

# ELECTION ASSESSMENT MISSION

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# FINAL REPORT

European Parliament Elections  
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## LIST OF ABBREVIATIONS

AEGEE	Association des États Généraux des Étudiants de l'Europe	EU	European Union
AFCO	Committee on Constitutional Affairs	EUPP	EU Political Parties
AI	Artificial Intelligence	FI	Finland
ALDE	Alliance of Liberals and Democrats for Europe Party	FR	France
APPF	Authority for European Political Parties and European Political Foundations	FRA	EU Fundamental Rights Agency
AT	Austria	GDPR	General Data Protection Regulation
BE	Belgium	GR	Greece
BG	Bulgaria	GRECO	Group of States against Corruption
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women	HR	Croatia
CJEU	Court of Justice of the EU	HU	Hungary
CoE	Council of Europe	ICCPR	International Covenant on Civil and Political Rights
CoFE	Conference on the Future of Europe	ICERD	International Convention on the Elimination of All Forms of Racial Discrimination
CRPD	Convention on the Rights of Persons with Disabilities	IE	Ireland
CSO	Civil Society Organisation	IT	Italy
CY	Cyprus	LT	Lithuania
CZ	Czechia	LU	Luxembourg
DE	Germany	LV	Latvia
DK	Denmark	MEP	Member of the European Parliament
DSA	Digital Services Act	MS	Member State (of the EU)
DSC	Digital Services Coordinator	MT	Malta
EAM	Election Assessment Mission	NI	<i>Non-inscrits</i> (MEPs not affiliated to a political group in the EP)
EC	European Commission	NL	The Netherlands
ECHR	European Convention on Human Rights	ODIHR	OSCE Office for Democratic Institutions and Human Rights
ECtHR	European Court of Human Rights	OSCE	Organisation for Security and Cooperation in Europe
ECNE	European cooperation network on elections	PES	Party of European Socialists
ECR	European Conservatives and Reformists	PL	Poland
EDP	European Democratic Party	PT	Portugal
EE	Estonia	RO	Romania
EESC	European Economic and Social Committee	S&D	Socialists & Democrats Group
EGP	European Green Party	SE	Sweden
EMB	Election Management Body	SEEDS	Supporting Engagement in European Elections and Democratic Societies
EMFA	European Media Freedom Act	SI	Slovenia
EOM	Election Observation Mission	SK	Slovakia
EP	European Parliament	SLAPP	Strategic Lawsuits Against Public Participation
EPP	European People's Party	TEU	Treaty on European Union
EPRS	European Parliamentary Research Service	TFEU	Treaty on the Functioning of the EU
ERGA	European Regulators Group for Audio-visual Media Services	TTPA	Transparency and Targeting of Political Advertising (Regulation of the EU)
ES	Spain	UN	United Nations
		VLOPs	Very Large Online Platforms
		VLOSEs	Very Large Online Search Engines

## I. Executive Summary

Democracy was tested on various levels in the 10<sup>th</sup> European Parliament (EP) elections. A total of 355 million eligible voters across the 27 Member States (MS) elected 720 Members of the EP to represent the more than 425 million European citizens for the next five years. National political parties and candidates campaigned increasingly on shared European issues, but with little visibility of their European political families and their lead candidates in MS. Acts of violence against politicians in some MS were a pronounced sign of a growing societal polarisation, compounded by fears of a wider political rift and concerns about foreign interference.

European Union (EU) bodies have initiated and advanced electoral reforms, enhancing the broader rights framework. Yet, significant differences and restrictions on voting and candidacy rights remain, and important reforms aimed at increasing the cohesion of electoral rules and procedures across the Union have yet to be completed. The distribution of the 720 EP seats among MS for the next term meets EU Treaty requirements and reduced disparities in the weight of the vote between MS, but a permanent seat distribution method based on objective criteria remains to be developed by 2026. Suffrage rights were expanded in a few MS. Belgium and Germany joined Austria and Malta in lowering the voting age to 16 years, resulting in a total of two million eligible voters below the age of 18. Belgium also reduced the candidacy age to 18, while it remained 25 in Greece and Italy.

The elections were administered by the 27 national election authorities and enjoyed high public trust overall. The European cooperation network on elections (ECNE) has become a valuable forum for facilitating contacts between MS, mutual learning, and inspiring improvements. National representatives are increasingly coordinating and exchanging on good electoral practices. In the absence of a centralised European voter register, data exchange among MS on possible multiple entries remains a challenge, not least because data about dual citizenship is not available. Overall, the confidence in voter registration procedures for the European elections is high, with the notable exception of Hungary and to a lesser extent Poland.

The proportional representation system is unequally implemented across MS, and there are different thresholds in place to obtain a mandate. Six MS do not foresee a preferential vote. Cyprus recently abolished compulsory voting, which remains in laws in four MS. Although mostly not enforced, disproportionate fines envisaged include a temporary withdrawal of voting rights for repeated abstention (Belgium) and one-year imprisonment (Greece). Most EU countries offer voters advance and alternative voting options, such as voting from abroad, by post, or using a mobile ballot box, but access to alternative voting modalities and the number of options available still vary greatly. Four MS (Czechia, Ireland, Malta, Slovakia) do not offer any possibility of voting from abroad to their citizens.

Special measures foster electoral inclusion and representation among marginalised groups. Eleven countries have legislated quotas for women and some, like Italy, Spain and Portugal reinforce their effect through rank-order rules. With up to 25 million young people eligible to vote for the first time, youth candidates were not listed in electable positions in 15 MS,

highlighting remaining barriers. There is no unified approach to citizenship education across the EU and youth remains underrepresented in EU decision-making, with 50 as average age of MEPs in the newly elected EP. Some EU MS provide special measures to facilitate electoral participation of national minorities, however Roma, Europe's largest ethnic minority, have lost any direct political representation in the EP and measures to facilitate their political participation remain insufficient.

Participation of persons with disabilities in elections has improved and since 2019, Germany, France, Slovenia and Luxembourg have abolished restrictions on voting rights for persons under guardianship, to align with international obligations. Nevertheless, 13 MS do not grant voting rights, and even more restrict candidacy for persons under guardianship. Several countries improved their legislation to explicitly require polling station accessibility and ballot readability but accessibility remains an issue in most MS, especially in Cyprus and Malta.

Around 11 million mobile EU citizens (EU citizens living in another MS) were eligible to vote either in their country of residence or citizenship. Their turnout has been low in the past, and data about their participation remains opaque. Their registration in host countries is hampered by language barriers, a variety of registration deadlines, and administrative requirements. Mobile EU citizens could also stand as candidates in their country of residence, although procedures vary by MS. Comprehensive reforms to the EU directives to enhance the participation of mobile EU citizens are pending finalisation.

Around 18,400 candidates and 490 candidate lists stood on the ballots, competing under unequal conditions across the MS. Candidate registration and campaign periods ranged from several months to a few weeks, and independent individual candidacy is not possible in nine MS. Most national political parties have joined a European Political Party (EUPP), which nominated lead candidates (*Spitzenkandidaten*) for their campaigns, but followed different procedures in that regard.

A detailed campaign finance reporting framework overseen by an independent European authority enhances transparency and oversight of EUPPs, which are largely financed through public funding from the EU, with a steep increase to EUR 50 million available for grants in 2024. In contrast to the rules for monitoring donations, the authority does not have systematic access to activities-related expenditure information during the campaign.

The bulk of campaign expenditure takes place at the national level. National laws and regulations for political finance vary widely, with public funding, considered as a measure to enhance equality, not available in all MS. Ten MS do not have any campaign spending limits or bans on types of campaign expenditure in place. Requirements to reveal the sources and amounts of contributions, the purpose and amounts of expenses, and to make relevant reports timely and publicly available also differ. Sanctions for campaign finance violations do not appear effective, dissuasive and proportionate, and the oversight body for campaign finance is not seen as fully independent, impartial and transparent in several MS.

Online campaigning is covered by regulations in 16 MS, and the new European regulation on the transparency and targeting of political advertising will provide further guidance once fully in effect. The EU has adopted new legislation to regulate digital service providers, and the EC,

together with the new national Digital Services Coordinators (DSC), oversees enforcement. While most MS appointed these coordinators, twelve MS either had not designated the competent authority as DSC, or did not empower these authorities to perform the tasks required by the Act, or both. The EC took decisive action to hold these MS accountable by opening infringement procedures and has also begun investigating large online platforms, including deceptive political advertising and the discontinuation of a monitoring tool. A self-regulatory regime against disinformation has been set up to prevent, detect, take down or label disinformation online, accompanied by various fact checking initiatives and hybrid threat response mechanisms to protect against information manipulation and interference.

While the EU generally remains a safe space for free and independent media, there are concerns pertaining to cases of arrests, surveillance, political pressure, and violence against journalists, as well as media ownership concentration. With another recently adopted legislation the EU attempts to protect media independence, freedom and pluralism, as well as journalists and non-governmental organisations from abusive cross-border lawsuits intended to silence or intimidate them.

European institutions emphasise the important role of civil society in safeguarding and promoting human rights and take measures to protect civic space. Yet, multiple civic space infringements have been reported for a number of MS, with the most concerning trends in Hungary and Slovakia. Non-partisan election observers have been globally recognised as human rights defenders, and the EC has urged MS to enable both international and citizen observation. Yet, only 7 MS have legal frameworks for both, and 9 MS do not have any provisions for election observation. Election-Watch.EU has applied in all 27 MS as international and citizen election observers and received accreditation in 13 MS.

The EP adjusted European turnout figures on its results website from 51.05 to 50.76 percent in September. There is still scope to improve accessibility to essential election information at European level and in most MS. All but two MS (Germany and Malta) publish detailed election results per polling station, in polling stations or online, to enhance transparency and public confidence. Electoral dispute resolution in the European elections is predominantly a matter for responsible national institutions. At least half of the MS define narrowly what complaints can be filed before election day. Decisions on final election results in seven MS are not subject to review and appeal in courts, which is at odds with international standards.

The 21 recommendations of this EAM report focus on advancing electoral reforms across the EU. Key proposals include intensifying collaboration between European institutions and MS to address inconsistencies in national electoral regulations and harmonising voting eligibility criteria. Recommendations emphasise increasing accessibility for persons with disabilities, enhancing women's participation, and promoting the inclusion of national minorities, youth, and mobile EU citizens. Efforts should be made to harmonise voter and candidate registration, enhance the European character of campaigns, and improve campaign finance transparency and oversight. Strengthening media freedom and the implementation of the new social media regulations are also recommended, along with the need for more robust mechanisms to handle electoral complaints, ensure independent election observation, and publish detailed election results to promote transparency and public trust.

## II. Introduction

[Election-Watch.EU](#) conducted the second comprehensive civil society-based Election Assessment Mission (EAM) and assessed the strengths and weaknesses of the 2024 European elections across all Member States (MS), highlighting good practices and areas of progress while identifying key challenges that require attention. Election-Watch.EU presented a [Preliminary Statement](#) at a press conference on 10 June 2024 in Brussels, with an assessment across the six areas of equality, inclusion, transparency, accountability, integrity, and resilience, and the overall objective of enhancing the European elections.

The EAM comprised a total of 77 election experts and observers and ten like-minded citizen election observer organisations, following established election observation methodology and using international and regional human rights standards and commitments as references.<sup>1</sup> Ahead of the EAM, Election-Watch.EU conducted a Pre-Election Assessment Mission and issued a [Report](#) in February 2024. In 2019, Election-Watch.EU conducted its first EAM<sup>2</sup> the findings of which serve as a reference for this report.

Election-Watch.EU has been advocating for citizens' engagement to strengthen electoral integrity and innovation of democracy within the European Union (EU) since 2019 and has endorsed the [Declaration of Global Principles for International Observers](#) as well as for [Non-Partisan Election Observation and Monitoring by Citizen Organisations](#) and their respective Code of Conducts.

Throughout this report the EAM highlighted 19 good practice examples<sup>3</sup> in boxes to provide inspiration for positive change and enhance electoral processes within and outside the EU. Further, the EAM provides a total of 20 recommendations throughout the report and summarised in the Annex. These recommendations are offered to stimulate discussion and provide a reference for future electoral reforms within the EU and the 27 MS. Election-Watch.EU stands ready to assist and continues advocating for electoral reforms.

Election-Watch.EU would like to thank the representatives of EU institutions and European political parties as well as national election management bodies and other stakeholders for their co-operation, and all EAM interlocutors for taking the time to meet and for sharing their views. Further, Election-Watch.EU expresses its gratitude to all colleagues who contributed to and reviewed this report.<sup>4</sup>

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<sup>1</sup> See a full list of team members and associated CSOs in Annex V.

<sup>2</sup> [Final Report of the Election-Watch.EU EAM to the EP elections 23-26 May 2019](#); Election-Watch.EU presented its findings and recommendations to the [EP AFCO Committee](#) and the [European cooperation network on elections \(ECNE\)](#).

<sup>3</sup> The selection of good practice examples from various countries cited in this report is based on those highlighted to the EAM. These examples are provided for illustrative purposes and are not intended to diminish the value of many other positive practices that exist across the EU.

<sup>4</sup> EAM contributors and interlocutors are listed in the Annex.



### III. Background and Political Context

The European Parliament (EP) is the only directly elected body of the EU. The European elections are held under 27 differing national legal frameworks and electoral traditions, resulting in a variance of electoral procedures and contributing to their complexity.<sup>5</sup> Elections took place across the EU from Thursday 6 to Sunday 9 June 2024. Elections were held on Thursday (NL),<sup>6</sup> on Friday (IE), on Saturday (LV, MT, SK), and in all other MS on Sunday, except for CZ (Friday and Saturday) and IT (Saturday and Sunday) where voting took place on two days.

Since the last EP elections in 2019, the EU has been challenged by global and regional crises, in particular by Russia's war of aggression against Ukraine, the Covid-19 pandemic, migration, and the growing cost of living. In response to the rising global significance of cyber-security of electoral infrastructure, foreign disinformation campaigns and the use of Artificial Intelligence (AI), the EU has developed and passed several new pieces of legislation, which include measures to safeguard electoral integrity, mitigate attempts of foreign interference, and enhance electoral resilience both at European level and in the MS.

In the past, campaigns for the European elections have been commonly dominated by national rather than European issues, with the European dimension of the campaign increasing over time. Prior to these elections many EAM interlocutors expressed concerns that the influence of political actors in the EP that oppose European integration could increase. Subsequently, debates about the perpetuation of a *cordon sanitaire* between pro-European political forces on the one hand and more nationalistic, EU-critical forces on the other became a significant factor during the campaign.

Ahead of the 2024 European elections, the EP was composed of the following groups: The European People's Party (Christian Democrats) (EPP, 178 MEPs), The Progressive Alliance of Socialists and Democrats in the European Parliament (S&D, 141 MEPs), Renew Europe (Renew, 101 MEPs), European Green Party/European Free Alliance (EGP/EFA, 70 MEPs), The European Conservatives and Reformists (ECR, 67 MEPs), Identity and Democracy (ID, 60 MEPs), The Left group in the European Parliament (GUE/NGL, 37 MEPs), and non-attached members (NI, 49 MEPs).

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<sup>5</sup> The European Parliamentary Research Service (EPRS) has published a number of substantial briefing papers and infographics to this effect (see a compilation [here](#)).

<sup>6</sup> NL=The Netherlands; AT=Austria, BE=Belgium, BG=Bulgaria, CY=Cyprus, CZ=Czechia, DE=Germany, DK=Denmark, EE=Estonia, ES=Spain, FI=Finland, FR=France, GR=Greece, HR=Croatia, HU=Hungary, IE=Ireland, IT=Italy, LT=Lithuania, LU=Luxembourg, LV=Latvia, MT=Malta, PL=Poland, PT=Portugal, RO=Romania, SE=Sweden, SI=Slovenia, SK=Slovakia.

## IV. Legal Framework

### A. Overview and European Electoral Reforms

The election of MEPs is governed by European legislation that establishes general common rules for all MS. The legal basis at the EU level comprises primarily the [Treaty of the European Union](#) (TEU; Articles 10 and 14), the [Treaty on the Functioning of the European Union](#) (TFEU; Articles 20, 22, 223), and the [Electoral Act](#) of September 1976, as [amended](#) in 2002. Detailed provisions are specified in various directives, regulations, and secondary legislation. For example, [Council Directive 93/109/EC](#), as amended in 2012, outlines the voting rights of EU citizens residing in a MS other than their own (mobile EU citizens). Additionally, [Regulation \(EU, Euratom\) 1141/2014](#), as last amended in 2019, provides the framework for European political parties and foundations.

Several landmark legislative acts were passed ahead of these elections, enhancing the broader rights and safeguards framework. The Digital Services Act ([DSA](#)), effective since November 2022, was directly applicable throughout the EU from February 2024. In April 2024, a new Regulation on the transparency and targeting of political advertising ([TTPA](#)) entered into force. While most of its provisions will take effect only in October 2025, some limited elements were applicable already during these elections. Recent reforms also included the adoption of three legislative acts in the field of information and media regulation - the [European Media Freedom Act](#), the Directive protecting persons who engage in public participation from manifestly unfounded or abusive court proceedings ([Anti-SLAPP Directive](#)), and the [Artificial Intelligence Act](#). While they entered into force in May 2024, they did not apply to the 2024 elections in line with the respective staggered future date application or transposition requirements.

The above reforms notwithstanding, the core EU-level legal framework for the 2024 elections has remained the same as for the 2019 elections. Despite cross-institutional efforts, several longstanding and newer reforms aimed at increasing the cohesion of electoral rules and procedures across the Union were not completed. The last electoral reform adopted through the [European Council Decision 2018/994](#) amending the Electoral Act has not yet entered into force due to a pending approval by one MS (ES). The Decision envisages additional common rules for the EP elections, including a threshold between 2 and 5 per cent for MS with more than 35 seats, provisions on the possibility of different voting methods, an obligation for MS to penalise double voting by national laws, and a three-week candidate submission deadline. Reforms to the rules on the financing of European political parties and on the participation by mobile EU citizens initiated by the EC as part of its December 2020 [European Democracy Action Plan](#) progressed to varied degrees, but remained pending.

The latest May 2022 ambitious [proposal](#) by the EP for a Regulation to further reform the Electoral Act has been subject to several working group and policy debates in the Council, including under different EU presidencies.<sup>7</sup> However, considerable divergences remain among MS on a number of elements, in particular on the EU-wide constituency and transnational lists, the lead candidate (*Spitzenkandidaten*) process, the establishment of a single European

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<sup>7</sup> See the Spanish Presidency [discussion paper](#) for the 15 November 2023 policy debate in the General Affairs Council.

voter register, lowering of voting age to 16 years, gender equality measures, and the obligation for all MS to provide postal voting.<sup>8</sup> Several EU-level EAM interlocutors expressed hope that the pending reforms would see renewed commitment by the incoming legislators and MS representatives for their completion ahead of the next elections.

The EU-level rules for the conduct of European elections are supplemented by more detailed provisions within the national legal frameworks in each MS. These have been [assessed](#) in the past as providing a generally robust foundation for conducting democratic elections, albeit with room for improvement in various areas in most MS. Since the 2019 elections, the legal framework has been revised in the majority of MS. While in many cases the changes addressed broader aspects of the electoral process, several MS (CY, EE, IE, LV, PT) introduced adjustments related specifically to the European elections. Changes aimed at widening of suffrage rights (BE, DE, IE, LU, SI), improving safeguards and access to alternative voting methods (AT, BG, EE, FI, FR, GR, PT), streamlining and centralising voter registration (AT, EE, IT, LV, PL, PT), and enhancing procedures for voting, counting and tabulation (AT, BG, CZ, ES, NL, SK) were among the largest groups of changes introduced by MS.

***Lithuania - Consolidation of election legislation into a single Electoral Code to improve coherence, accessibility, and to close gaps in regulation***

*The conduct of these elections was regulated by the new Electoral Code, which was adopted in June 2022 consolidating the provisions on all types of elections, political party campaign financing, and the work of the election management body (EMB). Subsequently, the Code was further amended in 2023 and in 2024. This codification followed a long period of preparatory work, with earlier drafts presented in 2012 and 2016, and over three years of development by a parliamentary working group. The stated purpose of the codification was to review and harmonise provisions in different laws, eliminate inconsistencies, and fill existing gaps.*

*Overall, such codification is to be assessed positively as it typically helps ensure legal certainty and coherence, and increases the accessibility and transparency of legal regulations. It is also notable that the process leading to the adoption of the Electoral Code was [inclusive](#), providing opportunities for meaningful public debate and consultations with the relevant institutions and stakeholders. Furthermore, its adoption as a constitutional law, by near unanimity, revealed a strong political consensus among different political forces, creating the basis for its greater stability.*

***Recommendation: European institutions and Member States need to intensify their collaborative efforts to advance the pending electoral reforms. It is essential to address past recommendations and persistent issues, including the lack of uniformity in national electoral regulations and the differing timelines for key electoral processes, which adversely impact the equality of rights and opportunities.***

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<sup>8</sup> See the results of the [Swedish presidency survey](#). Consult also EPRS: [European elections 2024: Rules of a pan-European democratic event](#), February 2024.

## B. Follow-Up to Recommendations

In its [2019 report](#), Election-Watch.EU made 16 recommendations addressed to both EU and MS institutions and stakeholders.

At EU level, several reforms initiated and concluded, as described above, tackled issues at the core of several Election-Watch.EU recommendations. EU institutions have kept electoral reforms on their agenda, hosting expert discussions and policy debates, as per recommendation 1 of the 2019 report. While these reforms have not yet been completed, these efforts attested to the commitment to continue to: search for appropriate solutions for the lead candidate principle (3), adopt an objective and permanent method for the EP seat allocation (4), and harmonise suffrage rights (5) and alternative voting opportunities (9). Among the more tangible achievements were the steps at the EU level to involve citizens and the civil society in reforms (2), facilitate pan-European campaigns by European political parties (10), strengthen oversight of their finances (13), ensure better regulation and transparency of online platforms (14), and tackle disinformation (15). In contrast, more consistent efforts are needed to effectively elicit and prevent possible multiple registrations and voting (7) and to develop more consolidated policies and approaches to civic education (8).

At the MS level particular challenges were noted in the implementation of recommendations encouraging sustained efforts in electoral reforms (1), inclusive consultative processes in their development (2), improved campaign finance regulation, including spending limits (11), reporting and transparency (12), and oversight of campaigns in social media (14), as well as widened opportunities for election observation (16). In contrast, recommendations calling for improved inclusion and accessibility (6), coordination on voter data (7), and enhanced civic education (8) were assessed more positively, with tangible efforts noted in the majority of observations.

## V. Electoral System

MEPs are elected for a five-year term by direct universal suffrage through a free and secret ballot. In line with the EU law, MS use a proportional representation list-based or a single transferable vote (IE, MT) system to translate votes cast into mandates. There is, however, considerable variation in how this electoral system is implemented, resulting in varied chances of being elected by contestants across the Union.

The number of votes needed to gain a mandate varies across the MS. This depends on whether a single or multiple constituencies are established, as in the case of four MS (BE, IE, IT, PL),<sup>9</sup> and on the electoral threshold imposed, which ranges from none in 13 MS to up to five per cent in others.<sup>10</sup> The majority of MS offer voters an opportunity to alter the sequence of candidates on the lists through preferential voting, while six MS (DE, ES, FR, HU, PT, RO) use

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<sup>9</sup> In line with international good practice, IE has legal provisions in place for periodic review of the three constituencies in EP elections to reflect population changes and requirements of "reasonable equality of representation" to ensure the equality of the weight of the vote. IE [reviewed](#) EP constituency size and boundaries in 2023.

<sup>10</sup> See EPRS: [2024 European elections: National rules](#). At a Glance, April 2024.

closed candidate lists where this is not possible. To allocate the EP seats that an MS is entitled to among the winning national contestants, the majority of MS use a method that slightly favours larger parties (d'Hondt), while ten MS use methods that distribute seats more proportionally to the number of votes obtained.<sup>11</sup>

The [decision](#) on the number of seats in the EP to be filled in the 2024 elections and on their distribution among MS was taken by the European Council in September 2023, based on (but somewhat departing from) the EP proposal and with its approval. The total number of seats was increased from post-Brexit 705 to 720, with additional seats allocated to 12 slightly under-represented MS.<sup>12</sup> The allocation reflected changes in national population numbers and met the EU Treaty requirements, including compliance with the *degressive proportionality principle*.<sup>13</sup> However, as in the past, the decision making process involved political negotiation, as a permanent seat distribution method based on clear and objective criteria is still due to be proposed by 2026. [Research](#) for AFCO underscored that, contrary to international good practice, the current approach to seat distribution results in the highest inequality of voting power between constituencies (i.e. MS) of any democratic parliament in the world. Although the disparities in the weight of votes between MS have been reduced for most in this term compared to the previous term, significant vote-to-mandate inequalities persist and have increased further for the most populous MS.<sup>14</sup>

***Recommendation: Sustained efforts are needed to identify a permanent method for the distribution of EP seats among Member States. In line with international good practice, the distribution should be based on clear, transparent, and objective criteria and ensure transnational equality of the weight of the vote, while reconciling with EU Treaty requirements.***

Compulsory voting remains in place in four MS (BE, BG, GR, LU).<sup>15</sup> Although mostly not enforced, legally envisaged fines for abstention vary in severity from fines to a temporary withdrawal of voting rights for repeated failure to vote (BE) and one-year imprisonment (GR), raising questions of proportionality of the envisaged measures.

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<sup>11</sup> The Hare/Niemeyer and Sainte-Laguë/Schepers methods lead to somewhat more proportional results than the d'Hondt formula. See EPRS: [Understanding the d'Hondt method: Allocation of parliamentary seats and leadership positions](#). Briefing, July 2024.

<sup>12</sup> Two extra seats were allocated to FR, ES and NL and one additional seat was attributed to AT, BE, DK, FI, IE, LV, PL, SI, and SK. The remaining seats remain in reserve, including for possible EU enlargements and/or transnational lists.

<sup>13</sup> TEU Article 14(2) provides for a maximum of 751 MEPs, not less than 6 and not more than 96 seats to any MS. Degressive proportionality grants smaller states greater representation than they would have been entitled to under a purely proportional method. See [A Mathematical Formula for Determining the EP Composition](#), Briefing, February 2024.

<sup>14</sup> Based on current population figures, the degree of underrepresentation increased in DE, ES, FR, IT, and PL.

<sup>15</sup> As in GR and LU, exceptions are often made for persons over a certain age, voters abroad, or hospitalized citizens. In BG, compulsory voting is not enforced; the Constitutional Court abolished the penalty in 2017 but not the compulsory voting provision as such. [The Organization for Security and Co-operation in Europe's \(OSCE\) Office for Democratic Institutions and Human Rights \(ODIHR\)](#) has previously pointed out that compulsory voting is contrary to international good practice, which foresees a right to abstain.

### **Cyprus - Shift towards voluntary electoral participation**

*Voting in all types of elections has previously been compulsory in Cyprus. [Penalties](#) for non-registration to vote and abstention envisaged in the law ranged from fines to a prison sentence of up to six months. However, these provisions have been inactive for many years, as the number of non-voters continued to grow, and it has become increasingly difficult for the state to enforce them. In a recognition of voting as a right rather than an obligation, Cypriot authorities amended legal provisions in 2017 for national and municipal elections and in [2023](#) for European elections. The amendments changed the requirement from stating that a voter 'must' vote to 'may' vote and repealed related sanctions. Compulsory registration for European elections was also repealed in 2023, while all sanctions related to non-registration were repealed in 2017.*

## A. Advance and Alternative Voting Methods

The EU law leaves it to MS to decide on the use of different voting methods and their scope. At the same time, amendments pending adoption or finalisation, recommendations by EU institutions, as well as emerging international good practice increasingly draw attention to the positive effect that varied voting methods may have on facilitating participation.<sup>16</sup>

Positively, most MS accommodate various voter groups by providing alternative voting methods to the in-person voting using paper ballots at regular polling stations on election day. Furthermore, some MS have expanded the availability of such alternative voting options since the last European elections and continued to improve applicable procedures and safeguards.<sup>17</sup> Overall, 12 MS offer the option to vote in advance of election day, and 17 MS provide postal voting (in-country and/or from abroad, or with limitations to certain groups), thus broadening participation opportunities. The possibility to vote using a mobile ballot box (in at least 15 MS) and in special polling stations, such as in hospitals, long-term care institutions, prisons, and pre-trial detention facilities (in at least 13 MS), also enhances electoral inclusion. In addition, EMBs in a few countries use electronic voting machines (BE, BG, FR<sup>18</sup>) and provide the option for Internet voting (EE). While widening participation opportunities, proxy voting offered in six MS, although with considerable variations in scope of use, is not in line with international standards for ensuring the equality and the secrecy of the vote.<sup>19</sup>

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<sup>16</sup> For instance, in its [Report on Out-of-Country Voting](#), the European Commission for Democracy through Law (Venice Commission) of the Council of Europe (CoE) recommended that states adopt a positive approach to the right to vote of citizens living abroad. Similarly, [Resolution 1591 \(2007\) on distance voting](#) by the CoE Parliamentary Assembly stresses that the right to vote is an essential freedom in every democratic system and invites member states to facilitate various forms of distance voting. See also [Resolution 1897\(2012\) on Ensuring Greater Democracy in Elections](#) by the latter.

<sup>17</sup> PT permitted mobile and early voting in these elections both in-country and abroad and extended mobile early voting to all voters. Through a number of changes, BG expanded the optional use of electronic voting, while continuing to review applicable certification and integrity requirements. EE introduced additional advance voting days, continued to review risk mitigation mechanisms and technological features of Internet voting, enshrined all technical regulations on the latter in the law, and the possibility of mobile phone voting is pending adoption. AT extended the postal voting period and introduced a QR-code for postal ballot tracking. In FR, postal voting was granted to voters in custody and in detention.

<sup>18</sup> Used only in a minority of polling stations in approximately 60 municipalities that purchased respective equipment before the 2008 moratorium on its wider use.

<sup>19</sup> Offered in BE, ES, FR, NL, PL, SE, with qualifying requirements ranging from being more restricted ES (persons with disabilities or illness), PL (persons with disabilities and age 60+), SE (disability, illness, age, detention) to more liberal: BE ("if you cannot go", "absence"), FR (absence), NL. Paragraphs 7.3 and 7.4 of the 1990 OSCE Copenhagen Document state

Most MS also facilitate voting from abroad, typically at embassies and consulates and/or by post. Various qualifying requirements are applicable, including related to residence and the duration of stay abroad. Among the recent changes, BG removed the limit on the number of polling stations that could be opened abroad, and ES and GR simplified the access for citizens abroad to voting by removing prior registration and residence and taxation-related requirements, respectively.<sup>20</sup> In PL, discussions are ongoing regarding the possibility of extending postal voting, currently reserved for persons with disabilities, to all voters abroad; the case is currently pending before the Constitutional Tribunal. In contrast, there are no provisions for voting from abroad in European elections for citizens of four MS (CZ, IE (except military and diplomatic staff), MT, and SK).

The use of alternative voting methods appears to be mostly non-controversial and well-accepted, with a growing stakeholder demand for wider availability and access, especially to vote from abroad by post and/or at embassies (CY, HU, PL, PT). Voting using a mobile ballot box has been a subject of limited concerns in a few MS, including regarding compliance with integrity and secrecy measures (AT, BG, CZ, LT), availability for all types of impairments (PT), and the ease of application procedures.

#### **Greece - Introduction of postal voting**

*Shortly before the 2024 EP elections, Greece enacted Law 5053/2024, allowing citizens both in-country and abroad to vote by post. This step [aimed](#) to facilitate voting for those with limited access to polling stations, including the elderly, persons with disabilities, seasonal workers, as well as military personnel. Postal voting was the [only option](#) for citizens outside Greece as no polling stations abroad were established. Voters needed to register on a dedicated [online platform](#), and 202,515 out of 9,796,330 registered voters (2 per cent) did so. About 75 per cent of registrations came from within Greece, and the rest from abroad, with over 80 per cent from Europe. The Ministry of Interior sent out postal vote sets, including return tamper-evident envelopes, ballots, candidate lists, instructions, and a declaration form, and postal votes had to be returned to Greece before election day to be included in the count.*

*Authorities [assessed](#) the first experience with postal voting as overall successful despite limited participation and some procedural issues. Of those registered, only 152,216 cast their postal ballots, and 20,000 votes were [declared](#) invalid due to omissions like missing voter declarations or enclosure of original ID documents together with ballots, leading to breaches of secrecy.*

Overall, the remaining considerable disparities in voter access to alternative voting options continue to raise questions of equality of opportunity in the exercise of the right to vote across the EU.

**Recommendation: Reforms of electoral legislation at EU and Member State levels should continue to prioritise the widening and more uniform availability of advance and alternative voting methods to Union citizens.**

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that the participating States will “guarantee universal and equal suffrage to adult citizens” and will “ensure that votes are cast by secret ballot or by equivalent free voting procedure...” See also Article 25 of the ICCPR; General Comment to Article 25, paragraphs 20-22, and ECHR, Protocol 1 of 1952, Article 3 for applicable standards pertaining to the equality and secrecy of the vote.

<sup>20</sup> See announcements related to amended registration requirements in ES and GR.

## VI. Suffrage Rights

### A. Right to Vote

Aside from the general EU-wide requirements of universal suffrage and equal treatment between nationals and non-nationals, MS are free to determine the rules on the eligibility to vote. This results in varied approaches to enfranchisement and uneven entitlement to vote across the EU. The minimum voting age is 18 years in most of the MS, 17 in GR, and has been set at 16 in only 4 MS, including BE and DE, which recently followed AT and MT in reducing it for EP elections.<sup>21</sup> Some MS extend the right to vote to other categories of citizens, including non-EU citizens.<sup>22</sup>

Equality of passive suffrage is further affected by varied approaches to limitations on the right to vote. Several MS restrict the right to vote of persons with a criminal conviction and/or deny it to prisoners based on varied criteria, including the duration of the conviction or explicit court orders to remove political rights.<sup>23</sup> In LU and RO, voting rights are not automatically reinstated upon release from prison. The European Court of Human Rights (ECtHR) and the Court of Justice of the European Union (CJEU) have ruled that the disenfranchisement based on criminal conviction may be justified when proportional to the gravity of the offense committed.<sup>24</sup> EE, LV, and SI do not grant the right to vote to persons with undetermined citizenship, non-citizens, and "erased persons", respectively.<sup>25</sup>

Furthermore, although the EU and all MS have ratified the Convention on the Rights of Persons with Disabilities (CRPD), eight MS grant limited voting rights and four MS - no voting rights to persons with intellectual and psychosocial disabilities under guardianship and/or whose legal capacity was restricted or revoked, including based on an individualised court assessment.<sup>26</sup> At the same time, it is encouraging that the remaining 15 MS uphold the unrestricted right to vote for individuals with disabilities, with DE, FR, LU and SI having recently repelled guardianship-related restrictions.

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<sup>21</sup> HU grants the right to vote at 16 to married individuals. Such distinction based on marital status is at odds with international standards. See [OSCE/ODIHR EOM Final Report on 2022 Parliamentary Elections and Referendum](#).

<sup>22</sup> FR and NL grant the right to vote to citizens in overseas territories. In PT, some Brazilian citizens holding the legal status of equality of rights are granted suffrage rights. In CY, recent changes facilitate voting by Turkish Cypriots.

<sup>23</sup> Voting rights of prisoners are restricted in 16 MS: AT, BE, BG, DE, EE, ES, FR, GR, HU, IT, LU, MT, NL, PL, PT, and RO.

<sup>24</sup> ECtHR Factsheet: [Prisoners' Right to Vote](#), and ERPS: [Prisoners' Voting Rights in European Parliament Elections](#), Briefing, September 2023. See also the 2015 CJEU [Delvigne v Commune de Lesparre Médoc and Préfet de la Gironde](#) and the 2022 ECtHR [Kalda v. Estonia \(No. 2\)](#) rulings. Blanket restrictions are applied in BG, EE, HU, and MT.

<sup>25</sup> The OSCE/ODIHR questioned the restrictions in EE and LV in its 2009 [Report](#) and suggested granting voting rights in EP elections to long-term EU residents without the citizenship of any EU MS. In its 2012 [Kurić and others vs. Slovenia](#) judgement, the ECtHR found that SI has violated the rights of people that it had erased from the permanent register of residents in 1992. The status of about half of the "erased persons" remains unresolved.

<sup>26</sup> BE, CZ, DK, HU, LT, MT, PT, RO and BG, CY, EE, PL, respectively. The removal of voting rights based on individualized court decisions in connection with legal incapacity as contrary to the objectives of the CRPD, which calls for the elimination of all restrictions based on disability. See also [Inclusion Indicators 2023](#) by Inclusion Europe.



***Belgium - Creating equal and just conditions for participation following the reduction of the voting age***

*The welcome reduction of the voting age for European elections to 16 years in May 2023 was accompanied by ongoing reviews by electoral and judicial authorities. Initially, the amended law required voters aged 16 and 17 to submit requests to their municipalities to vote, unlike other voters who are automatically registered. Positively, in July 2023, the Belgian Constitutional Court [ruled](#) this additional registration requirement unconstitutional and discriminatory, leading to its abolishment. Further debate arose regarding the initial exemption from the obligation to vote for voters under 18. In March 2024, the Constitutional Court, in its [second ruling](#) on the issue, suspended this provision, declaring the exception for this age group unjustified. Thus, equal conditions were established for all age groups to participate in the European elections. At the same time, some confusion was noted in connection with a different minimum age requirement for national elections, 18 years, as they were held in Belgium on the same day.*

## B. Right to Stand

The few common European requirements for candidacy include citizenship of a MS, standing as a candidate in one MS only, and compliance with listed incompatibilities.<sup>27</sup> The required age for candidacy varies across the EU, with the right to stand granted at 18 years in many MS, including BE that lowered the minimum age in 2021. Further nine MS allow candidacy at 21 years (BG, CY, CZ, EE, IE, LT, LV, PL, SK), 1 (RO) at 23, and two (GR and IT) at 25. Various other conditions are applied. This includes restrictions imposed in many MS based on criminal conviction or imprisonment, either linked specifically to candidacy or stemming from a restriction on the right to vote as the basic qualifying criterion for candidacy.<sup>28</sup> Several MS (CZ, EE, PL) apply residence-related requirements for candidates, especially for resident citizens of other EU MS.<sup>29</sup> Seventeen MS impose limitations based on psychosocial or intellectual disabilities and/or legal capacity.<sup>30</sup>

While the EP elections are mostly contested by political parties, 18 MS have provisions in place for some form of individual (independent) candidacy. In seven MS, candidates can stand as single, unaffiliated individuals and in another nine MS, independent, politically unaffiliated candidates need to join others to form candidate lists;<sup>31</sup> voter nomination or support signature requirements typically apply. Several MS (CZ, ES, FR, LV, PT) also leave the option to political parties to include independent, unaffiliated candidates on their lists.

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<sup>27</sup> Article 7 of the 1976 Electoral Act states that the office of an MEP is incompatible with that of a member of national governments and parliaments, of the EC, and of EU staff positions, among others. Many MS provide for further incompatibilities, including relating to positions in public service, military service, the police, and the judiciary.

<sup>28</sup> AT, BE, BG, CY, DE, DK, EE, ES, GR, HU, IE, LT, LU, LV, MT, NL, PL, RO, SK.

<sup>29</sup> For instance, permanent residence is required in EE, 45 days of registered residence in CZ, or five years of permanent residence in PL for EU citizens standing as candidates. Paragraph 15 of the 1996 UN Human Rights Committee's (HRC) [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".

<sup>30</sup> BE, BG, CY, CZ, EE, FI, FR, GR, HU, IE, LT, LV, MT, PL, PT, RO, SK.

<sup>31</sup> BG, CY, EE, FI, IE, MT, RO and BE, ES, FR, HR, LU, NL, PL, PT, SI respectively.

As with voting rights, varied approaches to candidacy affect the equality of opportunities and conditions for exercising passive suffrage by Union citizens. Limitations on the right to stand based on disability, length of residence, conviction, or imprisonment, when not proportional to the gravity of the offence committed, are contrary to international standards and good practice.

***Recommendation: To promote equality in voting and candidacy rights across the EU and reduce disparities in national suffrage approaches, renewed efforts should focus on establishing additional common European minimum eligibility criteria for voters and candidates. These criteria should aim to harmonise requirements for the minimum voting age, residency, independent candidacy, and permissible restrictions on suffrage rights.***

## VII. Participation in Elections

### A. Participation of Persons with Disabilities

CRPD, Article 29 provides for measures that state parties must take to ensure the equality of political rights, extending to accessible voting procedures, the protection of the right to a secret ballot, the facilitation of assistance during voting, and support for persons with disabilities to stand for elections.<sup>32</sup> According to the [European Economic and Social Committee](#) (EESC), around 400,000 persons with disabilities were deprived of their right to vote in the 2019 EP elections due to a failure to comply with the obligations outlined in the CRPD.<sup>33</sup> According to EAM interlocutors, persons in institutions such as care homes for the elderly are particularly vulnerable in their independent exercise and secrecy of the vote.

Four MS - BE, CY, FR, and MT - do not provide any alternative in-person voting options for persons with disabilities who cannot physically visit polling stations on election day. In addition, some persons with disabilities may need or prefer assistance from another person when voting. The CRPD stipulates that individuals should have the free choice of who to assist them. However, in some countries like GR and MT only election officials can assist persons with disabilities, something that may effectively discourage voters from participating in the elections and raises questions regarding secrecy.

To improve inclusion and the ability of persons with disabilities to cast their vote independently. The EC included a focus on accessibility in its December 2023 [Recommendation on inclusive and resilient elections](#) and published a [guide](#) providing examples of good practices to enhance accessibility in European elections. To support the voting rights of persons with disabilities, several MS have implemented alternative measures such as postal voting or mobile ballot boxes and the option to change and choose specific polling stations, which serve as reasonable accommodations to facilitate voting.<sup>34</sup>

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<sup>32</sup> See EPRS: [Political participation of people with disabilities in the EU](#), April 2024; European Disability Forum (EDF): [6<sup>th</sup> Human Rights Report on Political Participation of Persons with Disabilities, 2022](#); Rabitsch/Moledo/Lidauer: [Inclusive elections? The case of persons with disabilities in the European Union, in](#): South African Journal of International Affairs, Vol. 30, 2023; European Union Fundamental Rights Agency (FRA): [The right to political participation for persons with disabilities: human rights indicators](#), 2014.

<sup>33</sup> EESC: [The real right of persons with disabilities to vote in European Parliament elections](#), 2019.

<sup>34</sup> See EDF (2022) for further detail.

In GR, a recent legislation introduced postal voting for persons with disabilities and for political messages, interviews, and speeches being broadcast with sign language and subtitles. Also in IE, the new 2022 electoral code extends the eligibility for postal voting to persons with mental illness or disability. In EE, the EMB implemented support for the voice over (Apple macOS screen reader) for its Internet voting application in cooperation with visually impaired persons advocacy groups. AT also enhanced the accessibility of elections for persons with disabilities as barrier-free access to polling stations is now mandatory by law, ensuring that individuals with disabilities can participate in the electoral process without hindrance.

The availability of figures on accessible polling stations and estimates on voters with disabilities varies among the MS. For instance, HR relies on official numbers provided by the Ombudsman for Persons with Disabilities. Countries such as FI and DE have conducted detailed infrastructure accessibility audits and provide comprehensive data on the accessibility of their polling stations; conversely, other MS, including AT, BE, CY, HU, IE and SK, do not have extensive data available, and lack specific figures for planning purposes.

### Lithuania – ballot papers including European political party names and symbols



The conduct of voting varies across the 27 MS with varying impact on accessibility and inclusion of persons with disabilities, elderly, youth or illiterate voters. In most MS, voters express their will by marking their ballot with an “X”, a tick, or a circle (AT, BE, BG, CY, DE, DK, HR, HU, IT, LT, LU, NL) or by using a stamp (RO). In IT, voters who want to cast a preferential vote have to handwrite the name of the candidate on the ballot. Similarly, in EE, LT, FI voters also must handwrite the number of their party or candidate in a rectangle or circle. In IE and MT, both using single transferable vote system, the voter has the option of giving numerical preferences to as many or as few candidates as liked. In seven MS (CZ, ES, FR, GR, LV, SE, SK) there is one ballot paper for each political party and voters select and cast the ballot paper of the party they want to vote for. In SE and PT, however, unlike in most countries, the polling station officials and not the voter place the ballot into the

ballot box, whereas for example in IT and BE the voters must be the last ones who touch the ballot.

Accessibility does not stop at polling stations. EMBs make election-related materials and information available in braille, easy-to-read, and large text formats. BE includes sign language and subtitles in election information videos while the EMB in CZ provides a QR code to accessible formats. In FR, a new law obliges all candidates and parties to publish their electoral programmes in an easy-to-read format in close consultation with disabled persons

organisations, the Ministry of Interior and the EMB. In LU, besides providing free transport to the polling station for persons with disabilities, for the first time, the ballot paper featured the logos of political parties to make it more readable and easier to fill out for people with sensory or cognitive impairments. Additionally, adjustments have been made to the appearance of the ballot paper (e.g., adapted font, added contrasts, etc.) to make it accessible to visually impaired voters.

However, the extent and quality of these assistive provisions differ across MS, and while some including DK, ES, FI, FR, LT, LU, MT, NL, PL and PT are more forthcoming, all MS can learn from others' good practices. There is still room for improvement in the provision of accessible election-related information, in particular when provided by institutions that receive public funding, including EMBs, political parties, and the public media.

#### **France, Greece and Spain – Broadcasts with subtitles and sign language interpretation**

*Various MS have legal requirements to ensure media accessibility, particularly for audiovisual media. The EU [Audiovisual Media Services Directive](#) stipulates that both public and commercial TV channels make their services accessible to persons with disabilities. Despite the 2018 revision of this directive, and the fact that service providers report on their accessibility measures to national regulatory authorities regularly, implementation varies across the EU. In France, during election periods, all main national TV channels must use subtitles and sign language interpretation in their primary electoral news programs during peak hours. In Spain, TV announcements describing voting procedures include subtitles and sign language interpretation.*

**Recommendation: To enhance the accessibility and inclusion of persons with disabilities in elections, it is essential to implement alternative voting methods such as postal and mobile voting, ensure physical accessibility of polling stations, and provide election information in multiple accessible formats. Additionally, training election staff, deploying assistive tools and technologies, and engaging with Disabled Persons Organisations can significantly improve electoral participation for persons with disabilities.**

## B. Participation of Women

Equality between women and men is a fundamental principle in EU law, and all MS have ratified the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). In recent years, the enhanced participation and representation of women in public and political life have increasingly been in focus of EU policy and legislative efforts.<sup>35</sup> Proposed amendments to the Regulation on the statute and funding of European political parties and the latest EP legislative proposal include measures to improve gender equality, including in party structures and candidate lists. The EU [Gender Equality Strategy 2020-2025](#) commits the EC to enhance women's participation as voters and candidates, including through funding and promotion of best practices. The 2023 [Gender Equality Index](#) shows notable progress in the representation of women in electable and political appointment positions over the past decade, but this remains the area with the widest gender gap.

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<sup>35</sup> See [EC: 2023 Report on Gender Equality in the EU](#), 2023.

In these elections, most of the European political parties' manifestos outlined measures for advancing gender equality and countering various forms of discrimination, but women's political participation and representation topics were hardly raised.<sup>36</sup> Positively, there were five women among the lead candidates of European political parties (EUPP) in these elections.

Affirmative measures to advance the participation of women as candidates are in place in several MS. Ten countries have legislated gender quotas (BE, ES, FR, GR, HR, IT, LU,<sup>37</sup> PT, PL, SI) for EP elections and one (RO) has a vague legal obligation of gender equality on candidate lists. Only four MS (BE, FR, IT, LU) apply a parity principle, five MS (ES, GR, HR, PT, SI) have a 40 per cent quota, while a 35 per cent representation of each gender is required in PL. The positive effect of quotas is re-enforced in some MS through rank-order rules for closed lists or parts thereof (ES, FR, IT, PT, SI) and clearly outlined consequences for incompliance (HR, PL, PT, SI). In countries that do not have legislated quotas, voluntary measures and incentives as well as internal gender equality measures applied by national political parties can play a crucial role in promoting women candidates.

In practice, these measures resulted in the representation of women on candidate lists of 40 per cent and above in 13 MS (AT, BE, ES, FI, GR, HR, IT, LU, LV, PL, PT, SE, SI) and gender parity in one MS (FR). In another 11 MS (BG, CZ, DE, DK, EE, IE, LT, MT, NL, RO, SK), the representation ranged between 30 and 37 per cent. In contrast, in two MS (CY, HU) less than 1/3 of candidates were women. These figures constitute an average of 36 per cent of women on candidate lists across the EU, a decrease from the 42 per cent [reported](#) in 2019. Overall, women constituted 38.6 per cent of MEPs elected in these elections.<sup>38</sup> This marks a decrease compared to the outgoing parliament; women represented 40.6 per cent of MEPs elected in 2019 but 26.9 per cent at the start of 2024.<sup>39</sup> Also, considerable disparity in the number of women elected from different MS remained, ranging from no women MEPs at all in CY to parity and above in ES, FI, FR, and SE.

#### **Luxembourg - Candidate list gender equality conditions for the allocation of public funding**

*In Luxembourg, there is no explicit requirement for gender-balanced candidate lists. However, December 2016 [amendments](#) to party financing regulations made public funding conditional, among other requirements, to equal gender nominations in the EP elections. Non-compliance results in the reduction of funding by a quarter for each missing candidate of the other gender. This penalty is significant as state contributions are [estimated](#) to make up over half of parties' incomes. In practice, these measures resulted in a 43 per cent representation of women on candidate lists in 2019 and 46 per cent in the 2024 elections, with some parties having opted not to benefit from the financial incentive. However, the number of women MEPs from Luxembourg decreased from 4 out of 6 after the 2019 elections to 2 in the current term. Gender equality conditions and incentives linked to public funding are in line with international [good practice](#).*

<sup>36</sup> The European Conservatives and Reformists (ECR) manifesto does not contain any references to women, gender, equality, or non-discrimination. Identity and Democracy (ID) did not present a manifesto.

<sup>37</sup> See the related case study for details of gender equality provisions in LU.

<sup>38</sup> MEPs' gender balance by country - 2024; Constitutive Session, European Parliament [data](#) as of 18 July 2024.

<sup>39</sup> See EPRS: [Women in politics in the EU - State of play in 2024](#). Briefing, March 2024, and EPRS: [Members of the European Parliament, 2024-2029](#). At a Glance Briefing, July 2024.

Comprehensive analysis of women's participation in elections is impeded by the unavailability of readily accessible gender-disaggregated data at the EU level and in several MS, including on women among different voter groups, as candidates, and as members of EMBs. Collection and publication of such data is encouraged in international interpretative and good practice documents and was called for in the [EC Recommendation](#) ahead of these elections.<sup>40</sup>

***Recommendation: The EU and Member States should continue efforts to increase the participation and representation of women through legislative and voluntary measures. The collection and publication of gender-disaggregated data on electoral aspects should be further enhanced.***

### C. Participation of National Minorities

The protection of persons belonging to national minorities is part of the founding values of the EU. The MS define national minorities in various ways, including through constitutional recognition, in specific laws, or through state administrative practices.<sup>41</sup> All MS are signatories to the International Convention on the Elimination of Racial Discrimination ([ICERD](#), 1966),<sup>42</sup> and most are also parties to the CoE Framework Convention for the Protection of National Minorities ([FCNM](#), 1995).<sup>43</sup> The FCNM commits state parties to create the conditions for effective national minority participation, and to adopt adequate measures to promote their full and effective equality in political life. In this context, freedom of expression includes the freedom to receive and impart information in minority languages.<sup>44</sup> In addition, the CoE's [European Charter for Regional or Minority Languages](#) (1998) highlights the right to use such languages in private and public life, including their use by administrative authorities and in public services, as an inalienable right conforming to ICCPR principles.<sup>45</sup>

Furthermore, the EP expressed concerns about the increase of hate speech, motivated by racism, xenophobia or intolerance, directed at persons belonging to national minorities in Europe, and established an [Anti-Racism and Diversity Intergroup](#). The EC has committed to the [EU Anti-Racism Action Plan 2020-2025](#), signalling the intention to work with European political parties, ECNE and civil society to improve participation of groups susceptible to marginalisation. The EC has also addressed its [Action Plan on Integration and Inclusion 2021-](#)

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<sup>40</sup> CEDAW [General Recommendation 23](#), para. 48, notes that "States parties should include statistical data, disaggregated by sex showing the percentage of women relative to men who enjoy those rights." See also para. 40.13 of the 1991 [Moscow Document](#) which commits participating States "to ensure the collection and analysis of data to assess adequately, monitor and improve the situation of women". Council of Europe (CoE) [Recommendation Rec \(2003\) 3](#) encourages MS to "publish accessible statistics on candidates for political office and on elected representatives containing information on their numbers, with disaggregated data including by sex".

<sup>41</sup> Some MS do not establish national minorities in law, but recognise such groups through specific actions.

<sup>42</sup> See ICERD Article 5 for political rights including electoral participation.

<sup>43</sup> FR does not participate, and three MS are FCNM signatories, i.e. not state parties; BE, GR, and LU.

<sup>44</sup> This is further spelled out in the [OSCE Lund Recommendations on the Effective Participation of National Minorities in Public Life & Explanatory Note](#) (1999) as well as in the [Commentary on the Effective Participation of Persons belonging to National Minorities in cultural, social and economic life and in public Affairs](#) of the Advisory Committee on the FCNM (2008). Compare the [CoE Compilation of Venice Commission Opinions and Reports concerning Electoral Systems and National Minorities](#) (2019).

<sup>45</sup> The [Minority Safepack European Citizens' Initiative](#), first proposed in 2013, called for the adoption of a set of legal acts to improve the protection of persons belonging to national and linguistic minorities. While the [EC](#) proposed no further legal acts, the [EP](#) supported the initiative. Cf. [Federal Union of European Nationalities 2021](#).

[2027 to EP, Council, and EESC](#), pointing out that integration processes should include political participation. Following the elections, these policies await updates and continued implementation.

The European elections provide few examples of special measures to support minority participation and representation. Two MS, IT and PL – both with multiple constituencies in the EP elections – waive threshold requirements for minority lists.<sup>46</sup> Belgium’s three electoral constituencies are defined by language: Dutch (12 MEPs), French (8 MEPs), and German (1 MEP). Within the single-member constituency for the German community, the political party that receives the highest number of votes is effectively the winner. However, voters can make use of a 50 per cent threshold to express their preference for a candidate on a semi-open list. In RO, national minority organisations have the right to register candidate lists under the same conditions as political parties; for the 2024 EP elections, a Hungarian minority organisation used this option.

In some MS with national minorities such as BG and LT, election-related materials are only available in the state language(s), not in line with international instruments and regional guidelines.<sup>47</sup> SI provided ballots and other election materials in minority languages in the respective demographic areas, and CZ and LT provided voter information materials in polling stations in select municipalities. Innovatively, IE’s national Migrant Integration Strategy (2021) sets forth that migrants should be supported and encouraged to register to vote and exercise their franchise.

One issue of shared European significance is the inclusion of around six million Roma, who are citizens or residents in the EU, in public life.<sup>48</sup> Building on the lesson learned from earlier policy cycles when measures for economic empowerment often superseded those for political participation, the [EU Roma Strategic Framework 2020-2030](#) stressed that Romani participation in political life should be encouraged in MS with a significant Roma population (in particular BG, CZ, HU, RO, SK, but also ES, GR and IT), including their registration as voters, and to facilitate the exercise of their right to vote and to stand as candidates. In practice this is rare, as discrimination of Roma is still widespread and political will to enhance their rights is not uniform in the MS. Of the eight known Roma candidates in the 2024 elections (three in CZ, two SI, one BE, one BG, one HU) none was elected. Consequently, for the first time in 20 years, the Roma have lost any direct political representation in the EP.<sup>49</sup>

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<sup>46</sup> In [Italy](#), three legally recognised minorities may in principle avail themselves of this right; in practice, the rules appear tailored for the German-speaking candidate on the list of the South Tyrolean People’s Party (SVP) which has won a seat in the EP continuously since 1979. In PL, akin to national parliamentary elections, the electoral committees which nominate specifically national minority candidates are exempt from threshold requirements; however, of nine legally recognised ethnic minorities, none availed itself of this opportunity.

<sup>47</sup> United Nations Human Rights Committee’s General Comment No. 25, para 12, states that information and materials about voting should be available in minority languages. The 1990 OSCE Copenhagen Document, para 32.5, provides that “persons belonging to national minorities have the right (...) to disseminate, have access to and exchange information in their mother tongue.” FCNM Article 9 stipulates that “the right to freedom of expression of every person belonging to a national minority includes freedom to hold opinions and to receive and impart information and ideas in the minority language, without interference by public authorities”.

<sup>48</sup> See [EC](#) information.

<sup>49</sup> [Romea.cz](#), 10 June 2024.

**Sweden – Election Authority website available in multiple languages**

Sweden stands out in the area of national minority inclusion through its policy regarding minority languages. The Swedish Election Authority offers its [website](#) in twelve different languages, including Romani and Sami languages or dialects. Voter information on how to vote in the European elections is available in more than 40 languages.



**Recommendation: To facilitate the inclusion of disadvantaged communities, the European institutions and Member States should engage in increased awareness raising for electoral participation of national minorities, including the Roma, and of other underprivileged groups, and should encourage special measures for their participation. Particular focus could be given to the use of minority languages for electoral materials and voter information.**

#### D. Participation of Youth

Historically, young people have been underrepresented in the European Elections. Without a shared definition of youth between the European institutions and among the EU MS, however, concrete figures are difficult to establish.<sup>50</sup> Up to 25 million youth – close to seven per cent of the overall electorate – were eligible to vote for the first time in 2024, with two million in those countries alone where the voting age was below 18. According to the [Eurobarometer on Youth and Democracy](#), 64 per cent of young EU citizens expressed their intention to vote, but with considerable regional variation. The highest numbers were reported in RO and PT, while more than 20 per cent said they would not vote, despite having that right, in BG, LV, LU, MT, and NL. There were considerable debates about the political direction of the youth vote, including its potentially polarised and gendered nature.<sup>51</sup>

Despite their large numbers and high level of participation, young people remain marginalised in EU political decision-making. They comprise around 25 per cent of the European population, yet they hold only ten per cent of seats in the EP while the average age of the 720 MEPs remains 50 years.<sup>52</sup> There were only two MEPs under the age of 30 in the previous legislature, and youth candidates were not listed in electable positions in some 15 MS, highlighting continuous barriers to representation. In the newly elected legislature, five MS do not have a single representative below 35 (BE, IE, LV, LU, RO), and eight additional MS only have one (BG, HR, CY, CZ, EE, FI, HU, LT). MT presents the youngest delegation (median age

<sup>50</sup> The UN define youth as the age group between 15 and 24, some European definitions use 15 to 29, and in some MS, youth extends up to 35 years of age.

<sup>51</sup> [The Conversation](#), 10 June 2024.

<sup>52</sup> European Youth Forum: [European Elections 2024: Young People never had a chance](#), 31 July 2024.



40.5) while Luxembourg has the oldest (median age of 62), marking more than 20 years gap between the median age of MEPs and that of the citizens (39.3).

Ahead of the elections, remarkable efforts were undertaken by a variety of actors, including the EP, national educational institutions and civil society, to increase youth participation in 2024. However, while the MS have been placing a stronger focus on the teaching of democratic values in their national educational policies, this is not yet translating into practice in a systematic way.<sup>53</sup> Citizenship education was also only mentioned as a clear goal in one out of nine EUPP manifestos. Consequently, voter education for first-time voters differed greatly among the MS, depending not only on young people's concrete age and type of the first-time election, but also on the kind of education or professional training they receive. The lack of dedicated and concerted voter education for first-time voters was in particular reported for BG, CY, CZ, EE, RO, and SI.

***Recommendation: The EU and its Member States should provide civic and voter education to young and first-time voters, including through school curricula and practical vote simulations, in a manner to ensure that no young voter is left behind.***

#### ***Germany – Multi-pronged approaches to include and educate the youth***

*The German Federal Agency for Civic Education ([Bundeszentrale für politische Bildung/bpb](#)) and its autonomous branches at state level ([Landeszentralen für politische Bildung](#)) provide citizenship education and information on political issues for all, complemented by a variety of civil society initiatives. A wide array of civic and voter education activities has been available for the 5.1 million new voters who participated in the 2024 European elections for the first time. One project that stands out is the so-called "[junior election](#)", provided by an independent non-profit association. In this project, school lessons about elections and democracy culminate in an election simulation, with classrooms as polling stations and ballot booths and boxes to provide for the secrecy of the vote, and students acting as poll workers. For the 2024 EP elections, 4.500 schools participated in this project voluntarily throughout the 16 federal states, with more than 1 million votes cast. A number of [spin-off projects](#) has emerged from this, including public debating, interactions with politicians, recruitment of young poll workers, and electoral sensitisation for smaller children.*

## E. Participation of Mobile EU Citizens

According to TFEU every EU person holding the nationality of a MS is a Union citizen, and with it comes the right to move and reside freely in another MS, and to vote and to stand as candidates in municipal and European elections. The participation in European elections of EU citizens living in another MS, commonly referred to as mobile EU citizens, has historically been low. Only 10 per cent of mobile EU citizens registered to vote in their host MS in the 2019 elections.<sup>54</sup> There is a lack of data to clearly ascertain how many of these registered citizens effectively cast a ballot because MS do not collect such data in a systematic manner. In these elections, out of estimated

<sup>53</sup> EPRS: [Citizenship education in national curricula. Briefing](#), November 2023.

<sup>54</sup> EPRS: [Revision of Council Directive 93/109/EC. Electoral rights of mobile EU citizens in elections to the European Parliament. Briefing](#) February 2023.

13.7 million mobile EU citizens, some 11 million were considered to be of voting age. Their proportion of the population<sup>55</sup> as well as their registration as voters<sup>56</sup> varies significantly among MS. While 17 MS provided data on the number of mobile EU citizens, for nine MS (CY, CZ, GR, IE, LT, MT, NL, PL, SK) this data was not available. In 2019, a total of 5.6 million non-resident EU nationals were registered in their country of citizenship and 1.3 million mobile EU citizens were resident in another EU MS according to the EC.<sup>57</sup>

Further to TFEU, the EU [Council Directive 93/109/EC, as amended in 2012](#) (mobile EU citizen Directive) grants mobile EU citizens the right to vote either in their MS of residence or in their MS of citizenship. It further allows MS to impose a minimum period of prior residence in that country and to request additional documents. In 2021, the EC submitted a proposal to modify the mobile EU citizens Directive. The amendment became necessary to strengthen democratic practice and to proactively provide electoral information to mobile EU citizens.

In the proposed amendment of the Directive EP decided to further abolish the so-called derogation provisions, which allow MS to restrict the electoral rights of nationals of other EU countries when they represent more than 20 per cent of eligible EU citizens residing in its territory. This is particularly relevant for LU. Positively, the EP demanded also binding rules on: systems to proactively proceed with voter registration, as soon as a citizen registers as a resident in another EU country; information on electoral rights and deadlines to be offered to newly registered EU residents in an official EU language that they speak; and applying identical standards to all EU citizens (be it nationals of the country or from another MS) seeking to stand for election.<sup>58</sup> As of the publication of this report, the two amended Directives were not yet passed, including due to substantial changes to the content of the EP Directive by the Council of the EU, which require the consent of the EP.

Mobile EU citizens can also stand as candidates. In the 2019 elections, only 168 decided to do so. For 2024, no respective figures were available at the time of this report's publication and the EAM data suggest a decrease in mobile EU citizen candidates.

EAM interlocutors reported several problems of mobile EU citizens when exercising their political rights in their MS of residence. Besides the lack of awareness of their right to vote and stand as a candidate in their country of residence, these included long and at times cumbersome or unclear procedures.<sup>59</sup> In addition to language barriers to register to vote (reported especially in AT, HU, IT, LT, LV, MT, PL, RO), MS often require mobile EU citizens to proactively request to be added on the voter lists in the country of residence months before the elections (especially early in AT, BE, EE, ES, FI, HR). Some countries, like DK, are using predominantly digital interfaces, which could be a challenge for mobile EU citizens without

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<sup>55</sup> Ranging from 0.1 per cent in PL and 40.4 per cent in LU.

<sup>56</sup> From 0.1 per cent in HR and 0.2 in LV to 17 in ES and 24 per cent in MT, EC: [EU Citizenship Report 2020](#), footnote 33.

<sup>57</sup> EC [staff working document](#) 2019 EP elections, 2020, page 10.

<sup>58</sup> [EP press release](#): Participating in elections must be easier for Europeans from another EU country, 14 February 2023. See also EPRS: [Revision of Council Directive 93/109/EC. Electoral rights of mobile EU citizens in elections to the EP](#), February 2023.

<sup>59</sup> In MT, for example appeal procedures for mobile EU citizens who do not find themselves registered are not clear, as official sources communicated that an appeal should be submitted to the Electoral Commission's Revision Officer, however, an appeal was refused with the justification that it should have been submitted to the court.

computer skills to register. The EU has been providing mobile EU citizens advice about their voting options and national requirements via a [How to vote website](#).<sup>60</sup>

**Belgium – Online registration for mobile EU citizens available in all EU languages**

*Belgium's [online registration system](#) for mobile EU citizens is leveraging technology to enhance electoral inclusion. By providing a user-friendly, multilingual, and secure platform, Belgium ensures that mobile EU citizens can easily register to vote and participate in the democratic process. This approach highlights the importance of accessibility for all voters, clear guidance, and robust support services in fostering greater electoral participation. The online registration system offers step-by-step guidance on how to complete the registration process. This includes detailed instructions and prompts to ensure that users provide all the necessary information and documents. The system allows users to upload required documents, such as proof of identity and residence, directly through the platform. This eliminates the need for physical submission of documents, making the process more efficient. The online system includes automated verification mechanisms that provide instant feedback on the completeness and correctness of the submitted information, allowing users to promptly address any omissions. Once the registration process is complete, users receive confirmation emails with details of their registration. This includes information about their polling station and voting procedures; with the caveat that voting is compulsory in Belgium.*

To ensure uniform application of EU legislation MS also collaborate to exchange information on mobile EU voters and candidates. This is done predominantly to prevent multiple registrations and candidacy, although data of double/multiple citizenship is not recorded, available or included. To facilitate exchange of voter registration data, national EMBs used the so-called Crypto Tool, which was already employed in the 2014 and 2019 EP elections.<sup>61</sup> EAM interlocutors, including EMBs, noted that, while its use remains optional, and a certain optimal time period for data exchange was agreed, the tool is insufficient to cover up for the lack of a joint European voter register.

***Recommendation: To enhance the inclusion of mobile EU citizens in European elections, Member States could streamline online registration, provide multilingual information, simplify registration procedures and raise public awareness, while harmonising further cut off dates for registration and strengthening data exchange mechanisms.***

<sup>60</sup> In addition, (mobile) EU citizens can also get help from [Your Europe Advice](#) and [Solvit](#).

<sup>61</sup> See [EC Crypto Tool](#) released in December 2023.

## VIII. Election Administration

The electoral processes were administered by the 27 national EMBs. Among the variety of set-ups, the largest number of national election administrations, eleven, was led by bodies established following a governmental model. In nine MS, the election administration is autonomous from other state institutions, and in another seven MS, a mixed model is followed.<sup>62</sup> While party representation and institutional quotas are used in some cases, a professionalised, non-partisan composition of top-level EMBs is the most common (13 MS).<sup>63</sup> Only six national EMBs were led by a woman.

The performance of national level EMBs was assessed by interlocutors in MS overall positively, including independence, capacity, and ability to ensure election integrity. While several EMBs were praised for the efficiency and openness in their work, access to key electoral information and figures was more difficult in some countries, with stakeholder calls for greater electoral process transparency in BG, ES, and IT.

The MS follow different approaches to establish intermediate election administration bodies, for instance at constituency, district or municipality levels. Also at the level of polling stations, electoral commissions or polling boards were variedly staffed, commonly combining various nomination forms. In the majority of MS (17), regular voters work in commissions or polling boards at the precinct level. The involvement of representatives of political parties, either of all registered parties (six) or only of those parties with parliamentary representation (seven), is provided for in several states. In eight MS, political parties and/or candidates standing in the EP elections could nominate polling station workers, and in another nine MS, local administrations can nominate or supplement commission workers, including from among civil servants.<sup>64</sup>

The ECNE has continued to serve as a valuable forum for mutual learning, inspiring improvements, and facilitating MS contacts among themselves and with various EU-level institutions and actors. National representatives in ECNE increasingly assumed ownership and co-shaped its agenda, welcoming particularly exchanges on accessibility, data protection, cybersecurity, and voter mobilisation, including in thematic sub-groups and working streams. At the same time, EAM interlocutors in some MS noted the limitations of ECNE as a collaborative format, including regarding its ability to ensure cohesion in regulations and practice. Also, the scope of public information about ECNE's meetings could be further enhanced.<sup>65</sup> Based on the feedback in several MS and as indicated in the Swedish Presidency [survey](#), the EP proposal to establish a European electoral authority does not find shared approval. In addition, the EU Network and Information Systems Cooperation

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<sup>62</sup> A governmental model is used in AT, BE, CZ, CY, DE, DK, FI, GR, IT, LU, and SE; it is autonomous in HR, HU, IE, LT, LV, MT, PL, SI, RO; and mixed in BG, EE, ES, FR, NL, PT, and SK. In BG, the 2021 amendments reduced the number of national EMB members and adjusted nomination procedures for lower-level commissions, as was also the case in RO.

<sup>63</sup> Such composition was in place in BE, CY, DE, DK, FI, GR, HR, IE, IT, LT, LU, MT, SE. Compare Lidauer/Rabitsch/Grohma: [EMB Composition in European Comparison](#), 12 January 2022.

<sup>64</sup> Some MS select polling station workers from among the general population by lottery and from 1st instance courts (GR), volunteers (NL), and PL and MT use a special poll worker pool for appointments.

<sup>65</sup> Several ECNE meetings took place in the run up to the 2024 elections. As of mid-August 2024, minutes and agenda of only one of its meetings in February was available [online](#).

Group released an updated [compendium](#) to guide MS on securing elections against cyberattacks and conducted a cybersecurity workshop to test MS' readiness.

***Ireland - Establishment of the Electoral Commission to streamline election administration and processes***

*The electoral process in Ireland was administered by the newly formed Electoral Commission. Its establishment in February 2023 followed at least a decade-long process of inclusive stakeholder and public consultations and impact assessments, and was based on repeated cross-party endorsements of the idea of establishing an independent electoral body. The Commission was vested with a wide range of regulatory and educational responsibilities to see through the implementation of improvements in several key electoral areas envisaged by the 2022 Electoral Reform Act, including electoral boundary delimitation, party registration, voter registration, and the accessibility of elections. The establishment of the Commission was also widely welcomed as an effective way of streamlining oversight of election-related activities, which was previously decentralized and housed in different bodies, considerably complicating election administration. Its formation also met the recommendations of the 2012-2014 [Constitutional Convention](#) and of the 2007 OSCE/ODIHR Election Assessment Mission [Final Report](#).*

## A. Voter Registration

All MS maintain a population register that comprises records of all citizens or residents, including foreign citizens, within the respective MS. The national voter register is typically a subset of the population register, both in terms of the data included in each record and the eligibility criteria for inclusion. Several MS (AT, HU, IE, LV, NL, PL, SI) have amended their legislation in this area since the last EP elections. In HU, an amendment redefining residency and easing requirements for civil registration has weakened the safeguards against manipulation.<sup>66</sup>

***Latvia - Establishment of an online electronic voter register***

*The [Central Election Commission](#) introduced an online electronic voter register and the use of an eID card as proof of identity for voting, while voters could still use a passport. The online voter register is now used for all elections (European, parliamentary, local) and allows a voter to vote in any polling station in Latvia or in a polling station located in a Latvian embassy abroad. In the past voters had to vote at a particular polling station like in most MS and if a voter wanted to vote at another polling station, the change had to be applied for in time, which was not possible for all voters. The online voter register also benefits election organisers because it enables them to follow up workload of polling stations in real time and provided additional advantages in holding elections in the context of the Covid-19 pandemic.*

In IE, the Electoral Reform Act 2022 introduced significant positive changes to the voter registration system, including the move from fixed periods for updating details to continuous updates, streamlining of the application process through use of social security numbers, and the possibility of active online registration for first time voters. In addition, the new law includes

<sup>66</sup> See [OSCE ODIHR FR Hungary 2022](#).

provisions simplifying the process for those with no fixed address (homeless) being able to register.

With the exception of CY<sup>67</sup> and IE, where voters actively register at local administrative offices, other MS generally follow a passive registration approach whereby citizens' names are automatically included in the voter register once they become eligible to vote. Some MS (CZ, IE, IT) maintain decentralised voter registers at the municipal level and lack a central voter register;<sup>68</sup> this could potentially result in multiple entries for the same person. Overall, the confidence in voter registration procedures for the European elections is high, with the notable exception of HU and to a lesser extent PL.<sup>69</sup>

In 2024, of the more than 425 million<sup>70</sup> European citizens some 355 million (up from 350 million in 2019) eligible voters were registered for the EP elections.<sup>71</sup> However, no overall data of the number of double/multiple EU citizens exists and there is no data exchange or mechanism among MS to prevent double voting by such citizens. Only in few MS (FI, HR, IT) such data is available.<sup>72</sup> In 2024, the cut-off date for a voter to be registered in the national voters list or to change personal data in the voters list varied considerably between the MS from 2 April in CY, up to election day of 8 June in SK and 9 June in EE, LT, and RO.

In the absence of a centralised European voter register or harmonised voter registration format in MS, data exchange among MS on possible multiple entries remains challenging. The EMBs use the Crypto Tool provided by the EC to exchange data about voters and candidates.<sup>73</sup> One EMB reported the identification of deceased voters who are still in the voter register of another MS, while some MS do not provide all the required data, such as ID number, which makes the identification process difficult. Reportedly, the process is very challenging also because of different voter identification data and different spelling of names depending on the country. Most of this work needs to be done manually, which is time consuming.

***Recommendation: To enhance the accuracy, inclusivity and integrity of voter registers in European elections, it is recommended that the EU and Member States consider further harmonisation of voter registration procedures, data format, and data exchange, while starting to identify double/multiple EU citizenship and conducting regular audits.***

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<sup>67</sup> Registration was passive for the Turkish Cypriots residing in the areas not controlled by the Republic of Cyprus.

<sup>68</sup> PL introduced a Central Voter Register in August 2023.

<sup>69</sup> The [Batory Foundation](#), among other CSOs, raised concerns about missing voters in the registry in past elections. Concerns were also voiced regarding the Parliament entrusting the Ministry of Digital Affairs, which is not part of the EMB, with the registry.

<sup>70</sup> According to [Eurostat](#), 449.2 million inhabitants live in the EU in 2024, which is 1,650,000 more than in 2023.

<sup>71</sup> Based on the collected national EMB data. Other sources ([EP](#)) spoke of 366 million or 373 million ([Politico](#)).

<sup>72</sup> Like in FI (31,946), HR (19,306), and IT (47,588).

<sup>73</sup> Ahead of the 2019 elections, MS exchanged data on around 1.3 million voters and 114 parliamentary candidates, which resulted in the identification of over 213,000 multiple registration of citizens, see EC [staff working document](#), page 29.

## IX. European Political Parties and Candidate Registration

### A. European Political Parties (EUPPs)

The rules governing the EUPPs (and their funding) are laid down in [Regulation 1141/2014](#), as amended in 2018 and 2019. During the last term, an attempt was made to further amend the Regulation. However, the negotiations stalled in 2023, as the co-legislators (the EP and the Council of the EU) could not reach an agreement. Remaining points of contention were whether EUPPs should be allowed to receive contributions from members located in countries outside the EU, and the issue of governance of EUPPs.<sup>74</sup>

EUPPs have to be European in their composition and are required to have member parties in at least seven EU MS.<sup>75</sup> They also must run for the European elections; if they do not fulfil these conditions they can be deregistered. Following the 2014 elections, the regulation of EUPPs was put on a new legal basis with the foundation of the Authority for Political Parties and Political Foundations (APPF, or Authority).<sup>76</sup> The APPF has been established for the purpose of registering, controlling and imposing sanctions<sup>77</sup> on EUPPs and European political foundations pursuant to Regulation (EU, Euratom) No 1141/2014.<sup>78</sup> Since the last European elections, the Authority has grown in strength and capacity, and saw its mandate extending to the protection against external interference. Some stakeholders voiced criticism of the APPF concerning their stringency and broad interpretation of their oversight mandate.

The APPF registered ten European political parties<sup>79</sup> and ten European political foundations,<sup>80</sup> and performs annual compliance controls of the parties' incomes and expenditures. The Authority conducts regular verifications to ensure that EUPPs fulfil the criteria on which basis they were registered, and can issue sanctions in case of non-compliance.<sup>81</sup> The Authority has noted that an unusually high rate of membership changes occurred among EUPPs during the half-year period prior to the 2024 elections.<sup>82</sup>

Membership in EUPPs does not necessarily coincide with membership in political groups in the EP which consist of the political party (and individual) representatives elected from the MS. A political group needs a minimum of 23 members, and at least seven (one-quarter) MS

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<sup>74</sup> [EP Legislative Train Schedule](#), June 2024.

<sup>75</sup> TEU Article 10(4) states that EUPPs contribute to forming European political awareness and to expressing the will of Union citizens. There is a widely held belief that they play an important role in the process of European integration.

<sup>76</sup> [Authority for European Political Parties and European Political Foundations](#)

<sup>77</sup> EUPP revenues and expenditures are controlled by the APPF cooperation with the Authorising Officer of the EP. The APPF provides feedback to parties and foundations, uses preventive compliance measures, applies corrective measures before resorting to sanctions, and has sanctioned an EUPP for the first time in 2023.

<sup>78</sup> [Regulation \(EU, Euratom\) No 1141/2014](#)

<sup>79</sup> Alliance of Liberals and Democrats for Europe Party (ALDE), European People's Party (EPP), Party of European Socialists (PES), European Democratic Party (PDE/EDP), European Free Alliance (EFA), European Green Party (EGP), the Party of the European Left (European Left), the European Christian Political Movement (ECPM), European Conservatives and Reformists Party (ECR), and the Identity and Democracy Party (ID). Following the 2024 elections, ID reconfigured and called Patriots.eu, and [APPF](#) was verifying the statutes and membership composition of this EUPP.

<sup>80</sup> Political foundations are complementary organisations to political parties for activities of political education or training, and need to be affiliated with a political party; but only political parties can run for elections.

<sup>81</sup> In 2023, [APPF sanctioned ID](#) for intentionally providing incorrect information about its board composition to the public.

<sup>82</sup> APPF: [The 2024 European Elections: Resilience under Strain. Special Report](#), 28 June 2024.

must be represented within a group. Members may not belong to more than one political group. Those MEPs who do not belong to any group are known as ‘non-attached’ Members (*non-inscrits*, known as NI). Since the first direct elections in 1979, the number of political groups has fluctuated between seven and ten.<sup>83</sup> According to an institutional interlocutor, the political realities in the MS resulting in changes in group composition can be more dynamic and faster than membership changes in EUPPs. Prior to the 2024 elections, there was an expectation that the number, size and composition of groups in the EP would change.

Despite efforts to “Europeanise” the European Parliament elections, most of the Member States implicitly prohibit the use of the name or the logo of EUPPs on the ballots.<sup>84</sup> Only 11 MS allow the name and/or logo of an EUPP to be mentioned on the ballot. In five MS (FR, GR, IT, LT, SI) both name and logo can be displayed. In six MS only the name can be shown (BE, DE, IE, LU, NL) or only the logo (RO). For all the other 16 MS there is either an explicit or an implicit prohibition, for example an exhaustive list of requirements that prevents name and/or logo from being displayed on the ballot paper.

## B. Candidate Registration

Candidates for the EP are nominated on lists at national or at regional (constituency) levels, according to the rules set out by the respective MS. Most political parties have joined an EUPP, but it is also possible for national parties which are not members of an EUPP to participate in the EP elections. Demands for transnational European parties that can be directly elected – a significant element of the last EP proposal to amend the Electoral Act – have not yet prevailed.<sup>85</sup> Overall, 18,392 candidates and 490 candidate lists have contested the 2024 EP elections.<sup>86</sup>

Typically, lists intending to contest the European elections require proof of voter support as a prerequisite for registration. In AT, for example, the requirement is to provide 2,600 support signatures (about 0.4 per cent of eligible voters) for a list to become eligible. The type of electoral system has an impact on the composition and order of the candidate list on the ballot. The application of the proportional representation list-based system varies across the majority of MS. In closed-list systems (DE, ES, FR, HU, PT, RO), decisions on the composition and order of the list may depend on the party leadership alone, potentially impacting the democratic character of candidate selection.

Conditions vary across the MS regarding the timeframe of candidate registration. The EP recommended candidate registration to take place twelve weeks before and the EC recommended candidates to be announced at least six weeks before election day, whereas the Council Decision of 2018 speaks of three weeks. The earliest candidate registration cut-off date, however, was scheduled 17 weeks ahead of election day in LV and the latest - three weeks before election day in FR, with the majority of other registrations taking place

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<sup>83</sup> EPRS: [Rules on Political Groups in the European Parliament](#), June 2024.

<sup>84</sup> EP EPRS: [‘Europeanising’ the electoral ballot](#), May 2024.

<sup>85</sup> In the 2024 European elections, one political party, VOLT, ran decidedly as a pan-European party with independent lists in ten EU MS (BE, CY, DE, ES, LU, MT, NL, PT, SE, SK) and in coalition with like-minded parties in five additional MS (BG, CZ, FR, GR, IT).

<sup>86</sup> Based on EMB sources in the MS assembled by EAM focal points.



throughout April (15 MS) and May (seven MS), illustrating again the variety of practices across the EU.

***Recommendation: Harmonising conditions for candidacy, including registration procedures and timelines, could enhance equality of chances and intraparty democratic practices in the European Parliament elections.***

### C. Lead candidates

Since 2014, a growing number of EUPPs embrace the lead candidate (*Spitzenkandidaten*) process to establish a link between the election, the composition of the EP, and the nomination of the President of the EC. This envisaged political process comprises various objectives, such as making the selection of the EU executive more transparent, vesting it with greater democratic legitimacy by giving voters a possibility to influence the choice, enhancing similarity between EU and MS political processes, and bringing more dynamism in the EU elections by personalising the campaign. EAM interlocutors on the side of EP and EUPPs have voiced a clear commitment to the process as such, whereby the EUPPs took different approaches in nominating and presenting their lead candidates.<sup>87</sup> The EPP lead candidate stood as an incumbent without having been previously elected. As this process was not seen through in 2019, there also remains uncertainty over its future role in the institutional set-up.<sup>88</sup>

## X. Campaign Environment

Most EU MS saw an active and visible campaign for the 2024 European elections. Exceptions included BG and RO where concurrent national or local elections dominated the public discourse. The campaign was shaped by both national and European issues, with the exception of LU where European topics dominated, and BG, DE, ES, NL, and RO where national issues prevailed. The war of aggression of Russia against Ukraine, and more recently the conflict in the Middle-East, were prominent themes in the pre-electoral period. Key campaign topics included, but were not limited to, the European security and defence policy, EU enlargement and migration, economic stability, climate change, energy security, sustainable agriculture and housing policies as well as national versus EU competencies, and the political direction which the Union should be taking.

Acts of political violence against politicians and campaigners at the local level in some MS, most prominently in DE, marked peaks in a concerning trend of a deepening societal

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<sup>87</sup> EPP – Ursula von der Leyen (DE); PES – Nicolas Schmit (LU); three-party coalition Renew Europe Now – Renew Europe/Valérie Hayer (FR), EPD/Sandro Gozi (IT), ALDE/Marie Strack-Zimmermann (DE); EGP Bas Eickhout (NL) and Terry Reintke (DE); European Left – Walter Baier (AT), ECPM – Valeriu Ghilețchi (RO); and EFA – Maylis Roßberg (DE). ECR and ID did not nominate lead candidates, although the latter was represented by a Danish candidate in the Maastricht debate.

<sup>88</sup> EPRS: [Spitzenkandidaten or the lead candidate process. Ways to Europeanise elections to the European Parliament](#). June 2023.

polarisation,<sup>89</sup> with growing concerns of a wider gap between political extremes and foreign interference. The threat of foreign manipulation also came to the fore with cases of alleged Chinese<sup>90</sup> and Russian<sup>91</sup> espionage in the EP. Against this background, arguments for potential post-electoral coalitions were part of the campaign, often related to positions vis-à-vis right-wing extremism.<sup>92</sup>

On 9 April 2024, all EUPPs committed to a [code of conduct](#) for transparent and fair campaigning, proposed by the EC based on a commitment set out in its 2023 [Recommendation](#), and facilitated by International IDEA. Signatories agreed to fair and transparent campaigning, to accuracy and to countering mis- and disinformation, and to the ethical use of technology in their campaigns. The independent monitoring of commitments was weak and the code of conduct was rarely used as a mitigation tool between parties.<sup>93</sup> Critical voices expressed concerns regarding the potential misuse of administrative resources and a lack of distinction between official duty and campaign functions of high-level EU officials and some of their staff.<sup>94</sup>

Most EUPPs (but not ID) formulated manifestos which had a ‘Europeanising effect’ on national parties, assisting them to build agreement and commitment on the longer-term strategy within the respective party family. While national debates continued to become more European, however, the campaigns for the European elections have not yet resulted in a truly European debate as envisaged. Political stakeholders rallied predominantly as national parties and candidates, with little visibility of their European political families. Only in some countries like BE, CY, GR, IT, LV, MT, PT, and SI, national parties also used the branding of EUPPs for their campaigns. In HU, the membership of the governing party in a (new) EUPP and political group in the EP was a campaign issue as such.

In principle, the EUPPs were able to conduct Europe-wide campaigns online and offline, albeit complicated by a variety of national rules. Given the absence of a clear legal distinction between “national” and “European” campaigns, national legislations appear to prevent EUPPs from campaigning in seven MS (AT, BE, CZ, MT, PL, PT, and SK).<sup>95</sup> In contrast to the prohibition of transnational campaigns on Facebook in the previous EP elections, the adoption of the TTPA – although the majority of its provisions only take effect in October 2025 – allows for pan-European advertising including on social platforms.<sup>96</sup> Importantly, the TTPA as applicable for

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<sup>89</sup> On 15 May, the Prime Minister of SK was attacked with life-threatening injuries; the Prime Minister of DK suffered a minor attack on 8 June. Unprecedented in the context of European elections, dozens of politically motivated attacks occurred at local level in DE. Other acts of political violence were reported for IE and PT (cf. [OSCE/ODIHR](#), page 10).

<sup>90</sup> [Friedrich Naumann Foundation](#), 26 April 2024.

<sup>91</sup> [The Guardian](#), 29 May 2024.

<sup>92</sup> The EP group leaders of the S&D, Renew, Greens and the Left spoke out against future pacts that would include ECR or ID. While political leaders in the right wing-spectrum pondered the idea of a merged ‘supergroup’ in the EP, the French *Rassemblement National (RN)* initiated the expulsion of the German *Alternative für Deutschland (AfD)* from the ID group (related to alleged espionage by AfD staff).

<sup>93</sup> SE is the only known MS where the code of conduct was referred to in debates between parties at the national level.

<sup>94</sup> Compare [OSCE/ODIHR](#) p. 10.

<sup>95</sup> Reed: [Provisions of national law affection European political parties and European political foundations](#). APPF Study, 2023.

<sup>96</sup> Quaritsch: [Political Advertising in the 2024 European elections Between Europeanisation and the protection of electoral integrity online](#). 4 June 2024.

the 2024 elections defined political advertising. It appeared to have only been transposed in five out of 27 MS at the time of the 2024 European elections (AT, CZ, GR, LT, LV).

Most MS define the length of the campaign period in the electoral legal framework; only eight MS have no such provisions (AT, DE, DK, EE, LU, MT, NL, SE). Where it is defined, the campaign duration varies greatly, ranging from 280 days in LT to around 120 days in BE, LV, SK and to twelve days in FR and PT. Three of 19 MS (BE, CZ, HU) where the campaign duration is defined in law do not foresee a period of campaign silence; in the remaining countries, the campaign silence varies between one and two days before election day, and in many instances extends to during and after the polls.<sup>97</sup>

Two televised debates of lead candidates broadcasted in all 24 EU languages were organised in [Maastricht](#) on 29 April and in [Brussels](#) on 23 May. The invited lead candidates varied, illustrating different approaches to nominate and present these candidates.<sup>98</sup> Nevertheless, this contributed to making the positions of EUPPs and their lead candidates known to a broader audience.

***Recommendation: To strengthen the European dimension of electoral campaigns and ensure equal opportunities for all candidates, efforts could be intensified to increase the visibility of European Political Parties, including on ballot papers, and harmonise electoral campaign regulations across all Member States.***

## XI. Political Party and Campaign Finance

### A. European political party and campaign finance

EUPPs are largely financed through public funding from the EP.<sup>99</sup> Ahead of a financial year, each party is allocated a maximum grant; it may eventually receive less, but never more. The total envelope available is split between a lump sum, shared equally among all qualifying parties, and funding allocated in proportion to the parties' share of seats in the EP. The funding of EUPPs has become more proportional to their support in European elections over time. Following the 2024 elections, a total of 90 per cent of party funding is distributed in proportion to the parties' share of MEPs. The budget of EUPPs has seen a steep increase, with EUR 50 million available for grants to EUPPs in 2024.<sup>100</sup> Registration by the APPF, together with the condition of having at least one MEP, is a pre-condition for an EUPP to apply for funding. Member parties in the EU MS have to display on their websites the logo and the programme of the EUPPs to which they are affiliated as a requirement for the EUPP to receive EU funding.

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<sup>97</sup> Compare EPRS: [Length of the election campaign and the electoral silence period in European Parliament elections](#), September 2023.

<sup>98</sup> The European Broadcasting Union organised the Eurovision Debate 2024 in Brussels between the lead candidates for the presidency of the European Commission. [OSCE/ODIHR](#) criticised the limitation of the debate to five candidates whose parties are represented in the legislature as at odds with Paragraph 7.8 of the Copenhagen Document ([Politico](#)).

<sup>99</sup> Note that funding for political groups in the EP is distinct from funding granted to EUPPs.

<sup>100</sup> In 2024, the EPP is entitled to receive some EUR 13.6 million, the PES around EUR 10.7 million, ALDE close to EUR 5.7 million, EGP EUR 4.8 million, ECR EUR 4.4 million, and ID EUR 4.4 million. [Funding from the European Parliament to European political parties per party and per year](#), March 2024.

In addition to public funding, EUPPs may raise private funding. Regulations in this area aim at income transparency, with some grey zone at MS level. Private sources of funding include contributions from their member parties and individual members (some 70 to 90 per cent), donations from non-members (some 4-10 per cent), as well as other sources of income.<sup>101</sup> Donations and contributions can be financial, in-kind, or via the provision of goods and services (including loans) below market price. Limits and reporting requirements apply to both donations and contributions.<sup>102</sup> Donations from legal and natural persons cannot exceed a value of EUR 18,000 per year and per donor; donations exceeding the amount of EUR 12,000 have to be reported to the Authority immediately.<sup>103</sup> Regulation 1141/2014 prohibits EUPPs to receive anonymous donations or contributions. Donations to national political parties, however, can include anonymous or foreign funding in some cases, potentially circumventing the rules of funding for EUPPs through contributions from their members.

## B. European political party and campaign finance oversight

Oversight of the EUPP's campaign incomes and spending is exercised by the APPF; the Regulation provides that parties report on any donations received during the half-year period prior to the elections on a weekly basis. The reporting rules have not substantially changed since the previous EP elections, but oversight and accounting rules have tightened.<sup>104</sup> In contrast to the rules in place for donations, the APPF does not have systematic access to activities-related expenditure information while the election campaign is ongoing. Taking a preventive approach, the Authority developed the European Campaign Action Plan ([E-CAP](#)) tool to assist EUPPs in planning their campaigns in light of applicable rules and principles. It contributes to the transparency of EUPPs and their financing by publishing key sets of information, in particular regarding structure as well as contributions and donations, on their [website](#). Following EUPPs annual reports, a full overview of EUPPs financial activities in 2024 will only be available by June 2025. This raises questions regarding the timeliness and full transparency provided by the oversight framework.

## C. Party and campaign finance at Member State level

The campaign spending of EUPPs and their national member parties has to be kept strictly separate. In fact, the bulk of campaign expenditure takes place at the national level. In the national legislation of MS there is almost no direct regulation of EUPPs, as national provisions on the EP elections are almost entirely devoted to the activities of national parties.<sup>105</sup> The variance of MS' regulations for campaign incomes, expenditures, oversight and sanctions creates different conditions for the candidates of national parties to campaign and also

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<sup>101</sup> Some parties, including the EPP and PES, never receive donations, while others, including ALDE, the ECR, and the ECPM, consistently receive higher rates of individual donations ([EPFO](#)). According to one EUPP, they stopped fundraising because the required reporting is too cumbersome for small donations. See [APPF – Donations and Contributions](#).

<sup>102</sup> [European Party Funding Observatory](#), June 2024.

<sup>103</sup> The APPF “seeks to establish, within the limits of its investigative tools, the effective decision-maker of the donation. If this decision-maker is a legal or natural person from outside the European Union, the donation cannot be accepted and has to be returned” ([Special Report](#), page 5).

<sup>104</sup> [APPF Pre-election reporting obligations](#)

<sup>105</sup> [Reed 2023](#), page 11.

presents challenges for the EUPPs' campaigns. MS laws show a wide discrepancy in how they build risk prevention in political finance, how they define and permit donations, and in their oversight and sanctioning capacity.<sup>106</sup> The applicable laws and regulations vary from a loose set of rules (for example in DE, DK, NL) to tightly regulated systems (for example in HR, IE, LV, RO, and SK).

In nearly half of all MS, the legal framework for campaign finance was not seen as fully adequate at the time of the 2024 elections. At the same time, more than ten MS have changed the specific rules for the European elections during the last term, illustrating that this is a dynamic field of regulation adaptable to new challenges. For example, in AT, requirements to report on campaign expenditures became more nuanced to include online spending. A similar rationale reflects DE's decision to increase public funding for political parties, including for data protection, digital security, and social media. LV and NL increased the annual public funding for political parties as well; in NL, additionally, new regulations disallow foreign funding and lower the ceiling for anonymous contributions. In BG, on the contrary, donation ceilings were abolished, campaign donations by legal entities re-introduced, and public funding for political parties reduced since 2019.

#### ***Czechia - Disclosure requirements for political parties***

*Political parties and movements as well as third parties are subject to public disclosure of campaign incomes and expenses in real time through their 'transparent accounts', which allow the identification of transactions and contractors. For the 2024 European elections, each election contestant was obliged to open a transparent campaign account within five days (by 4 March) after the call of elections and provide remote access to the account on its website as well as send the website address to the [Oversight of Financing of Political Parties and Movements](#). At latest three days before election day, information on all persons that contributed to the campaign account must be disclosed. Campaigns may be financed only through this transparent account. In addition, the regular party account must also be transparent and allow remote access to all data. Other settlements valued in financial terms must be included in a special record, including the origin of the resource.*

In most MS, public funding is provided to political parties, most commonly based on the number of votes received or seats obtained at the last general elections. In eight MS, no public funding is available specifically for the EP elections (CY, DK, EE, FI, HU, IT, MT, SK). The MS apply various limitations to different types of private funding. Types of funding from individuals are permitted in all MS whereas funding from companies is prohibited in nine MS (BG, EE, ES, LT, LV, LU, PL, PT, and SI). In HR, the campaign finance framework lacks a regulation of loans taken to finance campaigning. In-kind donations are prohibited in EE; they are allowed without limitations in nine MS and in a limited manner in the remaining MS. LV is the only MS that established a limit on donations to EUPPs. Fewer than half MS have provisions to regulate third party campaigns, and difficulties to regulate third parties were reported in a number of them, for example in CZ, PL, and RO. Limited anonymous funding is available in six MS (AT, DK, DE, EI, NL, and SE). Types of foreign funding are permitted in another six MS (AT, CZ, FI, GR, MT, and SI) and unlimited foreign funding is permitted in five MS (CY, DK, DE, LU, SE). This is

<sup>106</sup> Compare the CoE's Group of States against Corruption ([GRECO](#)) Third Evaluation Round findings. See also [Reed](#) 2023 and EPDE: [Puzzling rules-equal game?](#) 2022.

contrary to recent [EC recommendations](#) warning against anonymous and unchecked donations from third countries. Additionally, a number of MS forbid the financing of national campaigns in EP elections by EUPPs.

Ten EU member states do not have any campaign spending limits or bans on types of campaign expenditure (DE, DK, EE, ES, FI, HU, LT, LU, NL, SE), and there are considerable differences in the level of campaign spending limits and types of campaign prohibitions in the other countries. In some countries, these are absolute amounts (e.g. EUR 7 million per party in AT or EUR 78,000 per candidate in GR), but most countries establish limits by a formula (e.g. EUR 1 per citizen in IT or EUR 0.40 per eligible voter in SI). LV and RO are the only countries that establish an expenditure limit for EUPPs.<sup>107</sup> Requirements to reveal the sources and amounts of contributions, the purpose and amounts of expenses, and to make relevant reports timely and publicly available also differ considerably. Not all MS foresee election- or campaign-specific disclosure, but only annual reports of political parties. Disclosure requirements to effectively allow public oversight are insufficiently detailed in a number of countries, but particularly so in CY and PL.

***Recommendation: European institutions and Member States could jointly review the applicable rules for political party and campaign finance and its transparency and oversight, especially with regards to expenditure limits and disclosure requirements, and applicable sanctions in case of non-compliance.***

#### D. Party and campaign finance oversight at Member State level

The most common type of campaign finance oversight body across the 27 MS is the national audit institution, closely followed by *ad hoc* commissions. These oversight bodies' investigative and sanctioning powers differ significantly from one MS to another, as do sanctioning mechanisms.

##### ***Estonia – Oversight of political party finance***

*The [Political Party Funding Supervision Committee](#) has become an effective body enhancing parties' transparency and accountability also with numerous successful court cases. The Committee is mandated to verify whether political parties, election coalitions and single candidates adhere to the requirements provided by the Political Parties Act. It advises the parties in matters of funding and, at request, makes proposals for overcoming economic difficulties, improving solvency, and ensuring sustainable management. The Committee has the right to demand that a political party, an election coalition, or a single candidate undergo a special audit. It will make an order if the respective entity has failed to perform the obligation to submit its report, or if the report contains deficiencies; has failed to return a prohibited donation; has not recognised an accepted donation; has not transferred a prohibited donation to the state budget; has failed to submit the documents specified the Political Parties Act; or has failed to submit a document requested by the Committee by the prescribed date. The Committee consists of nine members (six representatives of political parties and three experts). Its administration is guaranteed by the Parliament Chancellery, which is administratively close to the State Electoral Office.*

<sup>107</sup> [Reed](#) 2023, page 11.

The oversight institutions were not assessed as fully independent, impartial and transparent in ten MS (BG, DK, ES, HU, NL, PL, PT, SE, SI, SK). In MT, the law places the responsibility of controlling political party finances on the EMB, but its leadership argued that the control of campaign finance would be better placed under an agency with the resources and capacities to effectively monitor campaign spending. Sanctions for campaign finance violations do not appear effective, dissuasive and proportionate in about half of the MS.

***Recommendation: Further consideration could be given to clarify the institutional responsibilities of oversight bodies and equip the respective independent authorities with sufficient powers to exercise their mandates, including the scrutiny of incomes, expenditures, and types of campaign activities.***

## XII. Media

### A. Media Environment

Media freedom and diversity are enshrined in the Charter of Fundamental Rights of the EU. The EU generally remains a safe space for free and independent media and one of the easiest for journalists to work in, although the situation varies across the Union, with one third of MS (CY, BG, GR, HR, HU, IT, MT, PL, RO) categorised as problematic, two more MS than the previous year (HR and IT).<sup>108</sup> The main concerns related to media freedom pertain to cases of violence against journalists, arrests and surveillance of media professionals, political and commercial pressures, media concentration, and falling revenues of media companies.<sup>109</sup> The EU's Media Pluralism Monitor confirmed the deterioration in media pluralism in Europe.<sup>110</sup> A number of concerns related to media pluralism and media freedom were also raised in the [2024 Rule of Law Report](#) of the EC.<sup>111</sup>

In this context, the European Media Freedom Act ([EMFA](#)) is a vital contribution to the protection of media independence, freedom and pluralism. The EMFA entered into force on 7 May 2024, with its rules only fully applying after the EP elections, as of 8 August 2025. It sets forth common principles for all MS to address threats to a free, independent and vibrant media system, including: media capture, journalist surveillance, political interference, deteriorating media pluralism, transparency of media ownership and oversight of social platforms.

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<sup>108</sup> According to the 2023/2024 [World Press Freedom Index](#) prepared by Reporters Without Borders (RSF), the other two-thirds are ranked as 'satisfactory' and 'good', but many of them, including AT, CZ, FI, FR, IE, LT, and SK saw drops in their scores. Those that improved are in the minority, with tiny increases.

<sup>109</sup> Eyes on Europe, [Countdown to elections: how will the European Media Freedom Act shape press freedom in the EU? Media Freedom Rapid Response, Mapping Media Freedom – Monitoring Report 2023.](#)

<sup>110</sup> Centre for Media Pluralism and Media Freedom: [Media Pluralism in the Digital Era, 2022.](#) See also, EC: [2022 Rule of law report - Communication and country chapters](#), 2022.

<sup>111</sup> [Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2024 Rule of Law Report.](#) The report notes that concerns about the independence or impartiality of regulators exist in several MS, including insufficient safeguards against undue political influence over the nomination process or in the functioning of regulators (BG, HR, HU, PL, SI). The report also stresses that challenges regarding transparency of media ownership persist in BG, CY, CZ, FR, and NL, while concerns with regard to the independent governance and editorial independence of public service remain in HU, IT, MT, RO, SK.

As the EMFA establishes common minimum standards it is on the MS to further foster protection of media freedom and pluralism as well as journalists' rights.<sup>112</sup> The European Regulators Group for Audiovisual Media Services (ERGA) noted that the National Regulatory Authorities will play a central role in the successful implementation and monitoring of the EMFA provisions. It is therefore important that these authorities are given the required powers and resources.<sup>113</sup>

EAM interlocutors raised the point that EMFA is lacking safeguards against surveillance measures targeting journalists, with particular concerns regarding digital rights.<sup>114</sup> Also CSOs have called for further action from MS, regulatory bodies and the EC, to strengthen safeguards for journalists' rights and media pluralism beyond minimum standards.<sup>115</sup>

***Recommendation: To foster media freedom and pluralism in Member States, the EC should monitor the enforcement of the European Media Freedom Act and in particular, verify how Member States implement measures to ensure that media have appropriate financial and technical resources to operate independently of political or corporate influence.***

Strategic lawsuits against public participation (SLAPPs) have been frequently used against journalists in several MS, especially FR, HR, MT and PL.<sup>116</sup> In April 2024, following a 2022 [EC Recommendation](#), the EU adopted the [Anti-SLAPP Directive](#), which aims at providing journalists and CSOs with protection from abusive cross-border lawsuits intended to silence or intimidate them.<sup>117</sup> By developing a common understanding of what constitutes a SLAPP and by introducing procedural safeguards, the Directive provides courts with means to deal with SLAPPs and those targeted by SLAPPs with the means to defend themselves.

The Anti-SLAPP Directive sets the minimum standards for protecting public watchdogs against abusive litigation, and MS are now responsible to implement or amend national legislation to give effect to the Directive.<sup>118</sup> Those using SLAPPs build their legal cases on national defamation laws or similar provisions on insult or honour. Several MS, for instance DE, HU, IT, PL, SK still foresee prison sentences for defamation in their legal framework.<sup>119</sup>

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<sup>112</sup> According to several interlocutors, including the [Civil Liberties Union for Europe](#), the final version is a step back from the EP's version.

<sup>113</sup> ERGA: [ERGA statement on EMFA](#), April 2024.

<sup>114</sup> European Digital Rights (EDRI): [Challenges ahead: European Media Freedom Act falls short in safeguarding journalists and EU fundamental values](#), January 2024. outlets from the use of spyware. However, in the case of national security needs, spyware may be installed on journalists' devices within the limits of article 52 of the Treaty of Nice. The provision opens then the way for the violation of sources on the basis of public interest, investigations involving serious crimes (a shortlist of crimes considered to be of particular concern by European jurisprudence) and matters of national security.

<sup>115</sup> [Global Forum for Media Development: Reflecting on a Journey: History of the European Media Freedom Act \(EMFA\)](#), February 2024. In particular, a key provision in the EMFA concerns article 4, which aims to protect media.

<sup>116</sup> MT is one of the MS recording the highest number of SLAPPs, with the defamation law as the main legal basis. According to [Article 19](#), numerous SLAPP cases are pending in court, including cases brought against Daphne Caruana Galizia before her murder. Many cases are filed only to be dropped before they are concluded, forcing defendants to run up legal costs as well as time and effort. See also: CASE, [How SLAPPs increasingly threaten democracy in Europe – new CASE report](#), August 2023.

<sup>117</sup> [Directive \(EU\) 2024/1069](#) - adopted by the co-legislators on 11 April 2024 - concerning the protection of persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (SLAPPs).

<sup>118</sup> The Coalition Against SLAPPs in Europe (CASE) [stressed key areas to be addressed by MS](#).

<sup>119</sup> Media Pluralism Monitor, [Decriminalisation of defamation](#), 2019 and [Commission recommendation \(EU\) 2022/758 of 27 April 2022](#).



***Recommendation: To enhance protection against the misuse of criminal and civil defamation laws, which are representing an essential threat to freedom of expression and journalistic freedom, the EC should oversee the transposition of the Anti-SLAPP Directive in national legislations and closely monitor its implementation.***

## B. Media coverage

In most MS, the regulatory framework for media coverage provides for the allocation of free airtime according to the principle of equal opportunities while stipulating fairness, balance and impartiality in the general coverage of election contestants. In 21 MS, political parties are granted free airtime on public channels, normally awarded according to either equality or proportionality principles. The proportional allocation is based on a variety of criteria, which can include the parties' representation in the outgoing parliament, opinion polls, parties' active engagement, and the overall number of candidates, as well as the total of lists running for elections.

### ***The Netherlands – allocation of free airtime***

*The media environment in the Netherlands is diverse and provides for a wide range of views. The media system largely relies upon self-regulation. Nonetheless, constitutional guarantees are in place, including the guarantee of freedom of expression. According to the Media Law, political parties which have gained one or more seats in the most recent elections are allocated a set amount of broadcasting time on generalist national channels. The amount of time allocated to them is determined by the Media Authority. In addition, parties that participate in elections for the House of Representatives in all polling districts or that take part in the EP elections are also allocated free airtime by the Media Authority.*

In several MS where the public broadcaster is not obliged by law to provide free airtime, there are either self-regulatory systems for public and private channels to allocate airtime to contestants (like in AT, where a code of conduct provides guidance about election coverage) or other instruments aiming to ensure equitable treatment of parties and candidates (for instance CY and LU). Besides the European Broadcasting Union debate for EUPPs in the EP, debates were organised by public and private TV channels also at MS level among the main candidates and political actors. Laws in 12 MS require free airtime to be provided in accessible format.

## XIII. Online Campaign and Social Media Regulation

Online platforms have become an integral part of daily life in Europe, influencing various aspects of communication and information consumption especially during elections. Challenges to election integrity and citizens' trust in democratic institutions persisted and were exacerbated by information manipulation activities, including AI-generated content and cybersecurity threats.

## A. Legal Framework

While several resolutions by UN bodies have reaffirmed that “the same rights people have offline must be protected online”,<sup>120</sup> no binding regulatory framework has yet been established globally. The EU, however, besides the General Data Protection Regulation ([GDPR](#)) of 2018, passed since 2022 several landmark legislative acts to regulate the digital space surrounding elections.<sup>121</sup> The DSA that fully came into force in February 2024 establishes a robust framework and high standards for the protection of fundamental rights online. It holds accountable providers of intermediary services, such as online marketplaces and social media, particularly “Very Large Online Platforms” (VLOPs) and “Very Large Online Search Engines” (VLOSEs), which are defined as platforms with over 45 million average monthly active users in the EU. However, its effectiveness will be understood only once fully implemented at MS level.

In addition, and to ensure integrity and security during the EP Elections, the EC issued the Guidelines on the Mitigation of Systemic Risks for Electoral Processes under the DSA,<sup>122</sup> also to bridge the gap until the TTPA becomes fully in force. These measures aimed to create a safer and more transparent online environment, to safeguard democratic processes and ensure the integrity of public discourse by mitigating systemic risks. CSOs welcomed the TTPA adoption and the commitment of EU co-legislators to protect electoral processes, but emphasised that stronger safeguards are still needed, particularly for the protection of political expression and participation in elections.<sup>123</sup>

Furthermore, in addition to the DSA and the Guidelines, other EU initiatives to safeguard the EP elections against information manipulation while protecting freedom of expression included the Code of Practice on Disinformation (Code of Practice) and the European Digital Media Observatory (EDMO).<sup>124</sup> The strengthened Code of Practice, currently a voluntary and co-regulatory instrument developed on 16 June 2022, is signed by 44 signatories who joined the revision process of the 2018 Code and agreed to establish a framework for further collaboration through a permanent Task Force.<sup>125</sup> Signatories committed to taking action in several domains, such as demonetising the dissemination of disinformation, ensuring the transparency of political advertising, empowering users, enhancing cooperation with fact-checkers, and providing researchers with better access to data. For signatories that are VLOPs, the new Code will soon become a mitigation measure and it is recognised under the regulatory framework of the DSA.

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<sup>120</sup> UN GA resolution of 27 June 2016 on [The Promotion, protection and enjoyment of human rights on the Internet](#), A/HRC/32/L.20, par 1, as well as -UN HRC Resolution [20.8 of 5 July 2012](#) and [26/13 of 26 June 2014](#) on the promotion and protection of human rights on the Internet, amongst others.

<sup>121</sup> Including the [DSA](#), the [Digital Market Act](#), the [AI Act](#), the [EMFA](#) and the [TTPA](#), enhancing the broader fundamental rights and safeguards framework. See Chapter IV Legal Framework.

<sup>122</sup> The EC in cooperation with DSCs, can issue guidelines in relation to specific risks, in particular to present best practices and recommend possible measures. [Guidelines for providers of VLOPs and VLOSEs on the mitigation of systemic risks for electoral processes](#), 26 April 2024.

<sup>123</sup> [Joint Civil Society Statement](#): Recommendations on the Implementation of the Regulation on Transparency and Targeting of Political Advertising

<sup>124</sup> During the EP Elections, [EDMO](#) established a fact-checking task force via 14 hubs across 27 EU countries.

<sup>125</sup> The permanent Task Force is an important forum of exchange among signatories. Together with the ERGA, EDMO, and other stakeholders, the EC regularly assesses the progress made in the implementation of the Code. VLOPs have to report every six months while other signatories report on a yearly basis.

## B. Enforcement and Compliance

The enforcement and compliance with the DSA and the guidelines is primarily the responsibility of relevant national authorities from the 27 MS, named Digital Services Coordinators (DSC),<sup>126</sup> and the EC regarding VLOPs/VLOSEs. Overall, DSCs have been appointed in 21 MS. However, in BE, CY, EE, ES, HR, LT, LU, NL, PL, PT, SE, SK, the MS either did not designate the competent authority as DSC, or did not empower these authorities to perform the tasks required by the Act, or both. On 24 April and on 25 July, the EC took decisive action to hold in total twelve MS accountable by opening infringement procedures for not yet having appointed DSCs or providing them with sufficient powers and resources.<sup>127</sup> Overall, those MS with media regulators as DSCs (AT, BE, FR, GR, HU, IE, IT, MT, PT, SI, SK) appeared to be better equipped to fulfil the DSA mandate and regulatory responsibility compared to DSCs with other competencies.

Effectiveness of implementation of the DSA varied among the MS. IE has been noted for its preparedness and accountability, also by maintaining an open and active dialogue with civil society groups. Irish regulatory authorities actively carry out the supervision of and enforcement against smaller online service providers as well as some regulatory responsibility for the VLOPs and VLOSEs also established in IE.

***Recommendation: Continued efforts are necessary to ensure the full implementation of the DSA across all Member States. This includes providing adequate support and resources to national authorities, fostering collaboration and best practices, and conducting regular assessments to monitor progress and address any challenges promptly.***

Online campaigning in the MS is not entirely regulated and the interaction between the DSA and other EU regulations and directives is still unfolding. Some MS introduced supplementary legislation to the electoral laws to regulate the online sphere (ES, DE, FR, GR, HU, LV, PL) and DSA legislation has been incorporated into relevant national laws in 15 MS (AT, BE, DE, DK, FI, FR, GR, HU, IE, LT, LV, MT, RO, SI, SK). Among MS, FR has demonstrated a strong commitment over the past years by significantly enhancing both legislative and non-legislative efforts to combat online disinformation disseminated by domestic and foreign actors, promoting polarization, undermining elections, and threatening democratic discourse.

Noticeable improvements have been made in identifying and countering information manipulation campaigns in MS by both domestic and foreign actors. Numerous initiatives, broad coordinated efforts and collaborations were established among CSOs, media organisations, MS, EU institutions, and online platforms, which collectively enhanced their effectiveness. During the EP electoral campaign, the rapid response system under the [Code of Practice on Disinformation](#), established and agreed by the signatories of the Code, has proven to be an effective instrument facilitating cooperation and rapid reaction to disinformation threats. [EDMO](#) has also been instrumental in building resilience through monitoring, fact-checking and media literacy activities. There is also the [Rapid Alert System](#), a system with just

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<sup>126</sup> The deadline for the MS to designate DSCs was established as 17 February 2024.

<sup>127</sup> On [24 April](#) CY, EE, LT, PL, PT, SK, on [25 July](#) BE, ES, HR, LU, NL, SE. The procedure against SK has reportedly been stopped as a result of the DSC appointment in July.

MS and the EEAS and no platforms or other stakeholders involved, as well as the EU's East Stratcom Task Force [EUvsDisinfo](#).

With the VLOP Meta being the most active in complying and putting in place measures to respond to DSA requirements, the data access provision remains a critical aspect for all platforms to implement fully. The announcement of the discontinuation and the beginning of the phasing out of the Meta analysis tool CrowdTangle during the EP election campaign, combined with the lack of an adequate replacement, was concerning for the research community. Its demand to re-establish the tool remained unheard.<sup>128</sup> The EC initiated a formal proceeding to investigate Meta regarding non-compliance with DSA obligations,<sup>129</sup> including deceptive political advertising and disinformation, as well as transparency of political content.<sup>130</sup> While the DSA has effectively addressed many areas of concern and platforms have increased their efforts to comply with the regulations and combat information manipulation activities, including disinformation, their overall commitment and capacity to safeguard electoral integrity remains in question.

***Recommendation: Online platforms should ensure transparency by adhering to agreed commitments and implementing DSA rules and mitigation measures. They must enhance efforts in combating information manipulation activities by improving mechanisms and establishing a multi-stakeholder approach through working groups and open discussions. Comprehensive, real-time data access needs to be provided to researchers for systematic monitoring and analysis, while maintaining user privacy and data security.***

According to reporting and analysis issued after the EP elections, no major threats disrupted the electoral process or affected EU voters due to the preparedness of EU bodies and independent institutions committed to debunking and digital literacy programs across MS.<sup>131</sup> However, information manipulation campaigns and activities run by a range of foreign and domestic actors increased ahead of the elections and influenced the campaign.<sup>132</sup> Foreign information manipulation and interference (FIMI) primarily focused on DE and FR, and to a lesser extent on IT, PL, and ES.<sup>133</sup>

Furthermore, researchers noticed that a high number of political ads (predominantly on *Meta* and *Google* platforms) did not meet transparency measures and were largely utilised to proliferate messages demonising the EU and its values.<sup>134</sup> Recent changes in *X* platform moderation, now milder and lacking safeguards compared to former *Twitter*, contributed to

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<sup>128</sup> Over 100 social media research, advocacy, and watchdog groups led by the Mozilla Foundation have signed an open [letter](#) to Meta calling for CrowdTangle platform extension, which was discontinued on 14 August 2024.

<sup>129</sup> In case of non-compliance, online platforms may be fined up to 6 per cent of their annual revenue and continued refusal to comply with the legislation could lead to temporary suspension of services within the EU.

<sup>130</sup> At the end of 2023, the EC had already opened proceedings against another VLOP *X* (formerly *Twitter*) under the DSA related to countering the dissemination of illegal content and the measures to combat information manipulation on the platform.

<sup>131</sup> [Maldita](#) detected and debunked disinformation in a timely manner as a broad effort in protecting the digital space.

<sup>132</sup> Increase of information manipulation activities ahead of EP elections reported by the [Belgian Centre of National Crisis](#), and [EDMO Task Force on the 2024 European Parliament Elections Final Report](#).

<sup>133</sup> As part of the monitoring and analysis for the 2024 EP elections, the [EEAS StratCom detected FIMI activities by Doppelganger operations](#).

<sup>134</sup> [The Digital Forensic Research Lab \(DFRLab\)](#) reported on an inauthentic Facebook ad campaign spreading anti-EU messages. See [No embargo in Sight report](#) on political ads on Facebook and Instagram.

the rapid spread of harmful and toxic content about the EU and EP elections, with a high number of toxic posts in HU and PL.<sup>135</sup>

#### ***European networks countering disinformation: The Doppelgänger operation***

*Since the 2019 EP elections FIMI became more sophisticated to influence social media and traditional media outlets by using multi-dimensional information operation. The so called Doppelgänger operation operations were revealed first by [EU Disinfo Lab](#) and [Meta](#) in late 2022 and impacted the [platform regulation on the EU disinformation environment](#).*

*The Doppelgänger operation started simultaneously with Russia's full-scale invasion of Ukraine in February 2022 and revamped during the 2024 EP Elections as reported by the [EU External Action Service](#). The central part of the operation was the emergence of more than 60 websites impersonating legitimate news outlets, organisations and even public institutions spreading diverse false and misleading messages in various languages. By impersonating trusted media outlets these operations seek to influence public opinion, sow discord, and potentially shift voter perceptions.*

*Challenges to election integrity and to citizens' trust in democratic institutions persist and are enhanced by information manipulation activities including AI-generated content, like deep fakes imitating voice and images, spreading falsehoods via [chatbots](#) powered by large language models.*

## XIV. Complaints and Appeals

Handling election-related complaints and appeals is predominantly a matter for responsible national institutions, including EMBs and courts. EU law does not establish any standardised procedures on this matter. Consequently, the effectiveness of remedies for any irregularities in European elections depends on the electoral dispute resolution systems established and operated by MS. These vary considerably in scope of regulation and approach, and have been previously [assessed](#) by the CoE Venice Commission as requiring improvement in several respects.

At least half of MS define narrowly what complaints can be filed before election day, including several like FI, LU, MT, and NL that limit these to or explicitly outline procedures for challenges related exclusively to voter and candidate registration. In AT, complaints of rejected contestants are only dealt with after elections, detracting from timely redress. In line with the Venice Commission's [Code of Good Practice in Electoral Matters](#), the majority of MS provide expedited deadlines for complaint and appeal procedures. However, in several other countries, including BE, BG, CZ,<sup>136</sup> DE, FI, FR, IE, IT, LV, LU, NL, PT, PL, SE, and SK, either longer time limits are envisaged, or no clear deadlines are set for some types of election-related challenges. At odds with international standards and regional commitments,<sup>137</sup> there is a lack

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<sup>135</sup> Democracy Reporting International: [From Engagement to Enmity: Toxicity and Key Narratives in EP Elections 2024](#), June 2024.

<sup>136</sup> In CZ, deadlines for election-related complaints are shorter compared to those applicable to other complaints defined by the Administrative Procedure Code. Nevertheless, these deadlines are fairly long.

<sup>137</sup> Paragraph 5.10 of the [1990 OSCE Copenhagen Document](#) commits participating States to ensure that "everyone have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure

of a possibility of an appeal to court in seven MS (BE, DK, IT, LT, LU, NL, SE) against the decisions by national EMBs and/or by parliaments when they review and approve final election results.<sup>138</sup>

Overall, the effectiveness of electoral dispute resolution was assessed by the EAM interlocutors in MS somewhat less positively than other areas, pointing to the need for improvements to fully guarantee timely and effective electoral redress. According to the [Eurobarometer](#), 37 per cent of EU citizens assessed the independence of their national courts and judges as very or fairly bad.

The EC's July 2024 [Rule of Law Report](#) welcomes efforts and progress in several MS in strengthening the independence of national justice systems, while noting remaining concerns regarding Councils for the Judiciary in SK, appointments to high-level judicial positions in AT, LT, LV, and SE, as well as undue pressure on the judiciary from politicians or the executive level in ES, IT, and SK. Two MS, HU and PL, have been subject to CJEU rulings. While the EC has closed the TEU Article 7 procedures against PL in May 2024, HU remains subject to infringement proceedings under TEU Article 7 for breaches of rule of law and failures to guarantee judicial independence.<sup>139</sup>

#### ***Netherlands - Reforms to ensure independent scrutiny and judicial review of final election results***

*Under the current law, the final election results of elections in NL are reviewed and approved by parliament, which also decides on all the disputes related to them. At odds with international standards, there is no possibility of appeal against the parliament's decision to approve or invalidate final election results. In its 2020 [Mugemangango v. Belgium](#) judgement, the ECtHR has found the involvement of a legislature in the approval of election results as lacking impartiality and sufficient safeguards. The OSCE/ODIHR has also previously pointed to this issue in NL and other countries.*

*Positively, based on these considerations and recommendations, NL authorities have initiated the review of current provisions with a view to ensuring a more (politically) independent scrutiny of results and enabling judicial review. Related statements of intent by the Ministry of the Interior and Kingdom Relations of [2022](#) and [2024](#) reference and build on the advice provided by the Electoral Council in 2021, which also found the current system for assessing the validity of the vote no longer sufficient. As part of the review process, the Ministry of the Interior has also consulted with the Advisory Division of the Council of the State and engaged in expert consultations in the framework of ECNE to exchange experience and collect related good practice.*

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legal integrity". Principle 1A of [Recommendation Rec \(2004\)20](#) of the Council of Europe's Committee of Ministers advises that "all administrative acts should be subject of judicial review".

<sup>138</sup> In PL, while EMB decisions may be appealed in court, standing is granted to contestants only and the law defines narrowly, which decisions are subject to judicial review. In LT, it is only the parliament itself that can challenge the validity of final results in the Constitutional Court, while its decisions are not appealable to a judicial authority. Parliaments are involved in the (in)validation of election results also in DE and SI, but with an appeal to court granted.

<sup>139</sup> In June 2024, the Belgian EU Presidency [has urged](#) MS to advance Article 7 procedure against HU, the phase one of which was triggered by the EP in 2018. In contrast, in May 2024, the EC [has closed](#) the Article 7 procedure against PL, having assessed that there was no longer a clear risk of a serious breach of the rule of law. See also the February 2022 [Dolińska-Ficek and Ozimek v Poland](#) and the November 2023 [Wałęsa v Poland](#) ECtHR rulings pertaining to the independence of the judiciary.

Several [review mechanisms](#) relevant to EP elections are also present at the EU level. This includes the possibilities to address the EP, the EC, and the European Ombudsman in specific and clearly defined cases. However, except for the possibilities for national courts to request preliminary rulings and for infringement procedures initiated by the EC to be referred further to the CJEU, EU-level redress mechanisms are mostly non-judicial in nature and are generally not conceived as an avenue of first resort for addressing electoral irregularities.

***Recommendation: Common guidelines on the handling of electoral disputes could be developed at the EU level. Reforms in Member States could prioritise the introduction of expedited deadlines to provide timely redress in electoral matters and ensuring a recourse to court against administrative decisions, including regarding final election results.***

## XV. Civic Space and Election Observation

### A. Civic Space

The European institutions increasingly emphasise the important role of civil society in safeguarding and promoting human rights and take measures to protect civic space.<sup>140</sup> Nevertheless, CSOs have criticised the EU mechanisms of including organised civil society merely as a stakeholder for implementing policies, feeling lesser acknowledgement for their watchdog roles and as intermediaries between the state and individuals.<sup>141</sup> Ahead of these European Elections, the European Union Agency for Fundamental Rights ([FRA](#)) has specifically pointed out threats to democracy and civic space. FRA stated that during the last term, CSOs have raised concerns about the legal, political and practical challenges with regards to the regulatory environment, the availability and accessibility of resources, difficulties in accessing decision-makers and providing input to policy making, as well as the safety of CSO activists. Multiple civic space infringements have been reported for a number of MS including BG, HR, and FR, with the most concerning trends in HU and SK. A shared point of contention among Europe-wide civil society networks is the issue of transparency of foreign interest representation in the context of the EC's Defence Against Democracy Package.<sup>142</sup> Among others, CSOs have called for empowering resilience in the civic sector through embedding human rights in funding policies.

### B. Election Observation in the EU

Election observers can contribute to safeguarding civic space and must be protected against infringements as they are internationally recognised as human rights defenders.<sup>143</sup> As

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<sup>140</sup> According to the [UN Guidance Note on Protection and Promotion of Civic Space](#), "civic space is the environment that enables people and groups – or 'civic space actors' – to participate meaningfully in the political, economic, social and cultural life of their societies", September 2020; The [EP](#), the [EC](#), and the [Council](#) have all recognised civic space in key documents, and the EC has provided a dedicated [Recommendation](#).

<sup>141</sup> European Civic Forum: [Civic Space Watch Report 2024](#), with detailed country chapters.

<sup>142</sup> [Civil Society Europe](#), April 2024

<sup>143</sup> [UN Special Rapporteur on Human Rights Defenders](#), 27 October 2022; Inter-American Commission on Human Rights ([IACHR](#)), 23 May 2024

observation reports are increasingly referenced inside the EU,<sup>144</sup> citizen election observers within MS experience limitations in the areas of regulation, access to authorities, and funding, similar to other civic space actors.

All EU MS have pledged to respect election observation as part of their regional commitments.<sup>145</sup> Ahead of the 2024 European elections, for the first time, the EC has explicitly advised the MS to facilitate both international and citizen-based election observation in its December 2023 [Recommendation](#). However, only seven MS (BG, FI, HR, LT, PL, RO, SI) have enabling legal frameworks and accreditation procedures for both international and citizen election observers in place, while six MS (AT, BE, CZ, HU, LU, NL) only have provisions for international observers, with various limitations. For example, in BE and LU, this pertains only to organisations in which the country is a member; in AT and IT, it is explicitly limited to the OSCE;<sup>146</sup> in CZ, international observation is limited to presidential elections; and in SK, election observation pertains only to voting and counting on election day. LV accredits international and citizen election observers on the basis of a written EMB instruction, and CY (only international) and MT do so without any provisions.

Election-Watch.EU has applied for international observer accreditation, and through its national focal points for citizen observer accreditation, in all 27 MS and has received accreditation in 13 MS (BG, CY, CZ, FI, HR, HU, LT, LV, MT, NL, PL, RO, SI; see Annex II).<sup>147</sup> The 27 EU MS invited the OSCE/ODIHR to observe the European elections, which conducted a [Special Election Assessment Mission](#).

Overall, the elections in BG and RO were the elections with most accredited and deployed election observers, also due to concurrent national or local elections. For example, in RO, the *Vot Corect* coalition of six CSOs, associated to this EAM, deployed over 800 observers. Citizen observer organisations have also provided various independent scrutiny in HR, LT, and SK. Based on testimonies of polling station officials, as citizen election observation is not permitted, CSOs in HU have provided a [joint report](#) that highlights an overt dominance of the ruling party, vote buying, and systemic misuse of procedures.

#### ***Finland - Election observer accreditation and training***

*Most EU MS with enabling frameworks for election observation distinguish between international and citizen observers. Finland does not make such a difference. The Ministry of Justice (Department for Democracy and Public Law) recognises election observers on the basis of adherence to the principles for impartial and professional observation, such as the Declaration of Principles for International Election Observers ([DoP](#)) and the Declaration of Global Principles for Nonpartisan Election Observation and Monitoring by Citizen Organizations ([GNDEM](#)), and proactively offers a briefing for observers, in line with the EC recommendation.*

<sup>144</sup> Election-Watch.EU has been repeatedly invited to brief ECNE since its inception in 2019.

<sup>145</sup> [1990 OSCE Copenhagen Document](#), paragraph 8, [Venice Commission Guidelines on an internationally recognised status of election observers adopted by the Council for Democratic Elections](#), 2009.

<sup>146</sup> See Lidauer, Michael/Rabitsch, Armin: [Election Observation inside the European Union: A Void to be filled](#). European Democracy Hub, May 2024.

<sup>147</sup> This is one more MS than in 2019, namely CZ.



In 10 MS (BE, DE, DK, EE, ES, FR, MT, NL, SE, SK), the vote and count are open to the public, however, this is insufficient, as such access can be misused by actors with an interest to influence electoral outcomes in favour of a partisan agenda. This is notably the case in DE, where an initiative in proximity to the political party *Alternative for Deutschland* (AfD), which has been [classified](#) as a suspected case of right-wing extremism by the Federal Office for the Protection of the Constitution, has been mobilising voters as “observers”.<sup>148</sup>

**Recommendation:** *To safeguard independent oversight, all Member States should include provisions in their legislation to explicitly allow access and accreditation of non-partisan election observers throughout the electoral process according to international principles.*

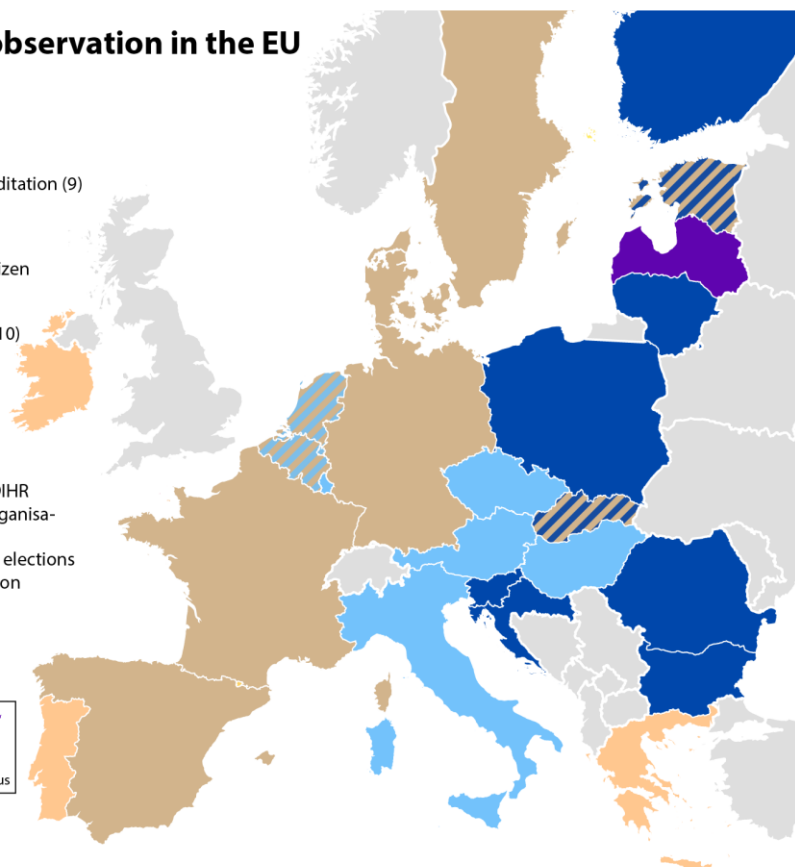
### Regulations for election observation in the EU



- Both international and citizen election observation permitted by law, with accreditation (9)
- Only international election observation permitted by law, with accreditation (7)
- Accreditation for international and/or citizen observers without legal provisions (3)
- Voting and counting open to the public (10)
- No provisions (3)

**Notes:**

BE, EE, SK: No accreditation procedures  
 AU, IT: International observers only by OSCE/ODIHR  
 CZ, BE, LU: International observation only by organisations in which the country is a member  
 CZ: International observers only for presidential elections  
 SK: Observation limited to voting and counting on election day  
 EE, FI: Law does not distinguish between international and citizen election observers



<sup>148</sup> See [wahlbeobachtung.de](http://wahlbeobachtung.de) and [einprozent.de](http://einprozent.de)

## XVI. Election Results

Election results are calculated and verified separately in the 27 MS. Provisional results for the European elections were aggregated on the [EP website](#) from 9 June evening onwards. First projections became available after 18:00 hours, and provisional results from most MS were displayed after 23:00 hours. Results for the elected MEPs in IE were only available one week later due to the more complicated single transferable vote system. Official results for BG and ES were only available in late June.

### A. Polling station results

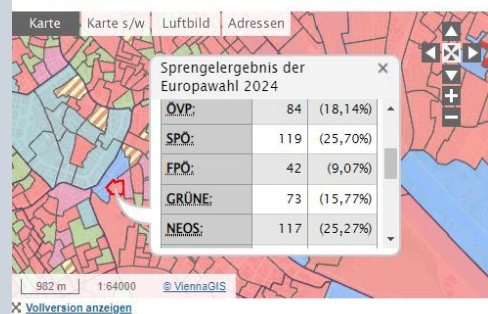
Arrangements for vote counting vary, with some MS counting the ballots in a centralised manner, at municipal or regional administrations. Counting centres which do not provide the same level of transparency and efficiency as counting ballot papers at polling station level are still used in BE, and reportedly rather inefficient. In addition, in BE, ES, and GR EMBs and municipalities rely on random selected citizens who are mandated to conduct the work in polling stations and counting centres on election day.

#### **Austria – Publication of polling station results online**

##### Sprengelergebnisse der Europawahl 2024

Seite vorlesen

Einzelne Sprengelergebnisse können auch im wien.at-Stadtplan eingesehen werden. Per Klick auf den Sprengel werden die gültigen Stimmen je Partei angezeigt.



##### Legende

- ÖVP – absolut/relativ
- SPÖ – absolut/relativ
- FPÖ – absolut/relativ
- GRÜNE – absolut/relativ
- NEOS – absolut/relativ
- DNA – absolut/relativ
- KPO – absolut/relativ
- Stimmgleichstand

*So far polling station results in AT were not publicly available. With the 2023 electoral law amendment, AT provided for the first time in the 2024 EP elections the publication of election results broken down to polling station level. The [Municipality of Vienna](#), like other municipalities in AT, provided a colour coded map according to the strength of political parties based on the result per polling station. By clicking on a polling precinct, the result per polling station appears. This change has been possible since the legal changes 2023 provided also for most postal ballots being counted at the polling station level on election day instead at the district election commission level in the days thereafter.*

Among the positive measures of transparency that enhance public confidence, most MS publish detailed election results per polling station. AT has recently adopted such requirements, and BG and SK make also scans of polling station result protocols available online with the former publishing open-source data in machine readable format allowing for independent calculations. In five MS (GR, IE, IT, LU, PT), polling station results are posted for public scrutiny in polling stations, but the disaggregated national results are not published per

polling station online.<sup>149</sup> At odds with international good practice, in two MS (DE, MT), detailed disaggregated election results per polling station are not published, either in polling stations or online. Concurrent national or local elections in nine countries added considerable administrative challenges but did not appear to negatively impact EMB performance.<sup>150</sup>

## B. Voter turnout and invalid votes

Based on the results provided by the MS, the EP announced a slightly higher preliminary voter turnout than in 2019 of 51.05 per cent. Voter turnout figures varied tremendously from 21.34 per cent in HR to 89.82 (89.01) per cent in BE (where voting is compulsory and general elections were held concurrently). Voter turnout decreased in ten MS (AT, DK, ES, FI, GR, HR, LT, LU, PL, and SE) and remained the same in EE, but increased in 15 MS (BE, BG, CY, CZ, DE, FR, IE, HU, LV, MT, NL, PT, RO, SI, SK). Some of these changes appear to be of historical significance in the respective MS. Turnout grew by over five per cent in DE, CZ, NL, and PT, by over ten per cent in SI and SK, and by over 16 per cent in HU. On the contrary, turnout diminished by 8.5 per cent in HR, 14 per cent in ES, 17 per cent in GR, and 25 per cent in LT.<sup>151</sup>

However, the preliminary results have been only displayed on the [EP result website](#) in percentages of the vote and turnout, without data of registered voters, cast ballots, etc., which limits transparency and independent oversight. Preliminary voter turnout figures varied at times significantly between those displayed on the EP website and those officially announced at the MS level. For example, the ES EMB released the official publication of results on 28 June, with voting data resulting in a voter turnout of 46.39 per cent,<sup>152</sup> while the EP website captured a voter turnout for Spain of 49.21 per cent.

Given the heightened public attention and interest in the announced turnout figures at the time of the elections, including how they compare to previous elections, such differences and late adjustment could raise questions about the process. Following Election-Watch.EU's communication with the EP, the turnout figure for Spain, as well as the resulting overall turnout figure was adjusted on the EP result website from 51.05 to 50.74 percent at the beginning of September.<sup>153</sup> The procedures followed by the EP in aggregating results received from MS are not spelled out in any public document and remain unclear.

In addition, EMBs announce and display votes for political parties with a varying degree of detail and transparency. While generally the percentage of invalid votes remains at a low range up to two per cent, four MS (BE, LU, RO, SI) have a percentage of invalid votes of four per cent and higher. There could be a variety of factors which may contribute to invalid/spoilt/blank ballots like withdrawal of candidates. In the case of BE this could be explained by voters expressing their discontent on the ballot papers due to the compulsory

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<sup>149</sup> For instance, in LU, results are displayed in every polling station but are published online by municipality.

<sup>150</sup> National votes were held on the same day in BE and BG and local/regional elections in CY, DE, HU, IE, IT, MT, RO. In addition, campaigns for other elections overlapped with the European campaign in ES, LT, PL and SK.

<sup>151</sup> EP: [European election results](#), 3 July 2024.

<sup>152</sup> Spanish [official results](#) announced in the State Bulletin.

<sup>153</sup> [Statista](#) website was still displaying the 51.05 percent overall voter turnout figure at the time of the publication of the report. For some MS, like LT and SK data still includes some discrepancy between MS EMB and EP websites.

voting system. Such a high percentage of invalid votes could also be explained with the ballot design (like booklets with a stamp in RO) as outlined by citizen election observers.

Table 1: Official results announced by national Election Management Bodies<sup>154</sup>

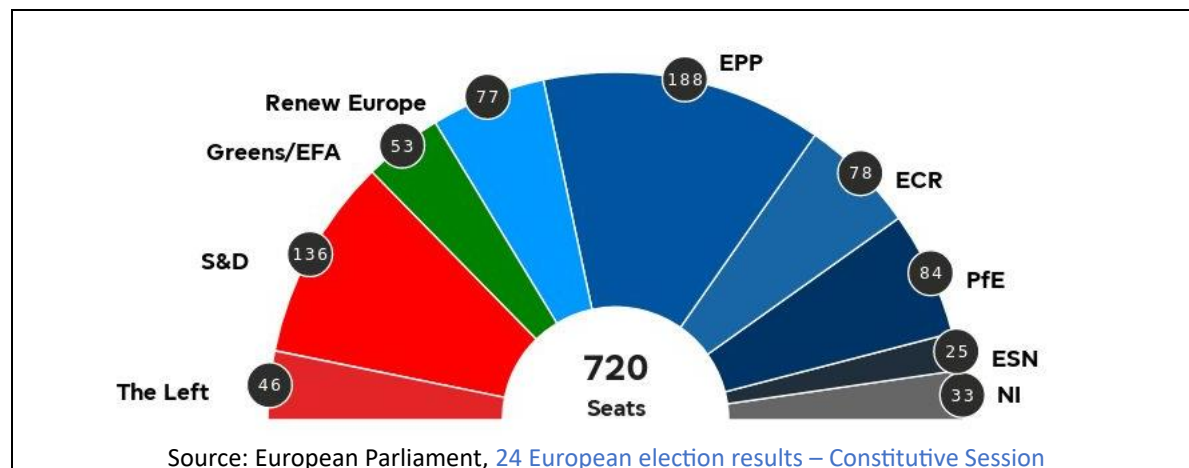
Member State	total # of registered voters	total # of votes cast	% turnout as per MS EMB data	% turnout as per <a href="#">EP official website</a>	total # of invalid votes as per MS EMB data	% invalid votes
Austria	6,372,204	3,584,482	56.25	56.25	60,548	1.69
Belgium	8,537,902	7,599,758	89.01	89.01	465,974	6.13
Bulgaria	6,170,472	2,073,730	33.78	33.78	61,238	2.95
Croatia	3,524,179	752,040	21.34	21.35	11,318	1.50
Cyprus	683,432	402,276	58.86	58.86	8,450	2.10
Czechia	8,212,628	2,993,252	36.45	36.45	22,793	0.76
Denmark	4,301,255	2,505,381	58.25	58.25	57,598	2.30
Estonia	980,014	368,925	37.64	37.60	950	0.26
Finland	4,546,589	1,835,762	40.38	40.40	6,513	0.35
France	49,462,981	25,470,451	51.49	51.49	716,689	2.81
Germany	61,963,020	40,114,939	64.74	64.74	304,450	0.76
Greece	9,814,685	4,062,092	41.39	41.39	55,293	1.36
Hungary	7,803,603	4,640,398	59.46	59.46	65,949	1.42
Ireland	3,554,450	1,800,226	50.65	50.65	54,996	3.05
Italy	51,214,348	24,740,230	48.31	48.31	774,735	3.13
Latvia	1,541,102	521,226	33.82	33.82	5,781	1.11
Lithuania	2,387,327	691,572	28.97	28.35	13,253	1.92
Luxembourg	319,410	262,676	82.24	82.24	11,784	4.49
Malta	370,184	270,142	72.98	73.00	9,884	3.66
Netherlands	13,542,363	6,253,467	46.18	46.18	11,607	0.19
Poland	29,098,155	11,831,590	40.66	40.65	67,731	0.57
Portugal	10,789,781	3,951,979	36.63	36.63	30,503	0.75
Romania	18,025,329	9,444,894	52.40	52.42	488,551	5.17
Slovakia	4,337,093	1,505,176	34.70	34.38	28,208	1.87
Slovenia	1,689,602	706,204	41.80	41.80	31,182	4.42
Spain	38,050,286	17,652,007	46.39	46.39 (49.21)	124,569	0.71
Sweden	7,942,272	4,240,459	53.39	53.39	42,448	1.00
<b>Total</b>	<b>355,202,244</b>	<b>180,275,334</b>	<b>50.75</b>	<b>50.74 (51.05)</b>	<b>3,532,223</b>	<b>1.96</b>

**Recommendation: To enhance transparency and independent oversight, Election Management Bodies should consistently publish detailed election results, including polling station data, the number of invalid votes, and data on voter demographics such as double citizens. Procedures for the aggregation of election results and calculation of voter turnout by the European Parliament should be clearly outlined and published.**

<sup>154</sup> Election-Watch.EU collected the data from official websites of national EMBs via its EU-wide network. Turnout was calculated on the basis of this data and compared with the data displayed on the EU website. Highlighted in yellow in the first voter turnout column are high voter turnout figures while in orange marks low voter turnout. In the second (EP) turnout column the variations to the figures obtained from the national EMB websites are marked in yellow.

## C. Composition of the European Parliament

During the five-week period before the constitutive session of the newly elected EP on 16 July<sup>155</sup>, negotiations took place to confirm key roles among the EU executive<sup>156</sup> and to complete group affiliation in the EP, resulting in a new composition of the EP. The number of groups in the EP grew from seven to eight as the ID group was dissolved and two new groups, Patriots for Europe (PfE) and Europe of Sovereign Nations (ESN), were established.



The elections resulted in increases for the EPP to 188 seats (+10) and the Left to 46 seats (+9), a loss for S&D to 136 seats (-5) and great losses for Renew Europe to 77 seats (-24 seats) and EGP/EFA to 53 seats (-17). The biggest gains, however, occurred on the right political spectrum, for ECR to 78 seats (+11), the new PfE group, mostly comprising of former parties of the ID group with 84 seats, and the newly created ESN with 25 seats. The number of non-affiliated MEPs (NI) shrunk considerably to 33 seats (-16).

## XVII. Conclusions and Recommendations

The 2024 EP elections showcased a strong commitment to democratic practice and electoral conduct, despite the growing challenges in a more polarised political environment. Malicious interference from both external and internal malicious interference is now well-documented, prompting the EU and national EMBs to enhance their safeguards and protections. The EU has also proactively worked to establish a comprehensive regulatory framework for the digital space, including AI, setting another international standard similar to the GDPR for data protection, to fill the void in global AI or digital media regulations that is likely to remain in the near future.

<sup>155</sup> At the first plenary, the EP elects its new president, vice-presidents and quaestors, and decides on the number of MEPs who will be sitting in each parliamentary committee. The committees are constituted during the second week. EPRS: [Timeline to new EU institutional leadership](#). At a Glance, April 2024.

<sup>156</sup> During informal meetings of European leaders and in the context of meetings of the European Council, the following executive was confirmed: Ursula von der Leyen as European Commission President (DE/EPP; second term), António Costa as European Council President (PT/PES), Kaja Kallas as High Representative for Foreign Affairs and Security Policy (EE/ALDE); and Roberta Metsola as President of the European Parliament (MT/EPP; second term).

Most MS and EMBs have shown a tremendous vigour to enhance electoral processes to reflect the changing society and adapt to the new challenges. Cybersecurity measures, greater inclusion and enhanced cooperation showed that elections can be well conducted in a charged and demanding environment. In addition, various good practice examples of introduced changes and established processes in different MS indicate what can be done better in the future and serve as a stimulus for change.

Election-Watch.EU has detailed its findings and recommendations in this report following its second EAM to the EP elections, and will continue its advocacy to further strengthen European electoral integrity and enhance democratic practices. The aim is to raise awareness of the importance of European elections and encourage positive change by highlighting good electoral practices of MS.

Involving citizens and organised civil society in the electoral process as observers fosters ownership, trust, and transparency, aligning with democratic decision-making ideals, as also recommended by the EC ahead of the 2024 European elections. Election-Watch.EU will continue advocating for electoral reforms at the European level with EU institutions, the new legislators, and the relevant EP committees. Additionally, it is crucial to sensitise national governments and EMBs about the need for reforms and greater cooperation to address the growing challenges in an increasingly complex electoral environment. A human rights-based approach to further electoral and democratic reforms is necessary, in line with international and European standards and commitments, as trust in elections is difficult to gain and easy to lose.

Election-Watch.EU stands ready to engage in a follow-up process to address EAM recommendations, assist in European electoral reforms, and encourage EU and MS authorities to consider issues and good practices raised by interlocutors during the course of the EAM.

## ANNEX I: Compilation of 2024 EAM Recommendations

### ***Electoral reform process***

1. *European institutions and Member States need to intensify their collaborative efforts to advance the pending electoral reforms. It is essential to address past recommendations and persistent issues, including the lack of uniformity in national electoral regulations and the differing timelines for key electoral processes, which adversely impact the equality of rights and opportunities.*

### ***Electoral system***

2. *Sustained efforts are needed to identify a permanent method for the distribution of EP seats among Member States. In line with international good practice, the distribution should be based on clear, transparent, and objective criteria and ensure transnational equality of the weight of the vote, while reconciling with EU Treaty requirements.*

### ***Suffrage rights***

3. *Reforms of electoral legislation at EU and Member State levels should continue to prioritise the widening and more uniform availability of advance and alternative voting methods to Union citizens.*
4. *To promote equality in voting and candidacy rights across the EU and reduce disparities in national suffrage approaches, renewed efforts should focus on establishing additional common European minimum eligibility criteria for voters and candidates. These criteria should aim to harmonise requirements for the minimum voting age, residency, independent candidacy, and permissible restrictions on suffrage rights.*

### ***Persons with disabilities***

5. *To enhance accessibility and inclusion of persons with disabilities in elections, it is essential to implement alternative voting methods such as postal and mobile voting, ensure physical accessibility of polling stations, and provide election information in multiple accessible formats. Additionally, training election staff, deploying assistive technologies, and engaging with Disabled Persons Organizations can significantly improve electoral participation for persons with disabilities.*

### ***Women participation***

6. *The EU and Member States should continue efforts to increase the participation and representation of women through legislative and voluntary measures. The collection and publication of gender-disaggregated data on electoral aspects should be further encouraged.*

### ***Inclusion of national minorities***

- 7. To facilitate the inclusion of disadvantaged communities, the European institutions and its Member States should engage in increased awareness raising for the electoral participation of national minorities, including the Roma, and of other underprivileged groups, and should encourage special measures for their participation. Particular focus could be given to the use of minority languages for electoral materials and voter information.*

### ***Youth inclusion***

- 8. The EU and its Member States should provide civic and voter education to young and first-time voters, including through school curricula and practical vote simulations, in a manner to ensure that no young voter is left behind.*

### ***Participation of mobile EU citizens***

- 9. For enhanced inclusion of mobile EU citizens in European elections, Member States could streamline online registration, provide multilingual information, simplify registration procedures and raise public awareness, while harmonising further cut off dates for registration and strengthening data exchange mechanisms.*

### ***Voter registration***

- 10. To enhance the accuracy, inclusivity and integrity of voter registers in European elections, it is recommended that the EU and Member States consider further harmonisation of voter registration procedures, data format, and data exchange, while starting to identify double/multiple EU citizenship and conducting regular audits.*

### ***Candidate registration***

- 11. Harmonising conditions for candidacy, including registration procedures and timelines, could enhance equality of chances and intraparty democratic practices in the European Parliament elections.*

### ***Campaign***

- 12. To strengthen the European dimension of electoral campaigns and ensure equal opportunities for all candidates, efforts could be intensified to increase the visibility of European Political Parties, including on ballot papers, and harmonise electoral campaign regulations across all Member States.*

### ***Campaign finance***

- 13. European institutions and Member States could jointly review the applicable rules for political party and campaign finance and its transparency and oversight, especially with*



*regards to expenditure limits and disclosure requirements, and applicable sanctions in case of non-compliance.*

- 14. Further consideration could be given to clarify the institutional responsibilities of oversight bodies and equip the respective independent authorities with sufficient powers to exercise their mandates, including the scrutiny of incomes, expenditures, and types of campaign activities.*

### **Media environment**

- 15. To foster media freedom and pluralism in Member States, the EC should monitor the enforcement of the European Media Freedom Act and in particular, verify how Member States implement measures to ensure that media have appropriate financial and technical resources to operate independently of political or corporate influence.*
- 16. To enhance protection against the misuse of criminal and civil defamation laws, which are representing an essential threat to freedom of expression and journalistic freedom, the EC should oversee the transposition of the Anti-SLAPP Directive in national legislations and closely monitor its implementation.*

### **Social media regulation**

- 17. Continued efforts are necessary to ensure the full implementation of the DSA across all Member States. This includes providing adequate support and resources to national authorities, fostering collaboration and best practices, and conducting regular assessments to monitor progress and address any challenges promptly.*
- 18. Online platforms should ensure transparency by adhering to agreed commitments and implementing DSA rules and mitigation measures. They must enhance efforts in combating information manipulation activities by improving mechanisms and establishing a multi-stakeholder approach through working groups and open discussions. Comprehensive, real-time data access needs to be provided to researchers for systematic monitoring and analysis, while maintaining user privacy and data security.*

### **Complaints and appeals**

- 19. Common guidelines on the handling of electoral disputes could be developed at the EU level. Reforms in Member States could prioritise the introduction of expedited deadlines to provide timely redress in electoral matters and ensuring a recourse to court against administrative decisions, including regarding final election results.*

### **Election observation**

- 20. To safeguard independent oversight, all Member States should include provisions in their legislation to explicitly allow access and accreditation of non-partisan election observers throughout the electoral process according to international principles.*

### ***Election results***

*21. To enhance transparency and independent oversight, Election Management Bodies should consistently publish detailed election results, including polling station data, the number of invalid votes, and data on voter demographics such as double citizens. Procedures for the aggregation of election results and calculation of voter turnout by the European Parliament should be clearly outlined and published.*

## ANNEX II: Provisions for Election Observation in EU Member States

	Voting and counting open to the public	Law foresees international election observation	Accreditation for international observers	Law foresees citizen election observation	Accreditation for citizen observers	Election-Watch.EU accredited in 2024
Austria <sup>157</sup>		X	X			
Belgium <sup>158</sup>	X	X				
Bulgaria		X	X	X	X	X
Croatia		X	X	X	X	X
Cyprus			X			X
Czechia <sup>159</sup>		X	X			X
Denmark	X					
Estonia <sup>160</sup>	X	X		X		
Finland <sup>161</sup>		X	X	X	X	X
France	X					
Germany	X					
Greece						
Hungary		X	X			X
Ireland						
Italy <sup>162</sup>		X	X			
Latvia			X		X	X
Lithuania		X	X	X	X	X
Luxembourg <sup>163</sup>		X	X			
Malta	X		X		X	X
Netherlands	X	X	X			X
Poland		X	X	X	X	X
Portugal						
Romania		X	X	X	X	X
Slovakia <sup>164</sup>	X	X		X		
Slovenia		X	X	X	X	X
Spain	X					
Sweden	X					

<sup>157</sup> International observation only by OSCE/ODIHR

<sup>158</sup> International observation only by organisations in which the country is a member

<sup>159</sup> For presidential elections only

<sup>160</sup> Law does not distinguish between international and citizen election observers

<sup>161</sup> Law does not distinguish between international and citizen election observers

<sup>162</sup> International observation only by OSCE/ODIHR

<sup>163</sup> International observation only by organisations in which the country is a member

<sup>164</sup> Limited to voting and counting on election day

## ANNEX III: Tables of EU Member States' Comparison<sup>165</sup>

TABLE 1: SUFFRAGE RIGHTS

Member State	Voting age	Candidacy age	Voting rights granted to persons with intellectual & psychosocial disabilities & under guardianship	Voting rights restricted for prisoners	Voting rights extended to specified non-EU citizens	Independent candidates	Electoral threshold	Multi-member constituencies
Austria	16	18	yes	partly		lists with others	4 %	
Belgium	16	18	with limitations	partly		lists with others	none	yes (3)
Bulgaria	18	21	no	blanket		individual	none	
Croatia	18	18	yes			lists with others	5 %	
Cyprus	18	21	no		yes	individual	1.8 %	
Czechia	18	21	with limitations			within party lists	5 %	
Denmark	18	18	with limitations			no	none	
Estonia	18	21	no	blanket		individual	none	
Finland	18	18	yes			individual	none	
France	18	18	yes	partly		lists with others	5 %	
Germany	16	18	yes	partly		no	none	
Greece	17	25	yes	partly		no	3 %	
Hungary	18	18	with limitations	blanket		no	5 %	
Ireland	18	21	yes			individual	none	yes (3)
Italy	18	25	yes	partly		no	4 %	yes (5)
Latvia	18	21	yes			within party lists	5 %	
Lithuania	18	21	with limitations			no	5 %	
Luxembourg	18	18	yes	partly *		lists with others	none	
Malta	16	18	with limitations	blanket		individual	none	
Netherlands	18	18	yes	partly	yes	lists with others	none	
Poland	18	21	no	partly		lists with others	5 %	yes (13)
Portugal	18	18	with limitations	partly	yes	lists with others	none	
Romania	18	23	with limitations	partly *		individual	5 %	
Slovakia	18	21	yes			no	5 %	
Slovenia	18	18	yes			lists with others	none	
Spain	18	18	yes	partly		lists with others	none	
Sweden	18	18	yes			no	4 %	

\* Voting rights are not automatically reinstated upon serving a sentence.

<sup>165</sup> Election-Watch.EU has made every attempt to ensure that the information contained in these tables is correct and will be glad to receive feedback about any inconsistencies as well as suggestions to develop the tables further.

TABLE 2: VOTING

Member State	Compulsory voting	Preferential voting	Out of country voting (postal or embassy)	Postal voting (in-country and abroad)	Advance voting	Mobile ballot box voting	Internet Voting & Electronic Voting	Proxy voting	Ballot paper (only one or one for each party)
Austria		yes	yes	yes	yes	yes			one
Belgium	yes	yes	yes	yes	yes		EV	yes	one
Bulgaria	yes	yes	yes			yes	EV		one
Croatia		yes	yes			yes			one
Cyprus		yes	yes						one
Czechia		yes				yes			each party
Denmark		yes	yes		yes				one
Estonia		yes	yes	yes	yes	yes	IV		one
Finland		yes	yes	yes	yes	yes			one
France		closed list	yes	yes	yes		EV	yes	each party
Germany		closed list	yes	yes					one
Greece	yes	yes	yes	yes					each party
Hungary		closed list	yes	yes		yes			one
Ireland		yes	milit. & dipl. only	yes					one, STV
Italy		yes	yes			yes			one
Latvia		yes	yes	yes	yes	yes			each party
Lithuania		yes	yes	yes	yes	yes			one
Luxembourg	yes	yes	yes	yes					one
Malta		yes			yes				one, STV
Netherlands		yes	yes	yes				yes	one
Poland		yes	yes	yes		yes		limited	one
Portugal		closed list	yes	yes	yes	yes			one
Romania		closed list	yes			yes			one
Slovakia		yes				yes			each party
Slovenia		yes	yes	yes	yes	yes			one
Spain		closed list	yes	yes				limited	each party
Sweden		yes	yes	yes	yes	yes		limited	each party

TABLE 3: PARTY AND CAMPAIGN FINANCE

Member State	Foreign funding permitted	Public funding available	Funding from companies prohibited	Limited anonymous funding permitted	In-kind donations permitted	No campaign spending limit or bans on types of expenditure in place	Online campaign included in campaign finance laws
Austria	limited			yes	limited		
Belgium					limited		no
Bulgaria			yes		unlimited		no
Croatia					limited		
Cyprus	unlimited	no			unlimited		
Czechia	limited				limited		
Denmark	unlimited	no		yes	unlimited	yes	no
Estonia		no	yes		no	yes	
Finland	limited	no			limited	yes	
France					unlimited		
Germany	unlimited			yes	unlimited	yes	no
Greece	limited				limited		no
Hungary		no			limited	yes	no
Ireland				yes	limited		no
Italy		no			unlimited		no
Latvia			yes		limited		
Lithuania			yes		limited	yes	
Luxembourg	unlimited		yes		unlimited	yes	
Malta	limited	no			limited		no
Netherlands				yes	unlimited	yes	no
Poland			yes		limited		
Portugal			yes		limited		
Romania					limited		
Slovakia		no			limited		
Slovenia	limited		yes		limited		
Spain			yes		limited	yes	
Sweden	unlimited			yes	unlimited	yes	no

WOMEN REPRESENTATION

Quota for Women on Candidate Lists (%)	Percentage women MEP elected 2024
	40.00%
50	40.91%
	23.53%
40	41.67%
	0%
	38.10%
	33.33%
	28.57%
	60.00%
50	50.62%
	36.46%
40	28.57%
	47.62%
	42.86%
50	32.89%
	22.22%
	18.18%
50 (incentive)	33.33%
	16.67%
	48.39%
35	28.30%
40	38.10%
equality	18.18%
	46.67%
40	33.33%
40	50.00%
	61.90%

TABLE 4: SEAT ALLOCATION IN THE EUROPEAN PARLIAMENT

Member State	total # of registered voters	Population (end of 2023)	EP mandates 2024	Inhabitants per mandate 2024	2024 deviation from median inhab/seat in %	EP mandates (post-Brexit)	Deviation from media inhab/seat in % (post-Brexit)	Changes in disproportionality (post-Brexit to 2024)
Austria	6,372,204	9,104,772	20	455,239	27%	19	37%	reduced
Belgium	8,537,902	11,742,796	22	533,763	14%	21	26%	reduced
Bulgaria	6,170,472	6,447,710	17	379,277	39%	17	43%	reduced
Croatia	3,524,179	3,850,894	12	320,908	49%	12	52%	reduced
Cyprus	683,432	920,701	6	153,450	75%	6	80%	reduced
Czechia	8,212,628	10,827,529	21	515,597	17%	21	31%	reduced
Denmark	4,301,255	5,932,654	15	395,510	37%	14	44%	reduced
Estonia	980,014	1,365,884	7	195,126	69%	7	75%	reduced
Finland	4,546,589	5,563,970	15	370,931	40%	14	46%	reduced
France	49,462,981	68,172,977	81	841,642	-35%	79	-16%	increased
Germany	61,963,020	84,358,845	96	878,738	-41%	96	-18%	increased
Greece	9,814,685	10,413,982	21	495,904	20%	21	30%	reduced
Hungary	7,803,603	9,599,744	21	457,131	27%	21	36%	reduced
Ireland	3,554,450	5,271,395	14	376,528	40%	13	49%	reduced
Italy	51,214,348	58,997,201	76	776,279	-25%	76	-9%	increased
Latvia	1,541,102	1,883,008	9	209,223	66%	8	66%	same
Lithuania	2,387,327	2,857,279	11	259,753	58%	11	65%	reduced
Luxembourg	319,410	660,809	6	110,135	82%	6	86%	reduced
Malta	370,184	542,051	6	90,342	86%	6	91%	reduced
Netherlands	13,542,363	17,811,291	31	574,558	8%	29	19%	reduced
Poland	29,098,155	36,753,736	53	693,467	-11%	52	0%	increased
Portugal	10,789,781	10,467,366	21	498,446	20%	21	33%	reduced
Romania	18,025,329	19,054,548	33	577,411	7%	33	19%	reduced
Slovakia	4,337,093	5,428,792	15	361,919	42%	14	47%	reduced
Slovenia	1,689,602	2,116,972	9	235,219	62%	8	64%	reduced
Spain	38,050,286	48,085,361	61	788,285	-26%	59	-8%	increased
Sweden	7,942,272	10,521,556	21	501,026	20%	21	35%	reduced

## ANNEX IV: Table of Meetings of Pre-Election and Election Assessment Missions at European Level

### European Parliament

Rainer Wieland, Vice-President of the European Parliament, European People's Party  
Charles Goerens, Member of the European Parliament, Renew Europe Group  
Domènec Ruiz Devesa, Member of the European Parliament, Progressive Alliance of Socialists and Democrats in the European Parliament

Philipp Schulmeister, Director for Campaigns  
Albrecht John, Civil Society Outreach Unit

Micaela del Monte, Head of Unit, European Parliamentary Research Service  
Silvia Kotanidis, Researcher, European Parliamentary Research Service  
Kamil Baranik, Researcher, European Parliamentary Research Service  
Rafal Manko, Researcher, European Parliamentary Research Service  
David de Groot, Researcher, European Parliamentary Research Service  
Hendrik Akexander Mildebrath, Researcher, European Parliamentary Research Service

Markus Warasin, Head of Unit EP Constitutional Committee (AFCO)  
Luca Rivera, AFCO Unit  
Diletta Bruno, AFCO Unit

Aleksejs Dimitrovs, Legal Advisor of the Greens/EFA group in the EP

Gonzalo de Mendoza Asensi, Administrator, Directorate-General for External Policies of the Union, Directorate for Democracy Support, Election Observation and follow-up Unit (ELEC)

### Council of the European Union

Juan Hernandez Alfaro, General Affairs Counsellor, Spanish presidency of the Council of the EU  
Sofia Torres Bizou, Policy Officer, Spanish presidency of the Council of the EU  
Peter Booms, Delegate - Working Group on Enhancing Resilience & Countering Hybrid Threats, Permanent Representation of Belgium to the EU / Belgian presidency of the Council of the EU  
Côme Van Autrye, Attaché – Interinstitutional affairs, Permanent Representation of Belgium to the EU / Belgian presidency of the Council of the EU

Maria Marotta, Director, General and Institutional Policy – GIP, Interinstitutional Relations  
Delphine Galon, Political Administrator, General and Institutional Policy – GIP, Interinstitutional Relations  
Emanuele Ricci, Political Administrator, General and Institutional Policy – GIP, Interinstitutional Relations  
Ilaria Vanzanelli, Political Administrator, General and Institutional Policy – GIP, Interinstitutional Relations  
Matteo Riceputi, Political Administrator, General and Institutional Policy – GIP, Interinstitutional Relations



### **European External Action Service**

Robert Huqi, Division Strategic Communication, Task Forces and Information Analysis/ Officers

### **European Commission**

Zuzana Dorazilová, Cabinet of Commission Vice President Jourová

Marie-Helene Boulanger, Head of Unit, Democracy, Union Citizenship and Free Movement, Directorate-General for Justice and Consumers

Harry Panagopulos, Democracy, Union Citizenship and Free Movement, DG for Justice and Consumers

Cristian-Alexandru Leahu, Democracy, Union Citizenship and Free Movement, DG for Justice and Consumers

Biliana Sirakova, European Youth Coordinator, DG for Education, Youth, Sport and Culture

Marta Touykova, Head of Sector Youth policy, DG for Education, Youth, Sport and Culture

Karen Vandeweghe, Deputy Head of Unit, Youth, Volunteer Solidarity and Traineeship Office, DG for Education, Youth, Sport and Culture

Alberto Rabacchin, Deputy Head of Unit, Media Convergence and Social Media, DG Communications Networks, Content and Technology

Amber Mechelse, Policy Officer, DG Communications Networks, Content and Technology

### **Authority for European Political Parties and European Political Foundations (APPF)**

Pascal Schonard, Director

Stephanie Kaiser, Head of Cabinet

Thomas Wiese, Team Leader Compliance Controls

Nikolay Entchev, Team Leader Registration/Verification

Emanuela Gulino, Legal Advisor

### **European Union Agency for Fundamental Rights (FRA)**

Robert-Jan Uhl, Stakeholder Relations Officer

Sanja Vovicic, Project Manager

### **European Institute for Gender Equality**

Helena Morais Maceira, Gender Mainstreaming Researcher and Team Leader

Ligia Nobrega, Expert Gender Statistics

### **Member State Institutions**

Stijn Theeuwen, Team elections NL, Netherlands Ministry of the Interior and Kingdom Relations

Aart Verloop, Team elections NL, Netherlands Ministry of the Interior and Kingdom Relations

Tim Nuyens, Belgian Institute for Postal Services and Telecommunications, Belgian Digital Service Coordinator

Ernst Visser, Netherlands Consumer & Markets Authority, Netherlands Digital Service Coordinator

Merel Koppenol, Netherlands Consumer & Markets Authority, Netherlands Digital Service Coordinator

Anders Lindell, Cybersecurity Expert, Permanent Representation of Sweden to the EU

### **Council of Europe (CoE)**

Prof. Petra Roter, President, Advisory Committee on the Framework Convention for the Protection of National Minorities

Sophie Meudal-Leenders, Administrative Officer, Group of States against Corruption (GRECO)

### **OSCE / Office for Democratic Institutions and Human Rights (ODIHR)**

Meaghan Fitzgerald, Head of Election Department

Martina Barker-Ciganikova, Election Advisor

Kseniya Dashutina, Election Advisor

Cristi Mihalache, Senior Advisor on Roma and Sinti Issues

ODIHR Special Election Assessment Mission Team

### **OSCE / High Commissioner for National Minorities (HCNM)**

Elżbieta Kuzborska-Pach, Senior Legal Advisor

### **European Political Parties<sup>166</sup>**

Karine Milheiro, Research and Strategic Planning, European People's Party (EPP)

Didrik de Schaetzen, Secretary General, Alliance of Liberals and Democrats for Europe (ALDE)

Gisela Ducaille Sinués, Compliance Officer, Alliance of Liberals and Democrats for Europe (ALDE)

Ioana Pavel, Campaign Assistant, Alliance of Liberals and Democrats for Europe (ALDE)

Benedetta de Marte, Secretary General, European Green Party (EGP)

Carlotta Weber, Political Advisor, European Green Party (EGP)

Sybren Kooistra, Campaign Manager, European Green Party (EGP)

Lea Haas, Head of Policy, Strategy, and Policy Development, European Greens (EGP)

### **Civil Society**

Noemi Arcidiacono, Director of Missions, Agora Election Observation

Gianni Dibiasi, Advisory Board, Agora Election Observation

Carlotta Besozzi, Director, Civil Society Europe

Michael Meyer-Resende, Executive Director, Democracy Reporting International (DRI)

Dennis Wenzl, Outreach Officer, Democracy Reporting International (DRI)

Eszter Hartay, Program Director, European Center for Not-for-Profit Law (ECNL)

Jonneke van de Kamp, Project and Comm Assistant, European Center for Not-for-Profit Law

Aarti Narsee, Senior Policy and Advocacy Officer, European Civic Forum

Alejandro Moledo, Deputy Director, European Disability Forum (EDF)

Alexandre Alaphilippe, Director, EU Disinfo Lab

Giovanni Zagni, Director, Pagella Politica / European Digital Media Observatory (EDMO)

Tommaso Canetta, Deputy Director / European Digital Media Observatory (EDMO)

Diego Naranjo, Head of Policy, European Digital Rights (EDRI)

Sophie Pornschlegel, Director of Studies and Development, Europe Jacques Delors

Gabriela Hrabanova, Executive Director, European Roma Grassroots Organisations (ERGO)

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<sup>166</sup> Attempts to set up meetings with the European Conservative and Reformists (ECR) Party and Identity and Democracy (ID) Party were unsuccessful.

Isabela Mihalache, Policy Officer, European Roma Grassroots Organisations (ERGO)  
Ken Godfrey, Executive Director, European Partnership for Democracy (EPD)  
Álvaro González Pérez, Policy Officer, European Youth Forum  
Fabiana Maraffa, Policy Officer, European Youth Forum  
David Levine, Senior Elections Integrity Fellow, German Marshall Fund  
Claire Jenifer Pershan, Mozilla Foundation  
Nick Aiossa, Executive Director, Transparency International (TI)  
Vitor Teixeira, Senior Policy Officer, Transparency International (TI)  
Tomaž Deželan, Chair of Policy Analysis and Public Administration, University of Ljubljana  
Maria Diaz Crego, constitutional lawyer and independent expert

### **African Delegation to the EU Elections**

Bankole Adeoye, Commissioner, Political Affairs and Peace and Security African Union Commission  
Isabela Moses Warrioba, Advisor, Office of the Commissioner for Political Affairs and Peace and Security African Union Commission  
Patience Z. Chiradza, Director, Governance Conflict Prevention and Democracy African Union Commission  
Karine Kakasi Siaba, Acting Coordinator Democracy and Elections Unit African Union Commission  
Samuel Mondays Atuobi, Senior Political Officer/ Elections, Democracy and Elections Unit African Union Commission  
Filipa Barreiros, EU Delegation to the African Union  
Kenneth Akibate, Acting Deputy Clerk, Finance, Administration and Human Resources Pan African Parliament  
Ahmed Mohamed Farag Mohamed, Independent election expert  
Karen Lynda Ogle, Independent election experts  
Olachi Sandra Ndukwe, Independent election experts  
Prosper Ntahorwamiye, Chairperson of Electoral Commission of Burundi  
Olufunto Akinduro, Senior programme Officer, International IDEA  
Vera Kwalar Muring, Programme Officer, International IDEA

## Annex V: List of EAM Focal Points and Team Members

Member State	Partner Organisation	Team Members, Focal Point (FP)
Austria	<a href="http://wahlbeobachtung.org">wahlbeobachtung.org</a>	Paul Grohma (FP) Christian Wind Markus Pollak Mathias Huter
Belgium		Agnieszka Górna (FP) Yves de Wolf
Bulgaria		Desislava Hristova (FP) Margarita Spasova
Croatia	<a href="http://GONG">GONG</a>	Josipa Brajković Dika (FP) Oriana Ivković Novokmet
Cyprus		Nicolas Koukoullis (FP) Antonis Stylianou
Czechia	Election Matters	Marcela Mašková (FP) Aleš Jakubec Markéta Nekvindová
Denmark		Ib Kok Hansen (FP)
Estonia		Priit Vinkel (FP) Marit Lani
Finland		Kira Kaurinkoski (FP) Kimmo Ranttilä Marko Mannila Leena Siikanen
France		Caroline Gonthier (FP) Camille Forite
Germany	<a href="http://EPDE">EPDE</a>	Ralph-Michael Peters (FP) Adam Busuleanu
Greece		Eleni Ioannou (FP) Dimitra Ioannou
Hungary		Péter Kramer (FP) Katalin Körössy Nikolett Babos András Palatitz
Ireland		Sandra Conway (FP)
Italy		Renata Tardioli (FP) Daniela Bottigelli Cecilia Lagomarsino Giovanna Maiola Marta Ponte
Latvia		Anitra Jankevica (FP) Inta Lase
Lithuania	<a href="http://WhiteGloves">White Gloves</a>	Julius Lizunas (FP) Valdemar Baran Tomas Kačiukevičius
Luxembourg		Philippe Decker (FP)

Malta		Eszter Kósa (FP) Carlo Binda – Binda Consulting International
Netherlands		Leontine Loeber (FP)
Poland	<a href="#">Political Accountability Foundation</a>	Anna Frydrych-Depka (FP) Zofia Lutkiewicz Robert Lech Sylwester Oracz Helena Krajewska
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