

REPUBLIC OF NORTH MACEDONIA

LOCAL ELECTIONS October 2025

ODIHR NEEDS ASSESSMENT MISSION REPORT

24 – 27 June 2025



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REPUBLIC OF NORTH MACEDONIA LOCAL ELECTIONS OCTOBER 2025

ODIHR Needs Assessment Mission Report

I. INTRODUCTION

In anticipation of an invitation to observe the October local elections in North Macedonia, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 24 to 27 June 2025. The NAM was composed of Kseniya Dashutsina, ODIHR Senior Election Adviser, and Ranko Vukčević, ODIHR Election Adviser.

The purpose of the NAM was to assess the pre-election environment and preparations for the local 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. The NAM held meetings with officials from state institutions as well as with representatives of political parties, media, and civil society. A list of interlocutors is annexed to this report.

ODIHR would like to thank the Ministry of Foreign Affairs and Foreign Trade for its co-operation and assistance in organizing the NAM. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and for sharing their views.

II. EXECUTIVE SUMMARY

Local elections are held every four years to elect mayors and councils in 80 municipalities and the City of Skopje, and are set to take place by the end of October 2025. The electoral preparations occur amidst persistent political polarization, follow a major political realignment, and are viewed as a test for the newly formed government following the 2024 parliamentary and presidential elections.

These elections will be held under a largely unchanged legal framework. Most ODIHR NAM interlocutors assessed the legal framework as generally adequate for the conduct of democratic elections, but several acknowledged that it contains gaps and ambiguities impacting the clarity of the process. Several previous ODIHR recommendations remain unaddressed, including those related to effective safeguards against the misuse of state resources and voter pressure, enhanced transparency of campaign finance, and improved regulation and oversight of media conduct.

The elections are administered by the State Election Commission (SEC), 81 MECs, and some 3,500 Election Boards (EBs). Most ODIHR NAM interlocutors expressed overall confidence in the professionalism of the election administration, but raised concerns about its limited financial and human resources, including in critical areas such as cybersecurity. Several ODIHR NAM interlocutors noted possible difficulties in recruiting EB members due to the limited financial compensation and the high level of responsibility. The SEC plans to train approximately 35,000 election officials and revise its voter education materials. Several ODIHR NAM interlocutors noted persistent challenges with the physical accessibility of polling stations and emphasized the need for a more co-ordinated approach involving municipal authorities.

Citizens of 18 years or older are eligible to vote, except those deprived of legal capacity by a final court decision. Voter registration is passive and based on civil registry data. Most ODIHR NAM interlocutors expressed confidence in the accuracy of the voter register, but some raised concerns about the inclusion of citizens residing abroad and the limited interoperability of state databases.

All political parties met by the ODIHR NAM stated their intention to nominate candidates, and none foresaw challenges with the nomination and registration process. Unlike political parties, independent candidates and citizen groups must collect supporting signatures. On 21 May 2025, the Constitutional Court declared the 2024 amendment to the Election Code that imposed higher signature thresholds unconstitutional. Draft amendments to the Electoral Code alter the method of signature collection; however, some ODIHR NAM interlocutors stated that even if the changes are adopted, the number of signatures remains disproportionately high, and they considered this and the requirement to collect the signatures at designated notaries' offices or SEC regional offices as burdensome.

Women remain underrepresented in public and political life. While gender quotas are in place for municipal council candidate lists, several ODIHR NAM interlocutors noted that parties often meet formal requirements without actively supporting women's political participation. Interlocutors highlighted the lack of meaningful efforts to promote women within party leadership structures and cited persistent gender stereotypes, limited media visibility, and the absence of financial or logistical support as key barriers to women's full political participation.

Most parties and independent candidates met by the ODIHR NAM intend to campaign using a combination of traditional outreach and digital platforms. Most ODIHR NAM interlocutors noted that the misuse of administrative resources remains a recurrent issue, particularly at the local level, where incumbents seek reelection. Some interlocutors noted that voter pressure and intimidation, including targeting of public sector employees and welfare recipients, politically motivated public sector appointments and procurement practices, and vote-buying, particularly in economically disadvantaged communities, remain a concern. Several ODIHR NAM interlocutors also raised concerns about the largely unregulated nature of online campaigning, including the spread of disinformation and the lack of oversight of political advertising on social media platforms.

Previous recommendations to address gaps and inconsistencies in the regulation of campaign finance remain unaddressed. Campaigns can be funded from political parties' own funds and bank loans, as well as from donations. The law sets maximum amounts for donations and campaign expenditures and foresees sanctions for violations of campaign finance rules. Campaign finance oversight is carried out by the State Audit Office and the State Commission for the Prevention of Corruption, which informed the ODIHR NAM about their limited institutional capacity and an anticipated increase in workload for the upcoming elections. Several ODIHR NAM interlocutors expressed concern that enforcement remains limited and that violations rarely result in sanctions.

The media environment is diverse but highly polarized, with television and online platforms being the primary source of political information. Several ODIHR NAM interlocutors raised long-standing concerns about editorial bias, opaque ownership structures, and limited investigative journalism. All political advertisements in the broadcast, print, and online media are paid for by the state according to regulations on pricing and timing. Several ODIHR NAM interlocutors were critical of the formula for the distribution of media, including disproportionate visibility for major parties and the limited space available for smaller and independent candidates. The Agency for Audio and Audiovisual Media Services oversees broadcast media and reimburses outlets for state-funded political advertising. The public broadcaster is required to allocate free airtime to contestants and plans to organize mayoral debates and conduct public opinion polls.

The Electoral Code provides for a multi-tiered framework for election-related complaints and appeals, with the Administrative Court being the final instance in most cases. Some prior ODIHR recommendations, including those related to limited standing and restrictive deadlines, remain unaddressed. Several ODIHR NAM interlocutors expressed concerns about the overall independence and public trust in the judiciary, which they viewed as affecting confidence in the electoral dispute resolution process.

The Electoral Code allows for international and citizen observation, as well as party-appointed observers at all levels of election administration. Accredited observers may follow all stages of the process and obtain the results protocols. Several citizen observer groups plan to monitor the upcoming elections, with a focus on election day procedures, vote buying, disinformation, hate speech, foreign influence, and misuse of administrative resources.

The majority of the ODIHR NAM interlocutors stressed a strong need for an election observation activity and requested ODIHR to deploy a high number of observers to cover all stages of the electoral process. In particular, ODIHR NAM interlocutors highlighted the need to observe the legal framework and its implementation, candidate registration, the conduct of the campaign, media coverage, campaign finance, election dispute resolution and election day procedures, and possible voter intimidation and misuse of state resources. In addition, numerous ODIHR NAM interlocutors stressed the importance of observing the participation of women, persons with disabilities, and members of national minorities throughout the electoral process.

Based on the findings of this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming October 2025 local elections, as well as for a potential second round of mayoral elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 24 long-term observers to follow the electoral process countrywide, as well as 250 short-term observers to follow election day procedures. In line with ODIHR's standard methodology, the EOM will include a media monitoring element.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

North Macedonia is a parliamentary republic. Local elections are held every four years to elect the councils and mayors of 80 municipalities and the City of Skopje, either on the third or the fourth Sunday of October in the year when the municipal mandate expires. In the 2021 local elections then opposition VMRO-DPMNE and its allies won the majority of races, including in the capital Skopje, with the ruling Social Democratic Union of Macedonia (SDSM) experiencing a notable setback, followed by the resignation of Prime Minister Zoran Zaev. In the 2024 parliamentary elections, the coalition led by VMRO-DPMNE further solidified its position and secured a substantial majority. It

The current term ends in 2025, and elections are expected to take place on either 19 or 26 October 2025. The official date has to be announced by the President of the Assembly between 60 and 30 days prior to election day.

VMRO-DPMNE won 42 mayoral races, marking an increase of 37 compared to the previous cycle, while SDSM secured 16, a decrease of 41. The Democratic Union for Integration (BDI/DUI) won 11 mayoral races, followed by the Alliance for Albanians (AA) and the Besa Movement (Besa) with 2 each, and the Democratic Party of Albanians (PDSH/DPA) with 1. The Liberal Democratic Party – Democratic Renewal of Macedonia (LDP–DOM) coalition and Citizen Option for Macedonia (GROM) each won one mayoral seat, while independent candidates and others won four in total. VMRO-DPMNE won 468 seats in municipal councils, SDSM secured 396, BDI/DUI 169, AA 82, independent candidates and others 72, Levica 49, Besa 36, the LDP–DOM coalition 27, the Democratic Party of Turks 16, PDSH/DPA 8, and GROM 2.

subsequently formed a government with political parties For Our Macedonia (ZNAM) and VLEN, realigning the political landscape.³ Further, Gordana Siljanovska-Davkova, endorsed by VMRO-DPMNE, won the 2024 presidential election, becoming the country's first woman president.

Pre-electoral preparations occur amidst persistent political polarization and are seen as a test for the government's commitment to continued progress toward EU accession, including the implementation of rule-of-law benchmarks and addressing outstanding bilateral issues, which remain a condition for opening EU accession chapters. The context is also shaped by growing public disillusionment with the majority of institutions, exacerbated by the tragic fire in the Kochani nightclub, which raised concerns about emergency response capacity and overall governance standards.

Despite long-standing commitments to promote gender equality, including through the National Strategy for Gender Equality, women remain underrepresented in public and political life.⁴ Women represent 38 per cent out of 120 members of parliament (46 MPs), but hold only 3 of the 23 (13 per cent) ministerial positions, and 2 of the 81 mayoral positions. Several ODIHR NAM interlocutors emphasized that political parties have taken limited action to promote women within their leadership, with some relying solely on legal compliance with candidate list quotas. Structural barriers, including persistent gender stereotypes and the absence of financial or logistical support for female candidates, were noted as ongoing challenges.

ODIHR has previously observed 20 elections and 2 referenda in North Macedonia.⁵ Most recently, ODIHR deployed Election Observation Missions (EOM) for the 24 April and 8 May 2024 presidential and parliamentary elections, as well as the 2021 local elections. The final report for the 2021 local elections, issued in March 2022, contains 36 recommendations, including 9 priority ones, for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.⁶

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Local elections are primarily governed by the 1991 Constitution (last amended in 2019), the 2006 Electoral Code (last amended in 2024), the 2002 Law on Local Self-Government, and related regulations adopted by the State Election Commission (SEC). Most ODIHR NAM interlocutors assessed the legal framework as generally adequate for the conduct of democratic elections, but several acknowledged that it contains gaps and ambiguities impacting clarity of the process. Several previous ODIHR recommendations remain unaddressed, including those related to effective safeguards against the misuse of state resources and voter pressure, enhanced transparency of campaign finance, and improved regulation and oversight of media conduct. Several ODIHR NAM interlocutors acknowledged the need for a comprehensive review of the legislation, and while some noted insufficient political will to address fundamental shortcomings, others stressed the importance of avoiding legislative changes close to elections.

VLEN is a coalition of ethnic Albanian opposition parties that emerged ahead of the 2024 parliamentary elections. Its member parties include the Besa, AlternAtivA (AAA), Democratic Movement (LD), and Vetëvendosje (LVV). The AA, which was initially part of the coalition, withdrew in May 2025, and subsequently, Arben Taravari resigned as Minister of Health.

See all previous ODIHR <u>election-related reports on North Macedonia</u>.

In paragraph 25 of the <u>1999 OSCE Istanbul Document</u>, OSCE participating States committed themselves "to follow up promptly the ODIHR's election assessment and recommendations".

⁴ See <u>Gender Equality Strategy 2022-2027.</u>

Other relevant legislation includes the Law on Political Parties, Law on Financing Political Parties, Law on Media, Law on Audio and Audio-visual Media Services, Law on Prevention of Corruption and Conflict of Interests, Law on Personal Data Protection, Law on Administrative Procedure, and relevant provisions of the Criminal Code.

The Electoral Code has been subject to frequent amendments, often shortly before elections. It was last substantially revised in April 2024, and no further changes have been introduced, despite earlier efforts to initiate an inclusive reform. In June 2025, VMRO-DPMNE initiated draft amendments to the Electoral Code, prompted by the 21 May 2025 Constitutional Court decision that declared provisions regulating the signature threshold for independent candidates unconstitutional.⁸ The proposed amendments address several other issues, including procedures related to the budgeting and financial autonomy of Municipal Election Commissions (MECs). These amendments are expected to be adopted prior to the upcoming elections. In June 2025, the Ministry of Justice (MoJ) drafted a package of amendments to the Electoral Code, aimed at addressing a number of ODIHR recommendations, but these proposals have yet to be tabled in parliament and are not expected to be adopted prior to the upcoming elections.⁹

Mayors are elected in a two-round majoritarian system. To be elected in the first round, a candidate must receive more than 50 per cent of the votes cast. If no candidate meets this threshold, a run-off is held within two weeks between the two top candidates. Municipal councillors are elected for a four-year term under a proportional representation system using closed party lists and the *D'Hondt* method for seat allocation. According to several ODIHR NAM interlocutors, the number of councillors per municipality based on the 2021 census data might need to be recalculated, following a significant population decline. ¹⁰

C. ELECTION ADMINISTRATION

The elections are administered by the SEC, 81 MECs, including the Election Commission of the City of Skopje, and some 3,500 Election Boards (EBs). The SEC is a permanent body composed of seven members, four are nominated by the parliamentary majority and three by the opposition, based on proposals from political parties. The president of the SEC is selected from the members proposed by the opposition, and the vice-president from among those proposed by the governing majority. The SEC has recently appointed a Secretary General, filling a post that remained vacant for several years.

The SEC informed the ODIHR NAM of significant financial constraints, which limit its ability to fully implement planned activities. ¹² For local elections, certain logistical and financial responsibilities fall under the remit of municipal authorities. The SEC noted that a number of

The proposed amendment introduces a minimum threshold of one per cent of voters, and at least 3,500 signatures in the City of Skopje. On 17 June, parliament fast-tracked the amendment addressing this specific issue, with support from the governing majority and SDSM. While the general debate concluded, the vote was postponed due to the lack of a *Badinter* majority, which is a mechanism introduced after the 2001 Ohrid Framework Agreement. It is s special double majority requiring not only a general majority of MPs but also a majority of MPs from non-majority communities.

According to the MoJ, the draft was drawn from a previous working group of state institutions, political parties and civil society organizations held between 2018 and 2023. The proposed changes include provisions on the misuse of state resources, campaign finance transparency, and media regulation, including political advertising rules and expanded oversight powers for regulatory bodies.

The 2021 Census of Population, Households and Dwellings, was the third census held in North Macedonia since independence, and the first since 2002. The census recorded a resident population of 1,836,713, a decrease of 9.2 percent, over the preceding 19 years. According to Article 34 of the Law on Local Self-Government, "the number of council members shall be determined depending on the number of inhabitants of the municipality and shall not be less than 9 nor more than 33 members." According to ODIHR NAM interlocutors, an earlier attempt by VMRO-DPMNE to amend the law failed to secure the required majority, and the changes might be implemented through government decisions rather than parliamentary procedure.

The SEC plans to merge PSs with fewer than ten registered voters with the nearest PS, addressing a long-standing issue where these were previously not opened on election day.

12 It has received only about one-third of its projected operational budget for the upcoming elections.

municipal bank accounts are currently blocked, preventing them from carrying out electoral preparations. ¹³ Recently proposed draft amendments aim to address this issue by allowing these municipalities to open special-purpose accounts dedicated exclusively to election-related expenses. Moreover, the SEC informed the ODIHR NAM that it has limited human resources, including in areas critical for overseeing cybersecurity, which interlocutors identified as a growing area of concern. ¹⁴

MECs are composed of five members and five deputies, selected from public service employees for five-year terms. MECs are responsible for overseeing the electoral process within their respective municipalities. ¹⁵ EBs, which are responsible for administering election-day procedures, are composed of five members and five deputies, formed according to a mixed professional-political model: three members are randomly selected from public employees, while one is nominated by governing parties and one by opposition parties. Several ODIHR NAM interlocutors noted possible difficulties in recruiting EB members due to the limited financial compensation and the high level of responsibility. The law provides for equitable ethnic and gender representation in election administration bodies. ¹⁶

While the SEC has undertaken several initiatives to improve accessibility, several interlocutors noted that accessibility has deteriorated due to a lack of investment and the gradual degradation of public infrastructure, and emphasized the need for a more systematic approach.

Most ODIHR NAM interlocutors noted general confidence in the professionalism of the SEC and lower-level election administration, but some stated that the manner of their nomination cannot ensure full impartiality. The SEC informed ODIHR NAM that it has developed a comprehensive training strategy that includes certifying 120 trainers who will, in turn, train approximately 35,000 election officials, with an emphasis on consistent application of election-day procedures.

D. VOTER REGISTRATION

All citizens aged 18 and over are eligible to vote, except those deprived of legal capacity by a final court decision or convicted of certain criminal offences. Although the September 2021 amendments to the Electoral Code removed the blanket restriction on voting rights for persons deprived of legal capacity due to intellectual or psychosocial disabilities, several ODIHR NAM interlocutors noted that this change has not been meaningfully implemented, and these voters continue to face disenfranchisement in practice. ¹⁷ Some 1.8 million citizens are currently registered to vote.

The authorities explained that blocked municipal accounts are the result of enforcement actions following audit findings, often linked to outstanding financial liabilities or procedural irregularities identified by the State Audit Office.

Including the appointment and training of EBs, collection and verification of supporting signatures for independent candidates and groups of voters, tabulation and announcement of municipal-level results, and other technical preparations.

In municipalities where an ethnic community constitutes more than 20 per cent of the population, that community should be represented in the composition of MECs and EBs. Additionally, election administration bodies at all levels must include at least 30 per cent of members from the less represented gender.

See the ODIHR Assessment of the Electoral Participation of People with Disabilities and the Election Administration in North Macedonia. According to civil society representatives, courts continue to issue standardized decisions that do not explicitly assess or preserve voting rights, effectively maintaining the exclusion of persons placed under partial or full guardianship.

During the 15 July 2020 parliamentary elections, the SEC's results website experienced a distributed denial-of-service (DDoS) attack shortly after polls closed, temporarily disabling access to preliminary results. Although the counting process itself was not affected, the incident raised concerns about the cybersecurity of electoral infrastructure and highlighted the need for improved digital safeguards.

Voter registration for resident citizens is passive.¹⁸ Citizens are included on the voter list based on data from the civil registry, maintained by the Ministry of Digital Transformation, in cooperation with various institutions. The SEC oversees the maintenance of the voter register through regular data exchange from various ministries and courts. The previous government's efforts to reduce barriers to obtaining identity documents have proven especially beneficial for Roma communities.¹⁹

Citizens may verify their registration on the SEC website or in person at one of its regional offices.²⁰ Most ODIHR NAM interlocutors generally expressed trust in the accuracy of the voter lists. However, some raised concerns about the overall number of registered voters, as a significant number of citizens residing abroad remain on the list.²¹ In addition, several interlocutors noted that the lack of full interoperability between key state databases hinders the timely and accurate updating of information.

E. CANDIDATE REGISTRATION

Citizens eligible to vote may stand as candidates for mayor or council if they are at least 18 years old and hold permanent residence in the relevant municipality. The legal framework prohibits individuals currently serving or awaiting the execution of a sentence of more than six months of imprisonment from running for office. In addition, persons whose legal capacity has been revoked on the basis of intellectual or psychosocial disability are also denied the right to stand as candidates. Mayoral and municipal council candidates may be nominated by political parties, coalitions, or groups of voters. All political parties met by the ODIHR NAM stated their intention to nominate candidates, and none foresaw challenges with candidate nomination and registration.

Unlike political parties, independent candidates and citizen groups must collect supporting signatures from registered voters in the respective municipality, which must be submitted on official forms, in person at SEC regional offices or in front of a public notary. ²² On 21 May 2025, the Constitutional Court declared the 2024 amendment to the Election Code that imposed higher signature thresholds unconstitutional and encouraged the parliament to address the matter. ²³ The pending draft amendments alter the method of signature collection; however, some ODIHR NAM interlocutors stated that even if the changes are adopted, the number of signatures remains disproportionately high, and considered this and the requirement to collect the signatures at designated notaries' offices and at SEC regional offices as burdensome. Some stated that independent candidates face systemic obstacles and are often deliberately disadvantaged by political parties seeking to preserve control over local electoral competition.

Candidate lists for municipal councils must include at least 40 per cent of candidates from each gender, with placement requirements.²⁴ While these measures have led to a more gender-balanced candidates' lists, several ODIHR NAM interlocutors noted that meaningful political empowerment

Those residing abroad are required to actively register.

Examples include amendments to the Law on Identity Cards (2023) and revisions to the Law on Civil Registry (2022), which reduced fees and administrative hurdles for late or rural registrations, measures intended to improve access to citizenship documentation, particularly among vulnerable groups.

The voter register is available for public inspection 15 days after the official call of elections and voters 20 days to request corrections.

As there is no automatic deregistration mechanism for those who move abroad, these citizens are retained in the voter register as long as they maintain an official residence in the country.

The signature collection period begins 15 days after the election is announced and lasts 15 days.

This amendment required groups of voters submitting lists for local elections to collect signatures amounting to 1 per cent of registered voters in their municipality, regardless of its size, which was a substantial increase from the previous threshold of 100 to 250 signatures depending on municipality size.

Every third position on the list must be occupied by a candidate of the underrepresented gender, and at least one candidate in every first ten positions must be of that gender.

of women remains limited in practice, with parties often placing women in non-competitive positions or failing to support their candidacies beyond formal compliance.

F. CAMPAIGN ENVIRONMENT

The official campaign period begins 20 days prior to election day and ends 24 hours before voting. The use of public offices, equipment, and vehicles for campaign purposes is expressly forbidden by law, as are announcements related to public sector employment.²⁵ By law, 90 per cent of public outdoor advertising space is allocated to the four main parliamentary parties, two from the government and two from the opposition, while the remaining 10 per cent is distributed among all other parties and candidate lists. Several ODIHR NAM interlocutors noted that this formula disproportionately benefits larger parties, limiting visibility for smaller and independent contestants.

Political parties and independent candidates met by the ODIHR NAM plan to campaign through a combination of traditional methods, as well as online. While most interlocutors expressed confidence in the ability of contestants to campaign freely, including in minority languages, some noted that fragmentation and increased political polarization, particularly in Albanian-majority areas, may heighten the intensity of local contests and contribute to a more confrontational atmosphere. In addition, several independent candidates and citizen groups expressed concerns about limited access to public campaign spaces.

Most ODIHR NAM interlocutors anticipated a low-intensity, locally driven campaign, shaped by community-level concerns and personal networks, as well as broader national topics such as the economy, education, foreign policy, identity, and political stability. Most ODIHR NAM interlocutors noted that the misuse of administrative resources remains a recurrent issue, particularly at the local level, where incumbents seek reelection. Some interlocutors noted that voter pressure and intimidation, including targeting of public sector employees and welfare recipients, politically motivated public sector appointments and procurement practices, and vote-buying, particularly in economically disadvantaged communities, remain a concern.

Most interlocutors anticipated that political parties and candidates would rely heavily on digital campaigning through social media and messaging platforms. While some aspects of online campaigning are regulated, including an obligation to disclose paid political content, the law does not regulate co-ordinated third-party campaigning online, paid promotion by unofficial pages, or micro-targeted advertising using voter data. The Electoral Code also lacks provisions on content moderation, advertising transparency, or platform accountability for social networks. Moreover, there is no systematic monitoring of digital campaign activity, and several ODIHR NAM interlocutors expressed concern over the spread of disinformation, hate speech during the campaign, unreported expenditures, and the lack of engagement between authorities and major social media platforms, which limits the ability to detect or respond to violations.

For the first time, the legal framework formally extends certain campaign-related obligations to online portals and social media influencers. Social media influencers are also obliged to disclose paid political content during the campaign period. Several ODIHR NAM interlocutors welcomed this expansion as a necessary step toward regulating digital campaigning but noted that implementation

The law requires all electoral contestants to sign a Code on Fair and Democratic Elections upon the official announcement of the elections. Political parties and other participants explicitly commit not to exert or attempt any pressure on employees of the public and state administration, institutions financed from the national or municipal budgets, or state-owned enterprises. The Code also prohibits any threats to a person's employment or social security based on their political affiliation or support for a particular party or candidate.

remains uneven and that definitions are vague. The Association of Online Media launched a self-regulatory database listing professional online media outlets meeting defined editorial and ethical standards.²⁶

G. CAMPAIGN FINANCE

The general framework for political and campaign finance is governed by the Electoral Code, the Law on Financing of Political Parties, and the Law on Prevention of Corruption and Conflict of Interest. Several past ODIHR recommendations remain unaddressed, including the need for electronic submission of campaign reports, mechanisms to verify online campaign spending, and strict limits on donations after election day. Both the State Audit Office and the State Commission for the Prevention of Corruption (SCPC) submitted suggestions to improve the legislation; however, these were not addressed by the current legislature.²⁷

Campaigns may be financed through a combination of public subsidies and private donations.²⁸ Public funding is available to contestants who received at least one per cent of the vote in the most recent parliamentary or local elections. During election periods, the state covers the cost of political advertising in broadcast, print, and online media, which is reimbursed directly to the media by the SEC. Donations from anonymous, foreign sources, state-owned enterprises, religious or charitable organizations, and municipal institutions are prohibited. Political parties, independent candidates and independent candidate lists may also take out loans, although loan regulations remain limited.

Campaign spending limits are based on the number of registered voters in each municipality.²⁹ All contestants are required to open a dedicated campaign bank account, obtain a unique tax number, and maintain a detailed ledger of all financial activity, recording the donor's name, contribution type, and date of receipt. The law does not restrict transfers from regular party accounts.³⁰ Third-party campaign financing is not regulated by law.

Contestants are required to submit three financial reports: two before election day and one after. Within 90 days of the publication of final results, campaigns must submit a comprehensive final report to the SAO, which in turn is required to audit the report within 60 days. Contestants' interim reports must include information on donations, but not on other sources of income or on expenditures. While some spending on online advertising may be included in contestants' financial reports, there is no dedicated mechanism to systematically track or verify digital campaign expenditures, including spending on social media platforms and third-party promotional content.

The database includes disclosure of ownership, staffing structure, editorial imprint, and adherence to journalistic standards. This initiative complements similar transparency efforts by the AAAVMS.

Donations may be received from individuals and legal entities, up to a legal maximum of EUR 3,000 and EUR 30,000 respectively.

For local elections, the ceiling is set at 2 EUR in MKD without calculated VAT per registered voter in a given municipality for all campaigns.

Campaign bank accounts must now be closed within 45 days following the end of the election campaign. Any remaining funds must be transferred to the political party's regular account.

In its most recent annual report, the State Audit Office (SAO) recommended several amendments to strengthen campaign finance regulation. These included prohibiting post-campaign donations, regulating online and social media spending, and introducing stricter eligibility criteria for media outlets receiving public funds, particularly online portals. The State Commission for the Prevention of Corruption (SCPC), in its post-2024 reports, echoed these concerns, highlighting late or incomplete financial reporting, unregulated digital advertising, and the disproportionate distribution of public funds favouring major parties. The SCPC also noted legal gaps related to co-ordinated online campaigning and the use of unofficial channels for political promotion.

Oversight is carried out by the State Audit Office (SAO) and the State Commission for the Prevention of Corruption (SCPC), with campaign finance reports submitted to both bodies as well as to the SEC. The SCPC is tasked with monitoring campaign finance throughout the electoral period, including the use of public resources by incumbents and the financial activities of public officials.³¹ The SCPC informed the ODIHR NAM that it would be updating the registry of official vehicles of state institutions to help prevent the misuse of public resources, and that it is entitled to initiate inspections ex officio and act on complaints from parties, observers, and the public.

Both the SAO and the SCPC informed the ODIHR NAM that they anticipate a significantly increased workload in the context of the local elections, and noted that their institutional capacity, both in terms of staffing and financial resources, remains limited. Several ODIHR NAM interlocutors expressed concern that enforcement remains limited and that violations rarely result in sanctions.

H. MEDIA

The media environment remains diverse but highly polarized, with a significant portion of outlets perceived as aligned with political or economic interests. Television is generally still the main source of political information, while online media and social networks are more dominant among younger voters. Print media have largely lost relevance, with limited circulation and reach. Several ODIHR NAM interlocutors expressed concern about editorial bias, opaque media ownership, and limited investigative journalism. Some interlocutors also noted that, while the media landscape offers a broad spectrum of views, it remains fragmented along political and ethnic lines.

The Constitution guarantees freedom of expression and media freedom. The March 2024 amendments to the Law on Audio and Audiovisual Media Services aimed to enhance transparency and media accountability, particularly in the digital space, by introducing a formal register of online media and aligning national legislation with the EU's Audiovisual Media Services Directive. The register requires online outlets to disclose ownership structures, editorial contacts, and legal status.

The state, through the SEC, pays for all political advertisements in the broadcast, print, and online media. All media are obliged to publish the price list for paid advertising, which must remain unchanged for the duration of the election campaign. By law, only three per cent of the total state-funded political advertising is allocated to non-parliamentary parties and independent candidates, a proportion widely viewed as insufficient for ensuring meaningful visibility. Some ODIHR NAM interlocutors reiterated concerns about the current model of state-funded political advertising, which they see as disadvantaging smaller parties and independent candidates.

The public broadcaster, Macedonian Radio and Television (MRT), is funded from the state budget and operates five terrestrial television channels and four radio stations, and is legally required to allocate free airtime and ensure balanced campaign coverage.³² The law prescribes 30 per cent of campaign-related programming to be dedicated to national and international news, 30 per cent to the ruling parties, another 30 per cent to the main opposition, and the remaining 10 per cent to all non-parliamentary parties and independent candidates. MRT informed the ODIHR NAM of its plans to organize televised mayoral debates in selected larger municipalities, and to conduct and broadcast

It may initiate inspections *ex officio*, request data from banks and public institutions, and refer suspected violations for criminal prosecution.

MRT broadcasts television content in seven languages and its radio is available in eleven.

public opinion polls with expert analysis, an initiative which attracted broad public interest in previous elections.³³

The law requires all media, including online outlets, to cover the campaign in a fair, balanced, and impartial manner, and sets out detailed rules on the airing of campaign materials and related deadlines, along with applicable sanctions. AAAVMS is tasked with monitoring broadcast media during the official campaign period.³⁴ AAAVMS is required to submit weekly reports to the SEC and publish its methodology and findings on its website. In 2023, AAAVMS introduced a voluntary Code of Conduct for political parties and candidates in the online space, including social networks. A coordinating body comprising AAAVMS and civil society representatives was established to track and publish complaints; however, it lacks enforcement powers. While ODIHR NAM interlocutors generally praised AAAVMS's professionalism, they also noted that significant gaps remain in the regulation and oversight of online campaigning.

I. ELECTION DISPUTE RESOLUTION

The Electoral Code provides for a multi-tiered framework for election-related complaints and appeals, with responsibilities shared among the SEC, MECs, the SCPC, and the Administrative Court. ³⁵ Decisions of both the SEC and the SCPC may be appealed to the Administrative Court. Some prior ODIHR recommendations, including those related to limited standing and restrictive deadlines, remain unaddressed. ³⁶ Several ODIHR NAM interlocutors expressed concerns about the overall independence and public trust in the judiciary, which they viewed as affecting confidence in the electoral dispute resolution process. ³⁷

According to the Electoral Code, complaints regarding election day procedures and results must be submitted within 48 hours of the publication of preliminary results.³⁸ In response to complaints alleging irregularities in specific polling stations, the SEC is required to conduct a review process and, if deemed necessary, may open the ballot boxes and examine all related election materials, including protocols and supporting documentation. Several ODIHR NAM interlocutors noted that complaints are frequently dismissed, often without thorough consideration of the substance of the allegations. In particular, some interlocutors highlighted the absence of clear and consistent procedures for ordering and conducting recounts.

MRT also produces select content in Macedonian Sign Language and is exploring closed captioning to improve accessibility for persons with hearing impairments. While Macedonian Sign Language is supported through the 2009 Law on the Use of Sign Language as a communication tool for persons with hearing impairments, it is not recognized as an official language.

The AAAVMS operates under a two-tier governance system: a Council of seven members (appointed for seven-year terms) and an Agency Director, elected by the Council. As of June 2025, the Council has been restored to its full complement, following the recent appointment of its seventh member by the parliament.

The MECs and SEC serve as the primary bodies for complaints concerning irregularities related to candidate registration, voter lists, and election day procedures, including voting, counting, and tabulation. Complaints related to campaign finance and the misuse of administrative resources fall under the jurisdiction of the SCPC.

Under the Electoral Code, complaints may be filed by electoral contestants and their authorized representatives. Voters and citizen observer groups are not entitled to submit complaints in most cases, a limitation noted in previous ODIHR reports.

These concerns are echoed by the European Commission, who notes persistently low levels of perceived judicial independence and ongoing risks of political influence. Only 25 per cent of the general public and 20 per cent of companies consider the courts fairly or very independent, according to the 2024 European Commission's Rule of Law Report.

The SEC must issue a decision within 72 hours, and appeals to the Administrative Court must be filed within 24 hours of receipt of the SEC's decision. The Administrative Court is obliged to decide within 48 hours.

J. CITIZEN AND INTERNATIONAL OBSERVERS

The Electoral Code provides for both international and citizen election observation. Political parties contesting the elections are also entitled to appoint observers to all levels of the election administration.³⁹ Several citizen observer groups intend to observe the upcoming local elections. In addition to election day procedures, they plan to focus on vote buying, detecting disinformation, hate speech, foreign malign influence, and the misuse of administrative resources.

IV. CONCLUSIONS AND RECOMMENDATIONS

The majority of the ODIHR NAM interlocutors stressed a strong need for an election observation activity and requested ODIHR to deploy a high number of observers to cover all stages of the electoral process. In particular, ODIHR NAM interlocutors highlighted the need to observe the legal framework and its implementation, candidate registration, the conduct of the campaign, media coverage, campaign finance, election dispute resolution and election day procedures, and possible voter intimidation and misuse of state resources. In addition, numerous ODIHR NAM interlocutors stressed the importance of observing the participation of women, persons with disabilities, and members of national minorities throughout the electoral process.

Based on the findings of this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming October 2025 local elections, as well as for a potential second round of mayoral elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 24 long-term observers to follow the electoral process countrywide, as well as 250 short-term observers to follow election day procedures. In line with ODIHR's standard methodology, the EOM will include a media monitoring element.

Accredited observers have the right to observe all aspects of the electoral process and to receive copies of the results protocols.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs and Foreign Trade

Ambassador Kire Ilioski, Director for Multilateral Affairs Dragan Mitrevski, Second Secretary Zoran Barbutov, Directorate for Multilateral Relations

State Election Commission

Boris Kondarko, President Abdush Demiri, Vice President Angelcho Ristov, Member Oliver Ristovski, Member

Ministry of Justice

Alen Dereban, Deputy Minister Cvetanka Aceva, Cabinet of the Minister

Ministry of Public Administration

Gjorgi Vlajnkinoski, State Secretary Emilija Georgieva Gjoshevski, National Correspondent for Quality Management Ms. Rudina Batku, Protocol Support Advisor Elena Panova, Senior Associate

Ministry of Digital Transformation

Gordana Klincharova, Secretary of State

State Commission for the Prevention of Corruption

Zoran Bogoevski, Member Cveta Ristovska, Member Adem Cucul, General Secretary

State Audit Office

Maksim Acevski, Chief State Auditor Aleksandar Popovski, Secretary General Katerina Chaloska Aleksovska, Assistant Auditor General

Agency for Audio and Audiovisual Media Services

Zoran Trajchevski, Director Dragica Ljubevska, Chief of Cabinet Emilija Janevska, Head of Programme Affairs Department

Public Broadcaster - Macedonian Radio and Television

Zaharija Vulgarakis, Director Dragan Nikolovski, Editor-in-Chief of the First Programme Service

Political Parties⁴⁰

Arbana Pasholli, Member of Parliament, BDI/DUI; European Front Blerim Bexheti, Co-ordinator of the Parliamentary Group, BDI/DUI; European Front

ODIHR offered meetings to all parliamentary political parties.

Oliver Spasovski, Co-ordinator of the Parliamentary Group, SDSM; European Macedonia Bekim Qoku, Co-ordinator of the Parliamentary Group, VLEN Nikola Micevski, Co-ordinator of the Parliamentary Group, VMRO-DPMNE; Your Macedonia Boban Karapejovski, Co-ordinator of the Parliamentary Group, ZNAM Aleksandra Zarić, Assistant of the Parlamentsry Group, ZNAM

Independent Candidates

Jana Belcheva Andreevska, Citizen initiative Chance for Centar Gorjan Jovanovski, Citizen initiative Green Human

Civil Society

Branko Geroski, Association of Online Media Ljatife Shikovska, Former Member of Parliament, Umbrella Elena Kochoska, Program Manager, Cross-disability Organization Zeta

International Community

Representatives of diplomatic missions of Serbia and Portugal. 41
Ambassador Kilian Wahl, Head, OSCE Mission to Skopje
Natalia Rusu, Chief of Democratization Unit, OSCE Mission to Skopje
Dimitar Spasenoski, National Political and Reporting Officer, OSCE Mission to Skopje
Ferruccio Bogo, First Counsellor, Delegation of the European Union in North Macedonia
Ioana Cosma, Country Director, IFES North Macedonia
Dejan Dimitrievski, Project Co-ordinator, IFES North Macedonia

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