



OSCE Office for Democratic Institutions and Human Rights
Limited Election Observation Mission
Republic of Bulgaria
Presidential and Municipal Elections 2011

INTERIM REPORT
28 September–11 October 2011

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I. EXECUTIVE SUMMARY

- On 23 October 2011, voters will elect the Bulgarian president and vice-president, the mayors and councils of the 264 municipalities, and the mayors of settlements with over 350 inhabitants. For the first time, two kinds of elections will be held simultaneously nationwide.
- Eighteen presidential and vice-presidential teams will contest the presidential elections. The Central Election Commission (CEC) has registered all candidates who sought registration in an inclusive process. More than 50,000 candidates are contesting the municipal elections.
- The new Election Code provides a sound legal basis for the conduct of democratic elections, but there is room for improvement; several recommendations previously offered by OSCE/ODIHR remain unaddressed.
- The elections are administered by the CEC, 264 Municipal Election Commissions (MECs), and some 11,452 Precinct Election Commissions (PECs). The CEC and MECs are actively preparing for election day, respecting legal deadlines. MEC training is currently underway. Some concerns have been raised about the composition of election commissions, lack of transparency of the CEC, and the professionalism of lower-level commission members.
- The number of registered voters is around 6.97 and 6.52 million for the presidential and municipal elections, respectively. Some interlocutors have questioned the accuracy of the voter lists, since the number of voters represents 95 and 89 per cent of the population of Bulgaria, respectively. Voters can check voter list records and request changes.
- The election campaign is competitive but generally calm. The municipal elections appear to generate more interest than the presidential race. Many interlocutors raised concern about potential vote-buying and possible manipulations during the vote count.
- Bulgaria has a pluralistic media scene. All campaign coverage in the media is *de facto* paid for, which creates an unequal playing field for candidates and restricts journalists in their work since they can not cover the campaign in the news and other editorial formats.
- The Election Code sets short deadlines for appeals on election commission decisions. It remains to be clarified whether there is a possibility to appeal in cases where an election commission failed to establish the two-thirds majority required for taking a decision.
- Members of minorities participate in the elections, largely for parties seen as representing their interests. The Roma community is considered to be particularly vulnerable to possible malpractices. Some candidates use intolerant and xenophobic rhetoric against minorities.

- The OSCE/ODIHR Limited Election Observation Mission opened in Sofia on 28 September, with an 11-member core team and 10 long-term observers who are deployed to 5 locations.

II. INTRODUCTION

On 15 July 2011, the Bulgarian parliament set the date of the presidential election for 23 October. President Georgi Parvanov issued a decree calling municipal elections for the same day, in line with transitional provisions of the Election Code providing for simultaneous presidential and municipal elections. Following an invitation from the Permanent Mission of the Republic of Bulgaria to the OSCE to observe the elections and based on the findings and conclusions of the Needs Assessment Mission,¹ the OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR) established a Limited Election Observation Mission (LEOM) on 28 September. The LEOM, led by Vadim Zhdanovich, consists of an 11-member core team based in Sofia and 10 long-term observers (LTOs) who were deployed on 2 October to 5 locations around the country.² Mission members are drawn from 15 OSCE participating States. In line with OSCE/ODIHR standard methodology for election observation, the mission will not carry out comprehensive or systematic observation of election-day proceedings, but intends to visit a limited number of polling stations.

III. BACKGROUND

The 23 October 2011 presidential and municipal elections in the Republic of Bulgaria come at the end of the second and final term of the incumbent president and of the four-year mandate of mayors and municipal councils. This is the first time since the emergence of a multi-party democracy in 1989 that two different types of elections will be held simultaneously in Bulgaria.

The last national elections were the 5 July 2009 parliamentary elections. OSCE/ODIHR concluded that they were “generally conducted in accordance with OSCE commitments and Council of Europe standards” but that “concrete measures are required to address persistent problems so as to ensure the integrity of the election process and increase public confidence in future elections.”

The Citizens for European Development of Bulgaria (GERB) won the last elections with 39.7 per cent of the vote and obtained 116 of 240 seats in the parliament. The center-left Coalition for Bulgaria, led by the Bulgarian Socialist Party (BSP), won 17.7 per cent and 40 seats, ahead of the Movement for Rights and Freedoms (DPS) with 14.5 per cent and 38 seats. The far-right *Ataka* party won 21 seats; the center-right Blue Coalition formed around the Union of Democratic Forces (SDS) and Democrats for a Strong Bulgaria (DSB) – 15 seats, and the conservative Order, Law and Justice (RZS) – 10 seats. Following these elections, GERB formed a minority government headed by its leader, Boyko Borisov.

In the last presidential election in 2006, President Parvanov was re-elected in the second round with 74.9 per cent of the vote, against 24.1 per cent for *Ataka* leader Volen Siderov. OSCE/ODIHR concluded in its final report that this election “confirmed the credibility of the election process in Bulgaria”, but it also “identified a number of areas where the electoral process could be further strengthened.” The municipal elections in 2007 were not observed by OSCE/ODIHR.

¹ OSCE/ODIHR Needs Assessment Mission Report is available at: <http://www.osce.org/odihr/elections/81779>.

² Long-term observers are based in Sofia, Plovdiv, Varna, Ruse and Pleven and are covering all 28 districts of the country.

IV. THE LEGAL FRAMEWORK AND ELECTION SYSTEM

The main elements of the electoral legal framework include the Constitution, as interpreted by decisions of the Constitutional Court, the Election Code, the Law on Political Parties, the Criminal Code, the Law on Administrative Procedure, and the Law on Meetings, Rallies and Manifestations.

OSCE/ODIHR and the Council of Europe's Venice Commission reviewed the Election Code, adopted earlier this year, and concluded that it provides a sound legal basis for the conduct of democratic elections, but with room for improvement. Some recommendations previously offered by OSCE/ODIHR are still to be addressed, such as the possibility for minorities to use their mother tongue during campaigning, and provisions regulating campaigning in the media, the possibility for a recount of ballots, and defining the rights and responsibilities of observers.

The Constitution and Election Code require, among other things, that candidates for president and vice-president have been permanently residing in Bulgaria for the five years preceding the election. The residency requirement became a political issue during candidate registration. However, there was no possibility for the Central Election Commission (CEC) to verify compliance with the residency requirement, which was determined based on candidates' declarations. The lack of clarity on this issue creates an unnecessary degree of uncertainty.

The issue of vote-buying appears to be of great concern for all segments of society. The Criminal Code was recently amended to increase the penalties for vote-buying and provisions were also added to the Election Code to combat it. The authorities are conducting public-awareness campaigns against such practices, and parties have to include warnings against vote-buying in all campaign materials. However, the public prosecutor has expressed concerns about not having sufficient legal tools necessary to investigate and prosecute vote-buying.

The Constitution establishes that the president shall be elected directly by the voters. The candidate who receives more than one half of the valid votes is elected, provided that more than half of all registered voters cast their ballots. If these requirements are not met, a second round is held one week later, between the two candidates who received the highest number of votes.

Mayors of the 264 municipalities and of settlements with more than 350 residents will also be directly elected, with a second round if no candidate receives more than half of valid votes cast. Mayors of smaller settlements and of city districts, which exist in the three largest cities (Sofia, Plovdiv and Varna), will be elected by the municipal council. Municipal councilors will be elected under a proportional-representation system; no threshold is specified and "natural" threshold applies. Nationals of the European Union who are permanent residents in Bulgaria and have resided in a municipality for at least four months prior to election day have the right to vote in the municipal elections and may also run for municipal councilor, but not for mayor.

V. THE ELECTION ADMINISTRATION

The elections are administered by the CEC, 264 Municipal Election Commissions (MECs) and some 11,452 Precinct Election Commissions (PECs).³ The newly appointed CEC will serve a five-year term; however, it is only actively working whenever elections are taking place.⁴ The current CEC consists of 21 members, appointed by the president upon nominations from political parties

³ These are referred to as Section Election Commissions in the Election Code.

⁴ Until the enactment of the new Code, the CEC was appointed only for the duration of a specific election cycle.

and coalitions which have a parliamentary group in the Bulgarian parliament or are represented in the European Parliament. The CEC composition is to reflect the strength of the respective parties and coalitions in the parliament. No party or coalition may have a majority, and the chairperson and secretary cannot be from the same party or coalition.

MECs and PECs are appointed by the CEC and MECs, respectively, upon nominations from the mayors (following consultations with the parliamentary parties and coalitions); their composition mirrors that of the CEC. In the context of simultaneous presidential and municipal elections, the number of MEC members has been increased and varies from 15 to 41 (in Sofia), depending on the number of polling stations in the municipality.⁵

Election commissions at all levels must take all decisions by a majority of two-thirds of the members present. Decisions that achieve the required majority are issued in writing and, in the case of the CEC and some MECs, posted on the respective commission's website. All MECs are required to post their written decisions in an accessible place within the MEC building for at least three days. Commission meetings are not open to the public before election day, as the Code does not grant the possibility to observe CEC and MEC sessions during the pre-election period.⁶ Nevertheless, the CEC and MECs have opened their sessions to OSCE/ODIHR LEOM members.

The CEC and MECs are actively preparing for election day, respecting legal deadlines. PECs have been appointed. MEC training is currently underway, to be followed by training of PECs. The MECs visited by OSCE/ODIHR LEOM observers were well organized overall and generally expressed satisfaction with the support received by the CEC and by municipal authorities.

Many OSCE/ODIHR LEOM interlocutors have raised concerns about what they perceive as an unbalanced composition of election commissions at all levels and about the dominance of the ruling party in their leadership. Interlocutors have also taken issue with the lack of transparency of the CEC⁷ and the level of professionalism of lower-level commission members.

VI. VOTER REGISTRATION

Voter lists are extracted from the national population register maintained by the Civil Registration and Administrative Services Department of the Ministry of Regional Development (GRAO), on the basis of voters' permanent addresses. To vote in municipal elections, a voter must have been registered in the respective municipality for at least four months before election day. Some 6,975,426 voters are registered for the presidential election and 6,517,804 for the municipal elections.⁸ These numbers represent 95 and 89 per cent of the population of Bulgaria, respectively.⁹ In view of these data, some OSCE/ODIHR LEOM interlocutors have questioned the accuracy of the voter lists.

Voters can check their registration through the Internet, telephone and SMS; voter lists are also to be posted for public scrutiny in the vicinity of polling stations. Requests for amending the voter list can be made until seven days before election day. Special voter lists are compiled for voters in

⁵ Under Art. 31(2) of the Election Code, MECs consist of 9 to 19 members. Under supplementary provisions of the Election Code (§5.3.a), the number is increased if two or more elections are conducted simultaneously.

⁶ Except for agents of political parties, coalitions and nomination committees, who can attend MEC sessions.

⁷ The law does not provide for access to sessions, minutes and agendas of the CEC by agents of political parties, coalitions, nomination committees and observers.

⁸ As of 9 September, the deadline for publishing the voter lists.

⁹ According to the census conducted in February 2011, Bulgaria's population is 7,364,570.

health care centers and in detention centers;¹⁰ to vote in the municipal elections, such voters must meet the four-month residency requirement. Requests to vote at the current, rather than at the permanent address can be made until 14 days before election day, again with the four-month residency requirement applying.

For the presidential election, polling stations will also be established abroad. In order to establish out-of-country polling stations in an embassy or consulate, a minimum of 20 voters shall have declared their wish to vote at least 25 days before election day.¹¹ Where the host country's legislation allows for it, polling stations may also be established outside diplomatic or consular offices, provided that at least 100 voters requested it. Some 161 polling stations will be established in 58 countries. On election day, any eligible voter can be added to the voter list of a polling station abroad, upon presentation of an official identity document and a signed declaration.

VII. REGISTRATION OF CANDIDATES

For a presidential election, parties, coalitions and nomination committees are to register with the CEC.¹² A deposit of 10,000 Bulgarian Leva (BGN; around 5,100 EUR)¹³ and a list of at least 7,000 supporting signatures are required to be registered.¹⁴ A voter may support only one list. GRAO checks the validity of the signatories' personal data. For this election, 21 parties, 1 coalition (comprised of 7 parties) and 6 nomination committees were registered. One nomination committee was denied registration on the ground of irregularities in the signature list. Eighteen parties, coalitions and committees eventually submitted nominations for their presidential and vice-presidential candidates, all of whom were registered by the CEC, in an inclusive process.

For the municipal elections, parties and coalitions have to register both at the CEC and at the MEC level. Local coalitions can be formed and are registered by the respective MEC. Nomination committees for municipal elections are to consist of 3 to 7 eligible voters residing in the municipality; the number of supporting signatures depends on the size of the population. The CEC registered 73 parties and 1 coalition; and a total of 50,921 candidates were registered by MECs.

VIII. THE CAMPAIGN ENVIRONMENT

Among the more prominent presidential candidates are former Minister of Regional Development and Public Works Rosen Plevneliev (GERB), former Foreign Minister Ivaylo Kalfin (BSP), and former European Commissioner Meglena Kuneva (nomination committee). Among the other parliamentary parties, *Ataka* nominated Volen Siderov, the Blue Coalition fielded former Agriculture Minister Rumen Hristov, and RZS its deputy chairperson Atanas Semov. The DPS and DSB (which for the presidential election did not join the Blue Coalition) did not field candidates, although the latter has publicly stated its support for Mr. Hristov. Two presidential and seven vice-presidential candidates are women. One presidential candidate is an ethnic Turk.

The official campaign period started on 23 September and ends at midnight on 22 October. The major parties are campaigning fairly actively throughout the country, although many interlocutors have said that this campaign is more low-key than previous ones. In general, local party structures and voters appear to place more emphasis on the municipal elections than on the presidential one. In

¹⁰ Except for those who have been sentenced to imprisonment by court decision.

¹¹ Some 37,749 eligible voters sent written requests to vote to Bulgarian embassies and consulates.

¹² Coalitions are to be composed only of parties registered with the CEC for an election. Nomination committees should consist of at least 21 members.

¹³ The deposit is refunded to parties and independent candidates who received at least 1 per cent of the valid votes.

¹⁴ Both the amount of the deposit and the number of supporting signatures have been reduced in the Election Code.

addition to traditional means of campaigning such as posters, billboards, campaign tents and stalls, and door-to-door canvassing, parties and candidates make increased use of the Internet, including social networks. Presidential candidates are touring the country and holding campaign meetings, but few parties and candidates seem to intend holding big rallies. Most candidates and party representatives the OSCE/ODIHR LEOM has met complained that they have to pay for any kind of media coverage and about the high prices for such coverage, noting that this created an uneven playing field. Several paid debates among candidates in the media have taken place, with more scheduled; there have been some arguments among the candidates about the format of such debates.

The campaign is competitive but generally calm, with few personal verbal attacks among the candidates. Some opposition parties, however, claimed that pressure had been put on some of their candidates in the municipal elections in order to dissuade them from running, including through tax inspections of businesses owned by the candidates or their relatives.

The campaign environment was negatively affected by several day-long anti-Roma protests, following the death of a young man in Katunitsa near Plovdiv. Most OSCE/ODIHR LEOM interlocutors said that some political parties, mainly *Ataka*, have exploited the incident and protests for political ends and that there were attempts to turn what appeared to be a criminal case act into an “ethnic issue”.

Parties, coalitions and nomination committees can finance their campaigns from their own funds, candidates’ private funds, and donations from individuals. The latter are limited to 10,000 BGN per calendar year. Anonymous donations, donations from legal entities,¹⁵ foreign citizens (except EU citizens eligible to vote in Bulgaria), foreign governments and organizations, and religious institutions are forbidden. The Code establishes spending ceilings; for a presidential election, the limit is 2 million BGN (1.02 million EUR). For municipal elections, the overall ceiling for parties and coalitions is 8 million BGN (4.08 million EUR), and there are separate ceilings for each mayoral campaign, depending on the number of inhabitants in a municipality, as well as a fixed ceiling of 5,000 BGN (2,560 EUR) for each municipal council candidate. For nomination committees, the spending limit is calculated on the basis of a municipality’s size (for mayoral candidates) and the number of council candidates fielded by the nomination committee. All contestants must open a bank account for campaign purposes and must submit a report on their campaign finances to the National Audit Office within 30 days of election day.

IX. THE MEDIA

The legal framework governing the media provides for freedom of expression, and Bulgaria has a pluralistic media scene.¹⁶ However, defamation is still a criminal offense, and Article 148 of the Criminal Code provides for higher penalties for defamation of public officials acting within the scope of their duties.¹⁷ Furthermore, the OSCE Representative on Freedom of the Media expressed her serious concern regarding amendments to the Criminal Code adopted by parliament in April 2011. Article 162 provides for prison sentences of 1 to 4 years for journalists convicted of instigating hatred, discrimination or violence based on race, ethnicity, nationality, religion, sexual

¹⁵ For the funding of a party’s regular activities, however, the Law on Political Parties allows donations from legal entities (except gaming organizers, companies with more than 5 per cent state or municipal participation, contractors under public procurement, companies undergoing privatizations, and religious institutions and other charities) of up to 30,000 BGN per calendar year..

¹⁶ The legal framework consists of the Constitution, the Radio and Television Law, the Criminal Code, and the Law on Protection against Discrimination. It is supplemented by the Ethical Code of Bulgarian Media.

¹⁷ Although the punishment of imprisonment for defamation was abolished in 1999, the Criminal Code provides for high fines and public censure (Art. 146, 147).

orientation, marital or social status, or disability.¹⁸ The legislator argued that the amendments were enacted in accordance with the relevant EU directive.¹⁹ However, the scope of sanctions in the Criminal Code is broader than what the EU directive provides for (1 to 3 years of imprisonment), and Bulgarian media law experts assess the harsher sanctions as not proportional to the intention of the law. The provisions could be abused to unduly restrict freedom of speech.

Article 147(1) of the Election Code provides that campaign broadcasts on the public broadcasters, Bulgarian National Television (BNT) and Bulgarian National Radio (BNR), are to be paid for by parties, coalitions and nomination committees, according to a predetermined tariff. The Election Code explicitly provides for free airtime only for the closing addresses and debate appearances of presidential candidates during a second round. The supplementing CEC decision No. 656 is not clear as to whether ‘addresses’ by presidential candidates during the first round must be paid for.²⁰ However, the contracts between the political parties and the public broadcasters indicate that all formats of campaign coverage, as defined in the Electoral Code and the CEC Decision,²¹ are considered to be paid airtime.

Journalists working for the public broadcasters complained to the OSCE/ODIHR LEOM that they can not cover the election campaign in news programs. Being obliged to produce ‘spots’ and ‘chronicles’, they are not able to ask critical questions or to provide any other editorial coverage of the campaign. A recent initiative by the Council for Electronic Media, the state body which licenses and oversees the broadcast media, to consider the abovementioned forms of election coverage paid political advertising and make them subject to the same restrictions that apply to commercial advertising failed.²² First results of the OSCE/ODIHR LEOM media monitoring indicate that the coverage of the election campaign, although separated from editorial content and announced as “Elections 2011”, is not labeled as paid airtime and not clearly recognizable as such, thus potentially misleading viewers about the nature of this coverage.

On 30 September, the OSCE/ODIHR LEOM started a quantitative and qualitative monitoring of the prime-time program of the TV stations BNT, bTV and Nova and of the content of the newspapers *Trud*, *24 chasa*, *Telegraph*, *Standart* and *Sega*.

X. COMPLAINTS AND APPEALS

The joint OSCE/ODIHR and Venice Commission opinion on the new Election Code highlighted the short deadlines for appeals of election commission decisions. At least one candidate for mayor of Varna has been denied registration by MEC decision and then missed the 24-hour deadline to appeal that decision to the CEC. The monitoring of the complaints and appeals process is made difficult because of the lack of transparency in election commissions’ proceedings.

The joint opinion specifically recommended that an appeal of an election commission decision to a court be made available more broadly. The concern about the limited right of appeal from CEC decisions was partially addressed by a Constitutional Court ruling of 4 May 2011. That ruling clarified that, where rights to appeal were not specifically defined in the Election Code, the general

¹⁸ Press release available at <http://www.osce.org/fom/77125>.

¹⁹ Article 3 of the “Framework Decision 2008/913/JHA of the Council of the European Union on combating certain forms and expressions of racism and xenophobia by means of criminal law”. The directive is available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:328:0055:0058:EN:PDF>.

²⁰ Article 142(2) of the Election Code stipulates that the election campaign on the public service broadcasters shall open and close with addresses by the pairs of candidates of a length of no more than three minutes.

²¹ Article 139(1) of the Code defines these formats as “spots”, “chronicles”, “debates” and “other formats”.

²² Such restrictions include a time limit per hour of advertisements, which must be clearly recognizable as such.

right to judicial review guaranteed by the Constitution would apply and could be exercised through application of the Code of Administrative Procedure.

Matters that are brought to a commission for decision but do not garner the required two-thirds majority are considered by the Election Code to be a ‘refusal’ to take a decision. The issue of whether a “refusal” can be appealed has been raised in two cases filed with the Sofia Regional Administrative Court by GERB and by an independent candidate. Final clarification of whether a ‘refusal’ by the CEC to take a decision can be appealed and under which procedures (those of the Election Code or those of the Administrative Procedure Code) may not come before election day.

XI. PARTICIPATION OF MINORITIES

The Constitution makes no reference to minorities, but Article 54.1 provides the right to ethnic self-identification. Article 11.4 prohibits the formation of political parties “on an ethnic, racial or religious basis”.²³ According to the 2011 census, 84.8 per cent of Bulgaria’s population are ethnic Bulgarians, while 8.8 per cent are ethnic Turks and 4.9 per cent are Roma.²⁴ Smaller minorities include Russians, Armenians, Vlachs, Karakachans, Ukrainians, Macedonians, Greeks, Jews and Romanians.

The DPS is generally perceived as representing the interests of the ethnic Turkish minority; however, for the municipal elections the party has fielded a number of candidates from other minorities, as well as ethnic Bulgarian candidates. Several small political parties or movements are representing Roma interests.

The Election Code stipulates that the election campaign shall be conducted in the Bulgarian language.²⁵ The Code does not provide explicit sanctions for violations of this provision but does foresee administrative fines of 200–2,000 BGN (102–1,020 EUR) for violations of the Code for which no sanction is specifically provided. DPS leader Ahmed Dogan has repeatedly addressed supporters in Turkish while campaigning, stating that he was willing to pay the fine if necessary. GERB and *Ataka* filed complaints against the DPS mayoral candidate in Omurtag for using Turkish during a campaign event. The Omurtag MEC did not impose a sanction since it could not garner the required two-third majority.

Minority groups, especially Roma, are considered to be particularly vulnerable with regard to possible malpractices such as vote-buying, pressure and intimidation. Several interlocutors from political parties told the OSCE/ODIHR LEOM that they expect vote-buying to be an issue in Roma communities. At the same time, various interlocutors have expressed concern that Roma are frequently presented as the source of the problem. Some politicians, most notably Mr. Siderov, are using intolerant and xenophobic rhetoric against minorities, in particular Roma, in their campaign.

²³ In its Decision No. 4 of 1992 on the registration of the DPS the Constitutional Court has decided that the prohibition only refers to cases where the membership is expressly limited to those belonging to a single racial, ethnic or religious group, irrespective of whether it is in a majority or in a minority.

²⁴ It is widely assumed that the actual number of Roma is significantly higher; most estimates put it at 700,000 - 800,000.

²⁵ Article 133(2).

XII. DOMESTIC AND INTERNATIONAL OBSERVERS

While the Election Code defines who can be an observer,²⁶ it does not specify the full scope of observers' rights and responsibilities. The CEC has adopted a decision to this effect. Registered agents of candidates, representatives of parties, coalitions and nomination committees and observers have access to all stages of election-day proceedings at PECs and MECs.

So far, five domestic NGOs have been accredited to observe the elections. The deadline for accrediting individual observers is 20 October. OSCE/ODIHR LEOM interlocutors expect that the CEC will interpret the Election Code in a way that allows for the widest possible accreditation of domestic non-party observers.

XIII. OSCE/ODIHR LEOM ACTIVITIES

The OSCE/ODIHR LEOM formally opened in Sofia with a press conference on 28 September 2011. During the reporting period, the Head of Mission met the CEC chairperson and most CEC members, senior staff of the Ministry of Foreign Affairs, 8 of the 18 presidential candidates, a number of mayoral candidates in Sofia, Plovdiv and Varna, leaders of political parties, diplomatic representations of OSCE participating States, representatives of international organizations, and representatives of civil society. The OSCE/ODIHR LEOM has also established regular contacts with the CEC, governmental institutions involved in the election process, political parties, civil society, and the media. Ten LTOs deployed in teams of two are meeting regional stakeholders, MECs and observing election campaign events.

The OSCE/ODIHR LEOM intends to co-operate with the Parliamentary Assembly of the Council of Europe (PACE) and the Congress of Local and Regional Authorities of the Council of Europe, who will deploy observer delegations for election-day observation.

²⁶ Representatives of the European Parliament, foreign parliaments, the OSCE, foreign parties and movements, as well as persons designated by the parties and coalitions running in the elections, who have been invited through the Ministry of Foreign Affairs, and authorized members of Bulgarian NGOs.