



Office for Democratic Institutions and Human Rights

THE NETHERLANDS

EARLY PARLIAMENTARY ELECTIONS

29 October 2025

ODIHR NEEDS ASSESSMENT MISSION REPORT

14 – 17 July 2025



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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

Following an invitation from the Government of the Netherlands to observe the 29 October 2025 early parliamentary elections, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 14 to 17 July. The ODIHR NAM was comprised of Goran Petrov and Yelena Kovalyova, ODIHR Election Advisers.

The purpose of the mission was to assess the pre-election environment and 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 state institutions and the election administration, as well as representatives of the judiciary, media, political parties and civil society. A list of meetings is annexed to this report.

ODIHR would like to thank the Ministry of Foreign Affairs and the Ministry of the Interior and Kingdom Relations 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 ODIHR NAM and for sharing their views.

II. EXECUTIVE SUMMARY

The Netherlands is a constitutional monarchy with executive power exercised by the government and legislative authority vested in a bicameral parliament. Following a government crisis over asylum policy, the coalition collapsed in June 2025, prompting the King to dissolve the parliament and call early elections for 29 October. Members of the House of Representatives are elected for four years through proportional representation system in a single nationwide constituency, with open candidate lists, where voters may cast a preference vote for a candidate. In the outgoing parliament, women hold 39 per cent of seats, though representation of women from diverse backgrounds remains limited.

The electoral legal framework was recently amended. The changes concerned the use of software for processing and determining election results, some election related deadlines, and the lines of election related responsibilities within governmental agencies and election commissions. The 2023 constitutional amendments strengthened, *inter alia*, human rights and anti-discrimination guarantees. Some ODIHR recommendations remain unaddressed, including on judicial appeals of election results; deadlines for handling election-related complaints; alternatives to proxy voting; and the establishment of an independent oversight body for political finance. Several ongoing legislative initiatives, some in line with prior ODIHR recommendations, were stalled by the dissolution of the parliament.

Election administration is decentralised between national and local levels, with the Ministry of the Interior and Kingdom Relations (MoIKR) responsible for oversight and the Electoral Council (EC), an independent permanent electoral body acting as the Central Election Commission, while the electoral process is administered by municipal authorities and temporary local-level election

commissions. All poll workers receive mandatory training, with a particular focus on presidents of polling stations and staff responsible for counting. All municipalities have opted to use the results tabulation software system developed by the EC. All ODIHR NAM interlocutors expressed confidence in ability of election administration at all levels to conduct elections impartially and professionally.

Polling stations are required by law to be independently accessible, and voters with physical disabilities may receive assistance inside the booth from a person of their choice, although this right does not extend to those with intellectual disabilities or low literacy. For these elections, the authorities will resume piloting a compact ballot format designed to reduce ballot size and enhance usability, although ODIHR NAM interlocutors noted that it may also lead to a higher risk of irregular markings and invalidated votes.

Voter registration is automatic and based on the continuously updated population register. According to the MoIKR, over 13 million voters are registered. Municipalities must distribute voting cards by 15 October, which allow to vote in any polling station within voters' municipality. Voters residing abroad must register with the municipality of The Hague by 17 September and may choose to vote by post or by proxy. ODIHR NAM interlocutors did not raise any issues with the voter registration process.

All voters, including those abroad, may authorise a proxy if they cannot attend a polling station, with each voter permitted to cast up to two in addition to their own. While ODIHR has previously recommended reconsidering proxy voting as inconsistent with ballot secrecy, many interlocutors regarded it as a convenient and established practice. In April 2025, the House passed a bill, now pending in the Senate, introducing safeguards such as prohibiting proxy solicitation, requiring voters themselves to initiate arrangements, and raising penalties, but it will not be adopted in time for these elections.

The EC registers all candidate lists, which may vary or be identical across all 20 districts. Non-parliamentary parties, other groups, and individual candidates must pay a deposit of EUR 11,250 and submit 30 support signatures per district. There are no legal diversity requirements, though most parties apply some internal rules on gender balance and broader inclusion measures. ODIHR NAM interlocutors generally considered the process inclusive but noted it remains paper-based and overly bureaucratic, with plans to propose digitalisation for future elections.

Women remain underrepresented in political life, holding 39 per cent of seats in the House of Representatives, 32 per cent in the Senate, 36 per cent in municipal councils, and 7 out of 17 ministerial portfolios within the outgoing government. ODIHR interlocutors stated that women of diverse backgrounds remain underrepresented at all levels. The absence of gender-sensitive promotion strategies and media requirements further limits visibility of women candidates. Women, especially those with a certain ethnic background, face disproportionate online abuse and threats.

Campaigning is largely unregulated, apart from municipal bylaws on public gatherings and outdoor advertising. ODIHR NAM interlocutors noted that while traditional campaigning remains relevant, it is increasingly shifting online, where the environment is polarized, hostile, and susceptible to manipulation, disproportionately affecting women from certain ethnic backgrounds and disadvantaging smaller parties. Online campaigning is not directly regulated nationally but is shaped by EU legislation. Disinformation, including from foreign sources, is regarded as an emerging threat, though no major incidents have been reported. MoIKR co-ordinates intra-institutional resilience and digital threats efforts, which were extended ahead of these elections, the measures include briefings for municipalities, public communication on disinformation, and use of the Digital Services Act

“flagger status” to request action from platforms, technical assistance to contestants, and protection against cyberattacks.

The regulation on campaign finance was not changed prior to the 2025 parliamentary elections. Most ODIHR interlocutors expressed satisfaction with the campaign financing rules, however, some noted that current political dynamics rendered its control insufficient, mandating reform. Election campaigns can be financed from substantial public subsidies, party funds, loans and private monetary and in-kind donations up to EUR 100,000 per donor; foreign and sizeable anonymous donations are prohibited. Donations are subject to accounting and disclosure under short deadlines. The MoIKR, responsible for the campaign finance oversight, verifies and publishes the reports - one on donations and loans submitted before the elections, and another required from winning parties after election day - one week before and two months after the elections, respectively. The sanctions range from the temporary withdrawal of public subsidies, including for the failure to submit financial reports, to administrative fines for other violations.

The legislation establishes a comprehensive system of guarantees for the freedom of expression and the media. The media landscape is diverse and offers a plurality of viewpoints. Television remains the primary source of political information, followed by online media. The ODIHR NAM interlocutors commended the strong editorial independence and the capacity of the national media to provide qualitative and accurate information, however, most voiced concerns about the lack of national fact-checking initiatives. The Dutch Media Authority (DMA) is the oversight entity, including for online content. The public and private broadcasters plan series of electoral debates, separate for larger and smaller political parties, as well as extensive campaign news coverage, interviews and talk shows with contestants and political experts. While campaign media expenditure is unlimited, political media presentations are capped at 12-minute ceiling, and contestants are entitled to free airtime on TV and radio.

Expedited remedial procedures are available for specific aspects of the electoral process, including voter and candidate registration, and election day proceedings, while other aspects are within the general civil and administrative jurisdictions without expedited deadlines. The parliament reviews the complaints recorded in the results protocols from all the PSCs nationwide and may initiate a partial or total recount of votes or repeat elections in case of serious violations. Contrary to prior ODIHR recommendations and international standards and good practice, there is no mechanism of judicial review of the complaints related to the election results.

All ODIHR NAM interlocutors expressed a high degree of confidence in the electoral process, the ability of contestants to campaign on an equal basis and the management of election day proceedings. At the same time, most ODIHR NAM interlocutors welcomed a potential ODIHR observation activity for the upcoming early parliamentary elections, underlining that an independent external assessment would contribute to further improvements of the electoral process. They emphasized the importance of the assessment by a potential ODIHR election observation activity in light of the highly polarized political environment and the ongoing legislative reform of campaign finance and oversight system, as well as the assessment of the resilience capacity of the election administration. Based on these findings, the ODIHR NAM recommends the deployment of an Election Expert Team for the 29 October 2025 early parliamentary elections to assess the election campaign, including on social media, and campaign finance and oversight frameworks.

III. FINDINGS

A. BACKGROUND

The Netherlands, the largest constituent country of the Kingdom of the Netherlands, is a constitutional monarchy in which the King serves as head of state with largely ceremonial powers.¹ The government consists of the Council of Ministers, headed by the Prime Minister. Legislative power is vested in a bicameral parliament comprising the 150-member House of Representatives (*Tweede Kamer*) and the 75-member Senate. Members of the House are directly elected for four-year terms; the Senate is elected indirectly by the 12 provincial assemblies and four electoral colleges representing the Caribbean special municipalities and Dutch nationals abroad.²

In the 22 November 2023 early parliamentary elections, 15 parties won seats in the House of Representatives. After protracted coalition talks, a new government was formed in July 2024 by the Party for Freedom (PVV, 37 seats), the People's Party for Freedom and Democracy (VVD, 24), the New Social Contract (NSC, 20), the Farmer–Citizen Movement (BBB, 7) and the remaining parties entered the opposition.³ In the 2023 elections, women won 59 of 150 seats (39 per cent) of the second chamber, currently hold 32 per cent of Senate seats, and 36 per cent of municipal council seats.⁴ However, ODIHR interlocutors stated that women from diverse backgrounds remain underrepresented across all levels of government.⁵

In autumn 2024, the government initiated a package of immigration reforms, declared a state of asylum crisis, and proposed emergency regulation that would bypass Parliament's approval, but withdrew it after institutional backlash and criticism over the impact on democratic oversight.⁶ In June 2025, the government resigned, after PVV withdrew coalition support, citing unresolved disagreements over asylum policy and implementation. The King thereafter dissolved the House and scheduled early parliamentary elections for 29 October.

ODIHR has observed five elections in the Netherlands since 2006.⁷ Most recently, ODIHR deployed an Election Expert Team for the 17 March 2021 parliamentary elections. The final report issued in July 2021 contains 10 recommendations, including 5 priority ones, for the authorities to improve the electoral process and bring it further in line with OSCE commitments.⁸

¹ The Kingdom also includes three other self-governing Caribbean countries: Aruba, Curaçao, and Sint Maarten, which are autonomous except in matters of defence and foreign affairs. The country of the Netherlands itself comprises the territory in Europe as well as the Caribbean special municipalities of Bonaire, Saba, and St. Eustatius.

² The Senate elections will occur in May 2027, following the provincial elections.

³ GreenLeft–Labour Party (GL–PvdA) – 25 seats; Democrats 66 (D66) – 9; Christian Democratic Appeal (CDA) – 5; Socialist Party (SP) – 5; Denk – 3; Party for the Animals (PvdD) – 3; Forum for Democracy (FvD) – 3; Reformed Political Party (SGP) – 3; Christian Union (CU) – 3; Volt – 2; and JA21 – 1.

⁴ As of 2025, the Netherlands descended in the IPU Women's parliamentary representation [ranking](#) from the 27th to 32d place, compared to 2023. In the outgoing government, 7 of the 17 ministerial posts were held by women.

⁵ According to the ODIHR NAM interlocutors, sexism, racism and other forms of violence and discrimination are main deterrent factors for political activism in the Netherlands, including by women politicians, and for those of colour or of migrant background. Racial and gender-based intolerance, aggression, social stereotypes and traditional gender roles are, according to some studies, [found](#) to contribute to underrepresentation of women in local governments.

⁶ The government introduced several immigration reform proposals. In July 2025, the House of Representatives passed legislation introducing stricter asylum rules, including reduced residency duration, limitations on family reunification, and a two-tier protection system; the bills are awaiting a vote in the Senate in autumn 2025.

⁷ See all [previous ODIHR election related reports on the Netherlands](#).

⁸ In paragraph 25 of the [1999 OSCE Istanbul Document](#), OSCE participating States committed themselves “to follow up promptly the ODIHR's election assessment and recommendations”.

B. ELECTORAL SYSTEM AND LEGAL FRAMEWORK

The 150 Members of the House of Representatives, or the Second Chamber (*Tweede Kamer*) of the Parliament (*Staten-Generaal*) are directly elected for a four-year term through a proportional representation system from open candidates lists in a single nationwide constituency, divided to 20 districts for diversifying representation.⁹ Voters cast one preferential vote for a candidate on a contestant's list, and that vote also counts toward the list's total. Each contestant receives as many seats as the number of full natural electoral quotas it attains across the country (sum of all valid votes divided by 150), and the remaining seats are apportioned among the contestants under the largest average or largest remainder methods.¹⁰ Each contestant's national seat total is then proportionally distributed among district lists under the largest-remainder method based on the contestant's electoral quota. Within each district list, candidates who reach at least 25 per cent of the natural electoral quota in preference votes are elected, and any remaining list seats are filled according to the list order.

Parliamentary elections are primarily regulated by the 1954 Charter of the Kingdom of the Netherlands, the 2002 Constitution, the 1989 Elections Act, and the 1989 Elections Decree that unifies prior election-related regulations.¹¹ The Netherlands is a party to major international and regional instruments on democratic elections.¹² The Constitution formally integrates international law into national legal system.

The legal framework has recently been amended. The Constitution was reviewed in 2022 and 2023, with the primary changes strengthening human rights guarantees.¹³ The Election Act was last amended in 2024 and 2025. The 2025 changes concerned the use of software for processing and determining election results; the 2024 amendments changed, *inter alia*, some election related deadlines, i.e., for voters to apply for changing the polling station, and clarified the lines of election related responsibilities within governmental agencies and election commissions.¹⁴ Some previous ODIHR recommendations remain unaddressed, including those on judicial appeals of election results; deadlines for deciding election-related complaints; alternatives to proxy voting; and an independent oversight body for political finance.

Several electoral amendments are pending at different stages of the legislative process, some of them in line with prior ODIHR recommendations. These include reforming political financing oversight, limiting each voter to casting a proxy vote for only one voter, and changing the format and reducing

⁹ The electoral districts are determined in the law. The contestants may propose different candidate lists in different districts, list the candidates in different order, or register identical lists across districts.

¹⁰ The law regulates the choice of the apportionment method depending on the number of allocated seats.

¹¹ Other relevant legislation includes the 2013 Political Finance Act, the 2009 General Administrative Law Act, and the 1994 Criminal Code, as well as organic laws on the courts and procedural codes.

¹² Including the 1966 International Covenant on Civil and Political Rights (ICCPR), 1979 Convention for the Elimination of All Forms of Discrimination against Women (CEDAW), 1965 Convention on the Elimination of All Forms of Racial Discrimination (CERD), the 2003 Convention Against Corruption (CAC), and the 2006 Convention on the Rights of Persons with Disabilities (CRPD). The Netherlands is also a party to the 1950 European Convention for the Protection of Human Rights and Fundamental Freedoms and the 1995 Framework Convention for the Protection of National Minorities.

¹³ In 2022, constitutional amendments [introduced](#) constitutional guarantees of fundamental rights and democratic rule of law, and [added](#) a new provision related to the right on fair trial; [reviewed](#) the procedures for constitutional amendments; changed regulation on the right to privacy of correspondence; and [introduced](#) and regulated the Electoral College for Non-Residents for the election of the upper chamber of the parliament. The [2023 changes](#) extended the prohibition of discrimination to sexual orientation and disability grounds.

¹⁴ The changes were introduced by the Election Results Software [Act](#) of 20 March 2024 and the 2025 Electoral [Decree](#) on Election Results enter into force on 1 August 2025; [Act of 23 October 2024](#) on the rectification of technical defects and gaps as well as making other amendments of a minor nature to various legal provisions mainly in the field of the Ministry of the Interior and Kingdom Relation entered into force on 1 January 2025.

the size of the ballot paper. A new Political Parties Act establishing, *inter alia*, a new political and campaign finance oversight institution, had passed several rounds of public consultations and was forwarded to the parliament on 13 May 2025. However, the dissolution of the parliament stalled the reforms.¹⁵

C. ELECTION ADMINISTRATION

Election administration is decentralised between national and local governments and election commissions. The Ministry of the Interior and Kingdom Relations (MoIKR) oversees elections nationally, and 342 municipal and 3 public entity governments organise them locally, appointing Municipal Electoral Commissions (MECs) and about 9,000 Polling Station Committees (PSCs). The commissions include the Electoral Council (EC), 20 District Election Commissions (DECs), MECs, and PSCs. All ODIHR NAM interlocutors expressed confidence in their ability to conduct elections impartially and professionally.

Several executive bodies, including the MoIKR and the Ministry of Justice, cooperate within the National Crisis Center (NCC), - part to a wider mandate of the National Coordinator for Terrorism and Security - responsible for counter-terrorism and cybersecurity measures, including with respect to the election-related processes and infrastructure. ODIHR interlocutors stated that the state and local information infrastructure is increasingly subject to cyberattacks.¹⁶

The MoIKR proposes legislation, issues regulations and instructions to municipalities, evaluates elections for improvements, and designs ballots and voting cards. The EC is a permanent, independent body of seven members appointed through open recruitment, currently the EC is composed of four women and three men, including the chairman. The EC advises the government and parliament on electoral matters and, during elections, acts as the Central Election Commission to register party names and logos, approve candidate lists for all districts, assign list numbers, aggregate and finalise results, and allocate mandates.

The 20 DECs tabulate, announce, and forward the results established by the MECs within their jurisdiction to the EC. Municipal governments conduct voter registration, ballot printing, distribute voting cards, establish and staff polling stations. PSCs, responsible for managing voting and vote count, are temporary bodies, each composed of a chairperson and between two and six members. The municipalities organize mandatory training for poll workers through both online and in-person courses. The EC informed the ODIHR NAM that the emphasis is put on training the PSC presidents and staff that count the ballots, while other PSC members will at minimum get a shorter retraining. The EC will also make an online training module available on 1 September.

The newly amended Elections Act formalises the conditions for using software to count votes and allocate seats. The software must meet legally prescribed technical and cybersecurity requirements, including open-source code, secure data exchange protocols, and independently verifiable vote-counting and seat-allocation functions. According to the EC, all municipalities have opted to use the software it provided.

¹⁵ For example, in 2024, upon the Minister of the Interior and Kingdom Relations' request, the Council of State has issued an [opinion](#) on the creation of an independent body for electoral disputes, in particular to decide on contested election results. The governmental initiative "[Election Agenda 2030](#)" (updated after the European Parliament elections) stipulates measures to simplify voting by introducing smaller ballot paper and additional assistance to voters.

¹⁶ For example, in April 2025, a foreign DDOS attack led to suspension of operation of webpages of over 20 municipalities. In June 2025, similar DDOS [attacks](#) were targeted institutions related to the NATO summit in The Hague, as well as several municipalities.

The law requires all polling stations to be independently accessible, and the exceptions must be reported to the municipal council.¹⁷ Voter who cannot vote independently due to a physical disability may be assisted inside the voting booth, by a person of their choice; however, this right does not extend to voters with intellectual disabilities or low literacy. The ODIHR NAM interlocutors noted challenges for voters with visual impairments due to lengthy ballots in small print. In May 2025, the government adopted the Action Plan on Accessible Voting 2025–2029, developed together with disability organizations and experts; however, many of the proposed measures, especially those that require legal changes, will not apply for these elections.¹⁸

The MoIKR and the EC will, for the second time, pilot in five municipalities using ballots in a compact format. The new ballot template provides a blank space to be filled with the respective numbers of the list and the candidate, while the actual compilation of the candidates list is provided as a separate booklet.¹⁹ The pilot aims to improve usability, particularly for voters with disabilities, to reduce counting errors and to optimise the format for potential machine readability. Most ODIHR NAM interlocutors assessed the new template positively, although the MoIKR and the EC also noted that its use increases the number of invalid ballots due to a higher risk of irregular markings.²⁰

The election authorities, in co-operation with various interest groups, provide extensive voter information online, including for voters with intellectual impairments. The law does not require provision of voter information in national minority languages.²¹ According to the ODIHR NAM interlocutors, in general, municipalities do not officially translate voter information into other languages, but some include machine translation functions on their websites.

D. VOTER REGISTRATION

All citizens aged 18 and over have the right to vote, except those whose rights are suspended by court order for crimes seriously undermining the democratic order, punishable by over one year of imprisonment.²² Voters in confinement on election day can vote only through a proxy. There are no voting restrictions for persons with intellectual or psychosocial disabilities, including those under guardianship. Voter registration is automatic and based on the central population register continuously updated by municipalities. According to the MoIKR, there are over 13 million registered voters. No ODIHR NAM interlocutors raised any issues with voter registration.

Municipalities must send voting cards to all eligible voters by 15 October 2025. Voters may cast their ballot in any polling station in their municipality or, if they obtain a separate voting pass, anywhere in the country. To vote, they present their card and ID to the polling station committee, which verifies its validity, and the voting card is retained once the ballot is issued. Replacement cards can be requested until noon on the day before the vote. Voters residing abroad must register or update their

¹⁷ According to the Open State Foundation [data](#), some 5 per cent of polling stations were inaccessible for the 2024 European Parliament elections.

¹⁸ The [2025-2029 Action Plan](#) notes that over 2 million Dutch citizens face barriers to independent voting due to physical, cognitive, or literacy challenges. It proposes measures such as improved online polling station information, assistive tools at polling places, changing the law to expand categories of voters who can be assisted in the booth, and accessible materials for voters and parties, and closer co-operation with disability organizations.

¹⁹ The ballot lists require a selection of only ordinal candidate numbers which, when combined with the selected party, uniquely identify the chosen candidate.

²⁰ The MoIKR informed the ODIHR NAM that the number of invalid ballots with a new format was 0.74 per cent, compared to 0.16 per cent for the regular ballot.

²¹ Except for the use of Papiamentu and English in the Caribbean Netherlands.

²² Residents of Aruba, Curaçao, and Sint Maarten are generally not eligible to vote in the parliamentary elections, except for the Dutch public servants and their families residing in the territories on duty, or the Dutch nationals resident in the Netherlands for at least ten years.

previous registration with The Hague municipality by post or electronically by 17 September, and indicate whether they prefer to vote by post or proxy as well as to receive their ballot.²³

All voters, including those residing abroad, may authorise a proxy to vote on their behalf. One voter may cast no more than two proxy votes in addition to their own. No justification is required to request a proxy, but the legislation does not permit issuing proxies at the polling station. ODIHR has previously recommended reconsidering proxy voting due to its inconsistency with the secrecy of the vote. However, many ODIHR NAM interlocutors viewed it as a convenient and longstanding practice and did not raise objections to its continued use.²⁴ A government bill to enhance safeguards against proxy abuse was passed in the House of Representatives in April 2025 and is pending in the Senate. The bill aims to prevent abuse of proxy voting by prohibiting the solicitation of proxies, ensuring that only the voter can initiate a proxy arrangement, expanding the ban to include requests made in person or online, and increasing the penalties for violations.²⁵

E. CANDIDATE REGISTRATION

All eligible voters who are 18 at the time of nomination may stand for elections. The EC is responsible for candidate registration of all district lists. Political parties and other groups may register a name under which they will contest the elections, subject to a EUR 450 fee. Alternatively, they may submit a list without a registered name and appear on the ballot with only an ordinal list number, which also applies to candidates that wish to stand individually. Non-parliamentary parties, other groups and individual candidates' lists are required to pay a deposit of EUR 11,250 and also submit 30 support signatures from each district for which they intend to be included on the ballot.²⁶

Parties with 15 or more seats from previous elections may nominate up to 80 candidates across their lists; all other lists are limited to 50 candidates due to the ballot format and size, as the ballot lists all registered candidates in the district (see also *Election Administration*). There are no legal requirements regarding gender balance on candidate lists; however, according to ODIHR NAM interlocutors, most parties have internal rules ranging from zipper systems, to minimum quotas and general diversity principles. Minority and disability representation is generally not regulated, although some parties apply broader inclusion measures, such as regional origin, ethnic or cultural background, and age. Some right-wing parties apply a value-based approach, without diversity considerations.

ODIHR NAM interlocutors generally regarded the candidate registration process as inclusive, though some reflected on the need to modernize it, noting it is paper-based and overly bureaucratic. MoIKR and EC informed the ODIHR NAM of their intention to propose digitalization of this process in future.

F. CAMPAIGN ENVIRONMENT

The Constitution guarantees freedoms of association, assembly and expression. There are no campaign regulations at the national level; apart from municipal bylaws on public gatherings and outdoor advertising, including on posting of campaign material, election campaigns remain largely unregulated. The main campaign issues centre on housing, cost of living, defence and security, healthcare, and the country's international positioning, including in relation to the war in Gaza. In

²³ An [estimated](#) 1 million Dutch citizens reside abroad, mostly within the EU. Based on the [2023 parliamentary elections results](#), more than 100,000 voters are permanently registered to vote from abroad.

²⁴ According to the MoIKR, on average, some 10 per cent of voters used this voting method in previous elections.

²⁵ See more information about the [bill](#).

²⁶ For nominations in smaller constituencies, 10 signatures suffice. A voter must not sign in support of more than one nomination. The deposit is returned if the contestant gains at least three quarters of the electoral quota.

addition, some parties, especially on the right of the political spectrum, are renewing emphasis to immigration, framing it in terms of its perceived impact on housing shortages and pressures on public services, while other parties seek to reframe the discussion around labour market needs and the importance of social cohesion.

ODIHR NAM interlocutors noted that while traditional campaigning through rallies, canvassing, and media remains important, the campaign is increasingly shifting online.²⁷ ODIHR NAM interlocutors did not question the possibility of contestants to campaign. They emphasized that the online environment has become polarized and hostile, with politicians amplifying harsh rhetoric. Women, especially those from certain ethnic backgrounds, face disproportionate online abuse and threats. Some interlocutors also observed that distorted or false narratives are amplified, including through emerging technologies such as Artificial Intelligence (AI). Overall, online campaigning was seen as resource-intensive, increasingly vulnerable to manipulation, and more difficult for smaller or newer political forces competing with established structures.

While there is no legislation directly regulating any aspects of online campaigning, it is partly shaped by the EU Digital Services Act (DSA), with the Authority for Consumers and Markets (ACM) designated as the national Digital Services Co-ordinator.²⁸ From 10 October, the new EU-wide Transparency and Targeting of Political Advertising Regulation (TTPA) will introduce new transparency requirements for political advertising.²⁹

Several ODIHR NAM interlocutors noted that disinformation, including from abroad, is regarded as an emerging threat, although no major incidents have been recorded. The national disinformation strategy, last updated in 2024, focuses on strengthening media literacy, supporting fact-checking, and enhancing international co-operation.³⁰ The MoIKR facilitates inter-institutional co-ordination on resilience and digital threats, meeting regularly to exchange assessments and plan responses, including briefings for municipalities, periodic threat analyses, public communication on disinformation, and use of the DSA “flagger status” to request action from platforms.³¹ It also informed the ODIHR NAM it is in the process of introducing several new resilience measures against digital threats ahead of these elections.³²

G. POLITICAL PARTY AND CAMPAIGN FINANCING

Political and campaign financing is regulated by the PFA, last amended in 2023.³³ A new Political Parties Act pending at the parliament is set to transfer the oversight mandate from the MoIKR to a

²⁷ Particularly through X, Instagram, Facebook, and TikTok, the latter noted as especially influential among youth.

²⁸ ACM liaises with the European Commission and the European Board for Digital Services, participates in working groups on information integrity, and engages Very Large Online Platforms (VLOPs) on election-related measures.

²⁹ According to the authorities, national legislation will follow at a later stage, but some TTPA provisions may apply within three months of its entry into force. The Media Authority, responsible for monitoring compliance, noted that the European Commission guidelines will be important to clarify labelling and transparency requirements.

³⁰ The MoIKR emphasized that it does not publicly counter perceived cases of disinformation, including deepfakes or AI-generated content, leaving this to civil society unless such content directly undermines the electoral process.

³¹ Apart from the election authorities, participants include ACM, the Media Authority, the Data Protection Authority, the National Co-ordinator for Counterterrorism and Security (NCTV), the Association of Netherlands Municipalities (VNG) as well as other institutional and civil society actors, including fact-checkers and research networks.

³² These include providing technical support to political parties and candidates, monitoring ‘doppelganger’ websites that impersonate political actors, issuing updated guidance and handbooks on countering disinformation, and strengthening protection against cyberattacks, including DDOS attacks.

³³ In 2025, the MoIKR [increased](#) most subsidies for political parties and their youth and research organisations.

new oversight agency, the Authority for Political Parties, with a wider scope of institutional independence, functions and entitlements.³⁴ While the announcement of the early parliamentary elections delayed the parliamentary debate on the bill until after the vote, all ODIHR NAM interlocutors, including the representatives of parliamentary parties, expressed support for it.

Political parties and election campaigns can be financed from public subsidies, monetary and in-kind donations from individuals and legal entities, and membership fees. Public financing to political parties is conditional upon and is primarily determined by their parliamentary representation and party membership.³⁵ The funds are earmarked for certain activities and expenses, including election campaign. Annual donations are limited to EUR 100,000 per donor per party, including its affiliated entities. Anonymous donations above EUR 250, and donations from foreign individuals and entities outside the European Economic Area (EEA) are prohibited.³⁶ Political parties are obliged to publish information on all contributions above EUR 1,000, while the donations above EUR 10,000 must additionally be reported to the MoIKR within 3 working days.³⁷ ODIHR NAM interlocutors from political parties noted some compliance challenges due to the short reporting deadline. There is no limitation on campaign expenditure.

Parliamentary parties must file annual financial reports, compiled by a chartered accountant, detailing income, loans, and the expenditure of earmarked public subsidies, to the MoIKR. During elections, all contestants must submit to the MoIKR a report on donations and loans for election campaigns and regular activities, and campaign-related donations to their candidates, from 21 to 14 days prior to the vote.³⁸ One month after election day, parties must submit an additional report accounting for the last twenty days before election. Both types of reports are verified by the MoIKR and are published one week before and two months after the elections, respectively.

The MoIKR conducts oversight over political and campaign finance; with the Minister exercising the main decision-making function, including sanctioning for violations, which was criticised by the ODIHR NAM interlocutors for a potential conflict of interests.³⁹ The sanctions range from the temporary withdrawal of public subsidies, including for the failure to submit financial reports, to

³⁴ The [bill](#), initiated by the MoIKR in 2022, along with the new rules consolidates regulations on political parties' functioning, financing, accountability and oversight. The bill proposes subsidies to local parties, increased disclosure requirements for national parties; and a possibility for a judicial ban of political parties. The new oversight agency, functionally independent, but organisationally and financially affiliated with the MoIKR, would have *inter alia*, investigative powers.

³⁵ Parties with at least one MP and at least 1,000 active members contributing membership fees are entitled to state subsidies, upon application with budgetary and activity plans. For 2025, the basic subsidy was set to approximately EUR 300,000 per party; additionally, parties received approximately EUR 95,000 per seat, and an apportionment of EUR 3,478,823, depending on party membership. Further subsidies are earmarked for youth organisations (the total budget is EUR 2,169,893), international co-operation organisations (in 2025, EUR 1,960,459 in total) and research entities (EUR 229,687 per party and additional EUR 23,892 per seat). Subsidies are disbursed in two instalments. Despite the largest representation, PVV is not granted public funding as the party has only one member, its leader Geert Wilders.

³⁶ Donations from Dutch citizens residing anywhere abroad are permissible. While donations from legal entities registered in the Netherlands by foreign subjects are legally not prohibited, it is generally considered as an unaddressed legal gap that may allow for the circumvention of the prohibition on foreign funding.

³⁷ The disclosure obligation applies to loans above EUR 25,000.

³⁸ Unlike the list submitters, candidates are not required to open campaign bank accounts and may use their private accounts for electoral fundraising and expenditure. The interim reports shall cover all monetary and in-kind donations over EUR 1,000 and loans, but the candidates' report is limited to campaign-related finance. While the political parties report on transactions from 1 year prior to the election year, those on candidates' finance cover the 2 years preceding the election year, up to 21 days prior to election day for both reports.

³⁹ The Minister acts upon advice from the Commission for Supervision of Political Party Financing, which issues opinions upon request. Commissioners are independent and cannot be affiliated with governing parties, with an additional four-year restriction after holding political or administrative posts.

administrative fines up to EUR 25,000. While the administrative fines have never been applied, the ODIHR interlocutors stated that public funding withdrawal is the mechanism of active recourse due to its perceived dissuasive nature.⁴⁰ Furthermore, the Minister is entitled to initiate criminal prosecution.

Most ODIHR NAM interlocutors expressed satisfaction with the current political and campaign financing rules, for facilitating a genuine political competition due to substantial public financial support and liberal donation rules. However, several interlocutors noted that the growing number of new political players, an increasingly volatile and hostile political climate, and the threat of potential foreign interference have made existing accountability and oversight mechanisms insufficient, despite the current rules, generally ensuring financial transparency. They stressed the need for strengthened control and oversight capacity.

H. MEDIA

The Constitution and the Media Act establish a comprehensive and detailed system of guarantees for the freedom of expression and freedom of media.⁴¹ The 2024 recent amendments to the Media Act did not affect electoral campaign rules.⁴² ODIHR NAM interlocutors underlined the well-established tradition of strong editorial independence, as well as the freedom of journalists to exercise their duties, which equip the national media with the capacity to provide qualitative and accurate information. However, most interlocutors voiced concerns about the lack of national fact-checking initiatives and generally low level of attempts to verify content for misinformation.

The Dutch media landscape is diverse, with over 600 broadcasters, including public and private TV and radio stations, as well as print and online media outlets, offering a plurality of viewpoints. Some ODIHR NAM interlocutors noted that recent media ownership consolidation may have far-reaching effects on the market.⁴³ Television remains the primary source of political information, followed by social networks and other online media.

The public broadcasting system includes 20 independent organizations under the umbrella of NPO (*Nederlandse Publieke Omroep*). ODIHR NAM interlocutors praised the public broadcaster for consistently delivering reliable, high-quality political content, including news tailored to diverse audiences, also in easy-to-understand formats and additional analysis designed for low literacy groups. ODIHR NAM interlocutors expressed concerns about the planned budget cuts for the NPO, which could affect the quality of its media offerings.

The Dutch Media Authority (DMA) is responsible for the Media Act implementation oversight, as well as for the licensing of private broadcasting.⁴⁴ The DMA's oversight is extended to online content generators on social media platforms, registered in the Netherlands or targeting the national audience.⁴⁵ During the election campaign, the DMA oversees the NPO distributing free campaign

⁴⁰ The decision to withdraw public funding was recently applied against several parties, including recently the BBB.

⁴¹ In 2025, the Netherlands improved its rating on [the Press Freedom Index](#), moving from the 4th to the 3^d place.

⁴² The 2024 amendments to the Media Act regulated investment into the Dutch cultural production.

⁴³ On 27 June 2025, the Dutch Authority for Consumers and Markets (ACM) approved the acquisition of RTL Nederland by Belgium-based DPG Media, assessed to influence approximately 50 per cent of news market. Following an in-depth review with the media regulator, the ACM [found](#) no significant risks to news quality, reporting freedoms, or advertising competition and imposed strict conditions for the merger to prevent adverse effects.

⁴⁴ The DMA sanctioning power for violations by the media outlets range from warnings to financial penalties.

⁴⁵ This applies to content generators with over 500,000 subscribers on YouTube, Instagram, and TikTok.

airtime among the political parties.⁴⁶ The DMA stated that its oversight role under the EU TTPA will increase in the election related processes.

The Press Council, a self-regulatory body, observes compliance with journalistic ethics regarding all media production, including online. All citizens and organizations are entitled to file to the council complaints over the journalistic work.⁴⁷ While it has no power to impose sanctions, decisions of the Press Council contribute to public opinion regarding journalistic conduct. Since 2022, the Press Council has received four election-related complaints; all were dismissed as unfounded.⁴⁸

The public broadcaster informed the ODIHR NAM about the plan to organise a series of debates on TV and radio, mostly in prime time, including the large-scale debates on the night before the elections. Debates were to be conducted in several issues, separately for large and small political parties. Commercial broadcasters were to organise a separate set of the debates. Additionally to the debates, numerous one-to-one interviews and talk shows with contestants, politicians and experts were foreseen.

The law does not impose specific limits on campaign expenditure in the media; political media presentations are subject to the commercial content regulation and must not exceed the general advertising ceiling of 12 minutes per hour. By law, the content of political advertisements is not subject to any monitoring or verification. The public broadcaster stated that its political coverage decisions depend on its internal editorial policy and estimated rankings.

ODIHR NAM interlocutors underlined the lack of diversity in political and election-related media coverage, with limited representation of persons with disabilities or members of minority groups. There are no requirements to facilitate representation of women politicians in the media during the campaign; the media coverage distribution within the political parties is based on the individual candidates' rankings and primarily results in campaign coverage featuring men of a specific profile. Most political parties and media representatives acknowledged that in the absence of gender-sensitive political promotion strategies, women candidates are not sufficiently featured in the media.

I. ELECTION DISPUTE RESOLUTION

Election dispute resolution is regulated by the Elections Act and the General Administrative Act, which establish remedial procedures for specific aspects of the electoral process, including voter and candidate registration, and election day proceedings. Expedited deadlines apply only for candidate registration disputes, which are to be resolved within six days. Other election-related disputes shall be decided under the general rules of administrative and civil procedure, within six weeks, in line with the general territorial jurisdiction rules.

The Administrative Jurisdiction Division of the Council of State resolves disputes related to voter registration, registration of party names, and candidate registration.⁴⁹ The Credentials Committee of the parliament checks the complaints recorded in the results protocols from all the PSCs nationwide and may initiate a partial or total recount of votes or repeat elections in case of serious violations.

⁴⁶ Each contestant is entitled to state sponsored 18 minutes of TV and 20 minutes of radio presentations divided per slots of 1.5 minutes and 20-30 seconds, respectively, that can be used during four weeks before the elections. The distribution is anonymised to ensure just and unbiased approach, consideration is given to ensuring equal qualitative and quantitative distribution, including equal access to prime time.

⁴⁷ The complaints may concern the compliance with the journalistic ethics, in line with the Press Council's [Guidelines](#).

⁴⁸ The rulings are available online [RvdJ 2023/3](#), [RdvJ 2022/32](#), [RvdJ 2022/23](#) and [RvdJ 2022/18](#).

⁴⁹ The Council of State informed that for the 2023 early parliamentary elections, seven disputes were brought before the Council, challenging the decisions on candidates and party names registration.

Contrary to prior ODIHR recommendations and international standards and good practice, there is no mechanism of judicial review of the complaints related to the election results.⁵⁰

All ODIHR NAM interlocutors expressed trust and confidence in the electoral dispute resolution mechanism and the established tradition of electoral integrity. However, most interlocutors underlined a need to substitute the obsolete mechanism of parliamentary review of election results with a judicial review to bring the Dutch model in line with the international standards for democratic elections.

IV. CONCLUSIONS AND RECOMMENDATION

All ODIHR NAM interlocutors expressed a high degree of confidence in the electoral process, the ability of contestants to campaign on an equal basis and the management of election day proceedings. At the same time, most ODIHR NAM interlocutors welcomed a potential ODIHR observation activity for the upcoming early parliamentary elections, underlining that an independent external assessment would contribute to further improvements of the electoral process. They emphasized the importance of the assessment by a potential ODIHR election observation activity in light of the highly polarized political environment and the ongoing legislative reform of campaign finance and oversight system, as well as the assessment of the resilience capacity of the election administration.

Based on these findings, the ODIHR NAM recommends the deployment of an Election Expert Team for the 29 October 2025 early parliamentary elections to assess the election campaign, including on social media, and campaign finance and oversight frameworks.

⁵⁰ Paragraph 20 of the 1996 HRC [General Comment no 25](#) to the ICCPR states that “There should be independent scrutiny of the voting and counting process and access to judicial review or other equivalent process so that electors have confidence in the security of the ballot and the counting of the votes”. Paragraph II.3.3.a of the 2002 Council of Europe Venice Commission’s [Code of Good Practice in Electoral Matters](#) states that “For elections to Parliament, an appeal to Parliament may be provided for in first instance. In any case, final appeal to a court must be possible.” See also ECHR judgments in the cases of [Mugemangango v. Belgium](#), [GC], no. 310/15, paras. 108,115,122, 10 July 2020; [Riza and Others v. Bulgaria](#), nos. 48555/10 and 48377/10, paras. 153-79, 13 October 2015; [Davydov and Others v. Russia](#), no. 75947/11, paras. 335-38, 30 May 2017; [Kovach v. Ukraine](#), no. 39424/02, paras. 54-62, 2008.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs

Myrthe Nolet, Senior Policy Officer
Daan Elders, Cluster Coordinator, East Flank
Johannes Kirpestein, Europe Directorate - Election Observation

Ministry of the Interior and Kingdom Relations

Aart Verloop, Head of the Elections Team
Annelie Ferment, Policy Coordinator
Hester Oomes, Policy Officer
Nicky Boot, Political Parties Coordinator
Savannah Mellendijk, Senior Political Party Policy Specialist
Dorine Dollekamp, Policy Officer Democracy
Hanneke Palm, Coordinating Policy Officer, Resilience Team

Commission for the Oversight of Political Party Financing

Martijn van Dam, Chairperson

Council of State

Eric Daalder, Judge, Judicial Division
Marcel Rijsdijk, Registrar

National Crisis Center

Puck (Karel) de Ruijter, Senior Advisor, Ministry of Justice and Security

Electoral Council

Hans Klok, Secretary Director
Diana van Driel, Team Leader

Delft Municipal Election Commission

Josine Schokker, Head of Operations Team, Customer Contact Centre, Elections Supervisor
Hulya Moran, Election Project Manager
Erik Markus, Head of Municipal Electoral Office
Asle Kaya, Helpdesk Coordinator
Xandra Zuurdeeg, Helpdesk Coordinator
Barry Raymakers, Director of Communications
Jean-Marc Kool, Deputy Project Manager for Elections

Association of Dutch Municipalities

Karin Huigsloot, Senior Policy Officer on Local Government
Hanneke van Katwijk, Legal Adviser

Dutch Media Authority

Marcel Betzel, Senior Policy Advisor for International Affairs
Ted van Osch, Market Access Advisor

Authority for Consumers and Markets

David Korteweg, Lawyer, Senior Enforcement Officer
Merel Koppenol, DSA manager

College of Human Rights

Barbara Oosters, Senior Policy Advisor on Human Rights

Samantha Smidt, Legal policy advisor on Human Rights

Political Parties⁵¹

Carl-Eric Rasch, Party JA21 (Correct Answer 2021)

Benjamin van Es, Campaign manager, People's Party for Freedom and Democracy

Floor de Groot, GreenLeft Party

Bram Kouwenhoven, Campaign Manager, New Social Contract

Media

Bas de Vries, Head of the Hague Editorial Team, NOS

Frits van Exter, Chairman, Dutch Press Council

Civil Society

Sophie Witteveen, National Board Chairperson, Dutch Women Council

Marion Minis, Dutch Women Council

Anne Valkering, Project Manager, *ProDemos*

Matthijs van Tuijl, Project Manager, *ProDemos*

Hanneke Propitius, Manager, Reading and Writing Foundation

International Community⁵²

Representatives of diplomatic missions of the Czech Republic, Finland, Switzerland, and Türkiye.

⁵¹ Meetings were requested with all parliamentary parties.

⁵² The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in the Netherlands.