





INTERNATIONAL ELECTION OBSERVATION MISSION Republic of North Macedonia – Local Elections, 19 October 2025

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

PRELIMINARY CONCLUSIONS

The 19 October local elections were competitive, providing voters with a genuine choice from a range of political alternatives, but they took place in a highly polarized political environment, including along ethnic lines, and against a backdrop disenchantment with politics and widespread perceptions of corruption While the election administration generally managed electoral preparations efficiently, inconsistencies and gaps in the election legislation, as well as limited resources and outdated infrastructure, adversely affected some aspects of its work. Fundamental freedoms were largely respected, and candidates were able to campaign freely, but instances of misuse of public resources and allegations of voter pressure and intimidation were of concern. Although candidates largely campaigned on municipal issues, the process, led predominantly by political parties, was marked by national-level debates on identity, EU integration, corruption and the rights of ethnic communities to equitable representation. Legal provisions for political advertising, including in the media, disadvantaged independent candidates and non-parliamentary parties and unduly excluded smaller parties with a parliamentary group. Campaign finance transparency was negatively affected by systemic legislative shortcomings and the limited capacity and enforcement powers of oversight bodies. Women remained underrepresented in public and political life, and gender equality received limited attention during the campaign. Election day was generally calm and orderly, but some procedural shortcomings were noted.

The legal framework provides a technical basis for conducting democratic elections. However, it contains numerous gaps and lacks clarity in several areas, which at times has led to divergent interpretations. While the 2024 amendments to the Electoral Code addressed some previous ODIHR and Congress recommendations, most remain unaddressed. Additionally, in May 2025, the Constitutional Court repealed provisions on the number of supporting signatures for independent candidates, and parliament failed to fill the legal gap in time to complement the legal framework. Subsequently, the State Election Commission (SEC) regulated this aspect by requiring only two citizens' signatures. While this intervention by the SEC was seen as necessary to regulate an important aspect of the electoral process, it created a precedent that potentially challenges the principle of separation of powers, contrary to OSCE commitments.

The election administration generally operated within legal deadlines and managed preparations efficiently. It enjoyed public trust, but some concerns were voiced about its independence, since it is mostly comprised of public officials. The SEC filled several long-vacant staff positions prior to these elections, including that of secretary general, aiming at improving its administrative capacity. Some electoral operations, including the selection of Election Board (EB) members, were adversely affected by the systemic lack of long-term investment in SEC capacities and modernization. The SEC held sessions on an *ad hoc* basis, which were streamed online and published on its website; however, media, observers, and authorized representatives of contestants were invited through internal lists rather than public announcements, limiting transparency.

The law provides voting rights to all citizens aged 18 and over, except those deprived of legal capacity by a final court decision. Restricting suffrage rights on the basis of intellectual or psychosocial disability is contrary to OSCE commitments and other international standards. The voter register (VR) was open to public scrutiny, including by electoral contestants. The long-standing issues, including the large number of voters living abroad rather than at their place of permanent residence according to the VR,

and the incomplete and outdated residential address system, negatively impacted the accuracy of the VR and voter turnout. Some 1.72 million citizens with permanent residence in the country were included in the voter lists.

In an overall inclusive process, Municipal Election Commissions (MECs) registered a total of 577 councilor lists, all of which complied with the gender quota, and 309 mayoral candidates, of whom only 32 were women, and denied registration to 6 mayoral candidates and 4 council lists. Despite previous ODIHR recommendations, individuals serving or awaiting the execution of a prison sentence of more than six months remain barred from running for office. Verifying candidates' criminal records through basic courts proved burdensome and, at times, led to delays.

Fundamental freedoms were respected, and overall, contestants were able to campaign freely. The campaign was competitive and offered voters a range of political alternatives. Although strict rules aimed at preventing the misuse of public resources or abuse of office are in place from the day elections are called, the ODIHR Election Observation Mission (EOM) noted that both prior to and during the official campaign period, mayors and high-level government officials inaugurated, visited, or promoted investment and infrastructure projects, effectively undermining these legal safeguards. Campaign activities of public officeholders are not regulated, and government officials, including the prime minister, actively promoted local candidates across the country. While not in violation of the law, such practices blurred the line between state and party, contrary to paragraph 5.4 of the 1990 OSCE Copenhagen Document. Many ODIHR EOM interlocutors alleged pressure on public sector employees and intimidation of voters and opposition candidates, as well as vote buying by political parties, particularly targeting economically vulnerable Roma communities. The ODIHR EOM noted several instances of inflammatory rhetoric and *ad hominem* attacks, as well as a few isolated instances of violence.

Campaigning on social networks, including paid political advertisements and third-party campaigning, is not specifically regulated. No oversight authority is mandated to monitor the campaign on social networks, detect disinformation, manipulative content, or co-ordinated inauthentic behavior, which raises concerns. The Agency for Audio and Audiovisual Media Services developed a voluntary Code of Conduct in the Online Sphere during Electoral Processes and Referenda, but only nine electoral contestants signed it. Candidates and political parties had a strong focus on social network outreach, campaigning actively on Facebook from the start of the official campaign period. The tone used on social networks became increasingly accusatory in the final stages of the campaign, and several instances of inflammatory rhetoric were observed. Several ODIHR EOM interlocutors reported online harassment, including from fake accounts, as well as misogynistic attacks.

Regrettably, women continue to be underrepresented in public and political life, including at the local level. The current president is a woman, and women account for 40 per cent of members of parliament, but only 3 of the 23 government ministers and 2 of the 81 mayors elected in 2021 are women. The law prescribes a 40 per cent gender quota for candidate lists, with placement requirements, and mandates that each gender be represented by at least 30 per cent in election commissions. Discussions on gender equality and women's rights were largely absent from candidates' platforms and campaign speeches. Several ODIHR EOM interlocutors expressed concerns regarding misogynistic rhetoric against women candidates and women's political participation in general, especially online.

Public funds constitute a significant share of overall campaign financing. The legal framework regulating campaign finance contains systemic gaps, and most ODIHR recommendations pertaining to campaign finance remain unaddressed. Combined with the limited capacity of oversight bodies, this hindered effective campaign finance oversight. Campaigns may be financed from public and private sources. Although there is no direct public campaign funding, political parties that receive state funding could use

it for campaign purposes. The law sets limits on donations and expenditures, prohibits certain funding sources, and prescribes sanctions for campaign-finance violations. Contestants must file interim and final finance reports, but only final reports are audited, reducing transparency. Almost two third of the participants did not submit their first interim reports at all, contrary to the law.

The Constitution guarantees the freedoms of expression and of the media, and the Electoral Code requires the media to cover elections in a fair, balanced, and unbiased manner. However, requirements to provide equal coverage to candidates proved challenging, given the high number of contestants and the limited capacity of most outlets. Political advertising in the media, including online, is reimbursed from the state budget with the distribution formula significantly favouring major parliamentary parties, while denying meaningful opportunities for smaller parties and independent candidates, and providing no funds or airtime for smaller parties with a parliamentary group. The media regulator noted some imbalance in media coverage, but did not report any violations of the law by the media. National broadcasters fulfilled their legal obligation regarding accessibility for persons with disabilities in their programming. ODIHR EOM media monitoring showed that election-related coverage in broadcast media during the campaign was overall balanced.

While election-related complaints may, as a rule, be filed with election commissions and courts, the regulation of election dispute resolution contains ambiguities and gaps, including conflicting deadlines and unclear institutional mandates. The legal standing of voters to file complaints remains limited, contrary to international good practice. The law provides for short filing and adjudication deadlines, which could potentially undermine the quality of rulings. The Constitutional Court reviewed several initiatives related to these elections and rejected all of them, while the Administrative Court reviewed four complaints prior to election day, upholding the SEC and MEC decisions rejecting candidacies. While disputes were generally handled efficiently, in accordance with procedures and within prescribed deadlines, many ODIHR EOM interlocutors raised concerns about the impartiality and independence of the adjudicating bodies, particularly regarding potential disputes over election results.

The Electoral Code provides for both domestic and international election observation, including by authorized representatives of contestants. In an inclusive process, the SEC accredited 807 citizen observers from 20 organizations and 644 international observers from 21 organizations. Election observation activities by citizen observer organizations were minimal due to a lack of funding. They focused instead on media and social networks monitoring, and possible foreign malign influence and disinformation campaigns, misuse of state resources, inter-communal relations, and electoral accessibility.

Election day was generally calm and orderly, and procedures were followed overall. IEOM observers assessed voting positively in 98 per cent of polling stations observed, but reported procedural shortcomings such as group voting and undue interference by candidate representatives, as well as some issues related to the secrecy of the vote and issues with biometric voter identification. Regrettably, more than half of the polling stations observed did not provide for independent access for voters with physical disabilities. The large majority of vote counts observed by the IEOM were assessed positively overall, with negative assessments mainly due to a frequent lack of adherence to prescribed procedures, and procedural errors. IEOM observers assessed tabulation positively in most MECs observed, although they reported unsuitable premises, overcrowding, and some procedural shortcomings. In four municipalities, the mayoral election will have to be repeated as fewer than one-third of registered voters participated.

PRELIMINARY FINDINGS

Background and Political Context

On 9 August, the Speaker of Parliament called local elections for 19 October, with possible second round mayoral contests on 2 November, to elect mayors and councils in 80 municipalities and the City of Skopje.

The political landscape has long been dominated by the Internal Macedonian Revolutionary Organization – Democratic Party of Macedonian National Unity (VMRO-DPMNE) and the Social Democratic Union of Macedonia (SDSM), which have led alternating governments in coalition with the ethnic-Albanian Democratic Union for Integration (BDI/DUI) and smaller parties. In the last local elections in 2021, the coalition led by VMRO-DPMNE gained control of most municipalities, while SDSM incurred significant losses, prompting the resignation of then-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 concurrent presidential election, Gordana Siljanovska-Davkova, endorsed by VMRO-DPMNE, was elected in the second round as the country's first woman president.¹

These local elections took place in a polarized political environment. Public discourse focused on questions of national identity, the rights of ethnic communities, and debates on outstanding constitutional and governance reforms required for progress in European Union (EU) accession negotiations. Legislative issues affecting ethnic communities, including a pending Constitutional Court review of the Law on the Use of Languages, and concerns over equitable representation in public institutions, also formed an important backdrop. Public dissatisfaction with institutions at all levels and perceptions of widespread corruption persisted.² Many ODIHR Election Observation Mission (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.³ Existing concerns over the respect for judicial independence deepened following recent government calls for dismissals in the Judicial Council and the Council of Prosecutors.⁴

Regrettably, women remain underrepresented in public and political life, including at the local level. Women currently hold 48 of 120 parliamentary seats (40 per cent), only 3 of the 23 ministerial posts (13 per cent), and only 2 of 81 mayoral positions. Despite the 2006 Law on Equal Opportunities for Women and Men and the 2022-2027 National Strategy for Gender Equality adopted by the parliament, interlocutors highlighted the lack of meaningful efforts to promote women within party leadership structures, noting that persistent gender stereotypes, limited media visibility, and a lack of financial and organizational support continue to hinder women's full political participation.

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</u> report; and the <u>2024 European Commission North Macedonia Report</u>.

On 16 March 2025, a fire in a Kochani nightclub killed 63 people and injured at least 192. 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, short-lived anti-corruption protests erupted nationwide, while weekly protests in Kochani continue.

On 6 February 2025, Prime Minister Hristijan Mickoski <u>called</u> for dismissals in the Judicial Council. Following such calls, on 11 March, the Parliament voted on interpellation motions against several members of the Judicial Council. See also the <u>2025 European Commission's Rule of Law Report</u>.

Electoral System and Legal Framework

Local councilors and mayors of the 80 municipalities and the City of Skopje are directly elected for four-year terms. Mayors are elected under a two-round majoritarian system. If no candidate receives the absolute majority of votes cast in the first round, a runoff between the two leading candidates is held two weeks later. A mayoral election is valid if at least one-third of voters registered in the municipality participate in the first round; otherwise, the election must be repeated within 60 days, without a turnout requirement.⁵ Councilors are elected through a closed-list 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.⁶ 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.⁷

Local elections are primarily governed by the 1991 Constitution, the 2006 Electoral Code, and subsidiary acts adopted by the State Election Commission (SEC). The latest amendments to the Electoral Code, adopted shortly before the 2024 parliamentary and presidential elections through an expedited process without public debate and consultation of key stakeholders, addressed some previous ODIHR recommendations, including clarifying the timeline and conditions for repeating mayoral elections. However, many recommendations remain unimplemented, including those related to ensuring equal media access during election campaigns, increasing the accountability and integrity of campaign finance, and enhancing regulations on the misuse of administrative resources.

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 Rights and Registration*). On 16 August, a week after the elections were called, three MPs proposed an amendment to the Electoral Code with the aim of addressing the legal gap resulting from the Constitutional Court's decision; however, the initiative did not pass in parliament.⁸

Overall, the legal framework provides a technical basis for conducting democratic elections. However, it contains numerous gaps and is unclear in several key areas, which at times has led to inconsistent interpretations, not in line with international good practice. Furthermore, due to the lack of a qualified

In case no mayor is elected, the government shall appoint a trustee to execute the office and notify the Speaker of Parliament within 15 days, to call a new mayoral election. The turnout requirement does not apply to a potential second round of mayoral elections or to council elections.

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 position for this gender within every ten positions.

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.

Although 65 MPs voted for the initiative, it failed as it did not secure a qualified double majority, required under Art. 69(2) of the <u>Constitution</u>, which besides an overall majority, for certain laws also requires the majority of MPs from non-majority communities to vote in favour. Para. II.B.6 of the 2024 Council of Europe's European Commission for Democracy Through Law (Venice Commission) <u>Revised Interpretative Declaration on the Stability of the Electoral Law</u> prescribes that "once elections have been called, no amendments to electoral law should be made, unless they are strictly necessary to comply with binding decisions by national constitutional courts".

For instance, the law lacks clear distinction between mayoral and councilor races, a comprehensive formula for the distribution of state funds for campaign purposes, clear rules for pre-campaign events, detailed requirements for campaign finance reporting, and clear procedures for some types of complaints. Principle 15 of the 2024 ODIHR Guidelines on Democratic Lawmaking for Better Laws provides that "laws must be drafted in a clear, precise and unambiguous manner". See also paragraph 60 of the 2016 Venice Commission Rule of Law Checklist.

majority in parliament to address these legislative gaps and to act upon Constitutional Court decisions, the SEC regulated the aspect related to the number of signatures for independent candidates. While this intervention by the SEC was seen as necessary to regulate an important aspect of the electoral process, it creates a precedent that potentially challenges the principle of separation of powers, contrary to OSCE commitments. ¹⁰ Many ODIHR EOM interlocutors, including those from state institutions, criticized the recurring practice of introducing late amendments to the Electoral Code without prior debate or consultation, which, in their view, contributes to legal uncertainty and undermines the stability of the law, stressing the need for comprehensive legal reform. ¹¹

Election Administration

The elections were 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). Electoral bodies must meet legal criteria for gender and ethnic representation. Each gender must comprise at least 30 per cent of the membership, and in municipalities where at least 20 per cent of citizens belong to non-majority ethnic communities, these groups must be equitably represented.¹²

The SEC is a permanent body appointed by parliament for a five-year mandate and composed of seven members, four nominated by the parliamentary majority and three by the opposition, based on proposals from political parties. ¹³ In line with previous ODIHR recommendations, prior to these elections, the SEC filled several long-vacant staff positions, including that of secretary general. ¹⁴ However, it continued to heavily rely on temporary personnel and services from other institutions due to a systemic lack of long-term funding for personnel and physical and ICT infrastructure. This adversely affected the efficiency of electoral operations and hindered the SEC's ability to fulfil its mandate independently, despite long-standing ODIHR recommendations. ¹⁵

The election administration enjoyed stakeholder trust, but some concerns were voiced about its independence, since it is mostly comprised of public officials. Overall, election preparations under the SEC's responsibilities were undertaken without major delays. It held sessions on an *ad hoc* basis, which were streamed on YouTube, and minutes were generally published on the SEC website. SEC decisions were usually adopted unanimously due to the practice of prior consultations among the members. As a rule, media, observers, and authorized representatives of contestants were notified through an internal list rather than through public announcements, limiting transparency and diverging from international good practice. ¹⁷

Paragraph 18.1 of the <u>1991 OSCE Moscow Document</u> states that "[l]egislation will be formulated and adopted as the result of an open process reflecting the will of the people, either directly or through their elected representatives".

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

See Paragraph 62 of the 2025 ODIHR Opinion on the 2006 Electoral Code.

In the absence of a clear deadline for publication and the low frequency of SEC sessions in local elections, the publication of session minutes was not always consistent and prompt. The Rulebook on SEC internal procedures provides that SEC session minutes are published once the commission has voted to approve them. Some minutes were published with significant delay.

Section II.3.1 of the Venice Commission's <u>Code of Good Practice in Electoral Matters</u> states that "the meetings of the central electoral commission should be open to everyone, including the media".

See paragraphs II.B.3 and 4 of the 2024 Venice Commission Revised Interpretative Declaration on the Stability of the Electoral Law. Principle 9 of the 2024 ODIHR Guidelines on Democratic Lawmaking for Better Laws states that "overly frequent amendments to laws [...] undermine the stability of the legislative framework and legal certainty..."

The SEC chairperson is selected from opposition-nominated members, and the deputy chairperson from those proposed by the parliamentary majority. The current SEC composition, appointed in 2021, was adjusted in 2025 by selecting a new chairperson and deputy chairperson following the change in parliamentary majority after the 2024 elections.

Although the Electoral Code does not impose specific accessibility obligations beyond assigning responsibility for polling-station accessibility to local authorities and premises owners, the SEC provided some accommodations and assistive tools for voters with disabilities, including tactile ballot frames tailored to each municipality, special voting booths, and voter education in Macedonian Sign Language. Voter education spots produced by the SEC were broadcast by national broadcasters, including spots encouraging citizens to vote and informing first-time voters.¹⁸

MECs are composed of a chairperson and four members randomly selected from among public-service employees for five-year terms. ¹⁹ In local elections, MECs are responsible for administering the process in their municipalities, including appointing and training EBs, verifying the documentation submitted by prospective candidates, registering contestants, as well as tabulating and announcing municipal-level election results. The MECs in municipalities with particularly high numbers of voters and polling stations hired additional staff to compensate for the disproportionate workload. Despite numerous replacements of their members, including late in the process, non-competitive remuneration, and budgetary constraints, most MECs managed electoral preparations efficiently. However, publicly available information about MECs and their activities remained limited, reducing transparency, at odds with international standards. ²⁰

As the mandate of the permanent EB members expired prior to these elections, new permanent members had to be selected in parallel with other electoral preparations. ²¹ The majority of MECs reported delays and challenges with this process, conducted for the first time using SEC software. MECs informed the ODIHR EOM that the database of public officials was outdated and included ineligible persons. They also noted that the system, maintained by the Ministry of Public Administration, lacks contact details that would enable MECs to promptly verify the availability of selected EB members. ²²

Although the 2024 amendments introduced a Centre for Continuous Election Education, in line with a prior ODIHR recommendation, the SEC training department has not yet been reorganized.²³ Over a 20-day period, the SEC trained 27,178 MEC and EB members.²⁴ Training sessions observed by the ODIHR EOM were overall efficient and interactive, despite delays in the adoption and distribution of some

Sign language interpretation was provided only from spoken Macedonian into Macedonian Sign Language, as official interpreters do not work from other spoken languages. Macedonian Sign Language is used across all ethnic communities in North Macedonia. Some voter education materials were subtitled in Albanian. Some of the SEC voting education materials featured voters with disabilities.

The current mandate of MECs commenced in 2021. Women accounted for 49.8 per cent of MEC members and 36 of the 81 MEC chairpersons (44.4 per cent). Almost 80 per cent of MEC members and 48 of the 81 chairpersons (59.2 per cent) appointed in 2021 remained in their positions at the time of these elections, while around 3 per cent of member and substitute positions were vacant. While the law does not set deadlines for MEC and EB members to submit withdrawal requests, at its 3 October 2025 session, the SEC chairperson announced that it would be the last meeting to consider such requests prior to election day.

Article 10 of the 2009 Council of Europe Convention on Access to Official Documents states that "a public authority shall take the necessary measures to make public official documents which it holds in the interest of promoting the transparency and efficiency of public administration and to encourage informed participation by the public in matters of general interest".

EBs, responsible for administering election-day procedures, are formed under a mixed professional-political model. Three members are randomly selected from among public-sector employees for four-year terms, while one member is nominated by the governing parties and one by the opposition, 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 their absence.

The Ministry of Public Administration acknowledged these shortcomings but noted that public institutions have no legal obligation to submit regular updates to the ministry.

The ODIHR EOM was informed that the centre has not yet been established due to financial limitations and disagreement within the current SEC management over its status in the overall structure of the SEC technical service.

EB members were obliged to participate in training, otherwise their remuneration would be reduced by 20 per cent.

handbooks and templates that would otherwise amplify the learning effect.²⁵ Training did not systematically address interaction with voters with disabilities and was not always conducted in the language of the respective municipality's majority population.²⁶

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 on the basis of intellectual or psychosocial disability. Restricting suffrage rights on the basis of intellectual or psychosocial disability is contrary to OSCE commitments and other international standards, and despite prior ODIHR recommendations.²⁷

Voter registration is passive and structured by the municipality of a voter's permanent residence. The voter register (VR) is maintained by the SEC with assistance from the State Statistical Office. The law prescribes that the VR is based on data from the central population register, maintained by the Ministry of Digital Transformation in co-operation with various institutions. ²⁸ In practice, despite previous ODIHR recommendations, the SEC continues to rely solely on data and on updates it receives from the Ministry of Internal Affairs (MoIA), as its IT system is not compatible with other institutional databases, which prevents automated data exchange.

Citizens can verify their records year-round on the SEC website or in person at the SEC's regional offices. In addition, prior to every election, the VR is available for public scrutiny for a period of 18 days, starting 15 days after the call of elections.²⁹ Following the public scrutiny period, political parties had the opportunity to request an electronic copy of the register for the municipalities where they contested, and submit requests for corrections until 20 September.³⁰ The VR included 1,832,415 eligible citizens, while the voter lists used on election day included 1,717,803 entries, excluding 112,000 voters residing abroad, 2,162 in detention, and 450 in care institutions outside their home municipality.³¹

The law does not distinguish between mayoral and municipal council elections. Therefore, voters signed the voter lists once to receive and cast two ballots in most municipalities and four in the city of Skopje.

The ODIHR EOM observed 38 EB training sessions in 31 municipalities. Women comprised a total of 13,512 (49.7 per cent) participants.

For example, in the municipalities of Dolneni, Karbinci, Mavrovo i Rostushe, Struga, and Studenichani, the training observed by the ODIHR EOM was conducted only in Macedonian.

Paragraph 7.3 of the 1990 OSCE Copenhagen Document states that "the participating States will ... guarantee universal and equal suffrage to adult citizens." See Article 29 of the 2006 UN Convention on the Rights of Persons with Disabilities (CRPD), which requires States Parties to "guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others". Paragraph 9.4 of the 2013 CRPD's Committee's Communication No. 4/2011, states that "[...] an exclusion of the right to vote on the basis of a perceived or actual psychosocial or intellectual disability, including a restriction pursuant to an individualized assessment, constitutes discrimination on the basis of disability".

The main providers of data to the population register are the Civil Acts Office, the Ministry of Internal Affairs (MoIA) and the Central Registry.

According to SEC data, a total of 26,393 voters inspected their data during this period, including 19,606 who verified it electronically through the SEC website and 6,787 who checked it in person at SEC regional offices. In most municipalities, the number of registered voters decreased compared to the 2021 local elections, most notably in Novaci (by 15.31 per cent), Chucher Sandevo (11.57 per cent) and Mogila (10.09 per cent), while increases were registered in Studenichani (8.15 per cent), Arachinovo (5.57 per cent), and Plasnica (5.51 per cent).

Political parties and other contestants were required to submit requests to inspect voter lists by 11 September, while the deadline for submitting 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, five political parties and one group of voters requested voter list data. None submitted requests for corrections to the SEC.

Voters residing abroad, as well as those in detention or in care institutions outside their home municipality, were excluded from the lists. This affected a total of 114,612 individuals.

While voting is not compulsory, this arrangement did not allow voters to choose which contest to participate in, at odds with international standards.³²

Despite overall stakeholder confidence in the quality of voter registration, the long-standing issues of the significant number of voters who live abroad rather than at their place of permanent residence, according to the VR, and of the incomplete and outdated residential address system, negatively impacted voter turnout and the accuracy of the VR. While the law obliges citizens who live permanently abroad to deregister their residence within the country, this obligation is rarely fulfilled.³³ The address registry, managed by the Central Registry, is a compilation of municipal address databases. In the absence of enforcement mechanisms or incentives, most municipalities ignored the request from the Central Registry to submit their updated address databases, preventing a meaningful audit and diminishing efforts to improve data accuracy.³⁴

Candidate Rights and Registration

Citizens eligible to vote may stand as candidates for mayor or councilor, but only in the municipality of their permanent residence.³⁵ Despite previous ODIHR recommendations, individuals serving or awaiting the execution of a prison sentence of more than six months remain barred from running for office. This restriction is overly restrictive and at odds with OSCE commitments and other international standards.³⁶

Candidates may be nominated by political parties, coalitions, or groups of voters. To fill the legal gap regarding the required support signatures for independent candidates (see *Electoral System and Legal Framework*), the SEC adopted a Rulebook on Collection of Signatures by Independent Candidates, which clarified that independent candidates needed to collect only two support signatures. 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.³⁷

Paragraph 9 of the 1996 UN CCPR General Comment No. 25 on Article 25 of the International Covenant on Civil and Political Rights (ICCPR) states that "elections must... ensure that the authority of government continues to be based on the free expression of the will of electors".

Paragraph 1.1.6.c of the Venice Commission <u>Code of Good Practice</u> states: "Registration could take place where a voter has his or her secondary residence, if he or she resides there regularly and it appears, for example, on local tax payments; the voter must not then, of course, be registered where he or she has his or her principal residence".

Only 38 of the 80 municipalities (47.5 per cent) did so. The process of reforming legislation pertaining to the address registration system that was launched in 2016 is currently suspended. See also 2015 Congress Resolution 378 (2015) on Electoral lists and voters residing *de facto* abroad para.12 "...the importance of a "genuine link", through predominant relations (permanent residence, central point of life interests, etc.), between a voter and the country in which he/she casts the ballot at local level".

The restriction that a candidate may only run in her or his municipality of permanent residence is potentially disproportionate to the aim of the law when applied to municipalities within the city of Skopje.

Paragraph 24 of the 1990 OSCE Copenhagen Document provides that "any restriction on rights and freedoms must, in a democratic society, relate to one of the objectives of the applicable law and be strictly proportionate to the aim of the law". Paragraph 15 of the 1996 UN CCPR General Comment No. 25 states that "persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent, or by reason of political affiliation". See also Paragraph 14 of General Comment No. 25, which states that "parties should indicate and explain the legislative provisions which would deprive citizens of their right to vote. The grounds for such deprivation should be objective and reasonable. If conviction for an offence is a basis for suspending the right to vote, the period of such suspension should be proportionate to the offence and the sentence".

The Association "World Macedonian Congress" challenged the Rulebook and Guidelines, 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.

Nomination documents had to be submitted to MECs and the ECCS, with a two-day period provided for rectifying deficiencies. ³⁸ The Electoral Code, the SEC calendar of activities, and other acts do not clearly regulate various timelines applicable during the verification of lists, which led to an inconsistent implementation of verification procedures by MECs. ³⁹ MECs noted that the verification of candidates' criminal records through basic courts was burdensome and that courts frequently did not comply with the 24-hour deadline for these checks, resulting in significant delays in processing candidate registrations and, at times, affecting other electoral preparations. ⁴⁰ Nevertheless, all candidate lists were verified before the deadline for candidate registration and before the SEC lottery determining the order of contestants on the ballots. ⁴¹

In an inclusive process, MECs and the ECCS registered a total of 10,490 candidates on 577 council lists submitted by 27 political parties, 6 coalitions, and 65 groups of voters. All registered candidate lists met gender quota requirements. Women comprised 45.1 per cent of all council candidates and headed 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. Women were significantly underrepresented, with only 32 mayoral candidates (10.4 per cent). The ODIHR EOM is aware of only a few candidates with disabilities running in these elections. MECs rejected six mayoral candidates and four council lists, on grounds of late submission or documentation deficiencies; all appeals against rejections were dismissed by the Administrative Court (see *Election Dispute Resolution*).

Campaign Environment

The official campaign period began on 29 September and ended on 17 October. Early campaigning, including the use of campaign funds and the publication of campaign advertisements, is prohibited; however, the law allows one campaign event between candidate registration and the official start of the campaign. This provision is vague and was applied inconsequently by contestants.

The Electoral Code provides for equal access to campaigning for all contestants; however, 80 per cent of outdoor spaces for political advertising and 90 per cent of state funds for paid media political advertising are distributed equally to the four main ruling and opposition parties. This arrangement disadvantages non-parliamentary parties and independent candidates and excludes smaller political parties that have a parliamentary group. For these elections, no billboard space was allocated to Levica and ZNAM.⁴²

The fundamental freedoms of association, assembly, and expression were respected, and overall, contestants were able to campaign freely. The campaign was competitive, offering voters a range of political alternatives. Campaign activities ranged from localized outreach efforts to large-scale rallies

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-hour period 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 criminal convictions of nominees.

For example, the MECs in parallel had to select new EB members, a complicated multi-step process. In some municipalities, the selection of EB members had not been finalized prior to their scheduled trainings (see *Election Administration*). 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 were 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.

⁴² ZNAM noted that they purchased billboard spaces that were not claimed by other parties, as allowed by the law.

organized by major parties or coalitions. ⁴³ The main topics centred around local issues, but broad national themes, notably competing visions on national identity and inter-ethnic relations, EU integration, the rule of law, and corruption, featured prominently. The campaigns of the coalitions led by VMRO-DPMNE and SDSM used predominantly Macedonian in events observed by the ODIHR EOM and on social networks, while the DUI-led coalition and VLEN campaigned in both Albanian and Macedonian in several municipalities and online. ⁴⁴ DUI claimed exclusive legitimacy to represent the Albanian community and framed these elections as a referendum on this issue, while the VMRO-DPMNE presented itself as the guarantor of Macedonian national dignity. Contestants levelled mutual accusations, and several instances of inflammatory rhetoric and *ad hominem* attacks were noted. ⁴⁵ A few isolated instances of violence were reported. ⁴⁶

The law prohibits the misuse of certain state resources from the day elections are called. There is a ban on the use of public offices, equipment, and vehicles for campaign purposes.⁴⁷ The law also prohibits the use of public funds for new infrastructure projects and the inauguration of state-funded projects starting 20 days before the official campaign period. Both prior to and during the official campaign period, mayors and high-level government officials inaugurated, held inspections at, or promoted investment and infrastructure projects, at odds with these provisions.⁴⁸ Several ODIHR EOM interlocutors raised concerns about potential pre-planned infrastructure projects scheduled to take place during the electoral

The ODIHR EOM observed 98 campaign events across 42 municipalities. Of the 98 events, 15 featured women speakers, 69 were accessible to persons with physical disabilities, and only 1 included sign-language interpretation. At events observed by the ODIHR EOM, youth participation averaged at 20 per cent, while women constituted 33 per cent of the audience.

At four events of DUI-led coalition and VLEN, both Albanian and Macedonian were used. Turkish was used at two events observed, one by DUI-led coalition and one by VLEN.

On 28 September, at a campaign rally held by the DUI-led National Coalition for Integration (AKI), videos of the 2001 inter-ethnic conflict were displayed on screen. Ali Ahmeti, the leader of DUI, in reference to the prime minister and to VLEN said: "Hristijan, you go hunting with hounds for rabbits, not for eagles. Eagles fly high – hounds keep watch for rabbits". The same day, Prime Minister Mickoski responded: "We have a message for Ali Ahmeti: You are not an eagle, but a sparrow. In essence, you are ... criminal and corrupt magicians". On 10 October, at a rally in Valandovo, the prime minister said: "We would like to compete with arguments ... with strategy. But with such necrophiles, we cannot compete in a legitimate political way. Let them remain there, in their own political swamp". On 8 October, SDSM leader Venko Filipche said at a rally in Prilep, in reference to the head of ZNAM Maksim Dimitrievski: "I hear that Maksim Dimitrievski, Mickoski's pawn, has requested a debate with me. I do not debate with traitors to the social democratic idea and subcontractors of VMRO-DPMNE".

On 2 October, a Roma councilor candidate in Vinica from the Democratic Forces of the Roma was attacked and gravely injured, allegedly in order to have him withdraw his candidacy. On 7 October, Zekirija Shahini, the lead candidate on the DUI-led coalition's councilor list for Lipkovo municipality, was shot and injured in Kumanovo. On 16 October, a ZNAM councilor candidate attacked campaign staff of the SDSM-led coalition's mayoral candidate in Kumanovo.

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 (58 per cent). By law, failure to submit the data within the prescribed deadline is subject to fines ranging from EUR 200 to 400.

For example, on 11 September, Izet Mexhiti, Minister of Environment and Physical Planning and VLEN mayoral candidate in Chair, inspected public roadworks. On 12 September, Deputy Prime Minister Aleksandar Nikoloski, together with the prime minister and the minister of health, visited the Military Hospital in Skopje and announced a EUR 12 million investment for its reconstruction. On 23 September, the prime minister inaugurated a public swimming pool in Shtip. On 12 October, the prime minister and Mr. Nikoloski visited the construction of the Ljubani, Ljuboten water supply system, financed by the Ministry of Transport with MKD 106 million, and in a press release stated that the project is being implemented at the request of local residents. EUR 1 equals approximately MKD 61.5.

period to reinforce the incumbent's advantage. 49 Campaign activities of public officeholders are not regulated, and government officials, including the prime minister, actively promoted local candidates across the country throughout the campaign. 50 While not in violation of the law, such practices blurred the line between state and party, contrary to paragraph 5.4 of the 1990 OSCE Copenhagen Document. 51

The law encourages contestants to sign a Code on Fair and Democratic Elections, a self-regulatory instrument that *inter alia* prohibits pressure on civil servants and public-sector employees. ⁵² However, many ODIHR EOM interlocutors made allegations that public sector employees were pressured by their superiors to support the VMRO-DPMNE or the incumbent mayor, and some alleged instances where municipal employees were instructed to take part in the campaign. ⁵³ Additionally, allegations of intimidation of voters and opposition candidates, as well as instances of alleged targeted administrative inspections by authorities on opposition supporters, were reported to the ODIHR EOM. ⁵⁴ A wide range of ODIHR EOM interlocutors alleged that political parties with substantial financial means engaged in vote-buying, particularly targeting economically vulnerable Roma communities, despite long-standing efforts to combat this practice. ⁵⁵

Campaigning on social networks, including paid political advertising and third party campaigning, is not specifically regulated, but the law requires all paid political advertisement to be clearly labelled and separated from other content. There is no oversight authority mandated to monitor the campaign on social networks, including disinformation, manipulative content, or co-ordinated inauthentic behavior. In 2023, the Agency for Audio and Audiovisual Media Services (AAAVMS) developed a voluntary Code of Conduct in the Online Sphere during Electoral Processes and Referenda, addressing political advertising, disinformation, discriminatory rhetoric, and personal data protection. However, only five political parties and four independent candidates contesting these elections had signed it. Services (AAAVMS)

In the municipalities where such concerns were raised, from 9 August to 17 October, a number of public procurement processes for new infrastructure projects were initiated. For example, the municipality of Butel initiated or published 3 new procurement procedures for infrastructure development and adopted 16 positive decisions on open procurements; Gostivar initiated 5, and Karposh initiated 8, and both municipalities adopted decisions on 18. Tetovo initiated 2 procurement procedures and adopted 34 positive decisions. The annual budgets of the municipalities of Gostivar and Tetovo are not publicly available.

Of the 98 campaign events observed by the ODIHR EOM, government officials were actively campaigning at 33. For example, the prime minister spoke at campaign rallies on 29 September in Aerodrom, on 4 October in Jegunovce, on 10 October in Dojran and Valandovo, and on 13 October in Veles. Deputy Prime Minister Aleksandar Nikoloski spoke on 29 September in Prilep, on 5 October in Strumica, and on 13 October in Rosoman.

Paragraph 5.4 of the <u>1990 OSCE Copenhagen Document</u> calls for "a clear separation between the State and political parties".

In at least ten municipalities and the City of Skopje, Levica candidates announced that they would refrain from signing the non-binding code.

Allegations of municipal employees being pressured by their superiors were made in Debar, Kochani, Kriva Palanka, Mogila, Novaci, Ohrid, Shuto Orizari, Struga, and Tetovo.

Allegations of intimidation on voters were made in Arachinovo, Bitola, Brvenica, Gazi Baba, Labunishta, Mogila, Struga, and Sveti Nikole. Allegations of pressure on opposition candidates were made in Bitola, Kumanovo, Mogila, and Prilep. Allegations of targeted inspections against opposition supporters were made in Bitola, Labunishta, Mogila, and Tetovo.

Vote-buying allegations were made in Brvenica, Chair, Kumanovo, Rankovce, Resen, Saraj, Shtip, Shuto Orizari, Staro Nagorichane, and Tetovo.

According to data from Meta Ad Library, between 17 September and 16 October, the accounts that spent the most on Facebook and Instagram were those of Levica (EUR 11,292), the official account of the mayor of Kisela Voda Orce Gjorgjievski (EUR 9,615), and the official account of Prime Minister Hristijan Mickoski (EUR 9,529). The highest spending official party accounts were of SDSM, the Democrats, and Integra – Macedonian Conservative Party, with EUR 8,359, EUR 3,641, and EUR 345, respectively.

The AAAVMS launched a pilot project for monitor third-party campaigning of 50 accounts across social network platforms. Civil society organizations Metamorphosis, CIVIL, and the Helsinki Committee for Human Rights conducted social network monitoring.

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

Candidates and political parties relied heavily on social network outreach and campaigned actively on Facebook from the start of the official campaign period, and, to a lesser extent, on Instagram and TikTok.⁵⁹ While at the start of the campaign, most posts presented candidates and programmes in a neutral tone, sharing content from campaign events, the tone used on social networks became increasingly accusatory in the final stages of the campaign. Several instances of inflammatory rhetoric were also observed.⁶⁰ A number of high-level government officials and incumbent mayors used their official Facebook accounts for campaigning.⁶¹ Several ODIHR EOM interlocutors reported online harassment and misogynistic attacks, including from fake accounts; concerns were also raised about the potential spread of harmful narratives and manipulative content online during the election period. Despite growing digital vulnerabilities, no comprehensive institutional mechanism has been established to counter digital threats to elections, including co-ordinated malign influence and disinformation.

Negative rhetoric surrounded women's political participation, particularly online, where women faced frequent verbal abuse, threats, and graphic content. ⁶² Gender equality and women's rights were largely absent from candidates' platforms and campaign discourse, and when mentioned, women were portrayed mainly as voters, rather than as political actors. Women's civil society representatives noted a broader regression in women's rights and a decline in the progress toward participatory democracy. According to several ODIHR EOM interlocutors, the growing influence of the anti-gender movement, often backed by religious leaders and unchallenged by political parties, undermines past achievements in gender equality policies. ⁶³

Parties representing smaller ethnic communities campaigned freely, conducting outreach in their respective languages and areas. A total of 20 parties representing smaller ethnic communities participated in these elections. While many of these political parties have traditionally aligned themselves with major parties through electoral alliances or coalitions, in these elections, some ran independently, arguing that maintaining their own voter base provides for a stronger post-election negotiating position. Some political parties representing the Roma and Turkish communities chose to run independently in municipalities with concentrated communities, but in other municipalities, joined coalitions led by the major parties. Serb and Vlach parties all joined the VMRO-DPMNE-led coalition.

The ODIHR EOM followed the campaign activities of 47 accounts of political parties, coalitions, candidates, and influencers on Facebook.

For example, the mayors of Berovo, Gostivar, Kisela Voda, Kumanovo, Ohrid, and Tetovo actively campaigned on their official Facebook pages, as did the prime minister, the ministers of foreign affairs, defense, transport and communication, and others.

Several women CSO representatives informed the ODIHR EOM that local councils are increasingly changing the wording 'gender equality' to 'equal opportunities for women and men' in official documents.

On 30 September, Levica leader Dimitar Apasiev posted derogatory remarks against a political opponent. During the first week of the campaign, derogatory, explicit, and misogynistic attacks were posted on Facebook against Luna Stefanovska, VMRO-DPMNE candidate for the Skopje City Council. On 13 October, the DUI-led coalition posted a video of Tetovo mayor Bilal Kasami with the caption: "the servant of VMRO and Mickoski!"

See 2020 Congress Report on Fighting Sexist Violence Against Women in Politics at Local and Regional Level, Recommendation 449, 7.c. "introduce or revise codes of conduct in national assemblies, governmental bodies and institutions, explicitly prohibiting sexist speech and sexual harassment, introducing effective complaint and sanction mechanisms, and assist local and regional governments with the implementation of measures regarding sexist violence against women in politics". See also 2003 Council of Europe Recommendation of the Committee of Ministers on Balanced Participation of Women and Men in Political and Public Decision Making.

Of these parties, eight represent the Roma community, four the Turkish community, three each the Serbian and the Bosniak communities, and two the Vlach community. According to ODIHR EOM interlocutors, some members of the Roma community prefer to identify as Turkish, citing perceptions of lower levels of discrimination.

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 pertaining to campaign finance remain unaddressed, including those related to constituency-level reporting of income and expenditures in both interim and final reports, electronic submission of campaign reports, regulation of bank loans, paid political advertising on social networks, third-party financing, strict limits on post-election donations, and adequate resources for oversight bodies.

Campaigns may be financed from public and private sources. In practice, public funds constitute a significant share of overall campaign financing through different mechanisms.⁶⁵ While there is no direct public funding, the state reimburses registered broadcast, print, and online media outlets for political advertising through the SEC (see *Media*). Political parties that receive state funding may also use these funds for campaign purposes.⁶⁶

Private funding includes bank loans, which are not comprehensively regulated, and monetary or in-kind donations, capped at EUR 3,000 per individual and EUR 30,000 per legal entity per campaign, in Macedonian Denar (MKD) equivalent. Donations from foreign, state, municipal, and anonymous sources, as well as from public, religious, and charitable organizations, are prohibited. 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 reporting purposes, the law does not distinguish between mayoral and council elections and narrowly defines who qualifies as an election participant. Consequently, only political parties, coalitions, and independent candidates or lists of independent candidates are required to submit campaign-finance reports.⁶⁷

All contestants are required to open dedicated bank accounts through which all campaign income and expenditures must be processed.⁶⁸ Oversight is entrusted to the State Audit Office (SAO) and the State Commission for Prevention of Corruption (SCPC). Each contestant must submit three interim reports, two before election day and one after, which are not subject to audit.⁶⁹ All reports are filed with the SAO,

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For instance, the first campaign finance reports revealed that donations from private entities were reported by only one contestant and amounted to some EUR 427,000, while transfers from political parties' regular accounts, which are funded from public sources, totalled almost EUR 760,000.

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 1 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.

While 309 mayoral candidates and 577 lists for councilors contested these elections, the SEC <u>published</u> that there are 153 registered contestants.

Out of the total of 886 mayoral candidates and council lists registered, the authorities informed the ODIHR EOM that only 167 bank accounts had been opened for campaign purposes.

The first 167 interim reports were due on 9 October by 24:00, while the second set of reports was due the day before election day. An additional report is due the day before potential mayoral run-offs. According to the SCPC, almost two-thirds of the participants did not submit their first interim report at all, and the content and timing of publication of submitted reports varied. According to time stamps of the published reports, 45 of the 56 reports published on the SEC website were submitted within the deadline; 57 of 58 reports published on the SCPC website; and 37 of 56 reports published on the SAO website. Of these reports, 15 contained information only on donations, 32 reported zero donations or were blank, while 19 also contained expenditures. Only three reports included information not required by the reporting instructions, including funds transferred from political parties or in-kind donations. The first reports were posted on the day after submission by the SAO and SCPC, while the SEC posted them four days after. The second reports were posted on election day by the SCPC only. The third interim report is due one day after the closing of the bank account dedicated to the campaign and covers the period between the end of the campaign and the closing of the account.

SCPC, and the SEC, which publish them on their websites. Within 60 days of the official announcement of election results, campaign participants must submit final reports to the SAO, which then has 60 days to audit them. The reporting template, provided by the Ministry of Finance prior to the 2024 elections, does not require a breakdown of expenses by municipality, preventing verification of compliance with spending limits, contrary to the law. Furthermore, interim reports include only donations, omitting loans, transfers from regular party accounts, and expenditures, thereby reducing transparency and falling short of international good practice. It

The Electoral Code prescribes 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, but does not specify which institution should initiate procedures in case of infringements. Instead, the SEC, SCPC, and SAO are required to sign a Memorandum of Understanding (MoU) to co-ordinate the implementation of campaign finance provisions, including information-sharing and follow-up on detected irregularities.⁷²

Before the start of the campaign, the SAO conducted two training sessions for contestants' financial staff on completing financial reports. The training covered legal requirements related to campaign finance and included sample reporting templates. However, some practical issues, including gaps in the reporting template and ambiguous definitions of who is considered a participant, remained unresolved, leading to inconsistent and, at times, overly narrow interpretations by both participants and oversight institutions. Combined with systemic gaps and limited institutional capacity, these shortcomings hindered effective campaign finance oversight.⁷³

Media

The media landscape is diverse but fragmented along political and ethnic lines, operating within a limited advertising market. Television (TV) remains the main source of political information, while online news portals and social network platforms are increasingly influential. Several ODIHR EOM interlocutors expressed concern about the absence of local media in some regions. They also noted unfavourable working conditions and limited human resources in the media sector, affecting both journalistic and technical capacities. While the legal framework provides for the protection of journalists, intimidation, especially outside the capital city, online attacks, including against women, and isolated incidents of physical violence against journalists remain a concern.⁷⁴

The Constitution guarantees the freedoms of expression and of the media. 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 Electoral Code requires media to cover elections in a fair, balanced, and unbiased manner. Despite prior ODIHR recommendations, newscasts of the public broadcaster, Macedonian Radio and Television (MRT), during the campaign remain subject to stringent regulations. Although these regulations aim to ensure equitable access, they limit the broadcaster's editorial

The spending limits in these elections range from some EUR 3,400 in Lozovo to some EUR 168,000 in Kumanovo. Additionally, for the Skopje City Council and mayoral elections, the spending limit is some EUR 848,000.

On 17 September, the SEC, SCPC and SAO signed the MoU.

Paragraph 261 of the <u>2020 ODIHR Guidelines on Political Party Regulation</u> states that "[i]t is good practice to require [...] reports providing oversight bodies and the public with preliminary information on campaign incomes and expenses of parties and candidates several days before election day".

In its latest <u>annual report</u>, the SAO recommended several amendments to campaign-finance regulations, 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. The SCPC, in its <u>2024 post-elections report</u>, highlighted issues of late or incomplete financial reports, as well as unregulated digital advertising.

On 2 October, the Association of Journalists (AJM) announced that it had expelled Zoran Bozhinovski following the series of gender-based insults through social media posts against women journalist. In 2025, AJM reported two cases to the MoIA, regarding a physical attack on a TV crew in Skopje and the arson of a journalist's car in Ohrid.

independence.⁷⁵ The AAAVMS oversaw media compliance with legal requirements relating to electoral coverage, from the day of the announcement of the elections until the end of voting, publishing seven weekly reports before the official launch of the campaign, and daily reports during it.⁷⁶

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Mayoral candidates are entitled to equal coverage by all broadcasters, and submitters of councilor lists to equal coverage in local media. Due to the high number of contestants and limited media capacity, the decision on which candidates to invite to numerous debates in private media remained under editorial discretion, and some candidates declined participation. Several local media outlets organized debates and interviews with candidates in their respective municipalities. Due to the limited number of such media outlets, the impact was not significant. In the national media, in addition to the main parties and their candidates, several smaller parties and a few independent candidates had opportunities to present their political platforms. Three of the five private national terrestrial broadcasters informed the ODIHR EOM that some parliamentary parties avoid participation in their programmes. One daily newscast and one weekly primetime programme on national broadcasters were supplemented by subtitles or Macedonian Sign language, as required by law.

Paid political advertisement in the media during the campaign period is financed directly and exclusively from the state budget. The distribution formula significantly favours major parliamentary parties, while denying meaningful opportunities for smaller parties and independent candidates, and providing no funds or airtime for smaller parties with a parliamentary group. The Levica filed several motions challenging these guidelines (see *Election Dispute Resolution*). Media wishing to offer paid airtime or space for campaign advertisement must register with the SEC and publish their price lists. While the reimbursement to broadcasters is based on AAAVMS monitoring, reimbursement to online media is not transparent and lacks oversight. Many ODIHR EOM interlocutors alleged that this provision is exploited by political parties to channel funds through loyal media.

According to ODIHR EOM media monitoring, election-related coverage in broadcast media during the campaign period was overall balanced.⁷⁹ Major parties and coalitions were often represented by their leaders. Televised debates were organized by private channels almost exclusively for mayoral candidates. Non-parliamentary parties and independent candidates received approximately two and five per cent of news coverage on public broadcasters, respectively, and up to two and three per cent on private channels.

During the official campaign period, 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.

On 7 October, the AAAVMS published monitoring data for the period between the calling of the elections and the start of the campaign, noting some imbalance in media coverage by TV Alfa and Alsat-M, but no legal violations. Alsat-M filed a complaint, objecting to these conclusions. Also, on 8 October, the AAAVMS initiated a misdemeanor procedure against Kichevo TV Gurra for exceeding the limit of paid political advertising.

The Electoral Code prescribes that 8 minutes out of each 9.5 minute-long paid advertisement block and 90 per cent of the funds allocated for the campaign in the media are to be equally divided between the 2 largest ruling and the 2 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. On 16 September, the SEC, the AAAVMS, the SCPC, and the SAO submitted a joint letter to the Speaker of Parliament, requesting action on the appropriate regulation of the allocation of paid airtime and space and distribution of funds for the campaign in the media. ZNAM noted through a bilateral agreement they were provided a small percentage of VMRO-DPMNE's funds for advertising in the media. For these elections, 33 TV stations, 42 radio stations, 8 daily newspapers, and 246 online media outlets registered

For these elections, 33 TV stations, 42 radio stations, 8 daily newspapers, and 246 online media outlets registered with the SEC.

With the exception of *TV Alfa*, which devoted almost 40 per cent of its political coverage to VMRO-DPMNE in a

With the exception of *TV Alfa*, which devoted almost 40 per cent of its political coverage to VMRO-DPMNE in a positive tone and around 45 per cent of its coverage of SDSM in a negative tone, including critical commentary by journalists. On 15 September, the ODIHR EOM started its media monitoring of 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 election-related articles of the online news portals *kurir.mk*, *plusinfo.mk*, and *slobodenpecat.mk*, along with *tetovasot.com* and *lajmpress.org* (in Albanian).

Coverage in the pre-campaign period on private television and online media reflected political polarization, and negative reporting on the largest parties largely originated from the rhetoric of party leaders.

Election Dispute Resolution

Election-related complaints may be filed with the SEC, MECs, basic courts, or the SCPC, depending on the subject matter. The regulation of election dispute resolution contains ambiguities and gaps, including with respect to conflicting deadlines, unclear mandates for dispute resolution, and the authority of lower-level election commissions. ⁸⁰ The legal standing of voters to file complaints remains limited, contrary to international good practice. ⁸¹ Citizen observers may file complaints concerning campaign finance, while for potential irregularities observed during the electoral process, including on election day, they can only have their remarks on alleged irregularities recorded in the EB logbooks.

Basic courts and the SEC handle different types of campaign-related complaints. 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. MECs review complaints regarding violations of voting rights on election day, while the SCPC reviews those related to campaign finance and misuse of administrative resources. Decisions by the SEC, MECs, and 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. Some of these deadlines are unduly short, potentially undermining the quality of rulings.

The Constitutional Court reviews the constitutionality of election-related legal acts or decisions, without an expedited procedure. However, following the announcement of the local elections, the Court reviewed several initiatives in a prompt manner and within days, including challenges to 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 Rights and Registration*, and *Electoral System and Legal Framework*, respectively). The Court rejected all initiatives.

During the campaign, two additional initiatives were submitted to the Constitutional Court: one by Levica on 29 September, challenging the AAAVMS Guidelines on paid political advertising, and another by the Democrats on 3 October, challenging provisions of the Electoral Code related to the allocation formula.⁸⁴ The Court held a session on 15 October, two days before the end of the campaign, reviewing and rejecting

Procedures and applicants in cases concerning the annulment and repetition of voting are not comprehensively defined in Article 151 of the Electoral Code, which also sets deadlines that differ from those under Article 148, despite their partly overlapping scope. ODIHR EOM long-term observers reported that many MECs had varying interpretations of their authority to rule on different types of complaints, often relying solely on SEC advise rather than independently reviewing and deciding cases within their jurisdiction.

Voters can 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. Section II.3.3.f of the Venice Commission's Code of Good Practice in Electoral Matters recommends that "[all] candidates and all voters registered in the constituency concerned must be entitled to appeal. A reasonable quorum may be imposed for appeals by voters on the results of elections".

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

Section h II.3.3(95) of the Venice Commission's <u>Explanatory Report of the Code of Good Practice in Electoral Matters</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".

In addition, Levica filed several lawsuits with the Basic Court in Skopje, all of which were dismissed, as well as a complaint to the Commission for Prevention and Protection of Discrimination, on the same matter.

the initiative by Levica. 85 Although the Constitutional Court is not bound by expedited deadlines, its practice of hearing election-related cases promptly created an expectation among many stakeholders that the Court would continue with this approach. Such practices have the potential to significantly impact on the legal framework while an electoral process is ongoing.

The SEC reviewed 67 complaints related to violations of individual voters' rights and requests for homebound voting, accepting 25 and rejecting the remaining 42. In line with the law, the SEC maintained an electronic system for filing and tracking complaints but did not consistently update it., Since the announcement of elections, the SCPC received some 25 reports, most alleging misuse of state resources. These reports were not treated as complaints and hence were not reviewed in an expedited manner, and the procedural right of the parties to the case were not ensured, limiting access to an effective remedy.⁸⁶

The Administrative Court received and adjudicated four complaints prior to election day, concerning candidate registration. It dismissed one as late and upheld the SEC and MEC decisions in the other three. The court also dismissed as unfounded a lawsuit filed by Levica, requesting annulment of the AAAVMS Guidelines on paid political advertising.⁸⁷ As required by law, the Administrative Court published its decisions promptly.

While disputes were generally handled efficiently, in accordance with procedures and within prescribed deadlines, many ODIHR EOM interlocutors expressed concerns about the impartiality and independence of the adjudicating bodies, particularly regarding potential disputes over election results. ⁸⁸

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 to follow the election process at all levels of the election administration in municipalities where they compete, by applying to the relevant MEC until three days before election day. Media representatives were entitled to be present at all stages of the electoral process apart from the vote count.

In an inclusive process, the SEC accredited 807 citizen observers from 20 organizations and 644 international observers from 21 organizations. The SEC also conducted a training for accredited observers and a workshop for media outlets. Election observation activities by citizen observer organizations were minimal due to a lack of funding, which prevented them from deploying meaningful numbers of long-term and short-term observers. ⁸⁹ They focused instead on activities such as monitoring

The initiative by the Democrats was not on the agenda of this session of the Court. The Court informed the ODIHR EOM that two more initiatives were received, one by Levica, challenging the provisions of the Electoral Code on the allocation formula, and another, by World Macedonian Congress, challenging parts of the SEC Election Calendar.

By law, the SCPC should review and decide on complaints related to violation of campaign-finance rules and misuse of administrative resources within five days. The SCPC reviewed 12 reports in public session on 13 October.

On 13 October, Levica filed an appeal against this decision to the Higher Administrative Court.

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. The <u>2024 European Commission's Enlargement Report</u> notes 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".

Of the main citizen observer organizations that were previously involved in election observation, CIVIL – Center for Freedom deployed 6 long-term and 60 short-term observers and the CSO "Wake Up" accredited 559 observers.. The National Council for Gender Equality deployed 24 women observers.

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of media and social networks and on possible foreign malign influence and disinformation campaigns, misuse of state resources, inter-communal relations, and electoral accessibility. ⁹⁰

Election Day

Election day was generally calm and orderly. According to the SEC preliminary data, turnout reached 48.46 per cent. The SEC published turnout data by municipality at two-hour intervals throughout the day, starting at 09:00, and began posting preliminary election results down to polling station level at around 21:00, contributing to transparency. In four municipalities, the mayoral election will have to be repeated as fewer than one-third of registered voters participated. In a number of municipalities, there were cases of misprinted ballots and information posters, including for the election of the Council of the City of Skopje. Women were well represented on the EBs in polling stations observed by the IEOM; they comprised 49 per cent of EB members and chaired 66 per cent of the observed EBs.

Regrettably, 54 per cent of polling stations where voting was observed did not provide for independent access for voters with physical disabilities, and in 27 per cent, the interior layout was not suitable for these voters. Positively, 95 per cent of polling stations observed were equipped with tactile ballot templates in Braille for use by voters with visual impairments.

Most polling stations opened on time or with slight delays. Opening was assessed positively in 105 of the 109 observations, highlighting the generally uniform application of procedures. IEOM observers reported some instances of procedural errors, including 14 instances where ballot boxes were not shown to be empty before being sealed, and 27 cases where the opening protocol was not completed before the polling station opened. Problems with initiating the Biometric Voter Identification Devices (BVIDs) were noted in one third of openings observed, and roughly the same proportion of polling stations opened with mostly minor delays.

IEOM observers assessed voting positively in 98 per cent of polling stations observed, describing the process as calm, efficient, and well-organized. Authorized representatives of contestants were present in 84 per cent of polling stations observed and were involved in 20 of the 22 cases of interference observed by the IEOM. Citizen observers were present in only 6 per cent of polling stations observed. The presence of unauthorized persons was observed in eight polling stations. Voter identification procedures were almost universally respected. However, IEOM observers reported that in 27 per cent of polling stations observed, not all voters could be identified by the BVID based on fingerprints, and in 2 per cent, there were technical issues with the devices. In 8 per cent of polling stations observed, one or more voters were turned away, in most cases because their names could not be found on the voter list or they could not present a valid identification document.

IEOM observers reported some problems related to the secrecy of the vote. In 7 per cent of polling stations observed, not all voters marked their ballots in secrecy. The layout of the polling stations was not adequate to conduct polling and did not ensure the secrecy of the vote in 4 per cent of observed polling stations. Overcrowding was noted in 4 per cent of observations. In 38 per cent of polling stations observed, voters were not consistently instructed on voting procedures and on how to properly mark their ballots.

Serious procedural shortcomings noted by IEOM observers included group voting, reported in 3 per cent of polling stations observed, and attempts to influence voters on who to vote for (1 per cent). In 2 per cent of polling stations observed, ballot boxes were not properly sealed. IEOM observers also reported

Community organizations such as Roma for Democracy and Umbrella, as well as local organizations like Inkluziva/Zeta and Polio+ focused on the rights and inclusion of persons with disabilities and electoral accessibility. A group of civil society organizations monitored the potential misuse of administrative resources across 26 municipalities.

from 3 per cent of polling stations observed that people other than EB members were seen keeping track of voters who had voted, indicating possible pressure on voters and attempts to unduly influence their choice. Campaign materials or activities were reported from outside of 4 per cent of polling stations observed.

The large majority of the 104 vote counts observed by the IEOM were assessed positively, although some observers described the process as disorganized and chaotic. However, a frequent lack of adherence to prescribed procedures, as well as procedural errors or omissions led to a negative assessment of the process in 13 observations. IEOM observers reported that EBs frequently did not perform the required reconciliation procedures, such as counting and recording the number of unused ballots in the results protocol (30 cases each) or determining the number of voters who voted by counting the signatures on the voter list (24 cases). Only 38 EBs were observed to have conducted all prescribed steps before opening the ballot boxes. The actual counting of ballots was carried out transparently in almost all cases, but in more than half of the observed counts, the various steps were not followed in the prescribed order. IEOM observers also reported procedural violations, such as results protocols pre-signed by EB members (10 cases) or persons other than EB members participating in the count (18 cases). In 3 counts observed, the results did not reconcile, and in 31 cases, EBs faced difficulties completing the results protocols. Other procedural shortcomings included EBs failing to post copies of the results protocols at the polling station (43 cases), negatively impacting transparency, and not transmitting preliminary results electronically to the SEC (23 cases).

IEOM observers assessed the tabulation positively in all but 6 of the 89 reports filed from 76 MECs, describing the process as transparent in most cases, though at times disorganized. They reported that the MEC premises were not always suitable for the reception of election materials (15 cases), and noted instances of overcrowding (10 cases), and tensions in or around MEC premises (4 cases). Almost three-quarters of MEC premises did not provide for independent access by persons with physical disabilities. IEOM observers also reported several procedural shortcomings, including MECs not consistently making changes to EB results protocols based on inspected election material, as required by law (26 reports), and cases of EBs correcting protocols at the MEC (25 reports). More than half of the submitted EB protocols contained discrepancies. Sixty observation reports noted the presence of authorized representatives of contestants at MECs, who were able to follow the process without restriction. IEOM observers did not report any instances of interference in the tabulation process.

The SEC reported that it had not received any complaints during election day. At the same time, by the end of voting, the SEC published information on some 286 complaints submitted by voters concerning their right to vote, which had been processed by MECs. According to the SEC, 156 of these complaints were upheld, 100 were rejected, while some 30 remain under review. IEOM observers reported that two complaints were filed related to irregularities during the voting and tabulation processes. The State Public Prosecutor's Office reported no major incidents but noted several isolated cases of alleged vote-buying, undue influence on voters, and one case of violation of the secrecy of the vote, all of which are under investigation. The police reported that 11 persons had been detained and arrested on election day on suspicion or charges of vote buying, destruction of election material, and for photographing voter identification documents.

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

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MISSION INFORMATION & ACKNOWLEDGEMENTS

Skopje, 20 October 2025 – This Statement of Preliminary Findings and Conclusions is the result of a common endeavour involving the OSCE Office for Democratic Institutions and Human Rights (ODIHR), the European Parliament (EP), and the Congress of Local and Regional Authorities of the Council of Europe (the Congress). The assessment was made to determine whether the elections complied with OSCE commitments, Council of Europe standards, other international obligations and standards for democratic elections, and with national legislation. Each of the institutions involved in this International Election Observation Mission has endorsed the 2005 Declaration of Principles for International Election Observation.

Matteo Mecacci is the Head of the ODIHR EOM, deployed from 5 September. The Congress delegation was led by Gobnait Ní Mhuimhneacháin. Marta Temido headed the EP delegation.

This Statement of Preliminary Findings and Conclusions is delivered prior to the completion of the electoral process. The final assessment of the election will depend, in part, on the conduct of the remaining stages of the electoral process, including the count, tabulation, and announcement of results, the handling of possible post-election day complaints or appeals, and second rounds of the mayoral elections. ODIHR will issue a comprehensive final report, including recommendations for potential improvements, some months after the completion of the electoral process. The EP delegation will debrief the EP Delegation for the Relations with North Macedonia at the earliest convenience following the second round of the election. The Congress will present its report at its plenary session in March 2026.

The ODIHR EOM includes 17 experts in the capital and 24 long-term observers deployed throughout the country. On election day, 275 observers from 40 countries were deployed, including 253 observers deployed by ODIHR, a 15-member delegation from the Congress, and a 7-member delegation from the EP. There were 48 per cent of women among observers. Opening was observed in 109 polling stations, and voting was observed in 1.100 polling stations across the country. Counting was observed in 104 polling stations, and the tabulation in 76 MECs.

The IEOM wishes to thank the authorities of the Republic of North Macedonia for the invitation to observe the elections, and the State Election Commission and the Ministry of Foreign Affairs and Foreign Trade for their assistance. The IEOM wishes to also express its appreciation to other state institutions, political parties, candidates, media, civil society organizations, and international community representatives for their co-operation.

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