OSCE Office for Democratic Institutions and Human Rights Election Observation Mission Republic of North Macedonia Local Elections, 19 October 2025



# INTERIM REPORT 5 September–1 October 2025

## **3 October 2025**

## I. EXECUTIVE SUMMARY

- Local elections will be held in North Macedonia on 19 October. Voters will elect the mayors and councils of 80 municipalities and the City of Skopje. Potential second-round mayoral elections will take place on 2 November. The elections are taking place in a political environment that continues to be polarized, including along ethnic lines. Public dissatisfaction with institutions and perceptions of corruption form a backdrop to these elections. Questions of national identity and the representation of ethnic communities have dominated public discourse, along with debates on the reforms needed for progress in the European Union's integration process.
- Local elections are primarily regulated by the Constitution, the Electoral Code, and subsidiary acts of the State Election Commission (SEC). While the 2024 amendment to the Electoral Code addressed some previous ODIHR recommendations, most remain unaddressed. In May, the Constitutional Court struck down provisions on supporting signatures for independent candidates; the SEC regulated this aspect by requiring only two signatures after parliament failed to fill the legal gap. Legal provisions for political advertising in the media, including online, and for outdoor advertising structurally disadvantage independent candidates and non-parliamentary parties and exclude certain parliamentary parties.
- The elections are administered by the SEC, 81 Municipal Election Commissions (MECs), including the Election Commission of the City of Skopje, and 3,480 Election Boards (EBs). Technical preparations for the elections are ongoing and proceeding without major delays. However, MECs, responsible for appointing the new permanent EB composition, reported challenges and delays in the selection process. The SEC holds *ad hoc* sessions that are open to observers, media, and authorized candidate representatives and are streamed online.
- 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. The centralized voter register (VR) includes the records of some 1.83 million eligible citizens, of which some 1.72 million with permanent residence in the country will be included in the voter lists. The VR was open to public scrutiny, including by electoral contestants. ODIHR Election Observation Mission (EOM) interlocutors noted long-standing concerns about the significant number of voters not living in their place of permanent residence but abroad, and that shortcomings in the residential address system may adversely affect the accuracy of the VR.
- Citizens with voting rights may stand as candidates in their municipality of permanent residence, except those serving or awaiting to serve prison sentences of over six months. Candidates may be nominated by political parties, coalitions, or groups of voters. The requirement to check candidates' criminal records through basic courts was reported to the ODIHR EOM to be burdensome and, at times, led to delays. MECs registered a total of 577 councilor lists, all compliant with the gender quota, and 309 mayoral candidates, including 32 women (10.4 per cent). MECs denied registration to six mayoral candidates and four council lists.

- The official campaign period lasts from 29 September to 17 October. While early campaigning is prohibited, some ODIHR EOM interlocutors noted that several mayoral candidates engaged in campaign activities before the official period. Although strict rules aimed at preventing the misuse of public resources or abuse of office are in place from the day an election is called, many ODIHR EOM interlocutors raised concerns about potential misuse of state resources and pressure on public employees, and several alleged instances of voter intimidation.
- Campaigning on social networks remains largely unregulated, with no regulatory oversight in place. Most contestants indicated that they would rely in part on social networks for campaigning, but several contestants raised concerns regarding potential online verbal attacks against candidates and their supporters. The Agency for Audio and Audiovisual Media Services developed a voluntary Code of Conduct in the Online Sphere during Electoral Processes and Referenda, addressing political advertising, disinformation, and personal data processing.
- The law prescribes a 40 per cent gender quota for candidate lists, with placement requirements. In election administration bodies, each gender must be represented by at least 30 per cent. While the current president is a woman, women remain underrepresented in public and political life. Women account for 40 per cent of members of parliament and hold 3 of the 23 ministerial positions. Only 2 of the 81 mayors elected in 2021 are women. Several ODIHR EOM interlocutors expressed concerns regarding misogynistic rhetoric against women candidates and women's political participation in general, especially online.
- Campaigns may be financed from public and private sources. There is no direct public campaign funding, but parties receiving state funding can use it for campaign purposes. The law sets limits on donations and expenditures, prohibits certain funding sources, and foresees sanctions for campaign-finance violations. Contestants must file interim and final finance reports, but only final reports are audited. Many ODIHR EOM interlocutors expressed concerns about the effectiveness of campaign-finance oversight and the misuse of administrative resources, citing legal gaps and the limited capacity of oversight bodies.
- Media are fragmented along political and ethnic lines and operate in a limited advertising market. The Electoral Code requires media to cover elections in a fair, balanced, and unbiased manner. During the official campaign period, detailed rules govern newscasts of the public broadcaster. Political advertising in the media, including online, is reimbursed from the state budget. National broadcasters are required to make at least one daily newscast and one weekly primetime programme accessible to persons with disabilities.
- Most election-related complaints may be filed only by contestants, with election commissions or basic courts depending on the subject matter. Voters may only file complaints related to the misuse of administrative resources or to violations of their individual voting rights. The law provides for short filing and adjudication deadlines. The Constitutional Court reviewed several initiatives concerning these elections and rejected all of them, while the Administrative Court has thus far reviewed two complaints, upholding the MEC decisions rejecting candidacies. Most ODIHR EOM interlocutors expressed confidence in the efficiency of the dispute resolution system, although some expressed concerns about the impartiality and independence of adjudicating bodies.
- The Electoral Code provides for domestic and international election observation, including by citizen observers and authorized representatives of contestants. Observation activities by citizen observer organizations are very limited due to a lack of funding.

#### II. INTRODUCTION

Following an invitation from the authorities of the Republic of North Macedonia to observe the 19 October 2025 local elections and based on the recommendations of a Needs Assessment Mission conducted from 24 to 27 June, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) established an Election Observation Mission (EOM) on 5 September. The mission, led by Matteo Mecacci, consists of a 14-member core team based in Skopje and 24 long-term observers (LTOs) deployed on 13 September to 11 locations around the country. Mission members are drawn from 24 OSCE participating States, and 53 per cent of mission members are women. ODIHR has requested participating States to second 250 short-term observers to observe election-day proceedings.

## III. BACKGROUND AND POLITICAL CONTEXT

On 9 August, the Speaker of Parliament called local elections for 19 October, with potential second-round mayoral elections taking place on 2 November. In the last local elections in 2021, the coalition led by the Internal Macedonian Revolutionary Organization – Democratic Party of Macedonian National Unity (VMRO-DPMNE) secured control in the majority of municipalities and the City of Skopje, while the Social Democratic Union of Macedonia (SDSM) experienced significant losses, prompting the resignation of Prime Minister Zoran Zaev. In the 2024 parliamentary elections, VMRO-DPMNE won the highest number of seats and formed a government with VLEN, a coalition of ethnic-Albanian political parties, and For Our Macedonia (ZNAM). In the presidential election, Gordana Siljanovska-Davkova, endorsed by VMRO-DPMNE, was elected in the second round on 8 May 2024, becoming the country's first woman head of state.

The political environment remains polarized, including along ethnic lines. The public discourse has been dominated by questions regarding national identity and the rights of ethnic communities, as well as debates on outstanding constitutional changes and reforms required for progress in European Union (EU) accession negotiations. In addition, legislative matters relevant to ethnic communities, such as a challenge regarding the constitutionality of the Law on the Use of Languages pending before the Constitutional Court, as well as equitable representation of persons belonging to all communities across public institutions and in other areas of public life, form an important part of the backdrop to these elections. Public dissatisfaction with institutions at all levels and perceptions of widespread corruption remain prevalent.<sup>4</sup> Several ODIHR EOM interlocutors noted that in the aftermath of a tragic nightclub fire in Kochani in March 2025, perceptions of insufficient accountability further eroded public trust in institutions.<sup>5</sup>

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

Out of the 80 municipalities and the City of Skopje, VMRO-DPMNE won 42 mayoral races, while SDSM secured 16. The ethnic-Albanian Democratic Union for Integration (BDI/DUI) won 11 mayorships, 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 race, 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.

In the 2024 parliamentary elections, the VMRO-DPMNE-led coalition secured 58 mandates, BDI/DUI and the SDSM-led coalition each gained 18, VLEN won 14 seats, while ZNAM and Levica each won 6 mandates.

See Transparency International's <u>2024 Corruption Perceptions Index</u>, and the Macedonian Center for International Cooperation's <u>Corruption Assessment Report on North Macedonia 2023</u> and <u>General Trust and Trust in Institutions 2024 report</u>; and the 2024 European Commission North Macedonia 2024 Report.

On 16 March 2025, a fire in a Kochani nightclub killed 62 people and injured at least 193. The venue was in breach of multiple safety regulations, and several government officials were arrested as part of the investigation into the issuance of its license. In the aftermath of the event, anti-corruption protests erupted nationwide.

Women remain underrepresented in public and political life. Women currently account for 48 of the 120 members of parliament (40 per cent) and hold only 3 of the 23 ministerial positions (13 per cent). There are only 2 women among the 81 mayors elected in 2021. Although parliament in 2006 adopted the Law on Equal Opportunities for Women and Men and the government in July 2022 adopted the National Strategy for Gender Equality (2022–2027), interlocutors highlighted the lack of meaningful efforts to promote women within party leadership structures, noting that gender stereotypes, limited media visibility, and the absence of financial or logistical support remain key barriers to women's full political participation.

## IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Local elections are primarily governed by the 1991 Constitution, the 2006 Electoral Code, and subsidiary acts adopted by the State Election Commission (SEC).<sup>6</sup> The Electoral Code was most recently amended shortly before the 2024 parliamentary and presidential elections. Among other changes, the amendments addressed some previous ODIHR recommendations, including clarifying the timeline and conditions for repeating mayoral elections, and revising the formula for determining the number of support signatures required for independent candidates in parliamentary and local elections.<sup>7</sup> However, a number of previous ODIHR recommendations remain unaddressed, including those related to a comprehensive revision of the Electoral Code, ensuring equal media access in election campaigns, increasing the accountability and integrity of campaign financing, and enhancing regulations on the misuse of administrative resources. Many ODIHR EOM interlocutors, including those from state institutions, noted that the Electoral Code lacks clarity and criticized the recurring practice of introducing late amendments without prior debate or consultation, which, in their view, contributes to legal uncertainty and undermines the stability of the law.

In May 2025, acting on the initiative of a group of voters, the Constitutional Court repealed provisions of the Electoral Code that required independent candidates in parliamentary and local elections to collect supporting signatures from one per cent of voters registered in the respective electoral unit. The Court found that, under this formula, the required number of signatures in 37 of the 80 municipalities and the City of Skopje would be significantly higher than in previous local elections, creating unequal conditions (see *Candidate Registration*). On 16 August, a week after the elections were called, three MPs introduced an initiative to amend the Electoral Code with the aim of addressing the resulting legal gap, but it did not pass in parliament.<sup>8</sup>

Local councilors and mayors are directly elected for four-year terms in the 80 municipalities and the City of Skopje. Mayors are elected under a two-round majoritarian system. If no candidate receives an absolute majority of the votes cast in the first round, a runoff between the two leading candidates is held two weeks later. For a mayoral election to be valid, at least one-third of voters registered in the municipality must participate in the first round. If this threshold is not met, the election must be repeated within 60 days, without a turnout requirement. This turnout requirement does not apply to a potential second round or to council elections. Councilors are elected through a closed-list

The regulatory framework further includes the Law on Local Self-Government, Law on Political Parties, Law on Prevention of Corruption and Conflicts of Interest, Law on Media, Law on Audio and Audio-visual Media Services, and relevant provisions of the Criminal Code and Law on Administrative Procedure. North Macedonia has ratified key international and regional human rights instruments related to the holding of democratic elections.

The amendments also clarified certain campaign finance regulations, enhance data protection in relation to voter registration, and specify deadlines for resolving election disputes.

Although 65 MPs voted for the initiative, it failed as it did not secure a qualified double majority, required under Art. 5.2 of the 2001 Ohrid Framework Agreement, which besides an overall majority, also requires the majority of MPs from non-majority communities to vote in favour.

In case no mayor is elected, the government appoints a trustee to execute the office and notifies the Speaker of Parliament within 15 days, to call a new mayoral election.

proportional representation system with no threshold. Candidate lists for municipal councils must include at least 40 per cent of candidates from each gender, with placement requirements. <sup>10</sup> The number of councilors is determined based on the municipality's population, and can range from 9 to 33, with 45 members elected to the Council of the City of Skopje. <sup>11</sup>

#### V. ELECTION ADMINISTRATION

The elections are administered by the SEC, 81 Municipal Election Commissions (MECs), including the Election Commission of the City of Skopje (ECCS), and 3,480 Election Boards (EBs). <sup>12</sup> Electoral bodies must fulfil legal criteria for gender and ethnic representation: each gender must be represented by at least 30 per cent of the membership, and in municipalities where at least 20 per cent of citizens belong to non-majority ethnic groups, these communities must be equitably represented. <sup>13</sup>

The SEC is a permanent body appointed by parliament for a five-year mandate. It is composed of seven members, of which four are nominated by the parliamentary majority and three by the opposition, based on proposals from political parties. The SEC chairperson is selected from among the opposition-nominated members, and the deputy chairperson from among those proposed by the majority. <sup>14</sup> In line with previous ODIHR recommendations, prior to these elections, the SEC filled several staff vacancies, including the position of secretary general, which had been vacant for several years. <sup>15</sup>

In the reporting period, the election preparations that fall under the SEC's responsibilities in local elections were undertaken without major delays. <sup>16</sup> The SEC adopted new or amended previous instructions and guidelines, including those on the use of funds by the election administration, selection and appointment of EB members, signature collection and candidate registration, as well as the determination of the average price for paid political advertisement. The SEC has been holding sessions on an *ad hoc* basis. Media, observers, and authorized representatives of the contestants are notified through an internal list maintained by the SEC, rather than through the legally required public announcements. Sessions are streamed on YouTube, and session minutes are published on the SEC website. However, in the absence of a clear deadline for publication and the low frequency of SEC sessions, the publication of session minutes was not always prompt. <sup>17</sup>

According to the SEC, due to limited funding, accessibility measures remain restricted to ensuring the physical accessibility of polling stations and voting premises, providing some information

One out of every three positions on the list must be occupied by a candidate of the less represented gender, with at least one additional spot for this gender within every ten positions.

The number and locations of polling stations were approved by the SEC on 18 September. According to the SEC, minimal changes have been made to the locations of polling stations.

Ethnicity requirements are ensured by using the self-declared ethnic affiliation contained in the database of public employees as a mandatory criterium when randomly selecting election officials.

While the current SEC composition was appointed in 2021, its composition was adjusted in 2025 by selecting a new chairperson and deputy chairperson. This change was necessitated by the change of government resulting from the 2024 parliamentary elections.

While the newly appointed secretary general is a woman, the SEC still does not comply with gender requirement, as only two of its seven current members are women.

The SEC informed the ODIHR EOM that while it received the budget necessary to cover expenses related to these elections, there is a systemic lack of long-term funding, including for investments in staff and physical and ICT infrastructure, which, in the SEC's opinion, affects the efficiency of electoral operations.

The Rulebook on SEC internal procedures provides that SEC session minutes are published once the commission has voted to approve them.

In September 2024, the government adjusted municipal council sizes in 17 municipalities, based on the 2021 census data. In June 2025, the Constitutional Court repealed parts of the census methodology, with effect in future censuses. The government's September 2024 decision was subsequently challenged through three separate initiatives before the Constitutional Court, which on 24 September rejected all three.

materials in sign language, and offering some assistive tools such as tactile ballot templates on election day.

MECs are composed of a chairperson and four members, randomly selected from among public-service employees for five-year terms. MECs are responsible for overseeing the electoral process within their respective municipalities. BBs, which are responsible for administering election-day procedures, are formed under a mixed professional-political model: three members are randomly selected from among public employees for four-year terms, while one is nominated by the governing parties and one by opposition parties, appointed for each election. All MEC and EB members have substitutes, selected in the same manner as the main composition, who assume the same rights and responsibilities in the absence of the members. As the mandate of the permanent EB composition expired prior to these elections, new permanent members had to be selected by the MECs in parallel with other electoral preparations. The majority of MECs reported delays and challenges in the selection of EB members, which was conducted for the first time using SEC software. On the selection of EB members, which was conducted for the first time using SEC software.

Although the 2024 amendments to the Electoral Code introduced, in line with a prior ODIHR recommendation, a Center for Continuous Election Education, the SEC training department has not been reorganized and continues to operate in its old format.<sup>21</sup> The SEC has adopted a training plan that envisages training of approximately 36,000 MEC and EB members between 25 September and 15 October.<sup>22</sup>

## VI. VOTER RIGHTS AND 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. Voter registration is passive and is structured according to the municipality of voters' permanent residence. The voter register (VR) is maintained by the SEC with assistance from the State Statistical Office and is based on data from the central population register, maintained by the Ministry of Digital Transformation in co-operation with various institutions.<sup>23</sup>

Throughout the year, citizens can verify their records on the SEC website or in person at one of the SEC's regional offices. In addition, prior to every election, the VR is available for public scrutiny 15 days after the call of elections.<sup>24</sup> Following this, political parties had the opportunity to request an

The current mandate of MECs commenced in 2021. Women account for 49.8 per cent of MEC members and 36 of the 81 (44.4 per cent) MEC chairpersons. Almost 80 per cent of the MEC members and 48 of the 81 MEC chairperson appointed in 2021 remain in their positions. Around three per cent of positions of MEC members and substitutes are currently vacant.

For local elections, certain responsibilities fall under the remit of MECs. These responsibilities include, among others, appointing and training EBs, verifying the documentation submitted by prospective candidates and registering contestants, as well as tabulating and announcing municipal-level election results.

MECs informed the ODIHR EOM that the software's database of public officials is outdated and contains entries of ineligible persons. They also noted that the system lacks contact data, which would allow MECs to confirm the availability of newly appointed EB members.

The ODIHR EOM was informed that the center has not yet been established due to financial limitations and disagreement among the current SEC management regarding its status.

All EB members are obliged to participate in training, otherwise their remuneration will be reduced by 20 per cent.

The main providers of data to the population register are the Civil Acts Office, the Ministry of Internal Affairs (MoIA) and the Central Registry. In practice, the SEC maintains the VR based solely on data and updates it receives from the MoIA, as its IT infrastructure and databases are not integrated into inter-agency data exchange platforms.

Public inspection lasted from 23 August to 11 September, resulting in amendments of some 9,000 voters' records.

electronic copy of the register for the municipalities in which they are running and could submit requests for corrections until 20 September.<sup>25</sup>

As of 26 September, when it was closed for these elections, the VR included the records of 1,832,415 eligible citizens. ODIHR EOM interlocutors noted long-standing concerns about the significant number of voters not living in their place of permanent residence according to the VR but abroad, and about the incomplete and outdated residential address system, which may impact voter turnout and the accuracy of the VR. 27

## VII. CANDIDATE RIGHTS AND REGISTRATION

Citizens eligible to vote may stand as candidates for mayor or councilor in the municipality of their permanent residence. Despite previous ODIHR recommendations, individuals currently serving or awaiting the execution of a prison sentence of more than six months remain barred from running for office. Candidates may be nominated by political parties, coalitions, or groups of voters.

Following the May 2025 Constitutional Court decision repealing provisions of the Electoral Code on the number of required support signatures for independent candidates, and failure of parliament to fill the resulting legal gap, the SEC adopted a Rulebook on 17 August, prescribing only two support signatures to be collected between 18 August and 1 September. This act of the SEC, and consequently, the SEC Guidelines for procedures of submitting and registering candidate lists, were unsuccessfully challenged before the Constitutional Court.<sup>28</sup>

Nomination documents had to be submitted to MECs and the ECCS by 13 September, with a two-day period to rectify deficiencies.<sup>29</sup> The Electoral Code, the SEC calendar of activities, and other acts do not clearly regulate the various timelines that are applicable during the verification of lists, which led to an inconsistent implementation of verification procedures by MECs.<sup>30</sup> In addition, MECs noted that implementing the legal requirement to verify candidates' criminal records through basic courts was burdensome and, at times, affected other electoral preparations.<sup>31</sup> MECs informed the ODIHR

While political parties and other contestants had to submit requests to inspect voter lists by 11 September, the deadline for submission of their registration documentation to MECs was 13 September. The scope of information shared with political parties is limited to data indispensable for scrutiny, such as voters' names, dates of birth, and addresses. In these elections, six contestants, of which five political parties and one group of voters, requested voter list data.

The excerpt of the voter lists for these elections contains 1,717,803 voters. Voters residing abroad, those in detention and in elderly people care institutions, amounting to a total of 114,612 individuals, are excluded from the lists.

In 2007, the management of the address registry was transferred from the State Statistical Office to the Central Registry. In an attempt to improve the quality of the address register, the Central Registry requested updates from municipalities but has thus far only received data from 38 municipalities (47.5 per cent).

The Association "World Macedonian Congress" challenged the Rulebook, arguing that the SEC exceeded its legal powers. The Constitutional Court declined to review the challenge, noting that the Rulebook was adopted in the situation of legal vacuum, pursued the legitimate aim to respect the guaranteed rights of citizens, and was in line with the May 2025 Constitutional Court decision.

According to the SEC, 8 mayoral candidates and 20 council lists were provided this opportunity by MECs.

For example, the Electoral Code is not precise on when the 24 hours for the MECs to verify a submitted list start. The SEC calendar of activities provides that it starts when the list is submitted. Some MECs informed the ODIHR EOM that they were instructed by the SEC that the 24-hour deadline starts from the time the MEC receives a response from the court on convictions of nominees.

For example, the MECs in parallel had to select new EB members, a complicated multi-step process (see *Election Administration*).

EOM that courts frequently did not comply with the legally prescribed 24-hour deadline for these checks, resulting in significant delays in processing candidate registrations.<sup>32</sup>

All candidate lists were verified before the 24 September SEC lottery to determine the order of contestants on ballots.<sup>33</sup> MECs and the ECCS registered a total of 10,490 candidates on 577 lists for municipal councils, submitted by 27 political parties, 6 coalitions and 65 groups of voters. All registered candidate lists complied with the gender requirements. Women comprise some 45.1 per cent of all council candidates and head 107 candidate lists (18.5 per cent). A total of 309 mayoral candidates were registered, of whom 79 were nominated by 19 political parties, 176 by 5 coalitions, and 55 by groups of voters; only 32 (10.4 per cent) are women. MECs rejected six mayoral candidates and four council lists, on grounds of late submission or deficiencies in nomination documents; all appeals against rejections were dismissed by the Administrative Court (see *Election Dispute Resolution*).

## VIII. CAMPAIGN ENVIRONMENT

The official campaign period began on 29 September and ends on 17 October, with a 24-hour campaign silence period prior to election day.<sup>34</sup> Early campaigning is prohibited, but the Electoral Code allows contestants to hold one public event between the time of their registration and the start of the official campaign. According to some ODIHR EOM interlocutors, several mayoral candidates engaged in campaign activities before the official start, including on social networks.

The law prohibits the use of certain types of state resources for campaigning, effective from the day elections are called.<sup>35</sup> There is an explicit ban on the use of public offices, equipment, and vehicles for campaign purposes.<sup>36</sup> However, campaign activities of public officeholders remain unregulated.<sup>37</sup> The Electoral Code calls on all political parties participating in an election to sign a Code on Fair and Democratic Elections, which prohibits pressure on civil servants and public-sector employees. Many ODIHR EOM interlocutors raised concerns about potential misuse of state resources during the campaign, as well as pressure on employees of state institutions, and some reported alleged transfers or threats of termination of employment in public administration.<sup>38</sup> Numerous ODIHR EOM

Criminal record checks are carried out by basic courts with jurisdiction over the candidates' place of birth, and by the Skopje basic court for those born abroad. As the information on the place of birth in IDs is not always precise, it required MECs to contact potential candidates directly. Unlike other public institutions that have direct automatic access to this data, MECs had to request it manually for each candidate. Delays in processing requests for criminal records in courts have been reported to the ODIHR EOM by 34 MECs.

Neither the law nor any other act prescribes detailed procedures for the lottery. Existing provisions provide limited guidance on council lists only, but mayoral candidates are not covered. In practice, the SEC divided contestants into three sub-groups: parliamentary parties, non-parliamentary parties, and those nominated by groups of voters, and held separate lotteries to assign numbers from 1 to 9, from 10 to 33, and from 34 to 153, respectively.

In municipalities where a second round of mayoral elections will take place, the second-round campaign will last until 31 October, with 24 hours of campaign silence.

Including prohibitions on the use of public funds for new infrastructure projects, extraordinary budgetary payments, and public employment procedures, as well as on the inauguration of state-funded projects starting 20 days before the start of the official campaign period.

All public institutions must report their vehicles within ten days from the announcement of elections to the State Commission for Prevention of Corruption (SCPC), i.e., by 18 August. Prior to these elections, vehicles of public institutions received standardized license plates to distinguish them from private vehicles. The SCPC announced that as of 29 September, only 635 institutions had submitted the required data, while 879 had not. By law, failure to submit the data within the prescribed deadline is subject to fines ranging from EUR 200 to 400.

Upon the announcement of the elections, the SCPC informed state institutions, public officials, and contestants on the legal provisions on using public funds during the electoral process. It also announced that it will monitor the use of state resources during the campaign and notify the relevant authorities to take action when necessary.

Such allegations were made to ODIHR EOM LTOs in Kochani, Novaci, Ohrid, Shuto Orizari, and Tetovo municipalities.

interlocutors alleged that some major parties target marginalized communities for vote-buying, and some claimed on-going vote buying especially among economically disadvantaged Roma communities. Some opposition candidates alleged that supporters and their businesses face targeted administrative inspections, and some smaller parties or independent candidates reported that voters face intimidation for publicly supporting them.

The Electoral Code regulates access to political advertising in outdoor spaces, allocating 80 per cent of the available space equally to the two main parties of the parliamentary majority and the two main opposition parties, 10 per cent to parliamentary parties without a parliamentary group, and 10 per cent to non-parliamentary parties and independent candidates. Under this formula, smaller parties with a parliamentary group are not entitled to a share of outdoor advertising space. Many ODIHR EOM interlocutors noted that this arrangement disadvantages non-parliamentary parties and independent candidates.

Campaigning on social networks is not expressly regulated, but the law requires the distinction and labelling of all forms of paid political advertising. Most contestants indicated to the ODIHR EOM that they would rely in part on social networks for campaigning. Several ODIHR EOM interlocutors expressed concerns regarding online harassment, including misogynistic rhetoric against women candidates, and some interlocutors reported having received verbal attacks on social networks in the pre-campaign period. Several ODIHR EOM interlocutors noted that low levels of media literacy could make the public more susceptible to disinformation narratives amplified on social networks during the election campaign. Possible foreign information manipulation during the electoral process was also a concern for several stakeholders.

The law does not provide for regulatory oversight for the campaign on social networks. <sup>41</sup> The Agency for Audio and Audiovisual Media Services (AAAVMS) had developed a voluntary Code of Conduct in the Online Sphere during Electoral Processes and Referenda, which *inter alia* addresses disinformation, intolerant and discriminatory rhetoric. <sup>42</sup> AAAVMS and its counterparts have established a co-ordination body to which complaints may be submitted regarding violations of the Code. <sup>43</sup> In January 2025, the government adopted a new Cybersecurity Strategy 2025–2028 and Action Plan, and in June, through a fast-track procedure, and to align with the EU legislation on network and information security, the parliament adopted the Law on Security of Networks and Information Systems, which outlines a national response system to cyber threats and calls for the establishment of a National Cybersecurity Co-ordination Council. <sup>44</sup>

While political parties representing smaller ethnic communities have traditionally joined electoral coalitions with major parties and have done so again in these elections, some parties representing the Serbian, Turkish, Roma, and Bosniak communities informed the ODIHR EOM they intend to run independently.

On 9 September, the ODIHR EOM started monitoring the Facebook accounts of selected political parties, leaders, and mayoral candidates.

See the Code of Conduct in the Online Sphere during Electoral Processes and Referenda.

The Agency for Audio and Audiovisual Media Services (AAAVMS) has a legal obligation to promote media literacy. Among other activities, in January 2025, it published a <u>Handbook on Recognizing Disinformation</u>.

AAAVMS informed the ODIHR EOM that it will launch a pilot project for the first round of the local elections, monitoring third-party campaigning across several social network platforms.

The co-ordinating body is comprised of representatives from the AAAVMS, the Association of Journalists of Macedonia, the Macedonian Institute for Media, the Council of Media Ethics of Macedonia, the Institute of Communication Studies, and the Metamorphosis Foundation.

See the <u>Cyber Security Strategy 2025-2028 with Action Plan</u> and the <u>Directive 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union</u>. In addition, in June 2025, the Law on Electronic Communications was adopted, containing provisions that strengthen personal data protection.

## IX. CAMPAIGN FINANCE

Campaign and political finance are regulated by the Electoral Code, the Law on Financing of Political Parties, and the Law on Prevention of Corruption and Conflict of Interest. Most previous ODIHR recommendations remain unaddressed, including those related to reporting all income and expenditures per constituency in both interim and final reports, electronic submission of campaign reports, regulation of bank loans and third-party financing, strict limits on post-election donations, and sufficient resources for oversight bodies.

Campaigns may be financed from public and private sources. There is no direct public funding, but the state reimburses, through the SEC, registered broadcast, print, and online media outlets for political advertising. In addition, political parties that receive state funding may use these funds for campaign purposes.<sup>45</sup>

Private funding includes bank loans, which are not comprehensively regulated, and monetary or inkind donations, capped at EUR 3,000 per individual and EUR 30,000 per legal entity per campaign, in Macedonian Denar (MKD) equivalent. <sup>46</sup> Donations from foreign, state, municipal, and anonymous sources, as well as from public, religious, and charitable organizations, are prohibited. The law does not regulate third-party campaign financing. Campaign spending is limited to MKD 110 (approximately EUR 1.8) per registered voter in a municipality, applied cumulatively across both rounds of mayoral elections. For campaign-finance purposes, the law does not distinguish between mayoral and council elections.

All contestants must open dedicated bank accounts through which all campaign income and expenditures are processed. Oversight of campaign finance is entrusted to the State Audit Office (SAO) and the State Commission for the Prevention of Corruption (SCPC). Each contestant must file three interim finance reports, two before election day and one afterwards, which are not subject to audit.<sup>47</sup> All reports must be submitted to the SAO, SCPC, and the SEC, which publish them on their websites. Within 60 days of the official election results, campaign participants must submit a final financial report to the SAO, which then has 60 days to audit it. The reporting template was provided by the Ministry of Finance prior to the 2024 elections, but it does not require a breakdown by municipality. The Electoral Code foresees fines of up to EUR 9,000 for violations of campaign-finance regulations, including exceeding donation or spending limits or failing to submit a financial report.

Many ODIHR EOM interlocutors, including those from the oversight institutions, expressed concerns about the effectiveness of campaign-finance oversight and the misuse of administrative resources, citing systemic gaps in the legal framework and the limited capacity of oversight bodies.<sup>48</sup>

Interim reports require reporting only on donations received. Contestants are required to submit a first report by the 11<sup>th</sup> day of the campaign, the second by the day before election day, and a third within one day of closing the dedicated campaign bank account. In case of a second round, mayoral candidates must submit an additional interim report by the day before the second-round election.

Under the Law on Financing of Political Parties, 0.15 per cent of the annual state budget income is designated for subsidies to political parties with 70 per cent allocated to parliamentary parties, proportionally to their seats, and 30 per cent equally to all parties that received at least one per cent of votes in the last parliamentary or local elections. In 2024, state funding for political parties amounted to approximately EUR 7.5 million. The law does not limit transfers from regular party accounts to campaign accounts.

EUR 1 equals approximately MKD 61.5.

In its latest <u>annual report</u>, SAO recommended several amendments to campaign finance regulation, including prohibiting post-campaign donations, regulating online and social media spending, and introducing stricter eligibility criteria for media outlets receiving public funds, including online portals. Also, in its <u>2024 post-elections report</u>, the SCPC highlighted issues of late or incomplete financial reports, as well as unregulated digital advertising.

## X. MEDIA

The media landscape is diverse but fragmented along political and ethnic lines, and operates in a limited advertising market. Television remains the main source of political information, but online news portals and social network platforms are increasingly influential. Several ODIHR EOM interlocutors raised concerns about the absence of local media in some parts of the country. They also noted that due to unfavourable working conditions, human resources in the media sector are limited, affecting both journalistic and technical capacities. The 2025 amendments to the Law on Media introduced a definition of online media and a voluntary register for online outlets, aiming at increasing transparency.

The Constitution guarantees the freedoms of expression and of the media. The Electoral Code requires media to cover elections in a fair, balanced, and unbiased manner. During the official campaign period, the public broadcaster Macedonian Radio and Television (MRT) is obliged to dedicate 30 per cent of its newscasts to general events, 30 per cent to the parliamentary majority parties, 30 per cent to the parliamentary opposition, and 10 per cent to non-parliamentary parties and independent candidates. MRT shall also provide contestants with free airtime and organize candidate debates during primetime.

Mayoral candidates are entitled to equal coverage by all broadcasters, while submitters of councilor lists are entitled to equal coverage in local broadcast media. Paid political advertisement in the media during the campaign period is funded directly from the state budget. Similar to the outdoor advertising rules, the formula for distributing funds and paid airtime does not provide for smaller parties that have a parliamentary group. <sup>49</sup> On 26 September, after the AAAVMS adopted the guidelines for electronic media on allocation of paid advertisement for the local elections, Levica filed a motion for a temporary measure to the Skopje Basic Court, requesting to halt the application of the guidelines and to require AAAVMS to issue new Guidelines that would include the party in the formula for allocation of paid political advertisement. <sup>50</sup> Media that plan to provide paid airtime must register with the SEC. <sup>51</sup> National broadcasters are required to ensure accessibility for persons with disabilities of at least one newscast per day and one programme per week in primetime. AAAVMS is vested with regulation and oversight of the broadcast media, including monitoring, submitting weekly reports to the SEC, and publishing its findings online starting from the announcement of the elections.

On 15 September, the ODIHR EOM started its quantitative and qualitative monitoring of the primetime broadcasts of seven nationwide television stations and the qualitative analysis of election-related articles on five news websites.<sup>52</sup>

49 The Flectoral Code pres

The Electoral Code prescribes that 8 minutes out of each 9.5 minute-long paid advertisement blocks and 90 per cent of the funds allocated for the campaign in the media are to be equally divided between the two largest ruling and the two largest parliamentary opposition parties, 1 minute and 7 per cent of funds are allocated to parliamentary parties that do not have enough MPs to form a parliamentary group, while 30 seconds and 3 per cent of funds are to be shared by non-parliamentary parties and independent candidates.

By law, courts should act under urgent procedure and have three days to decide on such motions. If the motion is accepted, the temporary measure expires after 15 days. On 30 September, the Basic Court in Skopje declared itself not competent in this case, saying that it would forward it to the Administrative Court as the competent court, for further proceedings. Levica also filed a challenge of the AAAVMS Guidelines to the Constitutional Court on 29 September, and it informed the ODIHR EOM that it submitted a proposal to parliament to amend the Electoral Code and fill the legal gap.

For these elections, 33 television stations, 42 radio stations, 8 daily newspapers, and 246 online media outlets registered with the SEC. ODIHR EOM interlocutors expressed concerns about the transparency of some online media registered with the SEC.

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

## XI. ELECTION DISPUTE RESOLUTION

Election-related complaints may be filed with the SEC, MECs, basic courts, or the SCPC, depending on the subject matter. Most complaints can only be lodged by contestants; voters may only file complaints regarding the misuse of administrative resources with the SCPC, and regarding violations of their individual voting rights with the SEC before election day, and with MECs on election day. Basic courts and the SEC handle different types of campaign-related violations. The SEC also reviews complaints by contestants concerning voting, tabulation, and election results. It may initiate proceedings on electoral irregularities *ex officio* and refer alleged criminal offences to the prosecutor's office. Decisions by the SEC, MECs, and the SCPC can be appealed to the Administrative Court, while the appellate courts hear appeals on election-related decisions of basic courts. Deadlines for submitting complaints range from 12 hours to 2 days, with 1 to 3 days allowed for most reviews. Several ODIHR EOM interlocutors, including from the judiciary, noted that some deadlines are unduly short, potentially undermining the quality of rulings.

The Constitutional Court reviews the constitutionality of election-related legal acts or decisions, with no expedited procedure provided. However, following the announcement of the local elections, the Court reviewed several initiatives concerning these elections, including the SEC Rulebook governing the collection of support signatures for independent candidates, the SEC Guidelines for procedures of submitting and registering candidate lists, and the government decision on the number of councilors per municipality (see *Candidate Registration* and *Legal Framework and Electoral System*, respectively). The Court rejected all initiatives. To date, the Administrative Court has reviewed two complaints concerning the rejection of two mayoral candidates and one council list and upheld the MEC decisions.

Most ODIHR EOM interlocutors expressed confidence in the efficiency of the dispute resolution system, although some voiced concerns about the impartiality and independence of the adjudicating bodies.<sup>56</sup>

# XII. ELECTION OBSERVATION

The Electoral Code provides for both citizen and international election observation. Accredited representatives of citizen associations registered at least one year before election day, whose statutes envisage the protection of human rights, international organizations, and representatives of foreign countries, may observe all aspects of the electoral process. Applications for observer accreditation must be submitted to the SEC no later than ten days prior to election day. Electoral contestants may appoint authorized representatives in municipalities where they compete by applying to the relevant MEC until three days before election day to follow the election process at all levels of the election administration.

Election observation activities by citizen observer organizations are very limited, due to a lack of funding, which prevents them from deploying meaningful numbers of long- and short-term observers.

There are four appellate courts in North Macedonia, based in Skopje, Bitola, Gostivar and Shtip.

Voters' complaints on election day must be lodged within 12 hours and reviewed within 2 hours.

Section h II.3.3(95) of the Council of Europe's Commission for Democracy Through Law (Venice Commission)

<u>Explanatory Report of the Code of Good Practice</u> states that "time limits must [...] be long enough to make an appeal possible, to guarantee the exercise of rights of defense and a reflected decision. A time limit of three to five days at first instance (both for lodging appeals and making rulings) seems reasonable".

According to the <u>2024 European Commission's Rule of Law Report</u>, only 25 per cent of the general public and 20 per cent of companies consider the courts fairly or very independent. Also, in its <u>2024 Enlargement Report</u> for North Macedonia, the European Commission noted that "...the independence and impartiality of the judiciary need to be improved. External or political interference remains a serious concern. The perceived level of trust in the judiciary remains very low".

They focus instead on activities such as monitoring of media and social networks and of possible foreign influence and disinformation campaigns, misuse of state resources, inter-communal relations, and electoral accessibility.<sup>57</sup>

## XIII. ODIHR EOM ACTIVITIES

The ODIHR EOM opened in Skopje on 5 September. The mission has met with and established regular contacts with the SEC and MECs, the Ministries of Foreign Affairs and Foreign Trade, Internal Affairs, and Digital Transformation, governmental and state institutions involved in the electoral process, the judiciary, the Prosecutor General, political parties, candidates, civil society, the media, and the resident diplomatic and international community. ODIHR EOM LTOs have been meeting stakeholders at the local level since their deployment on 13 September.

The Congress of Local and Regional Authorities of the Council of Europe and the European Parliament have announced their intention to deploy an observer delegation for the 19 October election day.

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

Of the two main citizen observer organizations that were previously involved in election observation, 'Citizens' Association MOST' will not deploy observers, and 'CIVIL – Center for Freedom', plans to deploy 6 long-term and 60 short-term observers on election day. Other active groups include community organizations such as Roma for Democracy and Umbrella, as well as local organizations like Zeta and Polio+, which focus on the rights and inclusion of persons with disabilities and electoral accessibility. A group of civil society organizations is monitoring the potential misuse of administrative resources across 26 municipalities.