



Office for Democratic Institutions and Human Rights

HUNGARY

PARLIAMENTARY ELECTIONS

3 April 2022

ODIHR NEEDS ASSESSMENT MISSION REPORT

17 -21 January 2022



Warsaw
4 February 2022

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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

In anticipation of an official invitation from the authorities of Hungary to observe the parliamentary elections to be held on 3 April 2022, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 17 to 21 January 2022.¹ The ODIHR NAM included Meaghan Fitzgerald, ODIHR Head of Election Department, Vladimir Misev, ODIHR Senior Adviser on New Voting Technologies, and Kseniya Dashutsina, ODIHR Election Adviser. The NAM was joined by Stephanie Koltchanov, Election Adviser of the OSCE Parliamentary Assembly.

The purpose of the mission was to assess the pre-election environment and the preparations for the parliamentary elections. Based on this assessment, the NAM should recommend whether to deploy an ODIHR election-related activity for the forthcoming elections, and if so, what type of activity best meets the identified needs. Meetings were held with officials from state institutions, as well as with representatives of political parties, media, civil society, and international organizations. A list of meetings is annexed to this report.

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

II. EXECUTIVE SUMMARY

Parliamentary elections will be held on 3 April, 2022. Following the legislative amendments to allow for the holding of referendum and elections on the same day, a referendum on the matters addressed by the so-called “child protection law” will take place concurrently. Preparations for the elections are taking place amid a politically polarized environment, with six opposition parties uniting for the first time. Most of the ODIHR NAM interlocutors from the opposition parties, media and civil society organizations (CSOs) noted a general deterioration of the conditions for democratic elections and raised concerns over the independence of judiciary and media freedom as well as the extended powers of the government to issue decrees during the current state of danger.

The election-related legislation was changed on several occasions since the 2018 parliamentary elections, with the last amendments to seven laws, adopted in one package in December 2020 during the state of emergency. Several ODIHR NAM interlocutors stated that the reform process lacked inclusive consultation, however, they also opined that the amendments partially address previous election-related issues. Most of the ODIHR NAM interlocutors from state institutions expressed confidence in the legal framework to hold democratic elections. Some of the recent amendments included a significant increase of the number of single-member constituencies in which each party needs to nominate candidates simultaneously in order to be eligible to nominate a national list of candidates, the shortening of deadlines for voters to request absentee voting, and a widening of the discretion of the heads of local election offices to change or allocate additional members to polling station committees, and introduced a number of technical changes.

¹ On 20 January 2022, ODIHR received an official invitation to observe the elections and the referendum.

The National Election Commission (NEC) primarily oversees compliance with the law by election commissions and electoral contestants, and the National Election Office (NEO) supervises the administrative part of the elections. In addition, Constituency Election Commissions (CoECs) and Polling Stations Commissions (PSC) are supported by Constituency Election Offices (CoEOs) and Local Election Offices (LEOs). Most of ODIHR NAM interlocutors expressed general confidence in the capacity of election administration to manage technical aspects of elections professionally and both the NEC and NEO noted to the ODIHR NAM their commitment to conduct elections in a professional and effective manner. Some ODIHR NAM interlocutors raised concerns over the impartiality and independence of the election commissions, due to the significantly higher representation of nominees from the governing party and the role of local authorities in appointing polling station commissioners.

The right to vote is granted to all citizens, except those disenfranchised by an individualized court decision due to mental incapacity or criminal conviction. Voter registration is passive and centralized. The law was amended in November 2021 to define residence as the address used by a citizen for official communication, a change ODIHR interlocutors from the state institution said was aimed at improving the civil registration procedures. In January 2022, a number of opposition members of parliament requested the Constitutional Court to review the constitutionality of the new norm, and the case is currently pending before the court. Several ODIHR NAM interlocutors raised concerns that not requiring citizens to live at their registered address might facilitate registering fictitious addresses, in particular targeting closely contested constituencies. In December 2021, in response to some of these concerns and to increase confidence in the voter registration process, the NEO started publishing voter registration data on a weekly basis.

The right to stand as a candidate is granted to every citizen with voting rights. Interlocutors from political parties met by the ODIHR NAM stated their intention to participate in the upcoming elections and did not express concerns with the technical aspects of the candidate registration process. Recent legislative amendments significantly increased the number of single-member constituencies in which each party needs to nominate candidates to be able to contest the proportional component of the elections, a change some interlocutors saw as decreasing opportunities for some parties to compete. ODIHR NAM interlocutors from the state authorities, explained that this change is aimed at addressing the problem with ‘fake parties’, which run only to obtain public funding.

Women are generally underrepresented in political life. In the out-going parliament only 25 out of 199 MPs, and 2 out of 14 cabinet ministers are women. There are no special legislative measures to promote women’s participation and most parties met by the ODIHR NAM stated they do not have specific internal policies to promote women candidates.

Political parties met by the ODIHR NAM expressed their ability to campaign freely and intend to use a mix of traditional and online methods of campaigning. However, most ODIHR NAM interlocutors from the opposition, civil society and media stated that biased media campaign coverage and the limited national outreach of private media, especially in the rural areas, as well as the lack of availability of billboard space for all contestants on equal basis, might tilt the level-playing field. ODIHR NAM interlocutors from the ruling party expressed no concerns about the conduct of the campaign and the ability of the election commission and state institutions to regulate it.

Several ODIHR NAM interlocutors raised concerns about potential pressure on voters, including on civil servants and the misuse of state resources. Some of these interlocutors expressed that these concerns might be exacerbated by the concurrent holding of the government-led referendum and what they anticipate as a blurring of state and party messaging. The potential organization of transport for voters residing outside of Hungary and vote-buying, specifically targeting vulnerable groups such as Roma, as well as rural communities, were some of the concerns raised to the ODIHR NAM.

The campaign finance legislation remained largely unchanged since the last parliamentary elections and recent amendments did not address longstanding ODIHR and the Council of Europe's Group of States against Corruption (GRECO) recommendations. The legislation does not provide for limits on individual donations, interim reporting, or proportionate sanctions, and does not address third-party campaigning. Several ODIHR NAM interlocutors voiced concerns that the lack of expenditure limits on the referendum campaign might allow for the circumvention of campaign finance legislation, especially given the significant imbalances in resources of the contestants, and the anticipated government spending on the referendum. ODIHR NAM interlocutors from some opposition parties and CSOs questioned the impartiality of the State Audit Office. Overall, most ODIHR NAM interlocutors expressed a low level of confidence in the transparency and efficiency of the oversight of party and campaign finances.

The media environment comprises a large number of outlets, and is characterized by significant polarization, and an increasing concentration of ownership. The majority of ODIHR NAM interlocutors noted that these circumstances skew media pluralism, independence of editorial policies and provide a limited diversity of views, particularly in rural areas. Several ODIHR NAM interlocutors anticipated disproportionate coverage of incumbent candidates due to their institutional appearances, especially on the public broadcaster. The National Media and Info-communications Authority (NMHH) informed the ODIHR NAM that they are planning to conduct qualitative and quantitative monitoring of a number of television and radio channels and to issue weekly media monitoring reports. The NMHH and a number of other ODIHR interlocutors opined that the system of sanctions applied for violations of media legislation should be strengthened.

Every citizen and legal entity can challenge decisions, actions, or inaction that are in violation of election legislation. There is an expeditious review process for all election disputes, with three days to file a complaint and three days to render a decision. Despite previous ODIHR recommendations, there is no guarantee to a public hearing at any level of the dispute process. Several ODIHR NAM interlocutors noted a general deterioration of judicial independence and voiced concerns over the judicial review of election administration decisions. Some ODIHR NAM interlocutors anticipated an increase in the number of complaints, especially on election day, due to apparent competitiveness and contentious nature of the elections.

Despite previous ODIHR recommendations, the legislation does not provide for non-partisan citizen election observation of any aspect of the process, including election day. Each political entity registered to run within the respective constituency may appoint up to two representatives to the PSC that both fulfil some functions of polling station commissioners as well as those of a party agent. For these elections there is a civil society initiative assisting opposition parties with the recruitment of 20,000 representatives to be deployed in all polling stations on election day, other CSOs plan to conduct long-term observation. Some interlocutors informed the ODIHR NAM that in their general work certain CSOs are experiencing increased pressure, such as offensive rhetoric against them, mostly coming from representatives of the ruling coalition.

All ODIHR NAM interlocutors emphasized the value of an ODIHR election observation activity for the parliamentary elections and some stressed the importance of a long-term and country-wide presence to cover all aspects of the process. They underlined the importance of the assessment by a potential ODIHR election observation mission due to the highly polarized political environment and the need to contribute to public confidence in the electoral process. The representatives of state institutions expressed their full readiness to conduct the elections in line with the law, and welcomed observation by the ODIHR.

In considering an observation activity, the ODIHR NAM has taken into account the various findings outlined in this report and the opinions and concerns expressed by stakeholders. Specific aspects that could benefit from further assessment include scrutiny of the revised legal framework and its implementation, the work of the election administration at all levels, voter registration, the campaign,

including possible voter intimidation and vote-buying, media coverage of the elections, the transparency of campaign finances and the effectiveness of the complaints and appeals process, as well as the impact the holding of the referendum at the same time will have on these aspects. Based on the findings of this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) to observe the upcoming parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 18 long-term observers to follow the electoral process countrywide and 200 short-term observers to follow election day proceedings. In line with ODIHR's standard methodology, the EOM would include a media monitoring element.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

Hungary is a parliamentary republic with legislative power vested in the unicameral parliament and executive power exercised by the government, led by the prime minister.² On 11 January 2022, President János Áder set parliamentary elections to be held on 3 April.³ On 9 November 2021, the Law on Initiating Referendums, the European Citizens' Initiative and Referendum Procedure was amended to allow for the holding of referendum and elections on the same day.⁴ On 11 January 2022, the president also set the referendum on matters addressed by the so-called "child protection" law to be held concurrently with the parliamentary elections.⁵ On 21 January, a number of opposition parties submitted signatures to the NEO with a proposal to hold an additional referendum.⁶

The ruling party Hungarian Civic Union (*Fidesz*) has been in power since 2010, and following the 2018 parliamentary elections once again formed a coalition with the Christian Democratic People's Party (KDNP). Together they won 133 out of 199 seats and secured the two-thirds majority.⁷ Viktor Orbán, leader of *Fidesz*, was subsequently re-elected as a prime minister. In the run-up to the forthcoming elections, six opposition parties created a coalition, *United for Hungary*, and agreed to put forward a joint candidate list in all 106 electoral districts, with a joint prime ministerial candidate, and held primaries to elect the candidates.

Preparations for the elections are taking place amid an increasingly politically polarized environment. ODIHR NAM interlocutors from the opposition parties and civil society organizations (CSOs) noted a general deterioration of conditions for democratic elections, and concerns over the independence of

² The prime minister is elected by the parliament. The president is the head of state and is indirectly elected by the parliament for a five-year term, with a two-term limit.

³ According to the Constitution, parliamentary elections are called by the president for April or May four years after the election of the previous parliament.

⁴ The amendment was proposed by an opposition MP Tímea Szabó, from Dialogue for Hungary, who intended to propose holding a referendum on the same day as the elections.

⁵ The referendum refers to the matters addressed by the Law on Stricter Measures Against Pedophile Offenders and Amending Certain Laws to Protect Children, including teaching sexual education without parental approval in public schools, providing information related to gender reassignment treatments, presenting media content of a sexual nature that impacts children's development without restrictions.

⁶ The proposed referendum is related to the possible opening of a Chinese university in Hungary and extending state support for the unemployed. The NEO is in the process of verifying submitted signatures to determine their eligibility.

⁷ The remaining seats were distributed between the Movement for a Better Hungary (Jobbik) with 26 mandates, Hungarian Socialist Party (MSZP) and Dialogue for Hungary (*Párbeszéd*) 20 seats, Democratic Coalition (DK) with 9 seats, Politics Can Be Different (LMP) with 8 seats, and Together – Party for a New Era with one seat. All 13 national minority self-governments submitted a national-minority list, and the National Self-Government of Germans in Hungary gained a preferential mandate.

judiciary and freedom of the media. Some ODIHR NAM interlocutors raised concerns over the extended powers of the government to issue decrees under the current state of danger.⁸

ODIHR has observed five parliamentary elections in Hungary since 1998. Most recently, ODIHR deployed a Limited Election Observation Mission (LEOM) for the 8 April 2018 parliamentary elections.⁹ The final report issued on 27 June 2018 contains 26 recommendations, including 8 priority ones, for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.¹⁰

B. LEGAL FRAMEWORK

Parliamentary elections are primarily regulated by the 2011 Fundamental Law (Constitution), the 2011 Act on the Elections of Members of Parliament, the 2013 Act on Election Procedures (Elections Act), and the 2013 Act on the Transparency of Campaign Costs (Campaign Finance Act). These are supplemented by other acts and guidelines of the National Election Commission (NEC). The NEC amended its Guidelines in November 2021. According to the NEC, these were amended with the participation of politically appointed members of the NEC, addressing previous concerns raised by ODIHR.¹¹ Hungary is party to major international and regional instruments related to the holding of democratic elections.¹²

The election-related legislation was last amended in December 2020, in one package of amendments to seven laws. Amendments were adopted during the state of emergency and several ODIHR NAM interlocutors stated that no public consultations were held prior to the adoption.¹³ The majority of amendments were primarily to the Elections Act, and covered a broad range of issues, including a significant increase of the number of single-member constituencies in which each party needs to nominate candidates simultaneously in order to be able to run a national list of candidates, a shortening of deadlines for voters to request absentee voting and rules for establishing such polling stations, and widened the discretion of the heads of local election offices to change or allocate additional members to polling station commissions (PSC).¹⁴ The Campaign Finance Act established stricter requirements for

⁸ The state of danger, introduced in Hungary following the outbreak of the COVID-19 pandemic, was extended until 1 June 2022. Under the State of Danger, the Government may adopt decrees by which it may suspend or derogate from the provisions of certain acts, and take other extraordinary measures. According to the Constitution, the Government can suspend or restrict the exercising of fundamental rights beyond the extent permissible in ordinary circumstances, with a number of restrictions. These decrees can remain in effect after a period of 15 days only with the approval of the Parliament.

⁹ See previous ODIHR election [reports](#) on Hungary.

¹⁰ In paragraph 25 of the [1999 OSCE Istanbul Document](#), OSCE participating States committed themselves “to follow up promptly the ODIHR’s election assessment and recommendations”.

¹¹ Among other issues, the Guidelines also removed an explicit prohibition of taking photographs of one’s ballot on election day.

¹² Including the [1966 International Covenant on Civil and Political Rights](#), [1979 Convention on the Elimination of All Forms of Discrimination Against Women](#), [1965 International Convention on the Elimination of All Forms of Racial Discrimination](#), [2003 Convention against Corruption](#), [2006 Convention on the Rights of Persons with Disabilities](#), the [1950 European Convention on Human Rights](#).

¹³ The Ministry of Justice informed ODIHR NAM that the amendments were adopted in a regular procedure in the Parliament. The ODIHR and Council of Europe’s European Commission for Democracy Through Law (Venice Commission) 2021 Joint [Opinion](#) on 2020 Amendment to Electoral Legislation (2021 Joint Opinion) raised concerns over adoption of the amendments and the lack of meaningful public consultations. In the [statement](#) issued on November 2020, the Council of Europe Commissioner for Human Rights urged the parliament to “postpone the vote on the draft bills that, if adopted, will have far reaching adverse effects on human rights in the country”.

¹⁴ Some of the other amendments were related to recruitment of lower-level commission members, the mechanism for organizing polling stations for absentee voters, safeguard to candidate registration process, the applicability of general legislation to the campaign rules.

parties to receive public campaign funding in parliamentary elections. Amendments to the various legislation also introduced a number of technical changes.¹⁵

Previous amendments in 2018 introduced limitations on where political advertisement can be placed, narrowed the possibility to collect signatures in public places, modified criteria for the invalidation of postal votes, limited legal standing to appeal election commission decisions, and a number of technical changes. While most of the ODIHR NAM interlocutors from state institutions expressed confidence in the legal framework, other interlocutors opined that the amendments only partially address previous election-related issues and noted that the reform process lacked inclusiveness. The Ministry of Justice informed the ODIHR NAM that most previous ODIHR recommendations were considered, but those not in line with Hungarian democratic and legal traditions were not taken into account.

C. ELECTORAL SYSTEM

The 199 members of parliament (MPs) are elected under a mixed electoral system for a four-year term. Of these, 106 are elected through one-round majoritarian contests from single-member constituencies, and 93 through a nationwide proportional system provided that a party passes a threshold of 5 per cent, 10 per cent in case of a joint party list, and 15 per cent if more than two parties form a joint list. Parties that pass the threshold have the surplus votes from single-member majoritarian contests added to the totals before the proportional seat allocation.¹⁶ Those declared as belonging to one of the 13 recognized national minorities can choose to register for ‘minority elections’, which then excludes them from voting in the national proportional-list elections. National minority lists enjoy a preferential threshold and receive a non-voting parliamentary spokesperson should they fail to win a seat.

Boundaries of the constituencies were last defined in 2014 and were not amended for these elections. These are listed in the annex of the Elections Act, which can only be changed with a two thirds majority of the MPs.¹⁷ ODIHR previously raised concerns related to the variation in the number of voters per mandate across constituencies.¹⁸

D. ELECTION ADMINISTRATION

The elections are administered by a three-level system of election commissions: the NEC, 106 Constituency Election Commissions (CoECs) and some 11,000 Polling Station Commissions (PSCs). In addition, the NEO, 97 Constituency Election Offices (CoEOs) and some 1,200 Local Election Offices (LEOs) are responsible for the conduct of the elections, and assist respective commissions.

¹⁵ Additional amendments include clarifying that the general provisions of the Elections Act apply in the event of a repeat election, introducing additional safeguards to protect the integrity of the signature collection process, requiring election commissions to register a party’s candidate list that meets the legal requirements, explicitly providing that general legislation on the use of public areas does not apply to campaign activities, ensuring that the roles of election administrators and party representatives are kept distinct, and improving procedures and mechanisms for voting abroad.

¹⁶ The surplus votes are the votes the party’s losing single-member constituency candidates received and the votes of the party’s winning candidates over and above those needed to win.

¹⁷ The 2021 Joint [Opinion](#) noted that “failure to change the delimitation of some constituencies is therefore contrary to national law of Hungary and recommended to refrain from defining the constituencies in a cardinal law, and instead to establish an independent committee to revise constituency boundaries as and when necessary under national law and international standards.”

¹⁸ In 2018 Final [Report](#), ODIHR found that five constituencies exceed the 15 per cent deviation allowed by law, and a further 17 deviate from the national average by more than 10 per cent. Paragraph I.2.2.iv of the [Code of Good Practice](#) recommends that the permissible departure from the norm should not be more than 10 per cent, and should certainly not exceed 15 per cent except in special circumstances.

The NEC is a permanent body responsible for the overall conduct of the elections. It comprises a president and six members, appointed for a nine-year term by a two-thirds majority of the parliament.¹⁹ Three out of seven permanent NEC members are women. Political parties that form a faction in the parliament can appoint one member, whose mandate expires after the announcement of the next parliamentary elections. For each election, political parties that have a national list registered may designate one NEC member with full voting rights, whose mandate ends at the first session of the newly elected parliament.²⁰ Parties contesting jointly are only eligible to designate one NEC member. The CoECs and PSCs each include a chairperson and two members, which should be appointed by the representative body of the settlement's municipality from nominations made by the heads of the CoEOs and LEOs at least 20 days before the day of voting.²¹ Additional members are appointed by electoral contestants, with each electoral contestant in a constituency allowed to appoint one member to the respective CoEC and two members to each PSC. These members serve a dual function as commissioners as well as party agents. CoEOs and LEOs are headed by politically appointed municipal clerks.²²

The head of the NEO is appointed by the president based on a proposal from the prime minister for a nine-year term.²³ The head appoints up to three deputies and together they manage electoral offices at all levels. At the local level, LEOs support voting in PSCs across the country. For these elections, the number of PSCs for voting abroad in diplomatic representations has increased from 117 to 146.

On 11 January 2022, the Ministry of Justice adopted a regulation outlining the electoral timeline, logistical and financial issues, and providing general guidelines to election commissions. The preparations are ongoing, the NEC and the NEO are holding sessions, and have issued several decisions related to the upcoming elections.²⁴ The 2020 legislative changes prohibit amending the NEC's Rules of Procedure after the call for elections, addressing a previous ODIHR recommendation. The Rules of Procedures of the NEC were amended in February 2021, and introduced measures to facilitate its work, including holding sessions by electronic means.²⁵ However, these will not be streamed, and can only be observed in the premises of the NEO and NEC. The NEO plans to conduct training for election officials and voter education focusing on the changes in election procedures, absentee voting, and voting abroad. Moreover, the NEO plans to undertake efforts to facilitate voting for persons with disabilities.²⁶

Following the 2018 elections, the NEO has updated its website to facilitate access to information about the electoral process. Moreover, following the malfunctioning of the NEO website on election day in 2018 and the related criticism by opposition parties and CSOs, the NEO is planning to test the functioning of its information technology (IT) system and conduct a results transmission simulation exercise.

¹⁹ The responsibilities of NEC include registering nominating organizations for national lists, deciding on complaints, issuing non-binding guidelines to other commissions, and establishing final election results.

²⁰ The NEC members appointed by national minority lists have voting rights only on national minority issues.

²¹ The head of the local election office allocates three elected members to each polling commission and following the 2020 amendments if the number of partisan-delegated members is less than two, additional elected members are to be allocated to have five in total.

²² The 2021 Joint [Opinion](#) noted that this mechanism leaves the appointment to lower levels of the electoral administration in the hands of a political body. The CoECs are responsible for registering candidates running within the single-member constituencies and deciding on complaints regarding decisions and actions of the PSCs.

²³ The law requires members of the election administration to be independent and NEO officials are civil servants.

²⁴ Following 2020 amendments and as a response to COVID-19 pandemic, the NEC president can decide to hold its meetings online. The NEO informed ODIHR NAM that these will be held on issues that do not require a discussion.

²⁵ Other changes include a requirement that during an election period an invitation to the meeting of the NEC should be issued as soon as possible but not later than 24 hours prior to the session, and provides an opportunity for NEC members to propose amendments to the text of proposed decisions during the session, and express a dissenting opinion.

²⁶ The NEC informed ODIHR NAM that they are cooperating with the National Association of Disabled Persons' Associations in identifying polling stations accessible for voters with disabilities. A voter with a disability may apply to vote in a barrier-free polling station no later than the fourth day before voting. According to the NEO, 75 per cent of the polling stations are accessible to voters with disabilities.

While most of ODIHR NAM interlocutors expressed general confidence in the capacity of electoral administration to manage technical aspects of elections professionally and both the NEC and NEO noted to the ODIHR NAM its commitment to conduct elections in a professional and effective manner. Some ODIHR NAM interlocutors raised concerns over the impartiality of the election administration, and stated that given the current political context, the appointment procedure of the election administration at all levels does not guarantee their independence, including polling station commissions, especially in rural areas.

E. VOTER REGISTRATION

The Constitution grants every adult citizen the right to vote, except those disenfranchised by an individualized court decision due to mental incapacity or criminal conviction.²⁷ Voter registration is passive and the central voter register is extracted from the population register and is maintained by the NEO.²⁸ Eligible voters who are over 18 years of age by election day are automatically included in the voter register, as well as married citizens who are 16 years or older, upon their request. As of 2 February, the voter register included 8,201,824 voters.

Voters eligible to cast their votes at Hungary's diplomatic representations abroad have to apply to the NEO to be registered.²⁹ Voters abroad with in-country residence can vote in both proportional and majoritarian contests, and only in person. Voters without in-country residence are only eligible for the proportional vote and can vote by post or deliver the ballot in person to the diplomatic mission. While most ODIHR NAM interlocutors did not voice concerns over the technical capacity of the authorities to manage voter registration in general, several ODIHR NAM interlocutors criticized the process of voting abroad, including the procedures for registering for out of country voting, postal voting procedures and safeguards, the number of deceased voters out-of-country, and the use of different methods for voting abroad.

The Law on the Records of Citizens Personal Data and Address was amended in 2021 to define residence as the address used by citizens for official communication.³⁰ ODIHR interlocutors from the state institution stated that the change is aimed at improving the civil registration procedures. However, several ODIHR NAM interlocutors raised concerns that not requiring citizens to live at their registered address might facilitate voters registering fictitious addresses for the purpose of voting in a different constituency as well as the illegal bussing of voters, both targeting closely contested constituencies.³¹ In December 2021, the NEO started publishing voter registration data on a weekly basis, in order to increase confidence in the voter registration process and as a response to these concerns. On 10 January 2022, a number of opposition MPs requested the Constitutional Court to review the constitutionality of the new norm. The Constitutional Court informed the ODIHR NAM that they are not bound by a set deadline to review the case, but are planning to review the case within a reasonable time, which in their opinion would be prior to election day.

²⁷ The 2020 amendments removed the exclusion from suffrage rights based on "pathological addiction".

²⁸ Following 2020 amendments, the constant updating of the central voter register using specified databases, now includes the database on central travel documents. There is also a new requirement to record in the central register the voter's refugee, immigrant or settled status.

²⁹ Voters abroad are required to actively update their records in the voter register once every 10 years.

³⁰ The amendment was tabled by KDNP MP, and 133 MPs mostly from the ruling coalition voted in favor of the amendment.

³¹ In 2018, the Supreme Court ruled that organized transportation of voters across the border had violated the Elections Act.

Voters can request absentee voting. The deadline for absentee voting requests has been changed from four days to nine days before the voting. According to the NEO, the amendment aims to facilitate timely and effective handling of such requests and reduce the queues formed by absentee voters. Some ODIHR NAM interlocutors from the opposition and CSOs claimed the amendment can potentially suppress the vote of certain groups of absentee voters, including university students. In addition, the discretion of the head of the local election office to supplement members of a polling commission due to high numbers of registered absentee and/or mobile ballot voters has been revised.³²

F. CANDIDATE REGISTRATION

The right to stand as a candidate is granted to every citizen with voting rights. A candidate may run in single-member constituencies and on national lists concurrently. Following the 2020 amendments, in order to register a candidate list for the proportional race, each party or coalition needs to nominate candidates in at least 71 constituency and 14 counties. This is an increase from the previous requirement of 27 (out of 106) constituencies and 9 (out of 14) counties. ODIHR NAM interlocutors from the state authorities explained that this change is aimed at addressing the problem with ‘fake parties’, which run only to obtain public funding. Many ODIHR NAM interlocutors from the opposition and CSOs considered that this requirement places undue limitations on the ability of political parties to participate in elections.³³ Other amendments introduced a requirement that after an election, any candidate who did not win a mandate be removed from the candidate list and withdraw their nomination in writing.³⁴ ODIHR NAM interlocutors did not express concerns with the technical aspects of the candidate registration process.

The candidate registration process is on-going. Parties wishing to nominate candidates in the single-member constituencies have to register as nominating organizations with the NEC. Each candidate has to collect at least 500 signatures from eligible voters in that constituency on signature sheets and submit them to the CoECs. National minority self-governments can submit candidate lists that appear on a separate ballot for national minorities. They have to collect support signatures from at least 1 per cent of the voters included in that minority’s register, but no more than 1,500 signatures.³⁵

Women are generally underrepresented in political life. Only 25 out of 199 MPs, and 2 out of 14 cabinet ministers are women. There are no special legislative measures to promote women’s participation and most parties met by the ODIHR NAM stated they do not have specific internal policies to promote women candidates.

G. ELECTION CAMPAIGN

The election campaign officially starts 50 days before election day. There is no campaign silence period prior to or on election day, with the exception of the prohibition to broadcast political advertisements in the media on election day. Following recent legislative amendments, a written permission is required from the owner of the property where campaign materials are posted.

³² The amendments require additions if the number of mobile ballot voters exceeds forty, and allocation of the necessary number of members to polling stations designated for absentee voters if the voter list exceeds 1,500.

³³ The 2021 Joint [Opinion](#) made a key recommendation to significantly reduce the number of single-member constituencies and the number of counties in which each party needs to nominate candidates simultaneously in order to be able to run a national list of candidates.

³⁴ The 2021 Joint [Opinion](#) recommended to reconsider this provision as “this measure precludes the possibility to deem other list candidates elected in cases where an elected party list candidate resigns or dies”.

³⁵ Signatures are collected on forms approved by the NEO, which are then submitted to the respective CoEC by each nominating organization. A voter can support more than one candidate.

Parties intend to use traditional and modern methods of campaigning, including small scale rallies, door-to-door canvassing and various printed materials, and will have campaign material online. According to the NAM interlocutors, the campaign is expected to be primarily focused on topics of the referendum, living standards, utility costs, healthcare, and migration.

Political parties met by the ODIHR NAM expressed their ability to campaign freely, subject to regulations introduced under the state of danger currently in place due to the COVID-19 pandemic. However, most stated that biased media campaign coverage with limited national outreach, especially in the rural areas, and the lack of availability of billboard space for all contestants due to a concentration of ownership of commercial billboards, might tilt the level-playing field. The campaign is expected to be intense with many ODIHR NAM interlocutors expressing concerns over the potential use of harsh and divisive rhetoric.³⁶ ODIHR NAM interlocutors from the ruling party expressed no concerns about the conduct of the campaign and the ability of the election commission and state institutions to regulate it.

Several ODIHR NAM interlocutors expressed concerns over potential pressure on voters, including on civil servants, and the misuse of state resources. These concerns might be exacerbated by the prominence of the government in the political advertising market and the concurrent holding of the referendum. The organization of transport for voters residing outside of Hungary and vote-buying, specifically targeting vulnerable groups such as the Roma, were additional concerns raised to the ODIHR NAM.³⁷ The law does not prohibit taking pictures of the ballots, which according to some ODIHR NAM interlocutors may allow for pressure on voters on election day and facilitate vote-buying.³⁸

H. PARTY AND CAMPAIGN FINANCE

Party and campaign finance is regulated by the Law on Party Finance and the Campaign Finance Act. The legislation remained largely unchanged since the last parliamentary election, and recent amendments did not address longstanding ODIHR and the Council of Europe's Group of States against Corruption (GRECO) recommendations.³⁹ The legislation does not provide for limits on individual donations, interim reporting, or proportionate sanctions, and does not address third-party campaigning.

Political parties are partially financed from public funds. The Campaign Finance Act was amended in 2020 to provide campaign financing from the central budget only to parties which nominate candidates in at least 71 constituencies.⁴⁰ Every majoritarian candidate receives HUF 1 million in public campaign

³⁶ The [Memorandum](#) on Freedom of Expression and Media Freedom in Hungary of the Council of Europe Commissioner for Human Rights issued on 30 March 2021, called on the "Hungarian authorities to recognize the threat hate speech against journalists represents to society as a whole, to condemn publicly all incidents of it, and to put an end to the spread of smear campaigns and misinformation about civil society organizations, human rights defenders and those who criticize the government. The Commissioner also underlined the need for free political debate ahead of the 2022 parliamentary elections and calls on the Hungarian authorities to ensure a level playing field for all candidates, including in terms of media coverage."

³⁷ In January 2022, several opposition parties requested the resignation and investigation into actions of the government Commissioner for Roma relations, following a leaked recording where Roma representatives are offered jobs for favorable political support.

³⁸ According to NEC, this was done to align the Guidelines with the case-law of European Court of Human Rights.

³⁹ See GRECO Third Evaluation Round - Second Addendum to the Second Compliance [Report](#), issued on 1 August 2019.

⁴⁰ Previously, parties competing in the proportional part of parliamentary elections were entitled to public campaign funding as follows: 15 per cent of the amount designated in section 5 if they nominate candidates in at least 27 single-member constituencies; 30 per cent if they nominate in at least 54 constituencies; 45 per cent if they nominate in at least 80 constituencies; 60 per cent if they nominate in all constituencies. As per the amendments, parties now receive 40 per cent if they nominate in at least 71 constituencies; 50 per cent if they nominate in at least 80 constituencies; 60 per cent if they nominate in all constituencies.

financing.⁴¹ Nominating organizations and independent candidates have to return funds if they receive less than one per cent of the votes.⁴²

Contestants' campaigns can be financed from public and private sources. Donations from foreign sources are prohibited. Despite previous ODIHR recommendations, there are no explicit caps on individual donations. Campaign expenditure ceilings are set at approximately HUF 5 million for each single-member and national list candidate, amounting to HUF 995 million for the parties that field the maximum number of candidates. Several ODIHR NAM interlocutors voiced concerns that lack of expenditure limits on the referendum campaign might allow circumvention of campaign finance legislation, especially given the significant imbalances in resources of the ruling coalition and the opposition parties as well as the anticipated government spending on the referendum.⁴³

The State Audit Office (SAO) and National Treasury Office (NTO) are tasked with the overall supervision of campaign finance. The SAO informed the ODIHR NAM that it held a briefing for all political parties to inform them about their legal responsibilities related to campaign finance reporting prior to the upcoming elections and produced Guidelines for political parties and general public with an overview of the legal framework, and are continuously working to improve its methodology. All contestants are obliged to submit to the SAO and NTO a report, accompanied by invoices, on campaign contributions, donations and expenditures no later than 15 days after the election results are published. Only donations over HUF 500,000 are disclosed in campaign finance reports.

Most of the ODIHR NAM interlocutors from opposition political parties and CSOs questioned the impartiality of the SAO, and stated that its activities mostly target the opposition. Moreover, lack of regulation and control of third-party campaigning, including on social networks, detracts from the transparency of campaign finances and might allow for circumvention of the expenditure limits.⁴⁴ On 13 January 2022, the SAO stated that they can only verify submitted documents and clarified that while general rules should apply during the campaign period to the on-line content, advertisement on social networks outside of the election period is not considered to be political advertisement.⁴⁵ Overall, most ODIHR NAM interlocutors expressed a low level of confidence in the transparency and efficiency of the party and campaign finance regulation.

I. MEDIA

The media environment comprises a large number of outlets, and is characterized by polarization, and an increasing concentration of ownership.⁴⁶ While online media is popular, television continues to serve as the main source of information, especially in the rural areas. The public broadcaster *Magyar Television* (MTVA) operates five television channels. These, alongside the private broadcasters *RTL Klub* and *TV2*, are the main television channels. Several ODIHR NAM interlocutors from private media outlets cited difficulties in access to public information from the government and state institutions, posing challenges

⁴¹ Approximately 2,780 EUR (1 EUR equals 360 HUF).

⁴² In addition, each party having candidates nationwide is eligible to receive between HUF 150 million and 600 million depending on the number of candidates registered.

⁴³ The Government will run the referendum campaign, which is not subject to an expenditure cap, and might be mixed with the election campaign, as it was stated to be one of the main campaign topics.

⁴⁴ According to some ODIHR NAM interlocutors, government-affiliated platform *Megafon*, already spent some HUF 600,000,000 on content favoring the ruling coalition.

⁴⁵ See the SAO [analysis](#) of "the legal environment of political advertisements appearing on certain media platforms during the election campaign period."

⁴⁶ In Reporters Without Borders's 2021 World Press Freedom [Index](#), out of 180 countries Hungary is now ranked 92, as compared to 56 in 2013.

to providing balanced reporting.⁴⁷ The majority of ODIHR NAM interlocutors noted that these circumstances negatively impact media pluralism, the independence of editorial policies and provide for limited diversity of views.⁴⁸

In 2018, 476 private media companies simultaneously transferred ownership to the Central European Press and Media Foundation (KESMA).⁴⁹ In March 2020, 50 per cent of Indamedia Group, a partner of one of the country's largest news outlets *Index*, was acquired by a businessman reportedly affiliated with the ruling party.⁵⁰ According to ODIHR NAM interlocutors these developments further concentrated media ownership by business groups aligned with the governing coalition, with substantial amounts of state advertising channeled through them.⁵¹

By law, all media have an obligation to provide fair and balanced political coverage. The public broadcaster reiterated its commitments to provide free airtime to all contestants in line with its legal obligations, however several ODIHR NAM interlocutors voiced concerns over its independence and impartiality. The Elections Act provides for a total of 600 minutes free airtime on the public broadcaster, to be equally divided among the lists.⁵² The law does not contain special campaign regulations, including on campaigning of government officials. The public broadcaster adopted a non-binding Code in June 2021 which aims to provide general guidance to the public media service providers on the principles of their operation. The public broadcaster stated that it plans to cover the elections extensively, and is open to organizing debates upon consent of the parties. It plans to air voter-education spots prepared by the NEO.

The National Media and Info-communications Authority (NMHH) supervises media conduct. Its members are elected by a two-thirds majority in the parliament, and its president also chairs the Media Council, which has responsibilities over media content regulation. The law gives the head of the NMHH the right to nominate the executive directors of all public media.⁵³ The NMHH informed the ODIHR NAM that they are planning to conduct qualitative and quantitative monitoring of a number of television channels and to issue weekly media monitoring reports. The NMHH and a number of other ODIHR NAM interlocutors opined that the system of sanctions applied for violations of media legislation should be strengthened and the deadlines for dispute resolution should be shortened.

⁴⁷ Several ODIHR NAM interlocutors stated that deadlines for freedom of information requests are lengthy and do not ensure receiving information of public importance in due time. Due to the COVID-19 pandemic, the deadline to respond to such requests was extended to 45 days.

⁴⁸ The UN Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, in its Preliminary [Observations](#) issued on 22 November 2021, stated that "Hungary's interventions in the media sector over the past decade could create risks for human rights in the upcoming election [and that] authorities have proactively reshaped the media sector [which] undermined media diversity, pluralism and independence [...]." The Council of Europe Commissioner for Human Rights in its [Memorandum](#) on Freedom of Expression and Media Freedom in Hungary, issued on 30 March 2021, highlighted that "the combined effects of a politically controlled media regulatory authority and distortionary state intervention in the media market have eroded media pluralism and freedom of expression in Hungary."

⁴⁹ The official aim of the KESMA is "to promote those activities of the print, radio, TV and online sections of the Hungarian mass media which serve to build values and strengthen Hungarian national consciousness"

⁵⁰ Subsequently, the editor in chief of *Index* was dismissed after voicing his concerns about the outlet's independence.

⁵¹ The 2020 European Commission Rule of Law [Report](#), Hungary Chapter, adopted on 30 September 2020, underlined that "independent media outlets face systematic obstruction and intimidation, while a trend of economic takeover of such outlets raises additional concern".

⁵² Of these, 470 minutes for nominating organizations putting forward party lists and 130 minutes for organizations putting forward national minority lists.

⁵³ The president of NMHH was appointed by the President upon the proposal of the Prime Minister in December 2021.

J. COMPLAINTS AND APPEALS

Every citizen and legal entity can challenge decisions, actions, or inactions that are in violation of the election legislation. The 2018 amendments to the Elections Act narrowed the possibility to appeal decisions of election commissions to those citizens and legal entities whose rights were directly violated. Election commissions hear all election-related complaints in the first instance, the respective CoEC in cases regarding single-member constituency matters or the local media, and the NEC for all other matters.⁵⁴ Following a 2019 amendment to the Elections Act, regional courts of appeals are no longer dealing with election-related cases, and all appeals are subject to judicial review by the Supreme Court. Many ODIHR NAM interlocutors saw this change as potentially hampering access to an effective remedy in election related cases.⁵⁵ The constitutionality of Supreme Court decisions can be appealed to the Constitutional Court.⁵⁶

There is an expeditious review process for all election disputes, with three days to file a complaint and three days to render a decision.⁵⁷ Despite previous ODIHR recommendations, there is no guarantee to a public hearing at any level of the dispute process. The Supreme and Constitutional Courts informed the ODIHR NAM about their preparedness to deal with election-related cases and stated that they held a number of joint consultations to ensure smooth co-operation during elections, as well as summarized previous case law in order to facilitate swift consideration of cases.

Several ODIHR NAM interlocutors expressed low trust in the election administration's handling of election disputes due to the dominance of ruling party appointees and the limited presence of the opposition in the election commissions. Furthermore, several ODIHR NAM interlocutors noted a general deterioration of judicial independence.⁵⁸ Some ODIHR NAM interlocutors raised concerns that recent judicial appointments, including in the Supreme Court, coupled with changes in court procedures could impact the independent adjudication of election disputes.⁵⁹ Some ODIHR NAM interlocutors anticipated an increase in the number of complaints, including on election day, due to the apparent competitive and contentious nature of the elections.

⁵⁴ The 2020 amendment to Elections Act established an explicit right to appeal against the determination of the compensatory list result but only on grounds of breach of the rules for aggregating the results of individual constituencies and determining the election result.

⁵⁵ There is a possibility to file a uniformity appeal of a Supreme Court decision if it is deemed to be inconsistent with previous judgements on a similar matter. However, the deadlines are not aligned with the electoral process.

⁵⁶ The 2020 amendment to Elections Act introduces a new provision that if the NEC fails to determine the result of the elections within two days of a Supreme Court order pursuant to a complaint, the court is to determine the election results within two days based on the record, with the court's determination subject to review by the Constitutional Court.

⁵⁷ The law does not set any deadlines for the Constitutional Court to deal with cases outside of the electoral period, these must be dealt within a reasonable time.

⁵⁸ The Venice Commission [Opinion](#) assessed the 2019-2020 legislative changes related to judiciary, including appointment of the Supreme Court president, and its powers in allocation of cases, and stated that appointment process "could pose serious risks of politicisation and important consequences for the independence of the judiciary" and on the allocation of cases, "such extensive powers and roles could only be entrusted to the President of the Curia if the system provided for sufficient guarantees of independence, including on the manner of appointment and dismissal."

⁵⁹ The UN Special Rapporteur on the independence of judges and lawyers, stated that the appointment of the President of the Supreme Court "may be regarded as an attack to the independence of the judiciary and as an attempt to submit judiciary to the will of the legislative branch, in violation of principle of separation of powers." The 2020 European Commission Rule of Law [Report](#), Hungary Chapter, stated that the "Government of Hungary has initiated and implemented several steps that have adversely impacted the independence and impartiality of judicial institutions in Hungary."

K. ELECTION OBSERVATION

The legislation provides for international observation, however, non-partisan citizen election observation is not allowed, despite a previous ODIHR recommendation.⁶⁰ Contestants, except those from national minorities, and independent candidates have the right to appoint commission members to the NEC, and may appoint up to five observers to work alongside the NEO and verify the voting documents and the legality of the ballot counting. Each political entity registered within the respective constituency may appoint up to two representatives to the PSCs. Accredited media representatives are allowed to be present at polling stations at all times.

Opposition political parties informed the ODIHR NAM that in previous elections they were not able to find sufficient representatives for all polling stations, in particular in the smaller countryside villages.⁶¹ For these elections there is a civil society initiative, *20k22*, and Count for Democracy!, assisting the *United for Hungary* opposition with the recruitment of 20,000 representatives to be deployed in all polling station on election day. Some interlocutors informed the ODIHR NAM that in their general work certain CSOs are experiencing increased pressure, such as offensive rhetoric against them, mostly coming from representatives of the ruling coalition.⁶²

IV. CONCLUSIONS AND RECOMMENDATION

All ODIHR NAM interlocutors emphasized the value of an ODIHR election observation activity for the parliamentary elections and some stressed the importance of a long-term and country-wide presence to cover all aspects of the process. They underlined the importance of the assessment by a potential ODIHR election observation mission due to the highly polarized political environment and the need to contribute to public confidence in the electoral process. The representatives of state institutions expressed their full readiness to conduct the elections in line with the law, and welcomed observation by the ODIHR.

In considering an observation activity, the ODIHR NAM has taken into account the various findings outlined in this report and the opinions and concerns expressed by stakeholders. Specific aspects that could benefit from further assessment include scrutiny of the revised legal framework and its implementation, the work of the election administration at all levels, voter registration, the campaign, including possible voter intimidation and vote-buying, media coverage of the elections, the transparency of campaign finances and the effectiveness of the complaints and appeals process, as well as the impact the holding of the referendum at the same time will have on these aspects. Based on the findings of this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) to observe the upcoming parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 18 long-term observers to follow the electoral process countrywide and 200 short-term observers to follow election day proceedings. In line with ODIHR's standard methodology, the EOM would include a media monitoring element.

⁶⁰ According to NEO, a few organizations that regularly conduct international observation are in the process of getting accredited to observe upcoming elections.

⁶¹ See reports of the Helsinki Committee Hungary [here](#) and UnHack Democracy [here](#), which refer to irregularities in previous elections, including obstruction of the work of the opposition representatives in the PSC, issues with the protocols, and the malfunctioning of the IT system.

⁶² The 2020 European Commission Rule of Law [Report](#), Hungary Chapter stated that hostile rhetoric used by the Government and pro-government media hinders constructive cooperation with civil society organizations.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs and Trade

Balogh Csaba, Secretary of State for Administration

Pál András Ministerial Commissioner Responsible for the Parliamentary Elections for Hungarian Citizens Voting Abroad

Dávid Héttvári, Department of Security Policy and Non-Proliferation, OSCE Co-ordinator

National Election Office

Attila Nagy, President

Katalin Kibédi Varga, Head of Press, Foreign Affairs and Protocol Department

National Election Commission

András Téglási, President

Éva Bozsóki, Vice President

Ministry of Justice

László Péter Salgó, Deputy-Secretary for the Coordination of Legislative Preparation and Public Law Legislation

Ágnes Váradi Head of International Coordination

State Audit Office

Magdolna Holman, Vice-President

Imre Nagy, Head of Supervision

Cecília Szabó, Head of Public Relations Department

Gergely Pálmai, Head of Regulation and Administration Department

Constitutional Court

Tamás Sulyok, President

Botond Bitskey, General Secretary

Attila Szabó, Chief of Staff

Supreme Court

András Patyi, Vice-President

Tibor Kalas, Head of the Administrative College

Kálmán Sperka, Deputy Head of the Administrative College

Lipót Hóltzl, Head of the International Department

National Media and Communication Authority

András Koltay, President

Ervin Kajzinger, Director of International Affairs and Strategy

Media

Dániel Papp, Director of the Media Services and Support Trust Fund

Menyhért Dobos, Director of the Duna Media Service Nonprofit Zrt

Zoltán Pető, Public Broadcaster, Chief of Staff

Róbert Kotroczó, RTL, News Director

Péter Szigeti, 24.hu, Director

Miklós Hargitai, Népszava, Deputy Editor in Chief

Serdült Viktória, HVG.hu

Political Parties

Imre Vejkey, Christian-Democrats (KDNP)
Gergely Arató, Democratic Coalition
Tímea Szabó, Dialogue for Hungary (*Párbeszéd*)
Gábor Dobos, Hungarian Civic Union (*Fidesz*)
Zalán Zsolt Csenger, Hungarian Civic Union (*Fidesz*)
Ágnes Kunhalmi, Hungarian Socialist Party (MSZP)
Gábor Harangozó, Hungarian Socialist Party (MSZP)
Endre Tóth, Momentum
Miklós Hajnal, Momentum
László Lukács, Movement for a Better Hungary (Jobbik)
Örs Tetlák, Politics Can Be Different (LMP)
Janan Mirwais, Politics Can Be Different (LMP)
David Nagy, The two-tailed dog party (MKKP)

Civil Society

András Kádár, Hungarian Helsinki Committee
Róbert László, Political Capital Institute
Miklós Ligeti, Transparency International
Dániel Döbrentey, Hungarian Civil Liberties Union
Stefánia Kapronczay, Hungarian Civil Liberties Union
Zoltán Lomnici, Századvég
Zoltán Kiszelly, Századvég
Csaba Faragó, Századvég
Attila Kovács, Center for Fundamental Rights
Marcell Melles, Center for Fundamental Rights
Gábor Polyák, Mérték Médiaelemző Műhely
Zsafia Banuta, Civil College Foundation
Melani Barlai, UnHack Democracy

International Community⁶³

Representatives of diplomatic missions of Austria, Belgium, Canada, Cyprus, Czechia, Denmark, Finland, France, Greece, Ireland, Luxembourg, Netherlands, North Macedonia, Norway, Poland, Russian Federation, Slovakia, Slovenia, Sweden, Switzerland, Turkey, Ukraine, United Kingdom, United States of America, Uzbekistan.

⁶³ The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in Hungary.