monitoring Department

Main Electoral Committee of Brussels-Capital (Belgium)

Simon Cardon de Lichtbuer, President of Dutch-speaking Tribunal of First Instance, Brussels
Jean-François Funck, Vice-President of French-Speaking Tribunal of First Instance, Brussels
Frédérique Simons, Secretary to Head Office

Vera Aerts, Member of Head Office

Central Election Commission (Latvia)

Kristīne Saulīte, Chairperson

Ritvars Eglājs, Secretary General

Office for Citizenship and Migration Affairs (Latvia)

Janis Upmanis, Product Portfolio Manager, Office for Citizenship and Migration Affairs, Latvia

Toms Rozentals - Systems and Business Processes Analyst

Kristaps Milevskis - Information Systems Security Manager

Sanda Cielena - Head of Persons Status Control Division

Ilva Ievina - Head of European Affairs and International Cooperation Division

Corruption Prevention and Combating Bureau (Latvia)

Amīlija Raituma. Head of Division, Investigation of Violations of Political Organizations

Viktors Laizans, Chief Inspector on International Relations

Ministry of Foreign Affairs (Portugal)

Elisabete Cortes Palma, Head, Department of International Political Organisations

Filipa Cornelio da Silva, Head OSCE Division, Department of International Political Organisations

Raquel Bastos, OSCE Desk-officer, Department of International Political Organisations

Claudia Cardoso, OSCE Desk-officer, Department of International Political Organisations

Isabel Martins, Co-ordinator, Commission of the Electoral Registration of Portuguese living abroad

Ministry of Internal Administration (Portugal)

Joaquim Morgado, Deputy Secretary-General for Electoral Management

Isabel Ramos, Legal Director

Sofia Teixeira, Head, Legal and Electoral Research Division

Paula Vasco, Director, Electoral Information Systems Division

Amélia André, Electoral Information Systems Division

Nuno Silva, Project Management Officer

Elisabete Baptista, EU interface

National Cybersecurity Centre (Portugal)

Pedro Matos, Development and Innovation Unit

Rui Pereira, Development and Innovation Unit

Inês Martins, International Relations

Nuno Santos, Development and Innovation Unit

Media

Dirk Peereman, Clerk, Registrar of the General Chamber, Flemish High Audiovisual Council (Belgium)

Koen Desmaretz, Counselor, Flemish High Audiovisual Council (Belgium)

Karim Ibourki, President, High Audiovisual Council, French (Belgium)

Geneviève Thiry, Advisor, High Audiovisual Council, French (Belgium)

Simon-Pierre De Coster, Head, Legal Service, *Radio-Television of French-speaking Community* (Belgium)

Thomas Gadisseux, Editor Federal and Regional Elections, *Radio-Television of French-speaking Community* (Belgium)

Annick Capelle, Editorial Team Member, *Radio-Television of French-speaking Community* (Belgium)

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Ivan De Vadder, Journalist, *Flemish Radio and Television* (Belgium)

Aurēlija Ieva Druvieta, Vice-Chair, National Electronic Mass Media Council (Latvia)

Māra Madara Lūse, Head of International Co-operation and Information Analytics, National Electronic Mass Media Council (Latvia)

Gunta Sloga, Executive Director, Baltic Centre for Media Excellence (Latvia)

Tania Soares, Head, Media Analysis Department, Portuguese Regulatory Authority for Media

Antonio Jose Teixeira, Head of News, *Radio e Televisao de Portugal*

Political Parties

Didrik De Schaetzen, Secretary General, Alliance of Liberals and Democrats for Europe (EU)

Ioana Pavel, Campaign Assistant, Alliance of Liberals and Democrats for Europe (EU)

Maarten van de Fliert, General Director, European Christian Political Movement (EU)

Sandro Gozi, Secretary General, European Democratic Party (EU)

Benedetta De Marte, Secretary General, European Green Party (EU)

Carlotta Weber, Political Advisor, European Green Party (EU)

Thanasis Bakolas, Secretary General, European People's Party (EU)

Philip Claeys, Secretary General, Identity and Democracy Group (EU)

Francisco Orozco Dopico, Secretary General, The Left Group (EU)

Panayota Maniou, Deputy Secretary General, the Left Group (EU)

Frederik Vermeulen, Political Director, Christian Democratic and Flemish Party (Belgium)

François De Smet, Chairman, DéFI (Belgium)

Nicolas Blanchart, Party Employee, Ecolo (Belgium)

Georges Dallemagne, Member of Parliament, Les Engagés (Belgium)

Isabelle Karl, Party Employee, Les Engagés (Belgium)

Cedric Lemaire, Party Employee, Les Engagés (Belgium)

Liesbeth Coninx, Party employee, Groen (Belgium)

Aljosja Van der Straeten, Party Employee, Groen (Belgium)

Axel Miller, Party Employee, Mouvement Réformateur (Belgium)

Jolan Vereecke, Party Employee, Mouvement Réformateur (Belgium)

Peter De Roover, Leader of the Parliamentary Group, New Flemish Alliance (Belgium)

Laurens Verrelst, Staff, New Flemish Alliance (Belgium)

Mark Van Leeuw, Party Employee, Open Flemish Liberals and Democrats (Belgium)

Maxime Nautus, Employee, Open Flemish Liberals and Democrats (Belgium)

Ivo Flachet, Political Adviser of the Head, Workers' Party (Belgium)

Loonis Looghe, Adviser, Workers' Party (Belgium)

Gilles Doutrelepon, Head, Study Service, Socialist Party (Belgium)

Rim Ben Achour, Electoral Law Advisor, Socialist Party (Belgium)

Ellen Samyn, President, Vlaams Belang (Belgium)

Kevin Brackx, Secretary of the Parliamentary Group, Vooruit (Belgium)

Diogo Pacheco de Amorim, Vice-President, Foreign Affairs Commission, Chega (Portugal)

Ricardo Dias Pinto, International Relations, Chega (Portugal)

Fabian Figueiredo, Member, Secretariat and Political Bureau, Left Bloc (Portugal)

Paulo Vieira, Left Bloc (Portugal)

Tânia Mesquita, Member, People-Animals-Nature (Portugal)

Helena Costa, Head of Campaign, People-Animals-Nature (Portugal)

Eurico Brilhante Dias, MP, Socialist Party (Portugal)

Marta Valentin da Costa, Head of Cabinet, Socialist Party (Portugal)

Civil Society

Clara Helming, Senior Advocacy & Policy Manager, AlgorithmWatch

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Olafs Grigus, Delna: Transparency International – Latvia

Jan Beyer, Digital Democracy Research Coordinator, Democracy Reporting International

Dennis Wenzl, Outreach Officer, Democracy Reporting International

Armin Rabitsch, Chairperson, Election-Watch.EU
Michael Lidauer, Co-Chair, Election-Watch.EU
Tatyana Hilscher-Bogussevich, Core Team member, Election-Watch.EU
Alejandro Moledo, Deputy Director, European Disability Forum
Carolin Johnson, Policy Co-ordinator, European Partnership for Democracy
José Reis, President, Portuguese National Confederation of Disabled Persons' Organizations
Alexandra Silva, Project Co-ordinator, Portuguese Platform for Women's Rights
Maria Sepulveda, Project Officer, Portuguese Platform for Women's Rights
Isabel Romao, Volunteer, Portuguese Platform for Women's Rights
Gunta Anca, SUSTENTO – Latvian Umbrella Body for Disabled Persons' Organizations
Daiga Veinberga, SUSTENTO – Latvian Umbrella Body for Disabled Persons' Organizations
Nicholas Aiossa, Director, Transparency International EU