

Office for Democratic Institutions and Human Rights

REPUBLIC OF BULGARIA

PRESIDENTIAL ELECTION 2016

OSCE/ODIHR NEEDS ASSESSMENT MISSION REPORT 31 May - 3 June 2016



Warsaw 27 June 2016

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REPUBLIC OF BULGARIA PRESIDENTIAL ELECTION 2016

OSCE/ODIHR Needs Assessment Mission Report 31 May-3 June 2016

I. INTRODUCTION

In anticipation of an official invitation to observe the upcoming presidential election to be held in 2016 and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR) undertook a Needs Assessment Mission (NAM) to Bulgaria from 31 May to 3 June. The NAM included Lusine Badalyan, OSCE/ODIHR Senior Election Adviser, and Oleksii Lychkovakh, OSCE/ODIHR Election Adviser.

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

The OSCE/ODIHR would like to thank the Ministry of Foreign Affairs for its assistance and cooperation in organizing the visit. The OSCE/ODIHR would also like to thank all of its interlocutors for having taken the time to meet with the NAM.

II. EXECUTIVE SUMMARY

The elections are due in the autumn of 2016. The president and the vice-president are elected jointly through a nationwide majoritarian system for a five-year term. More than half of registered voters should cast ballots for the election to be valid.

In May 2016, the parliament adopted a number of amendments to the Electoral Code. These include introduction of compulsory voting, transfer of most election related responsibilities from the Council of Ministers to the Central Election Commission (CEC) and new rules for establishment of polling stations abroad. A number of the OSCE/ODIHR NAM interlocutors expressed concerns about the adoption of significant changes shortly before the election and without an inclusive public consultation, contrary to good international practice. Special concerns were raised regarding the issue of establishing polling stations abroad. At the time of the OSCE/ODIHR NAM the parliament was considering another set of amendments, focusing on redrafting rules for out-of-country voting.

The elections are administered by a three-level structure of election management bodies: the CEC, 31 District Election Commissions (DECs) and some 12,000 Precinct Election Commissions (PECs). The CEC expressed concerns that their new responsibilities are not matched by additional financial and human resources and there might be not enough time for them to make all the relevant preparations. Many OSCE/ODIHR NAM interlocutors raised concerns about the ability of the CEC to implement its new responsibilities, and the upcoming elections are seen as a test for the CEC to administer the elections in an impartial and effective manner. Some mentioned the organization of tabulation of results as potentially problematic.

All citizens aged 18 years or older on election day have the right to vote, except those serving a prison sentence, regardless of the severity of the crime. The amendments to the Electoral Code prescribe that the voter, who has not voted during two consecutive elections of the same type without a valid reason is taken out of the voter lists. Active registration is prescribed for those willing to be restored in the lists. It is not clear, however, how exactly and by which body these procedures are to be implemented. Some OSCE/ODIHR interlocutors raised concerns about the accuracy of voter lists.

The law provides for various voting methods including voting at special polling stations, use of absentee voting certificates, homebound voting and voting abroad. The recent amendments prescribe that establishing polling stations outside the diplomatic and consular representations of Bulgaria is not permitted except in the European Union member states and in the cities outside the European Union with over one million residents. In both cases at least 100 voters have to apply.

The law provides for paper and machine voting. For the upcoming elections the machine voting will be conducted at 500 polling stations and the results will be official. In addition, an experimental machine vote count shall be conducted in accordance with the rules defined by the CEC. The amendments also provide for the transfer of all responsibilities related to machine and remote electronic voting to the CEC. The CEC and some OSCE/ODIHR NAM interlocutors expressed concerns about the CEC's capability to implement these procedures properly considering limited timeframe and resources available. The OSCE/ODIHR previously provided recommendations regarding the introduction and implementation of new voting technologies.

Political parties, coalitions and nomination committees have the right to nominate candidates for the positions of president and vice-president. Candidates put forward by nomination committees have to collect support signatures of at least 2,500 voters. Despite previous OSCE/ODIHR recommendation, voters can sign in support of only one candidate.

The official election campaign starts 30 days before election day. The law prescribes that the election campaign is conducted in Bulgarian language only. The OSCE/ODIHR NAM interlocutors did not expect the campaign to be vibrant and opined that key issues during the campaign would be migration crisis, debate over the scope of presidential powers, and ways to improve social welfare. They also raised concerns regarding alleged vote-buying and cases of controlled voting, particularly among vulnerable groups of voters, such as minority groups, especially Roma.

Candidates' campaigns could be financed from public funds and own financial resources of the party/nomination committee, financial resources of the candidates and contributions by physical persons. The National Audit Office (NAO) has the authority to oversee political party and campaign finances. The OSCE/ODIHR NAM interlocutors expressed no major concerns regarding the legal framework that governs party and campaign finance and ability of the NAO to conduct its oversight efficiently.

Public service broadcasters are required to cover elections in accordance with the principles of equitability and objectivity and allocate free airtime to each contestant. The election coverage by private broadcasters is largely unregulated. Public funding is provided for media advertisement to the parties, coalitions and nomination committees that have registered a candidate. Media outlets that the OSCE/ODIHR NAM met with mentioned their plans to cover elections extensively, including through debates and talk shows. However, the reticence of some party leaders to engage in such debates in the past was noted.

The Electoral Code provides for citizen and international observers. Political parties, coalitions and nominating committees may register their agents and representatives. Civil society representatives that the OSCE/ODIHR NAM met with expressed concerns about new legal provisions as potentially limiting their ability to observe.

Complaints on election irregularities could be submitted to various levels of election commissions by voters, electoral contestants, and other electoral stakeholders. CEC decisions can be appealed to the Supreme Administrative Court (SAC). According to recent amendments, while considering appeals against the CEC's decisions, the SAC should pronounce on the merit of the case or return it back to the CEC with binding instructions. The SAC expressed concerns about potential additional workload for the court due to these amendments.

Most OSCE/ODIHR NAM interlocutors mentioned that they would welcome an OSCE/ODIHR election observation activity. Many viewed the OSCE/ODIHR observation activity as a means to promote confidence in the electoral process. In considering an observation activity, the OSCE/ODIHR NAM has taken into account the various findings outlined in this report and the concerns expressed by stakeholders. These include issues related to the implementation of the recently amended legal framework, potential issues in administering the election, including the machine voting, election dispute resolution and the role of the media.

Based on the findings of this report, the OSCE/ODIHR NAM recommends the deployment of a Limited Election Observation Mission (LEOM) to Bulgaria to assess the 2016 presidential election for its compliance with OSCE commitments, other international obligations, and domestic legislation. In addition to a core team of experts, the OSCE/ODIHR NAM recommends that 14 long-term observers be seconded by participating States. While the mission would visit a limited number of polling stations on election day, comprehensive and systematic observation of election day proceedings is not envisaged. In line with OSCE/ODIHR's standard methodology, the LEOM would include a media monitoring element. Given the number of concurrent election-related activities taking place across the OSCE region in 2016, the deployment of an LEOM to the 2016 presidential election in Bulgaria will be contingent upon availability of resources.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

According to the Constitution, the president is elected for a five-year term and the presidential election should be held not earlier than three months and not later than two months before the expiry of the term of office of the incumbent. The incumbent President Rosen Plevneliev stated he would not run in the upcoming election, despite being eligible.

Following the 2014 early parliamentary elections eight political parties entered the parliament. The center-right party Citizens for European Development of Bulgaria (GERB), led by Prime Minister Boyko Borisov, formed a coalition government with the Reformist Bloc and the Alternative for Bulgarian Revival. The government was supported by the Patriotic Front. The Bulgarian Socialist Party (BSP), the Movement for Rights and Freedoms (DPS), Bulgarian Democratic Centre, and the far-right *Ataka* constitute the opposition.

The ruling coalition initiated an electoral reform after the referendum held on 25 October 2015 to

The Alternative for Bulgarian Revival left the governing coalition in May 2016.

introduce electronic voting. The amendments were passed by the parliament on 28 April 2016, but were vetoed by the president. On 18 May, the parliament overpassed the veto and on 26 May the amendments came into force, some five months before anticipated election day.

At least one referendum is planned on the same day with the presidential election. Six questions will be on the ballot including the changing of the electoral system, reducing the number of the members of the parliament (MPs) from current 240 to 120, introducing of a compulsory voting and remote electronic voting (Internet voting). The president challenged the constitutionality of some of the questions with the Constitutional Court.

The OSCE/ODIHR has observed eight elections in Bulgaria since 1997, most recently in 2014, when the OSCE/ODIHR deployed a Limited Election Observation Mission (LEOM) for the early parliamentary elections. The LEOM concluded that the elections "were held against a backdrop of economic and political crisis and in a climate of distrust of voters in politics and politicians. The election environment is characterized by electoral and political fatigue, this being the third election in 18 months. Once again, accusations of vote-buying and selling, controlled voting and other election irregularities, from all sides, marred the campaign and affected public confidence in the integrity of the process".²

B. LEGISLATIVE FRAMEWORK AND ELECTORAL SYSTEM

The legal framework for presidential election includes the Constitution, the Electoral Code, the Law on Political Parties, and other legal acts, as well as decisions and instructions of the Central Election Commission (CEC).

The upcoming election will be conducted with a revised Electoral Code. The amendments include introduction of compulsory voting, transfer of most election related responsibilities from the Council of Ministers to the CEC and new rules for establishments of out-of-country polling stations.

A number of the OSCE/ODIHR NAM interlocutors expressed concerns about the adoption of significant changes close to the election and without an inclusive public consultation, contrary to good international practice.³ Many interlocutors noted controversy over some of the changes, especially on the criteria for establishment of the polling stations abroad. Opinions were expressed that the constitutionality of some of the amendments might be challenged in front of the Constitutional Court.⁴ At the time of the OSCE/ODIHR NAM, the Legal Affairs Committee of the parliament was considering another set of amendments to the Electoral Code, focusing on redrafting rules on establishing polling stations abroad.

The president and the vice-president are elected jointly through a nationwide majoritarian system. For the election to be valid at least 50 per cent of the registered voters have to participate. A candidate is considered elected if s/he is supported by at least half of the valid votes cast. If no candidate obtains the required number of votes, a second round is held one week later between the two candidates who obtained the most votes.

See previous OSCE/ODIHR election reports on Bulgaria.

Paragraph 5.8 of the 1990 OSCE Copenhagen Document states that the legislation will be adopted at the end of a public procedure. Section II.2.b of the 2002 Code of Good Practice in Electoral Matters of the European Commission for Democracy through Law (Venice Commission) states "the fundamental elements of electoral law, in particular the electoral system, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendments less than one year before an election".

The Constitutional Court may acts upon an initiative from at least one-fifth of members of the parliament, the president, the Council of Ministers, the Supreme Court of Cassation, the Supreme Administrative Court or the Prosecutor General.

C. ELECTION ADMINISTRATION

The election is administered by a three-level structure of election management bodies: the CEC, 31 District Election Commissions (DECs), and some 12,000 Precinct Election Commissions (PECs).

The CEC is a permanent body established for a five-year term. It comprises 20 members nominated by political parties and coalitions.⁵ The CEC chairperson, deputy chairpersons and the secretary are elected by the parliament, the remaining CEC members are appointed by the president based on party nominations. The CEC appoints DEC members, and DECs in turn appoint PECs. The same parties and coalitions that form the CEC, nominate members to DECs and PECs. DECs are composed of 13 or 17 members, depending on size of the district. The number of PEC members varies from 5 to 9, depending on the number of registered voters. The DECs are appointed not later than 50 days and PECs not later than 25 days before election day.

The CEC members expressed concerns that the new responsibilities transferred to it from the Council of Ministers are not matched by additional financial and human resources and there might be not enough time for the CEC to make all the relevant preparations. They also noted lack of legal and sub-legal framework, which would prescribe how exactly the CEC should implement its new responsibilities, including its interaction with central and local authorities.

The CEC informed the OSCE/ODIHR NAM that it plans a comprehensive voter awareness campaign on various aspects of the electoral process and an extensive training of DEC and PEC members, following previous OSCE/ODIHR recommendations. The CEC had still to adopt all the necessary bylaws, including for testing, auditing and certifying the machine voting envisaged in 500 polling stations. Many OSCE/ODIHR NAM interlocutors raised concerns about the ability of the CEC to implement its new responsibilities, and the upcoming elections are seen as a test for the CEC to administer the elections in an impartial and effective manner. Some mentioned the organization of tabulation of results as potentially problematic and highlighted the need for a comprehensive training of lower-level election commissions.

D. VOTER REGISTRATION

All citizens aged 18 years or older on election day have the right to vote, except those serving a prison sentence, regardless of the severity of the crime. The OSCE/ODIHR previously recommended that restrictions on voting rights for prisoners be reviewed so that any limitation is proportionate to the crime committed and clearly outlined in the law.

Voter registration is passive. Voter lists are extracted from the national population register maintained by the Civil Registration and Administration Services Department of the Ministry of Regional Development and Public Works (GRAO). The number of voters is estimated at 6.5 million. A voter can be added to a voter list on election day based on a permanent address or in a voter list abroad based on a residence address. If voter's residence address differs from the permanent one, s/he can apply to the respective municipality to update the address of registration not later than 14 days before election day.

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Eighteen members are nominated by parliamentary parties and coalitions in proportion to their representation in parliament. Additionally, parties and coalitions that have members in the European Parliament, but are not represented in the national parliament can nominate one CEC member each. Transitional provisions of the Electoral Code prescribe that for the period of 2014-2019 additional CEC members could be appointed, representing new parliamentary parties or parties in the European Parliament.

Preliminary voter lists should be posted for public scrutiny at the polling stations and on websites of municipalities at least 40 days before election day. A voter can file a complaint to municipal administration against any errors or omissions in the lists no later than seven days before election day. The decision of municipal administration can be appealed to the administrative court.

The May 2016 amendments to the Electoral Code prescribe that the voter who has not voted during two consecutive elections of the same type without a valid reason is taken out of the voter lists. Active registration is prescribed for those willing to be restored in the voter lists. It is not clear, however, how exactly and by which body these procedures are to be implemented. The CEC stated that it would adopt a regulation defining the responsibilities. Some OSCE/ODIHR interlocutors raised concerns about the accuracy of voter lists.

E. VOTING METHODS

The law provides for various voting methods including voting at special polling stations, use of absentee voting certificates, homebound voting and voting abroad. The CEC and DEC members, candidates and observers can vote at any polling station with an absentee voting certificate. Voters with disabilities have the right to request homebound voting. To vote in medical and specialised institutions, in detention facilities and on vessels, voters must be included into the special voter lists no later than two days before election day. In addition, students and voters with temporary disabilities are entitled to vote at polling stations of their choice, the PEC members and police officers may vote at the polling stations that they are assigned to serve at on election day.

The May 2016 amendments prescribe that establishing polling stations outside the diplomatic and consular representations is not permitted except in the European Union member states and in the cities outside of the European Union with over one million residents. In both cases at least 100 voters have to apply. Citizens should apply in-person or by post to a diplomatic mission, or electronically to the CEC at least 25 days before election day. Voters who apply for out-of-country voting are not included in the regular voter lists.

The law provides for paper and machine voting. During the presidential election machine voting will be conducted at 500 polling stations and the results will be official. In addition, an experimental machine vote count shall be conducted in accordance with the rules defined by the CEC. The amendments also provide for conducting a pilot of remote electronic voting (Internet voting) from 1 January 2018 and for transfer of all responsibilities related to machine and remote electronic voting, including respective research, public procurement, testing, audit and certification, to the CEC. The CEC and some OSCE/ODIHR NAM interlocutors expressed concerns about the CEC's capability to implement these procedures properly considering limited timeframe and resources available.

The OSCE/ODIHR previously recommended that consideration could be given to undertake a formal feasibility study before the selection and implementation of any new voting technologies (NVT); to undertake further pilots before a decision is made on whether to implement increased and binding usage of NVT; to outline testing, certification, and audit requirements well ahead of implementing NVT with results made publicly available so as to ensure transparency and public confidence.

⁶ Special polling stations are established at medical and specialised institutions, detention facilities and on vessels.

F. CANDIDATE REGISTRATION

Political parties, coalitions and nomination committees have the right to nominate candidates for the positions of a president and vice-president. Bulgarian citizens of at least 40 years old, who have resided in the country for at least 5 years before the election day, are eligible to stand. Parties and coalitions have to pay a deposit of BGN 2,500 and nomination committees of BGN 100. Candidates put forward by nomination committees have to collect support signatures of at least 2,500 voters. Despite previous OSCE/ODIHR recommendation, voters can sign in support of only one candidate. The collected signatures are checked by the CEC with assistance of GRAO. The candidates are registered by the CEC not later than 30 days before election day.

G. ELECTION CAMPAIGN

The official election campaign starts 30 days before election day. It is prohibited to display campaign materials outside this period. Each item of campaign material shall contain a statement that vote-buying and selling is a criminal offence. The law prescribes that the election campaign is conducted in Bulgarian language only. The OSCE/ODIHR has previously recommended that individuals who identify themselves as belonging to national minorities should be allowed to use their mother tongue in an election campaign.

The recent amendments introduce explicit prohibition to campaign for clergymen and to use coat of arms or flag of Bulgaria or of a foreign country, as well as religious symbols, during campaign. The amendments also give a definition of administrative resources and ban political parties to use such resources free of charge. 9

The OSCE/ODIHR NAM interlocutors did not expect the campaign to be vibrant and opined that key issues during the campaign would be migration crisis, debate over the scope of presidential powers, and ways to improve social welfare. They also raised concerns regarding alleged votebuying and cases of controlled voting, particularly among vulnerable groups of voters, such as minority groups, especially Roma.

H. CAMPAIGN FINANCE

Political parties represented in the parliament and those that obtained over one per cent of the valid votes in the last elections are entitled to state subsidies proportional to the number of votes received. ¹⁰ Candidates' campaigns could be financed from public funds and financial resources of the party/nomination committee, by candidates themselves and private donations.

Political parties, coalitions, and nomination committees that put forward candidates may also receive private donations that should not exceed BGN 10,000 per person annually. Anonymous donations and donations from legal entities, non-residents and religious institutions are forbidden. The Electoral Code sets a spending limit of BGN 2,000,000 per each party, coalition or nomination committee. Any expense over BGN 1,000 must be made by bank transfer.

The nomination committee should be composed of at least 21 voters with a permanent address within the territory of Bulgaria.

EUR 1,280 and EUR 51 respectively (EUR 1 is approximately BGN 1.95).

Administrative resources are defined as budget funding, premises, vehicles, aircraft and other vehicles, equipment and other movable and immovable properties - state or municipal property, provided by the administration, state and local authorities, state and municipal enterprises, as well as the work of administration officials.

Some BGN 30-40 million are allocated annually to these subsidies.

The National Audit Office (NAO) has the authority to oversee political party and campaign finances. Each entity nominating a candidate must open a campaign bank account upon the registration of the candidate. The details on the transactions at these accounts are made publicly available on the NAO website. Within 30 days after the election, contestants should submit to the NAO their final campaign expenditure reports. Within the same deadline the media service providers, the polling and advertising agencies, as well as the public relations agencies shall submit the information on services provided to the parties, coalitions and nomination committees. When the amount of a donation exceeds BGN 1,000, the NAO shall oversee the sources and level of income of a donor.

The recent amendments increased the fines for not disclosing the sources of donations. Some OSCE/ODIHR NAM interlocutors, including the NAO, opined that the sanctions are proportionate for political parties but are excessive for nominating committees that do not have proper party structures.

The OSCE/ODIHR NAM interlocutors expressed no major concerns regarding the legal framework that governs party and campaign finance and the ability of the NAO to efficiently oversee it.

I. MEDIA

The Electoral Code regulates the campaign coverage by the public service broadcasters, Bulgarian National Television (BNT) and Bulgarian National Radio (BNR). They are required to cover elections in accordance with the principles of equitability and objectivity and allocate free airtime to each contestant. The election coverage by private broadcasters is largely unregulated. The Electoral Code provides for public funding in the amount of BGN 40,000 for media advertisement to the parties, coalitions and nomination committees that have registered a candidate.

The recent amendments clarify that prices for election advertisement should not exceed the average market prices for commercial advertisements in the last six months before the start of the campaign. All broadcasters should separate paid content from editorial and news reporting and should clearly mark it as such.

Media outlets that the OSCE/ODIHR NAM met with mentioned their plans to cover elections extensively, including through organizing topical talk shows and debates between contestants and their representatives. However, the media representatives noted the reticence of some party leaders to engage in such debates in the past.

The oversight of broadcast media, including during the election campaign, is exercised by the Council for Electronic Media (CEM). The CEM informed the OSCE/ODIHR NAM that, as during the previous elections, it plans to monitor a number of TV and radio channels on their compliance with election related media regulations. The CEM highlighted that, despite the previous OSCE/ODIHR recommendation, it does not have a power to provide remedy and only forwards information on violations to the CEC that can decide whether to impose sanctions.

J. CITIZEN AND INTERNATIONAL ELECTION OBSERVATION

The Electoral Code provides for citizen and international observers. Political parties, coalitions and nominating committees may nominate their agents and representatives. The law contains detailed provisions on observers' rights including access to all stages of the electoral process and right to receive copies of the result protocols at polling stations.

The new legal provisions limited the range of civil society organizations that have a right to nominate citizen election observers to those "operating in the field of defending the political rights of the citizens". In addition, according to the amendments, nominations to register observers should contain observers' personal consents to be registered and an indication if the observer will observe in country or abroad.

Civil society representatives that the OSCE/ODIHR NAM met with expressed concern about a lack of legal definition of the term "political rights" and significant administrative burden related to new requirement to provide additional nomination documents. Several organizations mentioned that they intend to observe the upcoming election.

K. COMPLAINTS AND APPEALS

Complaints on election irregularities and information on possible violations ("signals") could be submitted to various levels of election commissions by voters, electoral contestants, and other electoral stakeholders. ¹¹ Appeals against decisions, actions and inaction by election commissions are submitted to the higher-level commission. CEC decisions can be appealed to the Supreme Administrative Court (SAC). Decisions on appeals must be made within three days.

According to recent amendments, the CEC has to consider complaints and "signals" against DECs and PECs abroad that are filed on election day within one hour from receiving those and prior to the end of voting. It is also stipulated that in its reasoning on appeals against the CEC's decisions, the SAC should pronounce on the merit of the case or return it back to the CEC with binding instructions. During the meeting with the OSCE/ODIHR NAM, the SAC expressed concerns about potential additional workload for the court due to these amendments and noted a mismatch between the deadlines indicated in the Electoral Code and the Civil Procedure Code.

IV. CONCLUSION AND RECOMMENDATION

Most OSCE/ODIHR NAM interlocutors mentioned that they would welcome an OSCE/ODIHR election observation activity. Many viewed the OSCE/ODIHR observation activity as a means to promote confidence in the electoral process. In considering an observation activity, the OSCE/ODIHR NAM has taken into account the various findings outlined in this report and the concerns expressed by stakeholders. These include issues related to the implementation of the recently amended legal framework, potential issues in administering the election, including the machine voting, election dispute resolution and the role of the media.

Based on the findings of this report, the OSCE/ODIHR NAM recommends the deployment of a Limited Election Observation Mission (LEOM) to Bulgaria to assess the 2016 presidential election for its compliance with OSCE commitments, other international obligations, and domestic legislation. In addition to a core team of experts, the OSCE/ODIHR NAM recommends that 14 long-term observers be seconded by participating States. While the mission would visit a limited number of polling stations on election day, comprehensive and systematic observation of election day proceedings is not envisaged. In line with OSCE/ODIHR's standard methodology, the EOM would include a media monitoring element. Given the number of concurrent election-related activities taking place across the OSCE region in 2016, the deployment of an LEOM to the 2016 presidential election in Bulgaria will be contingent upon availability of resources.

Individuals and legal entities can 'signal' potential irregularities to election commissions without claiming a violation of their own rights.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs

Yulian Yakimov, Head of International Humanitarian Organizations Department Konstantina Kostova, First Secretary, Human Rights Directorate

Legal Affairs Committee of National Assembly

Danail Kirilov, Chairperson Dimitar Lazarov, Member Lachezar Nikoforov, Member Peter Slavov, Member Radan Kanev, Member

Central Election Commission

Ivilina Aleksieva-Robinson, Chairperson Mariya Musorlieva, Deputy Chairperson Sevinch Solakova, Secretary Georgi Bahanov, Member Emanuil Hristov, Member Ivaylo Ivkov, Member Ivanka Grozeva, Member Kameliya Neykova, Member

Yordanka Gancheva. Member

Mariya Boykinova, Member

Metin Syuleyman, Member Rumen Tsachev, Member

Rumyana Stoeva (Siderova), Member

Tania Tzaneva, Member

Civil Registration and Administrative Services Department of the Ministry of the **Regional Development and Public Works**

Ivan Getov, Chief Director Ventsislav Hristov, Head of IT Department Nina Simeonova, Head of Methodology and Control Department

National Audit Office

Tsvetan Tsvetkov, Head Toshko Todorov, Deputy Head Ekaterina Percheva, Head of Specific Audits Directorate

Supreme Administrative Court

Georgi Kolev, Head Diyana Garbatova, Judge Mario Dimitrov, Judge

Council for Electronic Media

Maria Stoianova, Chairperson Betina Joteva, Member Rozita Elenova, Member Sofiya Vladimirova, Member

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Antoaneta Lozenska-Todorova, Director of Specialized Administration Department Dimitar Ganev, Senior Expert, International Affairs

Media

Aneta Milkova, Member of the Management Board, Bulgarian National Television Daniel Chipev, Director of Information Department, Bulgarian National Television Yuliana Toncheva, Head of International Relations and Programs, Bulgarian National Television Venelin Petkov, Director, News, Current Affairs and Sport Department, bTV Media Group Gospodin Yovchev, Director of the Legal Department, bTV Media Group

Political Parties 12

Rumen Petkov, Deputy Chair, ABV

Vesselka Vatcheva, Legal Officer, ABV

Deniza Slateva, Member of the Executive Bureau, International Secretary, Bulgarian Socialist Party

Philip Popov, MP, Bulgarian Socialist Party

Nayden Zelenogorski, MP, Reformist Bloc

Dimitar Delchev, MP, Reformist Bloc

Mustafa Karadayi, Chairperson, Movement for Rights and Freedoms

Stanislav Anastassov, Deputy Chairperson, Movement for Rights and Freedoms

Dzeyhan Ibryamov, MP, Movement for Rights and Freedoms

Tsvetan Tsvetanov, Vice-Chairperson, Political Party GERB

Djema Grozdanova, Chair of the Foreign Affairs Committee of the National Assembly, GERB

Sofiya Tsvetkova, Head of International Affairs, GERB

Civil Society

Kalin Slavov, Executive Director, Transparency International Bulgaria

Vanya Kashukeeva-Nusheva, Program Director, Transparency International Bulgaria

Iva Lazarova, Program Director, Institute for Public Environment Development

Desislava Hristova, Election Observer, Institute for Public Environment Development

Katya Koleva, Chair of the Board, Institute for Social Integration

Katia Mihailova, Media Expert, Civil Initiative for Free and Democratic Elections

Bozhidara Doncheva, Chair of Sofia branch, Federation of Independent Student Societies

Nadejda Gogolanova, Deputy Chairperson, Civil Initiative for Free and Democratic Elections (GISDI)

Ivo Indiov, Expert, Institute for Modern Politics

Doncho Pachikov, Deputy Chairperson, Bulgarian Association for Fair Elections and Civil Rights – Pleven

¹²