

INTERIM REPORT
20 March – 4 April 2024

9 April 2024

I. EXECUTIVE SUMMARY

- The presidential election will take place on 24 April 2024. Should no candidate secure support from more than half of all registered voters, a run-off between the two top candidates will occur on 8 May, coinciding with the parliamentary elections. The current parliament is the first to complete its tenure since 2006. While the pre-electoral period has been stable, the electoral process is taking place in a context marked by polarization along political and ethnic lines.
- The Electoral Code underwent its latest amendment on 7 March 2024, after the announcement of the elections. The amendments, though supported by the ruling parties and the opposition, were adopted via an expedited process that lacked adequate public debate. This process resulted in several prior ODIHR recommendations remaining unaddressed, as well as those made by an inter-agency working group responsible for preparing a comprehensive review of the election-related legislation. The recent amendments, *inter alia*, permit citizens with expired ID documents to retain their registration as voters, clarify certain campaign finance regulations, enhance data protection in relation to voter registration, and specify deadlines for resolving election disputes.
- To date, the election administration has carried out technical preparations within the legal deadlines. While the State Election Commission (SEC) achieved its full composition after the seventh member was appointed in February 2024 following a year-long delay, some ODIHR EOM interlocutors reiterated concerns that the election administration's human and financial resources remain limited, potentially affecting the timeliness of electoral preparations and communication with lower-level election bodies and the public. Training for lower-level commissions is ongoing. However, the SEC's voter education campaign has yet to start due to administrative challenges in the procurement process.
- The March 2024 legal amendments eliminate the requirement for citizens to possess a valid ID document for in order to retain their inclusion in the voter register, in line with a previous ODIHR recommendation. To mitigate the severe delays of replacing documents which became invalid following the country's name change in 2019, citizens whose identity documents expired up to nine months before the election days will also be permitted to use these outdated documents for voter identification. The final voter register includes 1,814,317 voters for the presidential election and 1,815,350 for the parliamentary elections.
- The SEC registered 7 presidential candidates and published preliminary candidate lists with a total of 1,770 parliamentary candidates. The law mandates a minimum of 40 per cent representation of each gender on every candidate list. Some 42 per cent of the parliamentary candidates on these preliminary lists and two of the presidential candidates are women.
- The law prohibits certain forms of early campaigning, including the use of campaign funds and the publication of political advertisements by media before the campaign period starts. However, the March 2024 legal amendments permit contestants to hold one campaign event between their registration and the start of the campaign period. Prior to the campaign period, the ODIHR EOM observed several events promoting political messages, including door-to-door canvassing, meetings with voters, inaugurations of party offices, *Iftar* dinners, and online activities. Many ODIHR EOM interlocutors expressed concerns about the potential for negative campaigning, as well as the

derogatory language already present on social networks, used against political parties and candidates, including women. Concerns about the potential for disinformation and the use of manipulative content in the campaign were also raised.

- The March 2024 amendments to the Electoral Code narrowed the scope of the interim campaign finance reporting by contestants, shortened the deadline for submitting the final financial report, and defined certain donation limits. However, the amendments did not address long-standing systemic issues of the regulatory framework governing political and campaign finance, as previously recommended by ODIHR as well as the State Audit Office (SAO) and State Commission for the Prevention of Corruption (SCPC). Many ODIHR EOM interlocutors expressed a lack of confidence in the oversight bodies' abilities to effectively monitor and sanction the misuse of administrative resources in the campaign, due to their limited resources as well as systemic deficiencies in the legal framework.
- Most ODIHR EOM interlocutors affirm that the environment is generally conducive to media freedom but noted that it is marked by political and ethnic polarization, intense competition among numerous media companies in a limited advertising market, and unfavourable working conditions for journalists. In March 2024, the Law on Media and the Law on Audio and Audio-visual Media Services were amended to introduce public subsidies to print media to publish public-interest pieces, and to lift a ban on publicly-funded advertisements in private media.
- Election contestants have broad legal standing to file complaints while voters are limited to cases where their individual rights have been violated or the misuse of administrative resources. Most complaints, including those concerning voter and candidate registration, violations of campaign rules, election-day irregularities, and election results, are decided by the SEC, with a possibility to appeal to the Administrative Court. Several ODIHR EOM interlocutors, including those from the judiciary, noted that some deadlines for resolving complaints are unduly short, which could compromise the quality of decisions.
- The Electoral Code allows for citizen and international observation of the entire election process. Several civil society groups have announced plans to observe the elections, with some organizations additionally focusing on the monitoring of media and social networks, potential disinformation campaigns, and inter-community relations.

II. INTRODUCTION

Following an invitation from the authorities of North Macedonia to observe the presidential and parliamentary elections, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) deployed an Election Observation Mission (EOM) on 20 March.¹ The EOM, led by Ambassador Jillian Stirk, consists of a 12-member core team based in Skopje and 20 long-term observers deployed throughout the country from 27 March. Mission members are drawn from 25 OSCE participating States, and 40 per cent of mission members are women. ODIHR has requested participating States to second 300 short-term observers to observe the proceedings on each election day.

¹ See previous ODIHR [election observation reports on North Macedonia](#).

III. BACKGROUND AND POLITICAL CONTEXT

On 14 February 2024, the speaker of the parliament announced presidential and parliamentary elections. The presidential election is scheduled for 24 April, with a potential second round taking place on 8 May, concurrently with the parliamentary elections.²

The last presidential election took place in 2019 and was won by Stevo Pendarovski, who was supported by the governing Social Democratic Union of Macedonia (SDSM). In 2020, the most recent parliamentary elections led to the formation of a coalition government consisting of SDSM and the Besa movement, which jointly secured 46 seats, the Democratic Union for Integration (BDI/DUI) with 15 seats, and the coalition between the Alliance for Albanians and AlternAtiva with 12 seats.³ In January 2024, in accordance with the law and the coalition agreement between the SDSM and the BDI/DUI, a caretaker government led by Talat Xhaferi, the country's first ethnic-Albanian prime minister, was established to organize the elections.⁴ This is the first time since 2006 that a parliament has completed its full term.

While the pre-electoral political environment has been stable, the elections are taking place in a context marked by significant polarization along political and ethnic lines. This has hindered the implementation of legislative reforms, including long-planned reforms of the Electoral Code and related legislation, as well as those required by the European Union (EU) for accession. Many ODIHR EOM interlocutors referred to an overall atmosphere of disaffection with the political establishment, citing, among other issues, inefficiencies within the public administration and insufficient anti-corruption efforts.⁵

The Constitution provides for equality of men and women. The 2006 Law on Equal Opportunities for Women promotes equal gender representation at all levels of the public administration and public life.⁶ Despite efforts by the authorities to promote women's participation, women continue to be underrepresented in some elected and appointed offices. The outgoing parliament included 51 women (42.5 per cent); women hold 4 of the 20 ministerial positions (20 percent), and only 2 of the 80 municipal mayors are women.

IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Presidential and parliamentary elections are regulated by the 1991 Constitution, the 2006 Electoral Code, the 2004 Law on Financing of Political Parties, the 2019 Law on Prevention of Corruption and Conflicts of Interest, the Criminal Code, and subsidiary acts by the SEC.⁷

² According to the Constitution, the presidential election must be conducted within the final 60 days of the incumbent president's term, while parliamentary elections must take place within the last 90 days of the parliament's term.

³ The main opposition party, the Internal Macedonian Revolutionary Organization – Democratic Party of Macedonian National Unity (VMRO-DPMNE) won 44 seats, the *Left* (Levica) 2 seats, and the Democratic Party of the Albanians (DPA/PDSH) 1 seat.

⁴ The Law on Government requires that a caretaker government consisting of ministers from the ruling majority and the largest opposition party take office 100 days before the holding of parliamentary elections.

⁵ See section 2.1.2 of the [North Macedonia 2023 Report](#) by the European Commission, which states that, despite ongoing efforts, no legislation has been adopted to tackle “nepotism, cronyism and political influence in the recruitment of public sector employees and in the appointment of members of supervisory and management boards”. Section 2.2.1 further states that “Corruption remains prevalent in many areas and is an issue of concern. Delays and reversals in trials of high-level corruption cases increased [...] The maximum legal penalties for specific corruption-related criminal offences were reduced, [...] halting or even terminating, a large number of high-level corruption cases”.

⁶ A national strategy for gender equality was adopted in 2022, along with an action plan for 2022-2024, which aims to increase women's participation in public life.

⁷ The regulatory framework further includes the 2004 Law on Political Parties, the 2013 Law on Media, and the 2013 Law on Audio and Audio-visual Media Services. North Macedonia has ratified key international and regional human rights instruments related to the holding of democratic elections.

The Electoral Code was last amended on 7 March and 1 April 2024, after the elections had been announced. The legislative changes were supported by the ruling parties and the opposition and incorporated some technical recommendations from the SEC.⁸ However, they were adopted through expedited processes that lacked sufficient public debate, largely disregarding recommendations which had been proposed in November 2023 by the inter-agency working group, working on the reforms since May of that year.⁹

The March amendments, *inter alia*, eliminate the requirement for citizens to possess a valid ID document in order to retain their inclusion in the voter register, change the formula for determining the number of support signatures required to register as candidates for the parliamentary and local elections, clarify certain campaign finance regulations, enhance data protection in relation to voter registration, and specify deadlines for resolving election disputes. In addition, specifically for these elections, the amendments permit the use of certain expired identity documents for voter verification at the polling stations on election day (see *Voter Rights and Registration*). The April amendment specifies the sequence of candidates on the parliamentary ballot.

Despite the amendments, a number of previous ODIHR recommendations remain unaddressed, including systemic revision of the Electoral Code to eliminate gaps and inconsistencies, ensuring equal access to the media in election campaigns, increasing the accountability and integrity of campaign financing, and enhancing regulations on the misuse of administrative resources. In addition, many ODIHR EOM interlocutors noted that the amendments were adopted too close to election day for all provisions to be effectively implemented; moreover, they indicated that the repeated practice of late amendments to the election-related legal framework might destabilize the electoral process and undermine legal certainty.¹⁰

The president is directly elected for a five-year term from a single nationwide constituency. If no candidate receives a vote share that is more than half of all registered voters, a second round is held two weeks later between the two top candidates.¹¹ The unicameral parliament, comprising 120 to 123 members (MPs), is directly elected for a four-year term. Of these, 120 MPs representing 6 in-country districts are elected under a proportional representation system from closed lists. The number of MPs elected from the district abroad is conditioned upon a threshold linked to the previous election results.¹²

The law mandates that in-country districts represent an approximately equal number of registered voters, permitting deviations of up to five per cent from the average number of registered voters per district. District boundaries can only be changed through an amendment of the Electoral Code. Prior to these elections, no assessment related to the equality of vote across electoral districts was conducted.

⁸ The bill was submitted by three MPs from the VMRO-DPMNE, SDSM, and BDI/DUI, and was [approved](#) by 84 MPs of the 86 MPs present, with 2 abstentions.

⁹ In May 2023, the Ministry of Justice initiated a working group comprising state institutions, political parties, and civil society organizations (CSOs) to amend the Electoral Code, with its work concluding in November 2023. Many ODIHR EOM interlocutors noted that this timeline did not allow for significant reform prior to the elections. Some parties, including the opposition VMRO-DPMNE, chose not to participate in the working group. Major parties conducted parallel negotiations on potential amendments.

¹⁰ Due to their late adoption, certain new provisions, such as the modified number of signatures required for nominating parliamentary candidates, were not implemented for these elections. On a number of previous occasions, the election-related legal framework was amended only several weeks prior to scheduled elections: including on 16 February 2020, and twice in 2021, on 2 April and 16 September.

¹¹ In the second round of presidential election, the candidate with the highest tally is elected, unless the turnout falls below 40 percent, in which case the entire election process is repeated without a legally determined deadline.

¹² The threshold to elect an MP from the out-of-country district has never been met in any prior parliamentary elections. For these elections, voters abroad will only be able to vote in the presidential election (See *Voter Rights and Registration*).

V. ELECTION ADMINISTRATION

The election administration is comprised of the State Election Commission (SEC), 80 Municipal Election Commissions (MECs), and 3,360 Election Boards (EBs). In addition, 31 EBs will be set up in diplomatic representations abroad to conduct out-of-country voting. Each election body is required to fulfil legal criteria for gender and ethnic representation.¹³ Two of the seven current SEC members are women. Women represent 49 per cent of MEC members.

The SEC consists of seven members appointed by the parliament for a five-year mandate. Its current tenure began in January 2021; following delays of over a year, a seventh member was appointed in February 2024.¹⁴ The SEC holds broad regulatory, monitoring and oversight powers. The position of secretary general of the SEC has been vacant since 2021. While the SEC generally enjoys confidence in its organizational capacity from most stakeholders, some ODIHR EOM interlocutors voiced concerns over the SEC's limited human and financial resources, including the continued lack of a secretary general, which might affect the timeliness of electoral preparations and communication with lower-level election bodies and the public.

To date, the SEC has carried out all technical preparations within the legal deadlines. It has adopted or reinstated several instructions and guidelines on voter registration and identification, candidate registration, ballot validity, voting of persons with disabilities, and police conduct during the electoral process.¹⁵ The SEC conducted regular sessions that were open to the media, observers, and authorized candidate representatives, and were also streamed online. However, sessions were often convened at short notice, and without the legally required public announcement. Moreover, contrary to legal requirements, not all session minutes and decisions have been published online in a timely manner.

By late March, the SEC had concluded training sessions for MECs, political parties, media and CSO representatives. Training courses for EBs started on 1 April. Although the SEC has developed a voter education curriculum, it informed the ODIHR EOM that, due to administrative challenges in the procurement process, the launch of this campaign has been delayed and is yet to occur.

MECs are comprised of five members, appointed from employees of state and municipal administrations for five-year terms, and are tasked with overseeing elections in their respective municipalities. EBs conduct election day procedures at polling stations, with three permanent members, appointed for four years from state and municipal employees, and two temporary members, nominated by political parties. All MEC and EB members have substitutes. Due mainly to personal reasons, such as retirement, change of residence or health issues, there has been a significant number of resignations among MEC members since the announcement of the elections, including after the conclusion of training sessions. Some ODIHR EOM interlocutors noted that, as there are no current plans for training the newly appointed members, the turnover of members might affect MECs' comprehension of election procedures.

While the SEC acknowledged ongoing challenges in ensuring the physical accessibility of electoral premises, it informed the ODIHR EOM of its efforts to improve the accessibility of various aspects of electoral process, including by providing information materials in accessible formats, publishing polling

¹³ By law, each gender must be represented by at least 30 percent of the members of each election body. In municipalities where at least 20 percent of citizens belong to ethnic minorities, these communities must be equitably represented. The SEC is obliged to publish election material, including candidate lists, voter information, and ballot papers in any official language and alphabet used by at least 20 per cent of citizens in a given municipality.

¹⁴ The SEC functioned with only six members from February 2023 until late February 2024 due to disagreements over which of the Albanian parliamentary parties was legally entitled to appoint the new member. The appointment took place upon the withdrawal of one of the nominees, which occurred after the nomination deadline.

¹⁵ The SEC informed the ODIHR EOM of its plans to adopt further regulations prior to election day, including on implementing measures for the electronic transmission of unofficial preliminary results from polling stations.

station accessibility data online, establishing a dedicated helpline for voters with hearing impairments, and providing additional measures to the legally prescribed assisted voting on election day, such as Braille ballot guides.

VI. VOTER RIGHTS AND REGISTRATION

All citizens over the age of 18 years are eligible to vote, except for those prohibited by a final court decision on the basis of legal incapacity.

The SEC, in cooperation with the State Statistical Office, maintains and updates a permanent voter register, based on data from the civil and population registers. Voters resident in the country are automatically included on in-country voter lists. Citizens temporarily residing abroad may actively register to vote at diplomatic representations or vote in-country according to their last place of residence. By the deadline of 19 March, the SEC received 2,904 applications from voters abroad, out of which 2,641 complied with the legal criteria, which falls below the threshold of registered voters for electing an MP from the out-of-country district.¹⁶

The March 2024 legal amendments eliminated the requirement that voters possess a valid identification document for inclusion in the voter register, in line with a prior ODIHR recommendation. For these elections, citizens whose identity documents expired up to nine months before election day will also be allowed to vote. This temporary measure was necessitated by severe delays in the process of replacing documents that had become invalid due to the country's name change. The Ministry of Internal Affairs informed the ODIHR EOM that this provision enables 87,378 citizens to vote for the presidential and 86,863 citizens to vote for the parliamentary race, whose documents expired within this timeframe.¹⁷

Citizens may verify the accuracy of their voter registration data and request corrections online or in person at SEC regional offices. From 28 February to 18 March, voter registration data was available for public scrutiny at the SEC regional offices. By law, political parties could request an electronic copy of the register by 21 March, and may submit requests for corrections based on their review. Pursuant to the March 2024 legal amendments, with an aim to enhance personal data protection, the SEC limited the scope of information shared with political parties to include only data indispensable for scrutiny, such as voters' names, dates of birth and addresses.

The final voter register, closed on 2 April, includes 1,814,317 voters for the presidential and 1,815,350 for the parliamentary elections. Since the Electoral Code does not provide for updating the voter register prior to presidential run-offs to include changes in civil registration data, those 1,148 citizens who turn 18 between the two rounds of the presidential election will only be included for the parliamentary elections.

Most ODIHR EOM interlocutors did not raise concerns about the inclusiveness of the voter register. However, some pointed to the significant number of citizens residing abroad who remain in the register as they maintain an official residence in-country, as well as shortcomings in the residential address system and civil registration, which could potentially impact the accuracy of the data. Additionally, some expressed concerns about the quality of citizens' biometric data collected through expedited procedures for

¹⁶ Voters had the option to register for one or both elections. The holding of parliamentary elections abroad depends on the registration a sufficient number of voters to elect at least one MP in the out-of-country constituency (5,353 votes for these elections). Since this practical threshold was not met, the SEC decided that the diaspora may not participate in the 2024 parliamentary elections. Furthermore, the required minimum of 10 registered voters was not met in 20 diplomatic representations, and therefore, these polling stations will not open for voting. In total, 2,569 voters abroad will be able to vote in the presidential election.

¹⁷ Documents that expired since 24 July 2023 will be accepted for the presidential, and those expired since 8 August 2023 will be accepted for the parliamentary elections.

issuing new identification documents, which could lead to instances of corrupted data slowing down the voter check-in process on election day.

VII. CANDIDATE RIGHTS AND REGISTRATION

Citizens who are registered voters over the age of 40 by election day, with at least 10 years of residency in the country over the past 15 years, may stand for president. Parliamentary candidates must be eligible voters of at least 18 years of age on election day. The law prohibits those serving or awaiting to serve a prison sentence of longer than six months from standing for election to parliament.

Presidential candidates can be nominated by at least 10,000 registered voters or 30 MPs. Parliamentary candidates may be nominated by registered political parties or pre-electoral coalitions, or stand independently. Independent candidates may run on a list supported by at least 1,000 voters. Candidates may be included in only one list.¹⁸ The law mandates a minimum of 40 per cent representation of each gender on every candidate list, stipulating that one candidate of the less represented gender must be included among every three consecutive candidates, with at least one additional candidate of this gender for every ten candidates.

By law, voters could sign in support of more than one contestant within the same electoral race. The signature collection period for both elections lasted from 28 February to 8 March, with signatures collected at the premises of SEC regional offices and designated notaries. Some contestants reported challenges for voters residing in rural areas accessing the limited number of SEC regional offices.¹⁹ Fifteen prospective presidential candidates informed the SEC of their intention to collect supporting signatures from voters, of whom seven received the required number of signatures. For the parliamentary elections, only one group of voters attempted to obtain voter support for their candidate list; however, it fell short of the required number of signatures within the prescribed deadline.

Candidate nomination ended on 19 March for the presidential and 2 April for the parliamentary elections. Requests to register presidential candidates and parliamentary candidate lists were to be submitted to the SEC, which verified the registration documents against the legal criteria. By law, prospective contestants had 48 hours to remedy omissions and issues identified in the registration documents. Two submitters of presidential candidacies were required to complete their documentation with information on tax number and bank account for campaign purposes; both complied within the prescribed deadline. Amendments to the Electoral Code adopted on 1 April, one day before the submission of parliamentary candidate lists, allowed parliamentary contestants to use the sequential number of presidential candidates, determined by lottery, on the parliamentary ballot.

The SEC ultimately registered seven presidential candidates, including two women.²⁰ On 3 April, the SEC published the lists of contestants that submitted parliamentary candidate lists for registration. These include 1,770 candidates nominated by 10 political parties and 6 coalitions, as well as one group of voters. Some 42 per cent of parliamentary candidates on these preliminary lists are women.

¹⁸ The number of candidates on the list must equal the number of seats in the district (20), including for independent candidates.

¹⁹ While SEC offices certify signatures for free, notaries may charge a fee to list submitters for their services. Only six contestants of the presidential race opted for using the service of notaries in signature collection.

²⁰ The registered presidential candidates are Maksim Dimitrievski (endorsed by I KNOW – Movement for Our Macedonia /ZNAM/), Stevcho Jakimovski (endorsed by the Party of Justice, Civil Option for Macedonia /GROM/), Bujar Osmani (endorsed by the BDI/DUI-led coalition), Stevo Pendarovski (endorsed by SDSM), Gordana Siljanovska-Davkova (endorsed by VMRO-DPMNE), Arben Taravari (endorsed by the Albanian Opposition Bloc /VLEN/VREDI/), and Biljana Vankovska-Cvetkovska (endorsed by the *Left*).

VIII. ELECTION CAMPAIGN

The official presidential campaign period started on 4 April and will conclude on 22 April (and on 6 May in the event of a second round). The campaign period for parliamentary elections begins on 18 April and ends on 6 May. Campaigning, including in online media, is prohibited on election days and the day before. The Electoral Code does not specify the application of campaign regulations, such as the allocation of airtime among contestants, campaign spaces and areas for posting campaign materials, in the event of presidential and parliamentary elections occurring simultaneously. On 20 March, the Agency for Audio and Audio-visual Media Services (AAVMS) adopted a regulation on the distribution of airtime for electoral contestants and campaign silence regulations in the media.²¹

The law prohibits certain forms of early campaigning, including the use of campaign funds and the publication of advertisements by political parties in media before the campaign period starts. However, the law permits contestants to publish calls for signature collection and, pursuant to the March 2024 legal amendments, to hold one campaign event between their registration and the start of the campaign period. Many ODIHR EOM interlocutors noted that the format and nature of these events are not regulated by the law, potentially making campaign regulations and their oversight ambiguous.

Before the official start of the campaign, the ODIHR EOM observed several events, including door-to-door canvassing, small-scale meetings, inaugurations of party offices, Ramadan fast-breaking *Iftar* dinners, as well as online activities promoting political messages.²² Most observed events were characterized by a neutral tone with occasional negative rhetoric targeting opponents, with messages focusing on the status of the economy, the fight against corruption, and questions surrounding the country's EU accession process, as well as occasional negative rhetoric targeting opponents.

The law regulates electoral contestants' access to all forms of political advertising and campaign activities during the campaign period.²³ Most contestants indicated their intentions to hold rallies, engage in door-to-door interactions with voters, distribute campaign materials, and utilize online outreach strategies. Many ODIHR EOM interlocutors expressed concerns about potential negative campaigning and harsh rhetoric that could impact the overall campaign atmosphere.

The Electoral Code contains some regulations aimed at preventing the misuse of administrative resources prior to the elections. Once elections have been announced, the law prohibits the launching of public development projects, extraordinary budgetary disbursements, and employment procedures from budgetary funds. The inauguration of public projects is prohibited starting 20 days before the campaign period begins. The use of state offices, equipment and vehicles in the campaign is expressly forbidden. Additionally, the Electoral Code mandates that all contestants sign a Code for Fair and Democratic

²¹ According to the guidelines, on 23 and 24 April, campaign silence is applicable for the media presentation of contestants in news programmes.

²² For example, on 22 March, the presidential candidate of BDI/DUI addressed a youth audience during an *Iftar* in Gostivar; on 24 March, the presidential candidate endorsed by VLEN/VREDI had a door-to-door canvassing in a commercial area in Skopje; on 28 March, during an inauguration of a district party office in Makedonska Kamenica, representatives of the *Left* addressed the audience; on 30 March, VMRO-DPMNE's leader addressed the audience during a rally in Skopje to promote parliamentary candidates; on 31 March, SDSM's leader was the main speaker of a rally in Skopje to disclose the list of parliamentary candidates; on 2 April, SDSM held a large-scale rally promoting its presidential candidate in Skopje.

²³ Contestants must notify the Ministry of Internal Affairs about their intention to organise a rally in public places at least 48 hrs before the rally is scheduled to take place. Campaign posters can be displayed free of charge at designated locations under equal conditions; municipalities can also provide additional space for displaying posters against a fee. Up to 50 per cent of the advertising space per municipality can be utilized for campaign purposes. The SEC allocates the available space for purchase by lottery based on the following criteria: 40 per cent for ruling parties with most votes in previous elections, 40 per cent for the two opposition parties with most votes in previous elections, 10 per cent for parties in parliament that have no parliamentary groups, and 10 per cent for parties not represented in parliament.

Elections, which commits them to protecting citizens from any form of pressure.²⁴ The law does not restrict public office holders from participating in campaign events. Several ODIHR EOM interlocutors raised concerns about the potential for misuse of administrative resources during the campaign period.

Campaigning on social networks is not specifically regulated. Most ODIHR EOM political party interlocutors indicated their intentions to conduct campaigns online to engage voters and reduce the expenses associated with traditional campaign events.²⁵ However, many of them expressed concerns about the derogatory language already present on social networks against political parties and candidates, including women. In addition, several ODIHR EOM interlocutors raised concerns about the potential for high levels of disinformation and manipulative content in the election campaign.²⁶ The ODIHR EOM is monitoring online campaign activities on social networks.²⁷

IX. CAMPAIGN FINANCE

Campaign finance is primarily regulated by the Electoral Code, the Law on Financing of Political Parties, and the Law on Prevention of Corruption and Conflicts of Interest. The March 2024 amendments to the Electoral Code narrowed the scope of interim campaign finance reporting, shortened the deadline for submitting the final financial report, and defined certain donation limits.²⁸ However, the amendments did not incorporate proposals submitted by the State Audit Office (SAO) and State Commission for the Prevention of Corruption (SCPC), and did not address long-standing systemic issues of the regulatory framework governing political and campaign finance, as previously recommended by ODIHR.²⁹

Political parties that received at least one per cent of the votes in the previous parliamentary or local elections are eligible for public funding, which may also be utilized for campaign purposes.³⁰ While there is no direct public funding allocated for presidential and parliamentary campaigns, the state directly reimburses broadcast, print and online media outlets registered with the SEC for campaign advertisements.³¹ Some ODIHR EOM interlocutors raised concerns that this model, while enhancing transparency in campaign-related advertising, allows political parties to direct state funding to selected media outlets, which might foster a culture of favouritism between political entities and media. The law

²⁴ The signing of the Code took place on 2 April at the SEC. The presidential candidate endorsed by GROM decided not to sign the document, citing lack of equal campaigning conditions of the contestants, and the unequal distribution of space and financing in the media.

²⁵ According to the United Nations (UN) 2021 Republic of North Macedonia [Digital Development Country Profile](#), in 2020, 81.4 per cent of the population had access to the internet.

²⁶ In January 2024, the Institute of Communication Studies, in its study [Determining Political Harmful Narratives](#) established that some political parties, including the leading ones, use “harmful narratives with manipulative audio-visual content, biased selection, character attack and demonization, as well as spreading panic and fear”.

²⁷ Since 21 March, the ODIHR EOM has been observing 19 Facebook accounts of presidential and parliamentary candidates, political parties, and their leaders.

²⁸ The amendments, *inter alia*, removed the requirement for reporting expenditures in the interim reports, shortened the deadline for the submission of the final financial report from 75 to 60 days from final results announcement, and clarified that donation limits to both parties and campaign accounts are cumulative.

²⁹ These recommendations include regulation of third-party financing of campaigns, reporting on in-kind contributions and loans, harmonizing timeframes and deadlines for the receipt and publication of reports to allow for meaningful scrutiny, as well as providing adequate authority, resources, and sanctioning power to the oversight bodies. See also the SAO’s [Annual Report for 2022](#).

³⁰ In 2023, the total state funding allocated for parliamentary political parties was approximately EUR 6.5 million.

³¹ For the upcoming presidential and parliamentary elections, 39 TV stations, 37 radio stations, 11 print outlets, and 251 internet portals are registered with the SEC. The amount of funds allocated for this purpose for both elections is approximately EUR 9 million combined.

does not specify whether independent candidates are eligible for their advertisement costs being reimbursed.³² Paid political advertisements on social networking platforms are not regulated.³³

In addition to the contestants' own funds, campaigns may be financed through monetary and in-kind donations, loans, and membership fees. Individual citizens can donate up to EUR 3,000, while legal entities may contribute up to EUR 30,000 per campaign and campaigns are required to maintain a registry of all donations.³⁴ By law, the expenditure limit is set at MKD 110 per election, per registered voter, a limit that applies cumulatively across both rounds of the presidential election.³⁵ Each presidential and parliamentary contestant must obtain a unique tax identification number and open a designated bank account for all campaign funds.

Campaign finance oversight is conducted by the SAO and SCPC.³⁶ Contestants are required to prepare three interim campaign finance reports: two prior to the elections and one after, none of which is subject to an audit.³⁷ All reports must be submitted to the SAO, SCPC and the SEC, which make them public on their websites. Within 60 days following the announcement of the election results, campaigns must submit a final financial report to the SAO, which then has 60 days to conduct an audit. Updated reporting templates, which should account for recent changes in interim reporting, have not yet been made available.

The SCPC investigates complaints related to prohibited activities in public procurement and employment in public offices following the announcement of elections, and violations of campaign finance rules. These investigations can be initiated *ex officio*, or based on complaints submitted by contestants or observers. The SCPC informed the ODIHR EOM that they would rule on complaints related to campaign finance within 5 days, in accordance with the law. Since the announcement of the elections, the SCPC has received 23 complaints concerning prohibited activities related to public procurement and employment in public offices. The SCPC can also initiate criminal proceedings with the State Public Prosecutor, in response to violations, or based on findings reported by the SAO.³⁸ Due to financial constraints, the SCPC does not plan to deploy field monitors to oversee campaign spending, deviating from previous practice. To prevent the use of public resources during election periods, the SCPC maintains a registry of vehicles belonging to state institutions. However, the SCPC has informed the ODIHR EOM that this database is currently not complete.³⁹

Many ODIHR EOM interlocutors, including from the oversight institutions, expressed a lack of confidence in the effective monitoring of campaign finance and sanctioning of misuse of administrative resources in the campaign, due to systemic deficiencies in the legal framework and the limited resources available to

³² The SEC informed the ODIHR EOM that, in practice, independent candidates may become eligible for reimbursement if they enter into a contractual agreement with a political party.

³³ Based on reports from the [Meta Ad Library](#), in March, only four political parties (Alternative, DUI, the *Left*, and SDSM) incurred advertising costs, totalling approximately EUR 22,000. Of this expenditure, SDSM alone accounted for EUR 21,200. Prominent individuals, including party leaders, and others affiliated with parties, spent approximately EUR 10,000, of which EUR 6,300 is made by the SDSM chair, and EUR 224 by VMRO-DPMNE chair.

³⁴ Donations from foreign or anonymous sources, municipal governments, state-owned companies, religious and charitable organizations, and from the media, are prohibited.

³⁵ One euro equals MKD 62 (Macedonian denar).

³⁶ Following the expiration of the previous commission, in February 2024, all seven SCPC members were newly appointed.

³⁷ Presidential and parliamentary campaigns are required to submit a first report on the 11th day of the campaign; a second report is due the day before the election; and a third report must be submitted one day after the closure of dedicated bank accounts for the campaign. In case of a second round, presidential campaigns must submit one more interim report, the day before the second-round election day.

³⁸ The Electoral Code stipulates fines up to EUR 9,000 for breaches of campaign finance rules. For the most serious and intentional violations, criminal penalties can include fines and imprisonment for up to five years.

³⁹ The SCPC informed the ODIHR EOM that, prior to the campaign period, institutions had only reported information on approximately one quarter of vehicles, with the law not imposing sanctions for failing to provide such data.

the oversight bodies. Several CSOs announced plans to monitor campaign finance and the use of public resources during the campaign period.

X. MEDIA

The media landscape is diverse yet fragmented along political and ethnic lines. Television is the primary source of political information, followed by social networking platforms and news portals. While nationwide some 40 television and 58 radio stations, as well as 22 print media outlets, offer a multitude of views to the public, many ODIHR EOM interlocutors noted that the overall quality of journalism is negatively affected by political polarization, the large number of media companies competing in a limited advertising market, and the unfavourable working conditions of journalists.

The Constitution guarantees freedoms of expression and the media. The Electoral Code requires that all media outlets, including online media, cover the elections in a fair, balanced and unbiased manner, and enumerates detailed requirements and timeframes for airing campaign material as well as sanctions for failure to comply.⁴⁰ Newscasts of the public broadcaster Macedonian Radio and Television (*MRT*) remain subject to stringent regulations during the campaign period.⁴¹ Most ODIHR EOM interlocutors affirm that the environment is conducive to media freedom. However, some note that frequent online attacks, including those targeting women, as well as isolated incidents of physical assault against journalists, remain a concern.⁴²

Since the last presidential and parliamentary elections, the media-related legal framework has undergone several amendments. The November 2022 amendments to the Law on Civil Liability for Insult and Defamation, along with the February 2023 amendments to the Criminal Code, introduced additional safeguards for journalists.⁴³ In March 2024, two amendments to the Law on Media and the Law on Audio and Audio-visual Media Services were made to introduce a provision for public subsidies to print media for publishing public interest information, and to lift a ban on publicly funded information campaigns of public interest on private broadcasters. While some ODIHR EOM interlocutors argued the latter measure contributes to the media sector's sustainability, others noted that it might lead to increased political influence over the media. Many interlocutors have highlighted the necessity for further reforms in the media sector aimed at improving the long-term viability of media outlets, addressing underregulated aspects, such as the registration and oversight of online media outlets, as well as further aligning the media-related legal framework with the EU *acquis*.

The Agency for Audio and Audio-visual Media Services (AAVMS) is vested with regulation and oversight of the broadcast media. The AAVMS is responsible for monitoring the media, submitting weekly reports to the SEC, and publishing its findings online starting from the announcement of the elections. For these elections, the AAVMS has developed a voluntary code of conduct for political parties and candidates in the

⁴⁰ As for distribution of airtime, the law only covers political parties, and is not adjusted to non-party nominated contestants. In its March 2024 regulation, AAVMS distributed airtime among presidential candidates based on their party affiliation, as opposed to prior practice, when the airtime was distributed equally among presidential contestants. The current distribution, in practice, provides more airtime to candidates endorsed by the main ruling and opposition parties.

⁴¹ During the official campaign period, *MRT* is obliged to dedicate 30 per cent of its newscasts to general events, 30 per cent to the ruling parties, 30 per cent to the parliamentary opposition, and 10 per cent to non-parliamentary parties and independent candidates.

⁴² For example, according to the Association of Journalists of Macedonia (AJM), in 2024, there was one case of a journalist being physically attacked during an interview in Kichevo, resulting in an injury.

⁴³ The amendments, among other measures, increased penalties for assaulting journalists or media workers and a reduction in defamation fines for journalists, editors, and media outlets.

online sphere.⁴⁴ While a coordination body consisting of representatives of the AAVMS and CSOs has been created to register and publish related notifications, this body lacks enforcement powers.

The state finances all political advertisements in broadcast, print and online media outlets registered with the SEC (see also *Campaign Finance*). Several ODIHR EOM interlocutors noted that provisions for reimbursing advertisement costs may be misused by some online news portals that are specifically created to channel state funds during election campaigns.

The ODIHR EOM started its quantitative and qualitative monitoring of election-related primetime coverage on seven nationwide television stations and four news websites on 1 April.⁴⁵

XI. ELECTION DISPUTE RESOLUTION

Election-related complaints can be lodged by contestants; voters can only file complaints about violations of their individual rights and on the misuse of administrative resources. Most complaints, including those related to voter and candidate registration, violations of campaign rules, election-day irregularities and election results, can be filed with the SEC, which is also entitled to initiate cases *ex officio*. The law designates MECs to decide on election-day complaints related to the right to vote, a mandate practically interpreted as correcting omissions in the voter lists. The SEC may initiate misdemeanour or criminal proceedings for serious election-related violations with the basic courts or prosecutor's offices. The Administrative Court is the final appellate instance for the decisions by the SEC and SCPC. The Constitutional Court assesses the constitutionality of election-related legal acts or decisions.

The SEC must decide on voter registration complaints within 4 hours during the electoral process and within 2 hours on election day; it must decide on complaints related to election campaigns and challenges of election results within 72 hours. The Administrative Court has 24 hours to decide on complaints regarding voter and candidate registration and election day irregularities, and 48 hours to review appeals on election campaign irregularities and election results. Several ODIHR EOM interlocutors, including from the judiciary, noted that some deadlines for deciding on complaints are unduly short, which might undermine the quality of decisions; in addition, for some violations, no effective sanctions are prescribed.

So far, the SEC has rejected two complaints regarding voter registration abroad as unsubstantiated, since the applicants did not submit all necessary documents. Upon appeal, the Administrative Court decided that the voters should be registered. The Administrative Court rejected as inadmissible two complaints about an advertisement issued by VMRO-DPMNE, seeking for a potential presidential candidate of the party, as well as a complaint contesting a SEC decision for its alleged failure to abide by the legal minority quotas in MEC formations. The basic court in Tetovo handled two requests for party leadership registration from the two factions of the Alliance of Albanians. On 14 March 2024, a group of voters challenged the constitutionality of the Electoral Code and its amendments on grounds that they do not ensure the equality of contestants in the electoral process.

Many ODIHR EOM interlocutors expressed limited trust in the adjudication of their election-related complaints, citing a backlog of unresolved disputes in previous elections, the potential for corruption within the judiciary and law enforcement agencies, as well as possible interruptions in inter-agency cooperation.⁴⁶

⁴⁴ The AAVMS informed the ODIHR EOM that, prior to the beginning of the campaign period, three political parties and 22 media outlets pledged to adhere to the [Code of Conduct](#).

⁴⁵ The ODIHR EOM monitoring includes the public broadcasters *MRT 1* and *MRT 2* (in Albanian), the private broadcasters *Sitel*, *Kanal 5*, *Alsat-M* (in Albanian), *Alfa TV* and *Telma*, as well as the online portals *kurir.mk*, *plusinfo.mk*, along with *tetotavsot.com* and *lajmpress.org* (in Albanian).

⁴⁶ The 2023 OSCE Corruption Risk [Assessment](#) of the Judiciary of North Macedonia highlighted a decline in trust within the judiciary and law enforcement, alongside a rise in vulnerabilities to corruption. See also the [announcement](#) of the cessation of cooperation between the public prosecutor and the SCPC concerning the prosecution of corruption cases.

XII. ELECTION OBSERVATION

The Electoral Code allows for citizen and international observation of the entire election process. Citizen and foreign associations registered at least one year before election day, with statutes that include the protection of human rights, along with international organizations and representatives of foreign countries, may apply for accreditation with the SEC until 10 days prior to each election day. Electoral contestants are also entitled to appoint their authorized representatives to monitor election processes at all levels of the election administration.

Several civil society groups have expressed their intentions to observe the elections, with *CIVIL – Centre for Freedom* and *Roma for Democracy* expected to deploy the largest groups of citizen observers. *Together We Can* (Zaedno mozhome), a CSO focused on promotion of rights of persons with disabilities, plans to field a group of observers to monitor the inclusiveness of the electoral process. Some other organizations focus on monitoring media and social networks, possible disinformation campaigns, as well as inter-community relations.

XIII. ODIHR EOM ACTIVITIES

The ODIHR EOM formally opened in Skopje with a press conference on 21 March. The ODIHR EOM established regular contacts with the SEC, the Ministry of Foreign Affairs and other high-level state officials, candidates and other representatives of political parties and movements, media, civil society, and members of the diplomatic and international community.

The Parliamentary Assembly of the Council of Europe (PACE) has announced its intention to deploy an observer delegation for the 24 April election day; the OSCE Parliamentary Assembly (OSCE PA), the European Parliament (EP) and PACE have announced their intention to deploy observer delegations for the 8 May election day. Alfred Heer (Switzerland) will act as PACE Head of Delegation.

*The English version of this report is the only official document.
Unofficial translations are available in Macedonian and Albanian.*