



ENEMO International Election Observation Mission

MUNICIPAL ELECTIONS IN HUNGARY, 09 JUNE 2024 STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

10 June 2024

The 9 June elections were significantly affected by several shortcomings in the legal framework, unequal opportunities in the electoral race, media bias, inflammatory rhetoric and instances of shadow funding, which is cause for utmost concern. Together with these detrimental aspects, the frequent blurring of lines between party and state negatively impacted the process in favor of ruling parties. The election administration generally functioned in an efficient and professional manner, and Election Day procedures were for the most part adequately followed.

On 20 April 2024, the European Network of Election Monitoring Organizations (ENEMO) officially deployed an International Election Observation Mission (EOM) to Hungary, to observe the upcoming 09 June 2024 Municipal Elections.

ENEMO has accredited a total of six Core Team experts based in Budapest. The Mission is headed by Mr. Pierre Peytier. ENEMO has additionally deployed eight long-term observers (LTOs) in four multinational teams throughout the country, based in Budapest, Szeged, Debrecen, and Pécs. On Election Day the mission conducted limited observation of the processes of opening of polling stations, voting, counting, and transfer of electoral materials.

Additionally, up until 9 June, the ENEMO CT experts have conducted 452 meetings, 145 with election management bodies, 51 with political parties, 97 with candidates, 40 with state officials, 42 with media, 41 with domestic civil society organizations and 36 with others, in addition to observing 18 campaign activities (meetings or rallies).

The mission has been monitoring and assessing the overall political and electoral environment, respect for the rights to elect and stand for election, conduct of election management bodies, campaigning, gender equity, voting and tabulation processes, electoral dispute resolutions and other crucial aspects of the process, based on international standards for democratic elections and the Hungarian legal framework.

This Preliminary Statement is based on ENEMO's findings from the pre-election period and the Election Day. The Statement should be considered in conjunction with the Interim Report of the mission, issued on 29 May. The Mission will stay in the country until the conclusion of the electoral process to follow post-election developments. A final report, including a full assessment, which will depend in part on the conduct of the remaining stages of the elections, detailed findings, and recommendations will be issued within sixty days from the certification of results.

The content of this document is the sole responsibility of ENEMO. The English version of this document is the only official version.

Preliminary Conclusions

The political atmosphere in Hungary leading up to the municipal elections was marked by significant turmoil and distrust, exacerbated by a clemency scandal that led to high-profile resignations. Several large events were held prior to election day, including the Peace March where Viktor Orbán promised a record-breaking mobilization and a major election victory, and Peter Magyar's campaign closing event just a day before the polls.

Only 48 hours before the start of voting, Fidesz's candidate for the mayor of Budapest, Alexandra Szentkirályi, withdrew from the mayoral race and asked all of her and Fidesz's supporters to vote for supposedly independent candidate Dávid Vitézy on the mayoral ballot. ENEMO raises concerns about such tactics used to misinform voters in an attempt to affect election results.

In addition to the complexity and over-regulations of several aspects of electoral processes, the mission has identified significant legal gaps in several key areas, including campaign finance, misuse of administrative resources, and media regulations. These areas lack sufficient regulation, which poses challenges to electoral contestants, non-partisan observers and independent media outlets.

ENEMO assesses that the legislative amendment process lacked broad consultations and consensus among stakeholders, and further failed to address key previous recommendations. Furthermore, the adoption of the Sovereignty Protection Act negatively impacted the state of media and civil society. Additionally, amending the framework six months ahead of election day is at odds with international good practice.

Despite the inherent complexity of the elections, the election administration at the national level, as well as at the observed territorial and local levels, generally complied with legal requirements and followed deadlines. ENEMO notes the overall trust from stakeholders in the professionalism, transparency and impartiality of election commissions and offices at all levels, though some concerns were raised regarding the appointment process of election commission members potentially favoring the ruling majority party.

Almost all observed EMBs demonstrated transparency and were open to ENEMO observers. This includes the NEC and NEO, which operated in a professional, collegial and transparent manner. Furthermore, the cooperation between observed commissions and offices was professional and collaborative. Lower-level EMBs were provided with necessary materials and support to perform their duties effectively and PSC members and bookkeepers underwent comprehensive trainings. The mission was informed that the vast majority of PSC members were experienced former commissioners. It was reported that some parties and candidates faced difficulties in finding individuals willing to serve as delegates due to perceived risks and lack of remuneration, unlike the appointed members.

ENEMO assesses that the candidate registration process was generally inclusive and transparent. However, some opposition parties struggled to collect enough signatures in local communities, or faced challenges in forming the list of candidates. The majority of candidacies rejected were due to an insufficient number of valid signatures collected, or their decision to withdraw. The mission was informed of some 859 settlements out of 3,178 mayoral races with only one candidate running for

mayor, which ENEMO assesses as damaging to the competitiveness of the elections in those settlements.

Generally, ENEMO assesses that the Central Electoral Register administered by the NEO enjoys the trust of the public and stakeholders. However, the number of voters in the register decreased in all municipalities compared to previous municipal elections in 2019, leading to the redrawing of electoral boundaries in December 2023. This impacted the size of some municipalities and therefore affected the electoral system for those settlements. ENEMO assesses that the redrawing of electoral boundaries based on updates to the voters' list six months before the election is at odds with international standards.

ENEMO observers reported on allegations related to data leaks of voters' personal information, including voter data being sold to nominating organizations and candidates for voter outreach purposes. ENEMO additionally raises concerns regarding reports of pressure on voters, and in some instances multiple voters unlawfully registered at the same address, including in one Budapest district, allegedly with an intention to affect the outcome of the mayoral election and holding the risk of undue influence on voters.

In the weeks leading up to the municipal elections, the campaign intensified significantly. ENEMO observers reported concerns about unethical data usage, such as sending political messages via emails, as well as misuse of state resources. ENEMO observers identified several instances of misuse of state resources for campaigning. Local authorities obstructed opposition candidates by making it difficult to obtain campaign permits and pressuring public employees to support or vote for the ruling party.

ENEMO raises significant concerns regarding the involvement of children in the political campaigns for these elections, as it contravenes international standards such as the UN Convention on the Rights of the Child, that safeguard the rights and well-being of minors. This practice jeopardizes children's welfare and political neutrality, reflecting poorly on the political process and international norms. This undermines campaign credibility and questions the commitment of political actors to ethical standards.

Campaign finance rules for municipal elections in Hungary starkly contradict the standards set by the Venice Commission. ENEMO highlights that spending by political parties should be limited to ensure equality of opportunity. There are no legal limits on campaign spending for municipal elections, in sharp contrast to the regulated limits for parliamentary elections. The glaring discrepancy between legal limits on campaign spending for municipal and parliamentary elections permits unrestricted spending, resulting in a severely uneven playing field that disadvantages smaller parties and independent candidates. Moreover, it flagrantly violates the principle of strict or proportional equality thereby undermining the democratic process.

ENEMO raises serious concerns about shadow funding practices, through the use of government-organized NGOs, state companies, and unreported funding sources. The deployment of GONGOs facilitates indirect state support for ruling party campaigns, significantly blurring the lines between state resources and political financing. For example, ongoing issues with financial transparency suggest that CÖF strongly benefits from state-affiliated and politically influenced funding sources. Additionally, Megafon's financial practices underscore its opaque and potentially unethical financial operations, increasing concerns about the undue influence of money in political communication and the lack of transparency in funding sources. The ongoing financial entanglement between the Urban Civic Fund and

pro-government entities highlights severe breaches of ethical standards and further erodes public trust in the impartiality of civic funding mechanisms.

ENEMO notes that during the pre-election period, a considerable number of objections and appeals were rejected on procedural grounds when the complaints failed to meet specific formal requirements. These preconditions are over-regulated, mostly setting out excessive formalism which is often the reason for rejections of complaints without considering the merits. There is no legal ground for the complainant to rectify format deficiencies within a reasonable timeframe, or the obligation for the relevant EMB to *ex officio* consider alleged violations if the objection is dismissed on formal grounds. Furthermore, the restriction whereby only affected subjects are entitled to file an objection limits the access of interested stakeholders to the dispute resolution process in case of violations, as does the legal basis to reject the complaint.

ENEMO expresses concerns over the low level of internal pluralism among Hungarian media, and the evident polarization of media outlets along political lines. ENEMO further assesses that the campaign was affected by significant discrimination against independent media by Fidesz-affiliated political actors and the government, both at the national and local levels.

ENEMO assesses that contestants in municipal elections did not enjoy equal access to media representation. Political pressure was evident in both national and local media, particularly in municipalities where the ruling party was in power. Bias in media coverage was further evidenced by several pro-government media actively participating in Fidesz's campaign.

ENEMO expresses significant concerns regarding the lack of legal regulation over social media, with a gap in legislation allowing political parties and their affiliates to conduct extensive and unrestrained social media campaigns. The absence of regulatory oversight opens the door to potential misuse, the spread of inflammatory narratives, misinformation, and unbalanced campaigning, which can significantly influence public opinion and electoral outcomes without accountability. Concerns should additionally be raised regarding the spread of pro-Russian narratives and anti-EU sentiments portrayed in the media.

On Election Day, ENEMO observation teams observed at 63 polling stations, as well as the intake of election materials and tabulation of results in 4 Local Election Offices. Based on the mission's observation, in the limited number of polling stations observed, Election Day procedures were generally conducted efficiently and in accordance with the law.

Background

The political atmosphere in Hungary leading up to the municipal elections was marked by significant turmoil and distrust, exacerbated by a clemency scandal that led to high-profile resignations. The Fidesz government, under Prime Minister Viktor Orbán, faced widespread discontent and recurring protests due to its controversial antimigrant and anti-LGBT+ policies, as well as its restrictive measures against opposition groups and NGOs. This environment of political instability and public dissatisfaction set a challenging backdrop for the upcoming elections.

Several large events were held prior to election day, including the Peace March. Viktor Orbán promised record-breaking mobilization and a major election victory at the tenth Peace March. It had been a long time since the ruling party held a notably strong rally, with participants arriving from various parts of the country.¹ Less than 24 hours before the polls, Peter Magyar and his party TISZA held a campaign closing event as a counterpoise to the Peace March. Magyar strongly criticized Fidesz and the Prime Minister's politics, accentuating "eastern influences".²

The National Sovereignty Protection Act³ raises significant concerns and has prompted widespread criticism⁴. It establishes a new entity, the Sovereignty Protection Office⁵, which is granted extensive powers to request information on the financing and activities of any media outlet and to investigate its reporting.⁶ ENEMO assesses that the legislation leaves much space for arbitrary decisions, granting the Sovereignty Protection Office excessive discretionary power to sanction media and civil society organizations.

Only 48 hours before the start of voting, Fidesz's candidate for the mayor of Budapest, Alexandra Szentkirályi, withdrew from the mayoral race. Furthermore, she asked all of her and Fidesz's supporters to vote for supposedly independent candidate Dávid Vitézy⁷ on the mayoral ballot and the remaining votes to Fidesz-KDNP.⁸ This coincides with previous rumors that David Vitézy's candidacy was indeed

¹ <https://telex.hu/belfold/2024/06/01/bekemenet-nagykepes>.

² https://hvg.hu/itthon/20240608_magyar-peter-tisza-part-kampanyzaro-hosok-tere-valasztas-2024

³ On 21 November 2023, an individual MP member of the Fidesz ruling party [submitted the Bill](#) on the Protection of National Sovereignty to the Parliament. On 12 December 2023, Parliament passed the Act LXXXVIII on the Protection of National Sovereignty. The law entered into force on December 22, 2023.

⁴ The Venice Commission further criticized the Sovereignty Act, arguing that the appointment process for the President of the Sovereignty Protection Office undermines its independence due to the involvement of the President of Hungary and the Prime Minister without checks from other branches. The lack of state oversight and accountability to Parliament further compromises its effectiveness. Additionally, the Commission raised concerns about the potential for the President's re-appointment and the superficial reporting obligations of the Office. They also highlighted the Act's vagueness, which allows for arbitrary decisions, potentially chilling opposition and civil society activities. Venice Commission, "Opinion on the Sovereignty Protection Act," CDL-AD(2024)001, available at: [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2024\)001-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2024)001-e).

⁵ European Parliament stated that the SPO has "extensive powers and a strict system of surveillance and sanctions, which fundamentally violates standards of democracy [...] and breaches multiple EU laws". <https://www.europarl.europa.eu/news/en/press-room/20240419IPR20579/rule-of-law-in-hungary-parliament-condemns-the-sovereignty-act>.

⁶ "(2a) To facilitate the performance of tasks under the Act on the protection of national sovereignty, the National Information Centre shall, in the course of the performance of its tasks relating to the fulfillment of information requests, perform information activities for the Sovereignty Protection Office using information available, or being generated, in connection with information requests." Act LXXXVIII of 2023 on the protection of national sovereignty, Section 24, 2a.

⁷ David Vitézy entered the mayoral race as an urban development expert nominated by [Hungary's Green Party \(LMP\)](#). His expert role was accentuated, and his political neutrality additionally emphasized. While announcing his candidacy, Vitézy harshly criticized the [dichotomized nature of politics](#) in Budapest: "Budapest has been made a battlefield of political parties... with the war between two sides suffocating all developments: while the government blocks all major projects, the city leadership acts as a martyr and falters (...)."

⁸ [Telex: Alexandra Szentkirályi withdrew from the mayoral candidacy and supports Dávid Vitézy](#)

supported by Fidesz.⁹ ENEMO raises concerns about such tactics used to misinform voters in an attempt to affect election results.

Municipal elections took place on 9 June 2024. Citizens could choose their representatives among 55,659 candidates by voting in 10,119 polling stations. The preliminary turnout was 58.10%¹¹, an all time high in Hungary for municipal elections.

Legal framework and electoral system

Legal Framework

Elections in Hungary are regulated by various legal acts at both the national and international levels. Key national documents include the Fundamental Law of Hungary (Constitution), Act XXXVI of 2013 on Electoral Procedure, Act L of 2010, Act CLXXIX of 2011, and Act CXIII of 2003¹². Hungary also is a party to major international and regional human rights instruments¹³ related to elections, further extending the country's commitments within the best practices. Non-binding guidelines from the National Election Commission supplement the existing legal acts, although these are not always adequate to address the regulatory deficiencies.

In addition to the complexity and over-regulations of several aspects of electoral processes, the mission has identified significant gaps in several key areas, including campaign finance, misuse of administrative resources, and media regulations. These areas lack sufficient regulation, which poses challenges to electoral contestants, non-partisan observers and independent media outlets.

Following the 2022 parliamentary elections, the electoral legal framework underwent several amendments to address shortcomings and gaps in the electoral processes¹⁴. Amendments carried out from July 2022 extended beyond parliamentary elections, and significantly impacted municipal elections, as well as EP and minority elections. The amendments aimed to rectify various issues, but their consistency, inclusiveness, and alignment with international recommendations received mixed reactions.¹⁵

Amendments adopted in 2023 especially related to the electoral system were implemented sporadically, targeting specific election types. These changes included adjusting county assembly sizes based on

⁹ Voters confirmed to ENEMO observers that they received campaign emails from Dávid Vitézy. Allegedly, Dávid Vitézy was provided with the same controversial contact list of citizens that Fidesz gathered, and occasionally used to distribute promotional emails to citizens.

¹⁰ Opposition candidates [strongly criticized](#) the withdrawal as a political move in an attempt to manipulate the electorate.

¹¹ <https://vtr.valasztas.hu/onk2024/valasztopolgaroknak/reszveteli-adatok?tab=national&filter=final>

¹² The Fundamental Law of Hungary sets the foundational principles for all elections; Act XXXVI of 2013 on Electoral Procedure outlines the procedural rules for conducting elections, applicable to all election types; Act L of 2010 governs the electoral system of election of local government representatives and mayors; Act CLXXIX of 2011 safeguards the rights of national minorities to elect their self-governments; Act CXIII of 2003 establishes the guidelines for European Parliament (EP) elections in Hungary.

¹³ International Covenant on Civil and Political Rights (ICCPR); Convention on the Rights of Persons with Disabilities (CRPD); Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), International Convention on the Elimination of All Forms of Racial Discrimination (CERD); etc.

¹⁴ Following [amendments](#) to the Act on Electoral Procedure entered into force on July 26, 2022.

¹⁵ See Interim Report - EOM to 2024 Municipal Elections in Hungary, 2024, 29 May.

population¹⁶, raising the threshold for registering a compensatory list in local government elections for towns and cities with populations exceeding 10,000 residents¹⁷, and revising procedures for vacancy succession¹⁸. Notably, on 12 December 2023, the Parliament reinstated the party list electoral system in Budapest, allowing voters to elect representatives from party lists¹⁹, a practice abolished in 2014.

ENEMO notes that the amendment carried out in the electoral legislation, which entirely changed the electoral system of the City Assembly of Budapest six months ahead of election day, is at odds with international good practice.²⁰

The legal framework governing elections was strongly shaken by the adoption and existence of the Sovereignty Protection Act, which in the eyes of many stakeholders is perceived as a significant tool for silencing critical voices, namely the media and non-partisan civil society.

ENEMO assesses that the legislative amendment process was characterized by a lack of broad consultations and consensus among stakeholders and further failed to address key previous recommendations from international and domestic observers. Furthermore, the adoption of the Sovereignty Protection Act negatively impacted the state of media and civil society. Consequently, this represented a missed opportunity to conduct comprehensive electoral reforms that could have resolved existing gaps and inconsistencies and ensured a more transparent process.

Electoral System

Voters headed to the polls on 9 June to participate in a multifaceted electoral process, voting to elect local governments, EP elections, and minority self-governments. According to the Constitution, local government representatives and mayors are elected by universal and equal suffrage through a direct and secret ballot, ensuring the free expression of voters.

The local government system in Hungary operates on a two-tier structure. This includes municipal governments at the local level and county governments at the regional level. The country is divided into 19 counties and the capital of Budapest. Local governments cover villages, towns, cities, district capital cities, and the capital districts, while county governments encompass the broader territorial regions. The capital municipality functions both as a settlement and a territorial municipality.

¹⁶ Act LXIV of 1990 on Local Governments, Section 4 was [amended](#): “The size of local and county assemblies will be determined based on the population data as of September 1st in the year preceding the general election.”

¹⁷ In December 2023, Act XCV repealed (section 8) and amended certain provisions of Act L of 2010 and also amended Act XXXVI of 2013. Compensatory lists can now be established by nominating organizations with candidates in at least two-thirds of the electoral districts for municipalities with over 10,000 inhabitants. For Budapest, a metropolitan compensatory list is permissible if candidates are fielded in at least two-thirds of the city districts. Section 10 of Act L of 2010 was amended in May 2023 to raise the threshold for registering a compensation list in the elections of local government representatives in towns and cities with populations exceeding 10,000 inhabitants. Before the amendment, nominating organizations were required to field candidates in at least half of the single-member constituencies within the settlement to be eligible to create a compensatory list.

¹⁸ Act XXXVI of 2013 on Electoral Procedure, Sections 56 and 57.

¹⁹ Reactions to these amendments varied among stakeholders. Some mission interlocutors saw the changes as an opportunity to enhance representation within the Budapest city assembly. Conversely, critics argued that the ruling majority used these amendments to consolidate power, favoring larger, well-organized parties at the expense of smaller, less structured ones.

²⁰ The [Venice Commission’s Code of Good Practice in Electoral Matters](#) (II.2.b.), recommends that “the fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendment less than one year before an election, or should be written in the constitution or at a level higher than ordinary law”.

The composition of local government representative bodies and county general assemblies is determined based on the population size as of September first in the year preceding the local government and mayoral elections (see Registration of Voters section).²¹

Municipal elections were held to elect the Mayor of the Capital, Mayors, County general assemblies, Metropolitan assembly as well as local councils. The mayor of Budapest, as well as mayors of settlements and cities with county rights are elected directly for five year terms, based on a simple majority system. Currently there are 25 cities with county rights, which do not participate in the county assembly elections²².

Local government representatives in local governments were elected through a mixed electoral system. In settlements with up to 10,000 inhabitants, a multi-member list electoral system was used, with the number of representatives determined by population size. In settlements with more than 10,000 inhabitants and capital districts, a mixed system combining single-member constituencies and compensatory lists were used. The number of single-member constituencies and compensatory list mandates varied based on population size.

Local government mandates total 20,326. Out of this number, 3,178 mandates are allocated to elected mayors, including one for the Mayor of Budapest. In settlements with a population of 10,000 or less, there are 3,011 mayoral mandates, while settlements with over 10,000 inhabitants account for 166 mayoral mandates. The total number of local government representatives stands at 16,735, and 413 mandates are designated for the county General Assemblies and capital lists.

Election Administration

The elections were administered through a parallel-tiered structure of EMBs, comprising National, Territorial and Local Election Commissions, each supported by a corresponding parallel structure of Election Offices.²³

These Election Commissions operate as autonomous entities, accountable only before the law. Alongside the election offices, they hold comprehensive authority to plan, organize, and conduct elections in accordance with principles of impartiality, equity, and legality.

Despite the inherent complexity of the elections, the election administration at the national level, as well as at the observed territorial and local levels, generally complied with legal requirements and adhered to deadlines. The election calendar, along with pertinent information for stakeholders and voters, was made accessible via the website maintained by the NEO.

²¹ See Interim Report - Electoral System section - EOM to 2024 Municipal Elections in Hungary, 2024, May 29.

²² These cities are: Békéscsaba, Debrecen, Dunaújváros, Eger, Érd, Győr, Hódmezővásárhely, Kaposvár, Kecskemét, Miskolc, Nagykanizsa, Nyíregyháza, Pécs, Salgótarján, Sopron, Szeged, Székesfehérvár, Szekszárd, Szolnok, Szombathely, Tatabánya, Veszprém, Zalaegerszeg. Baja and Esztergom since 2022.

²³ The Election Commissions involved in the electoral process included the National Election Commission/National Election Office, 20 territorial election commissions accompanied by 20 territorial election offices, 3,177 Local Election Commissions along with 1,264 Local Election Offices, and 10,119 Polling Station Commissions.

The complexity of conducting three elections simultaneously was mentioned as particularly challenging by nearly all representatives of EMBs. However, some interlocutors acknowledged that combining elections on the same day has the benefit of reducing election costs.

ENEMO notes that despite the complexities of managing different types of elections simultaneously, the work of the EMBs was overall transparent, efficient, and professional.

National Election Commission (NEC) and National Election Office (NEO)

The NEC is a permanent, independent body composed of elected and delegated members, currently consisting of 21 members²⁴. While the permanently appointed and parliamentary-group-based delegated members enjoy similar voting rights, the later-appointed EP party list-based members have only deliberative voting rights.²⁵

ENEMO notes the overall trust from stakeholders in the professionalism and impartiality of election commissions and offices at all levels, though some concerns were raised regarding the appointment process of election commission members potentially favoring the ruling majority party.

In contrast to the 2022 parliamentary elections, where there was a gap in the presence of delegated members between the announcement of elections and the registration of party lists, the current structure ensures that delegated members from parties with parliamentary groups are continuously included in the NEC between two general elections.²⁶ Positively, this change was the subject of amendments in line with previous ENEMO recommendations, which emphasized the importance of cross-party oversight by allowing delegated members of political parties to be part of the NEC during the interim period.

Since the announcement of the elections on 12 March 2024, the NEC held 31 sessions and adopted approximately 364 decisions, including registering 11 EP party lists of nominating organizations, addressing electoral disputes, approving the form of ballot papers, and registering observers of nominating organizations for foreign missions for the EP elections.

The sessions of the NEC²⁷ were announced in advance, and agendas were published beforehand. Sessions were open to authorized subjects, and decisions were adopted publicly. During the sessions, topics were often discussed, and all members acted in a collegial manner. The decisions of the NEC, as well as those of the NEO, were published promptly on their websites; however, the minutes of the NEC meetings were published with significant delay.²⁸

The NEO, by law, is an independent and autonomous state administrative body operating solely under the law, ensuring its tasks are performed separately from other bodies and free from external influence.²⁹

²⁴As of current [Composition](#) of the NEC Seven members and three substitute members are elected by the National Assembly. Fourteen members are delegated by each political party that has a parliamentary group and/or nominating organizations that have established a list for the EP election and do not have delegated members as part of the parliamentary group.

²⁵ The following nominating organizations having established a list for the EP elections have delegated members to the NEC that have consultative rights: Solution Movement; Second Reform Era Party; Respect and Freedom Part; Hungarian Two-Tailed Dog Party; Everybody's Hungary Movement

²⁶ This means that these delegated members maintain their roles and responsibilities within the NEC without interruption throughout the electoral cycle.

²⁷ Since the announcement of the elections on 12 March 2024, the NEC held 31 sessions and adopted approximately 364 decisions, including registering 11 EP party lists of nominating organizations, addressing electoral disputes, approving the form of ballot papers, and registering observers of nominating organizations for foreign missions for the EP elections.

²⁸As of June 6, 2024, the most recently uploaded minutes were dated 9 May, 2024.

²⁹ The NEO is led by a President appointed by the President of the Republic, based on the Prime Minister's proposal, from among Hungarian citizens with higher education eligible to be elected as members of the National Assembly.

ENEMO assesses that the NEO complied with the legal deadlines and managed technical administrative and preparatory aspects professionally and efficiently. The office performed various tasks including voter information campaigns assisting the commissions, and coordination with territorial and local, as well as foreign representation offices.³⁰

The NEO developed a complex national electronic system to enhance electoral processes, which included functionalities for voter registration, general election preparation, integration of election day data, and the rapid transfer of results. During the preparatory phase, ENEMO was informed by the NEO that the testing phase, including the simulation of election day events as well as the testing process for the newly introduced protocol scanners, was successful. Transfer of data via scanning protocols was followed by manual oversight conducted by the responsible commission members at each polling station.³¹

Territorial Election Commissions (TECs) and Territorial Election Offices (TEOs)

Twenty TECs and TEOs were responsible for conducting elections as the regional EMBs, corresponding to the number of counties and the capital. TECs consist of both elected and delegated members.

At the end of 2023, three members and at least two alternate members of the TECs were elected by the Capital and County Assemblies. Once the election date was set, nominating organizations with a county or capital list, as well as candidates for Capital Mayor, each could delegate an additional member to the TEC.

Throughout the pre-election period, TEOs conducted preparatory activities³². They were supported by the NEO and local public administrations, in order for all the necessary materials and equipment to be provided as needed. Almost all observed TECs/TEOs demonstrated transparency and were open to international observers. Most of the TECs were prepared for 10 June to tabulate results under their mandate.

Local Election Commissions (LECs) and Local Election Offices (LEOs)

At the local level, elections were managed by 3,177 LECs and 1,264 corresponding LEOs. The cooperation between observed LECs and LEOs was professional and collaborative. Most observed LECs/LEOs were open to ENEMO observers with minor exceptions and cases of reluctance to share information.

They were provided with necessary materials and support to perform their duties effectively. Bookkeepers, were responsible for maintaining election documentation and reporting results to the

³⁰ The NEO undertook voter notification and information campaigns, produced and disseminated election-related posters, television Public Service Announcements (PSAs), and online information on its website. Local election officials also distributed invitation/information cards to voters. Additionally, the NEO has issued guidebooks and PSAs for local election commission members and implemented an online training module alongside in-person training for polling station commission members.

³¹ During the initial testing phase of the election software, some LEOs faced issues related to the protocol scanning activity. However, the majority reported a smooth testing experience. The repetition of testing went without issues, attributed to the timely IT support provided by the NEO.

³² Among other duties, the TECs were responsible for registration of the county assembly lists and the capital assembly lists. Based on the polling district minutes, the TEC establishes the results of the County General Assembly election, the Budapest-Capital general Assembly election, as well as the election of the Capital Mayor.

LEOs. During the pre-election period, observed LEOs conducted continuous training for the bookkeepers.

The NEO significantly simplified the work of LEOs by introducing centralized online services, reducing the number of requests for mobile voting boxes.

Regarding Polling Station Committee (PSC) members, there were varied approaches to their recruitment and training. Some LEOs reported a shortage of reserve PSC members, attributed to a lack of interest in joining the process. During the week preceding election day LEOs provided extensive in-person training to PSC members, followed by oath-taking ceremonies.³³ Oftentimes, the trainings were held together for the elected and the delegated members.³⁴ The mission was informed that the vast majority of PSC members were experienced former commissioners. It was reported that some parties and candidates faced difficulties in finding individuals willing to serve as party delegates due to perceived risk and lack of remuneration, unlike the appointed members.³⁵

In some regions, there were concerns that PSCs were composed of public sector workers (e.g., doctors, teachers) who might rely on the ruling party for their employment. However, it was generally believed that despite some PSC members being public employees, this would not result in manipulations on election day.

Registration of voters

Voter registration in Hungary is passive and continuous.³⁶ Individuals may be disenfranchised by an individualized court decision due to mental incapacity, as well as criminally convicted individuals. The mission was informed in May that at least 74,403 individuals were registered in the non-voters register, including 26,774 persons excluded for criminal offenses, and 47,629 persons which were excluded on the grounds of mental incapacity. ENEMO assesses that both the deprivation of voting rights on the basis of an intellectual disability and the distinction based on marital status are contrary to international standards.³⁷

In order to exercise their right to vote in municipal elections, voters needed a residence or domicile in Hungary.³⁸ In line with the law, in municipal elections voting by mail was not allowed. However, voters

³³ In one isolated case, an LEO conducted oath-taking and training before the delegation deadline, even though not all nominated bodies had delegated members by the scheduled training. If new delegates were received after the training and before the deadline, the LEO head indicated that oath-taking would be organized again by the mayoral office. Training for delegates was not obligatory, as they had access to the NEO's online training section, and a Q&A session was included in the oath-taking event to address any unclear issues. Some LEOs instructed PSC members to complete online NEO training and pass a test.

³⁴ The length of the training was from 1.5 hours to three hours. The training followed PowerPoint presentations provided by the NEO, with allowed modifications by LEOs. The training also showed the animated videos prepared by the NEO.

³⁵ According to the [NEO](#), all nominating organizations and candidates delegated a total of 30,872 members.

³⁶ In municipal elections, the right to vote is granted to every citizen at least 18 years of age on the day of voting. Married citizens over the age of 16 are also entitled to vote.

³⁷ 2006 UN Convention on the Rights of Persons with Disabilities, Article 29; and 2013 CRPD Committee Communication No. 4/2011, par. 9.4.

³⁸ Voters could vote by presenting proof of their identity using a valid identity card, passport or driving license, and their address and personal identification with a residence card.

had the opportunity to apply for absentee voting no later than 31 May, and thereby vote in their registered address.

The Central Electoral Register is managed by NEO, using data provided by the Ministry of Interior compiled from various registers.³⁹ Voters could request changes to the register until 7 June. A total of 7,676,608 Hungarian citizens, 137,197 citizens of another EU member state with a Hungarian address, and 35,928 refugees with long-term residence permits were eligible to vote in the municipal elections.⁴⁰ Generally, ENEMO assesses that the central electoral register administered by the NEO enjoys the trust of the public and stakeholders.

However, ENEMO notes that the number of voters in the Central Electoral Register decreased in all municipalities compared to previous municipal elections in 2019⁴¹, which according to the Ministry of Interior can mostly be explained by migration and the removal of deceased voters from the register. This led to the redrawing of electoral boundaries in December 2023, which impacted the size of some municipalities and therefore affected the electoral system for those settlements.⁴² ENEMO assesses that the redrawing of electoral boundaries based on updates to the voters' list six months before the election is at odds with international standards.⁴³

ENEMO observers reported on allegations related to data leaks of voters' personal information, including voter data being sold to nominating organizations and candidates for voter outreach purposes.⁴⁴ The mission additionally raises concerns regarding reports of pressure on voters⁴⁵, and in some instances multiple voters unlawfully registered at the same address⁴⁶, including in one Budapest district⁴⁷, allegedly with an intention to affect the outcome of the mayoral election and holding the risk of undue influence on voters.

Candidate registration

The right to stand in municipal elections is granted to every citizen with voting rights. In order to stand in the municipal election, nominating organizations had to register to the NEC. In addition, nominating organizations and candidates running in elections had to collect recommendation sheets (i.e. signatures).

³⁹ Provisions related to the Central Electoral Register are included under Chapter V of the 2013 Act XXXVI. Furthermore, part 47, Section 96 mentions the continuous update of the data in the central electoral register in accordance with changes in data from the register of personal data and addresses; the register of citizens without suffrage; polling district and constituency register; and the register of travel documents.

⁴⁰ According to the [Central Electoral Register](#). Additionally, in EP elections, 7,676,608 Hungarian citizens with a Hungarian address, 4,707 citizens of other EU member states registered to vote with a Hungarian address, and 127,226 voters entitled to vote by mail were included in the register.

⁴¹ <https://www.portfolio.hu/en/economy/20240529/hungarian-municipal-elections-2024-number-of-eligible-voters-drops-sharply-688813>

⁴² According to data from the [NVI](#).

⁴³ Paragraph I.2.2.v and vi of the Venice Commission's Code of Good Practice in Electoral Matters recommends redistribution of seats at least every ten years preferably outside election periods. With multi-member constituencies, seats should preferably be redistributed without redefining constituency boundaries, which should, where possible, coincide with administrative boundaries.

⁴⁴ Reported from Budapest, Pecs, and Szombathely.

⁴⁵ Reported from Debrecen.

⁴⁶ Reported from Budapest and Szeged.

⁴⁷ The mission was able to verify on Election Day the registration of circa 800 voters, allegedly Venezuelan refugees, all registered at one polling station in the first district of Budapest (see Election Day section). This case also received attention in the media: https://nepszava.hu/3238451_i-kerulet-v-naszalyi-marta-valasztas-venezuelai-menekultek

The number of required signatures varied depending on the type of candidacy and the population size of the settlement.⁴⁸

In general, ENEMO assesses that the numbers of signatures required per type of constituencies are in line with international standards and best practices, except the requirement for mayoral candidates in settlements with less than 10,000 inhabitants, where they needed to collect signatures from 3% of voters.⁴⁹

A total of 39,236 candidates from 551 nominating organizations were registered by the legal deadline to run in the municipal elections, with a total of 775 lists registered.

ENEMO assesses that the candidate registration process was generally inclusive and transparent. However, some opposition parties struggled to collect enough signatures in local communities, or faced challenges in forming the list of candidates. The majority of candidacies rejected were due to an insufficient number of valid signatures collected, or their decision to withdraw.

Candidates could withdraw from the electoral race by 7 June. By the legal deadline, approximately 450 candidates withdrew, passed away, or lost their right to vote. Notably, the withdrawal of Fidesz' mayoral candidate in Budapest 48 hours before Election Day and encouraging her voters to vote for an independent candidate immediately following, raises the issue of attempts to further mislead voters (see Background section).

Additionally, ENEMO observers reported on cases where the local election commission issued a formal reprimand to Fidesz candidates for claiming to be running as independent candidates following their registration, which was deemed by the commission as misleading to voters.

The mission was informed of some 859 settlements out of 3,178 mayoral races with only one candidate running for mayor, which ENEMO assesses as damaging to the competitiveness of the elections in those settlements.

Electoral Campaign and Campaign Finance

Electoral Campaign

The 2024 municipal election campaign in Hungary officially began on 20 April, despite continuous campaigning practices that extend beyond the official 50-day period. Campaign activities are broadly defined by law, which leaves space for uneven application.

⁴⁸ For mayors, in settlements with less than 10,000 population, candidates had to collect signatures from 3% of voters. In settlements and Budapest districts with a population between 10,000 and 100,000, mayoral candidates needed signatures from 300 voters. In settlements and Budapest districts with more than 100,000 population, candidates needed signatures from 500 voters. Budapest mayoral candidates had to collect signatures from 5,000 voters. For the election of local councils in settlements with less than 10,000 inhabitants, candidates needed to submit signatures from 1% of voters. For the election of local councils in settlements with more than 10,000 inhabitants, as well as in Budapest districts, candidates also needed to collect signatures from 1% of voters. For county assemblies, in order to submit a list, nominating organizations had to collect signatures from at least 0.5% of voters in the county (with the exclusion of voters in cities with county rights). For the Budapest Assembly, parties and associations could submit a list either by submitting a candidacy of a Budapest mayoral candidate, or by submitting the candidacy of mayoral candidates in at least three of the capital city's 23 districts.

⁴⁹ [Venice Commission Code of Good Practice in Electoral Matters, par. 1.3., ii.](#): “The law should not require collection of the signatures of more than 1% of voters in the constituency concerned”.

The main political forces competing in the elections were Fidesz, TISZA, and various opposition coalitions. ENEMO observers reported concerns about the potential misuse of state resources and unethical data usage, such as sending political messages via emails. The ruling Fidesz party, along with its proxies, dominated the spread of hostile disinformation, accounting for 98,6% of spending on such narratives⁵⁰, often targeting European leaders with inflammatory rhetoric as well as their Hungarian opponents.

In the weeks leading up to the municipal elections, the campaign intensified significantly.⁵¹ Campaign activities became more visible across many areas, with a personalized approach being adopted to engage voters. The ruling government political parties held various types of events, including large open rallies in regions where they faced opposition candidates, and more exclusive, often bussing attendees to closed meetings for vetted citizens in areas where they held power, to avoid critical questions. The most prominent campaign themes included local issues, defense and security of the EU, asylum and migration, agriculture and the rule of law. Inflammatory language and black PR tactics remained prevalent on social media and in public advertisements such as posters and billboards.

ENEMO raises significant concerns regarding the involvement of children in the political campaigns for these elections, as it contravenes international standards that safeguard the rights and well-being of minors. International frameworks, such as the UN Convention on the Rights of the Child⁵², explicitly prohibit the exploitation of children for political purposes. Despite these clear standards, numerous instances prominently featured children in campaign events and propaganda⁵³, raising ethical and legal concerns.⁵⁴ This practice not only jeopardizes the neutrality and welfare of children but also reflects poorly on the integrity of the political process, highlighting disregard for international norms and the fundamental rights of minors. Such exploitation undermines the credibility of the campaign and calls into question the commitment of political actors to uphold basic ethical standards.

ENEMO's observers identified numerous instances of misuse of state resources for campaigning purposes. Local authorities obstructed opposition candidates by rendering it difficult to obtain permits for campaign spaces and pressuring public sector employees to support or vote for the ruling party. Additionally, mayors used official events to deliver politically charged speeches, blurring the lines between ceremonial duties and campaign rhetoric. Candidates accused incumbents of monopolizing public advertising spaces, highlighting the pervasive blending of state resources and party campaigning, regardless of which party was in power. These practices contrast sharply with the provisions set forth in the Copenhagen Document, Article 5.4, which mandates a clear separation between the state and political parties. ENEMO raises concerns over these frequent abuses of state resources, which compromise the

⁵⁰ According to [Political Capital](#), Fidesz and its proxies are the main purveyors of hostile disinformation narratives in Hungary, responsible for 98.6% of the total EUR 2.0 million spent on promoting such narratives. All opposition parties and their partisan media share the remaining 1.4%.

⁵¹ Fidesz and its politicians alone spent EUR 2.0 million, 2.6 times more than all 14 opposition parties combined, which totaled EUR 764,558, according to [Political Capital](#).

⁵² [Convention on the Rights of the Child](#).

⁵³ According to [Nepszava](#), every third big city candidate running for the mayor uses children for their political messages. Some cases are already [recognized by the NEO](#) as violations of the law on election procedures. [Several NGOs protested](#) against misuse of children for campaign purposes, advocating to end “political pedophilia”. The most recent example of using children in the campaign happened at [the Peace March](#).

⁵⁴ For example, on May 15, 2024, during school hours, students from the Sukorói Tagiskola were taken to the Fiatalok Háza opening ceremony without parental consent. The event, attended by Fidesz-KNDP candidates including the mayor and county council president, was used for political campaigning, violating election laws by using children as campaign tools. The NEC adjudicated the case on the merits, confirming the violation based on the event's nature and the involvement of children during school hours, thus upholding the principles under the Act XXXVI of 2013 on Electoral Procedure.

fairness and integrity of the electoral process, create an uneven playing field favoring certain entities, and undermine democratic principles.

ENEMO's observers also noted the use of various political marches, along with unconventional and peripheral inaugurations, as campaign strategies that divert public attention from pressing issues to ceremonial events with little substantive value.

These events often served as a platform for candidates to gain visibility rather than addressing voters' concerns. Moreover, data-driven campaigns and microtargeting became increasingly prevalent, raising ethical concerns about privacy and the manipulation of voter behavior. The use of sophisticated data analytics to tailor messages to specific voter segments further exacerbated the imbalance in the electoral process, favoring those with greater access to resources and technological capabilities. ENEMO assesses that this trend undermined the democratic principle of fair competition and equality of opportunity of the electoral process.

Campaign Finance

Campaign finance in Hungary is generally regulated by the Electoral Procedure Act and the Transparency of Campaign Costs Act, both amended in 2020, with oversight conducted by the State Audit Office and the State Treasury. However, ENEMO assesses that the inability to appeal their decisions undermines the principles of accountability and fairness, while failing to ensure the opportunity for legal redress. Unlike parliamentary elections, there are no legal limits on campaign spending for municipal elections, allowing unrestricted expenditures which creates an uneven playing field. Additionally, candidates and parties do not receive central campaign funding for municipal elections, and public funds are accessible only through demonstrated voter support. Foreign funding is prohibited, ensuring domestic sourcing of campaign finances.

Despite these regulations, ENEMO notes that financial transparency is inadequate, with no strict deadlines for publishing financial reports and insufficient detail for public scrutiny, further limiting the opportunity for voters to inform themselves. Most parties claim to fund their campaigns through membership fees and micro-donations, but the lack of measures to prevent excessive funding is at odds with GRECO recommendations, leading to significant shortcomings in ensuring fair and transparent campaign financing.

Campaign finance rules for municipal elections in Hungary starkly contradict the standards set by the Venice Commission. The Commission mandates that spending by political parties should be limited to ensure equality of opportunity. However, ENEMO highlights that there are no legal limits on campaign spending for municipal elections, in sharp contrast to the regulated limits for parliamentary elections. This glaring discrepancy permits unrestricted spending, resulting in a severely uneven playing field that disadvantages smaller parties and independent candidates, flagrantly violating the principle of strict or proportional equality thereby undermining the democratic process.

ENEMO raises serious concerns about shadow funding practices, through the use of government-organized NGOs (GONGOs), state companies, and unreported funding sources. These issues are particularly notable when it comes to the ruling parties, whose campaign finances are frequently managed at the national level when they have directly nominated candidates. The deployment of

GONGOs facilitates indirect state support for ruling party campaigns, significantly blurring the lines between state resources and political financing. This not only affects the transparency of campaign funding, but also raises questions regarding the fairness and integrity of the electoral process.

In 2022, the Civic Union Forum (CÖF)⁵⁵ received substantial financial support from dubious sources, raising questions about the transparency and integrity of its funding.⁵⁶ In recent months, scrutiny of CÖF's funding has intensified, revealing continued questionable financial practices. In April 2024, the National Tax and Customs Administration (NAV) launched an investigation into CÖF's company⁵⁷, amid allegations of financial misconduct. Furthering these concerns, in May 2024 a state-owned company attempted to conceal a grant given to CÖF. Additionally, it was reported that the Fidesz party foundation provides CÖF with HUF 60-70 million annually^{58,59}, reinforcing the perception of close ties between the organization and the ruling party. These revelations highlight ongoing issues with financial transparency and suggest that CÖF continues to benefit from state-affiliated and politically influenced funding sources.⁶⁰ Moreover, in the recent March for Peace organized by CÖF, thousands of Fidesz supporters participated, while Viktor Orbán held a speech.⁶¹

In 2022, Megafon⁶², a prominent pro-government communication platform, raised questions due to its substantial and opaque financial backing.⁶³ Furthermore, Megafon's extensive presence on social media, particularly Facebook, can be attributed to its significant financial resources and expansive network. This raises concerns about the influence of money in shaping public discourse and the potential manipulation of social media platforms for political gain.⁶⁴ Recent revelations have further intensified scrutiny of Megafon's financial practices.⁶⁵ These findings underscore the opaque and potentially unethical financial operations of Megafon, exacerbating concerns about the undue influence of money in political communication and the lack of transparency in funding sources.⁶⁶

In 2022, significant concerns arose regarding the Urban Civic Fund's (Városi Civil Alap) financial practices, particularly its use of public money for political activities.⁶⁷ Reports indicated that this state NGO's grants were being used for electoral mobilization, raising questions about the integrity of these funds.⁶⁸ Recent investigations have further exposed the problematic financial dealings of the Urban Civic

⁵⁵ <https://civilosszefogas.hu/>

⁵⁶ Notably, CÖF was [granted HUF 70 million](#) from the state owned National Lottery in March and an [additional HUF 170 million](#) subsidy, ostensibly for displaying advertisements from the state-owned company. Moreover, CÖF [received HUF 3 million](#) from another public company for organizing events on the "Future of Europe". These transactions suggest a pattern of state-owned enterprises channeling funds to CÖF, which undermines the impartiality expected from civic organizations and raises concerns about the misuse of public funds for politically motivated activities.

⁵⁷ <https://24.hu/belfold/2024/04/15/cof-kampany-nyomozas-nav-polt-peter/>

⁵⁸ <https://atlatszo.hu/kozpenz/2024/05/31/a-fidesz-partalapitvanya-evi-60-70-millio-forinttal-tamogatja-a-cof-ot/>

⁵⁹ CÖF's finances have seen a significant increase over the years, with their budget rising from HUF 143 million in 2019 to HUF 159 million in 2020, then surging to HUF 557 million in 2021, and reaching HUF 637 million in 2022.

⁶⁰ CÖF states that the organization [never participated in the elections](#). While CÖF never nominated any candidates in the electoral race, it is clear that the organization's activities are political in nature and often evidently advocate for Fidesz as a party as well as its candidates.

⁶¹ <https://telex.hu/belfold/2024/06/01/bekemenet-nagykepes>

⁶² <https://megafon.hu/>

⁶³ Only two months after being founded, the Megafon Centre received an [injection of HUF 56 million](#) from undisclosed sources. This sudden influx of funds challenged the transparency and legality of its financing.

⁶⁴ https://politicalcapital.hu/hirek.php?article_read=1&article_id=3338

⁶⁵ In April 2024, reports surfaced about Megafon spending tens of millions of forints on campaigns attacking political figures such as Péter Magyar, highlighting the platform's aggressive and well-funded political strategies.

⁶⁶ According to [Political Capital](#), Megafon and the Civic Union Forum invested EUR 2.3 million in the Fidesz 2024 campaign. In contrast, opposition proxies spent a total of EUR 74,530.

⁶⁷ VCA runs under the [Gábor Bethlen Fund](#) which is a separate state fund whose purpose is to facilitate the realization of goals related to the Hungarian Government's national policy strategy.

⁶⁸ The Urban Civic Fund was criticized for channeling public money to pro-government NGOs that were actively involved in [political campaigning and candidate endorsement](#), exploiting legal loopholes to funnel resources into partisan activities. This practice not only compromised the neutrality of civic

Fund.⁶⁹ In May 2024, it was reported that three distinct sources of public money⁷⁰ were being directed towards NGOs that support Fidesz candidates, demonstrating a pervasive misuse of state resources. These NGOs, often staffed by individuals with direct ties to the ruling party, including former corporate executives, were instrumental in local campaign efforts. This ongoing financial entanglement between the Urban Civic Fund and pro-government entities highlights severe breaches of ethical standards and further erodes public trust in the impartiality of civic funding mechanisms.

Documentation also reveals that Pro Civitate, as of its registration in May 2022, explicitly stated its purpose as supporting the FIDESZ-KDNP operation at the local level. Notably, this statement was omitted in the registration document from May 2024, suggesting a deliberate attempt to obscure the organization's political connections. These affiliations indicate a problematic entanglement between civic organizations and the ruling party, undermining the neutrality and independence of such entities.

Media

The Hungarian media market is disproportionately divided among pro-governmental⁷¹, independent, and gray-zone media, with a predominant 80% share held by pro-government media outlets, led by the KESMA Foundation⁷². According to ENEMO interlocutors, pro-government media enjoy a significant advantage due to substantial investments from Fidesz-KDNP loyalists (individuals and entities). This exacerbates the competitive disadvantage of independent media, which are not financed by any political party or oligarchs, but mostly through readership contributions, YouTube revenues, book publishing, advertising, and a small percentage through grants. The ruling party and pro-government media often derogatorily label these independent media as "dollar media"⁷³, "accusing them of being funded by George Soros to serve foreign interests. Hungarian media NGOs and independent news outlets expressed concerns⁷⁴ regarding the new National Sovereignty Protection Act, which labels independent media as a "national threat" due to their foreign sources of funding and which as such needs to be shut down.

ENEMO expresses concerns over the low level of internal pluralism among Hungarian media, and the evident polarization of media outlets along political lines.

organizations but also highlighted a systemic issue where public funds were being misappropriated for political purposes, undermining the democratic process and fair competition.

⁶⁹ In January 2024, it was revealed that organizations led by Fidelitas, the youth wing of Fidesz, dominated the Urban Civic Fund competition, suggesting a [targeted strategy](#) to influence young voters using state resources. Moreover, NGOs closely aligned with the ruling party were found to be campaigning for Fidesz with state money, continuing the trend of utilizing public funds for political gain.

⁷⁰ <https://atlatszo.hu/orszagszerte/2024/05/10/harom-forrasbol-is-folyik-a-kozpenz-a-fideszes-jelolteknek-kampanyolo-civileknek/>

⁷¹ ENEMO's interlocutors informed the mission that pro-government media are centrally controlled with no autonomous editorial teams, through which they disseminate the same or similar narratives.

⁷² Mertek's research available at: [Fidesz-friendly media dominate everywhere - Mérték \(mertek.eu\)](#).

⁷³ <https://www.origo.hu/itthon/2023/04/magyar-nemzet-kulfoldi-forrasoktol-fugg-a-dollarmedia>

⁷⁴ Several Hungarian NGOs have condemned the legislation, and ten independent news outlets signed an open letter denouncing it, accusing the Hungarian government of unjustly labeling them as "serving foreign interests" ([Telex: The "Sovereignty Protection Authority" is harmful and against the rule of law, yet it will not intimidate independent media](#))

Media at national and local level

Public broadcaster MTVA hosted a public debate on 30 May between representatives of 11 party lists.⁷⁵ This was the first public debate broadcasted by a public broadcaster since 2006.

Although the 2024 spring Eurobarometer poll results⁷⁶ commissioned by the European Parliament showed that the four most important topics for Europeans were the fight against poverty and social exclusion (33), public health (32), support for the economy and creating new jobs (31), EU protection and security (31), the public debate was limited to four topics: defense and security of the European Union; migration/asylum; agriculture and/or democracy and the rule of law (with a choice between the latter two).⁷⁷ ENEMO assesses as concerning the fact that the debate's chosen topics did not fully correspond with the priorities outlined in the Eurobarometer poll, which calls into question the impartiality and independence of the public broadcaster.

Pro-Fidesz political actors utilized pro-government media to gain an advantage in the public sphere over their political opponents. According to ENEMO interlocutors, in numerous cases, independent journalists did not receive invitations to attend events hosted by ruling coalitions or the government, thus hindering their ability to obtain timely public information. However, the mission did observe cases, for instance in Szombathely, where the Minister of Foreign Affairs and Trade Péter Szijjártó attended a meeting to support Fidesz's candidate for mayor. For the first time in such events, online portal nyugat.hu, considered to be an independent media outlet and known for its critical editorial stance towards Fidesz, was allowed to attend the rally and report on it.⁷⁸ Nevertheless, ENEMO observed significant discrimination against independent media by Fidesz-affiliated political actors and the government during the campaign, both at the national and local levels.

Additionally, ENEMO assesses that during the electoral campaign, contestants in municipal elections did not enjoy equal access to media representation. Political pressure was evident in both national and local media, particularly in municipalities where the ruling party holds political power. According to local media, the majority of media outlets in rural areas are either directly or indirectly controlled by mayors and are fully dependent on local government contracts. Fidesz-tied media outlets tend to favor the ruling party and its affiliates, providing them with more coverage and positive portrayals.⁷⁹

Bias in media coverage was further evidenced by several pro-government media actively participating in Fidesz's campaign. For instance, the mission was informed about a local newspaper, Tolnai Népújság, which was delivered to every household in settlements with fewer than five thousand inhabitants across

⁷⁵ [Hungary state TV hosts first election debate in nearly 20 years – Euractiv](#).

⁷⁶ Eurobarometer is available at the link: [EP Spring 2024 Survey: Use your vote - Countdown to the European elections - April 2024 - - Eurobarometer survey \(europa.eu\)](#).

⁷⁷ Invitation letter sent by the CEO of MTVA to debate's participants contained information about topics which pertain to defense and security of the European Union; migration/asylum; agriculture and/or democracy and the rule of law (with a choice between the latter two).

⁷⁸ ["Those who do not want nuclear war will vote for Fidesz's local government candidates in Szombathely" \(nyugat.hu\)](#).

⁷⁹ For instance, the mission was informed that a local media in Balassagyarmat was evidently campaigning for the incumbent Fidesz mayor. The opposition candidate (registered through a local organization) inquired about the televised debate, but was rejected by the local television. Another example of contestants' unequal representation in the media was further illustrated in Szentendre, where a local TV channel did not want to invite a certain candidate to the debate, but instead only the incumbent mayor and Fidesz candidate. However, public discontent on Facebook forced the media outlet to invite this third participant to the debate.

the country. Interlocutors explained that this newspaper⁸⁰ is a part of the Fidesz campaign, as almost all the content is supportive of Fidesz.

ENEMO expresses concerns regarding the pro-Russian narratives and anti-EU sentiments portrayed in the media. Aside from election-related topics, narratives that were veiled in pro-government media referred to Fidesz's accusations that the EU and USA are forcing Hungary into participating in the war⁸¹, while Orban's government wants peace instead. On 21 May, Fidesz's communication director Tamas Menczer publicly called out US President Joe Biden and US Ambassador to Hungary David Pressman that they want the war to continue.⁸² The rhetoric used by pro-government media was systematically selected to appeal to citizens' emotions, by calling them "pro-peace voters" and labeling the Fidesz victory as a "pro-peace victory". Most of the narratives spread in traditional and electronic media were also disseminated on Facebook.

During the electoral campaign, media outlets at both the national and local levels did not report any cyber-attacks to the ENEMO mission. However, ENEMO expresses concerns regarding DDos attacks on independent media outlets 444.hu and Telex, which occurred on E-day. Namely, online portal [444.hu](https://www.444.hu) announced on their Facebook page that their website had been experiencing intermittent DDos⁸³ attacks since Saturday evening, rendering the site inaccessible at times and preventing them from publishing new content.

Social media⁸⁴

Social media, especially Facebook, were a crucial component of electoral contestants' political strategy in these elections. Political actors used Facebook to communicate with their electorate, sharing information about their activities and engaging in public discourse. The media also relied⁸⁵ on Facebook as a significant source of information, since political actors frequently use Facebook posts for debates and attacks on each other.

During the campaign period Fidesz stood out as the most active on Facebook with 695 posts⁸⁶ among the 11 political parties. Following Fidesz, the Megoldás Movement (291 posts) and Mindenki Magyarországa Néppárt (284 posts) were the next most active. Other parties had fewer than 200 posts during the same period. However, the TISZA party distinguished itself with the highest average interaction rate of 7.51%, significantly outperforming others such as Mi Hazánk, Solution Movement and Jobbik which displayed lower interaction rates, indicating less followers' engagement. ENEMO did

⁸⁰ There is also an online version: [Tolnai People's Newspaper \(tolnai nepujsag.hu\)](https://www.tolnai.hu).

⁸¹ <https://dailynewshungary.com/orbans-party-joe-biden-and-his-man-in-budapest-want-to-squeeze-hungary-into-the-war/>.

⁸² Additionally, Menczer openly supported former US president Donald Trump, highlighting that he would be able to bring peace and that the war might not have happened if Trump had been a president at the time. Available at the link: [Orbán's party: Joe Biden and his man in Budapest want to squeeze Hungary into the war - Daily News Hungary](https://dailynewshungary.com/orbans-party-joe-biden-and-his-man-in-budapest-want-to-squeeze-hungary-into-the-war-daily-news-hungary). Also, one of Fidesz's supporters at the Peace March, held on June 1st expressed open support to Donald Trump in US elections to be held in November. Available at: <https://www.voanews.com/a/hungary-s-orb%C3%A1n-stages-peace-march-ahead-of-eu-elections-7638999.html>.

⁸³

<https://www.facebook.com/444.hu/posts/pfbid0dTU16LzkSzwsTv6HDeESAQtJLcpR5DjCFboKVuiJo2gvdeF2SHq6jbTdzXoJfBcSl?rddid=ueEIFtK6XYERVbjf>

⁸⁴ ENEMO conducted limited social media monitoring over the reporting period, by using the Crowd Tangle platform to monitor actors' Facebook activities and also to identify possible signs of coordinated inauthentic behavior, hate speech, and other forms of harmful online conduct. However, for the purpose of his social media campaign, Peter Magyar uses his personal Facebook account, due to which ENEMO could not monitor his account through the Crowd Tangle platform.

⁸⁵ Political actors frequently utilize Facebook to publish open letters addressed to each other, which the media subsequently adopts and repurposes for their own press releases.

⁸⁶ From ENEMO's Crowd Tangle monitoring for the period of 20 April until 5 June 2024.

not observe any spending by the TISZA party on Facebook ads during the reporting period. However, on June 7, the Meta Ad Library showed evidence of the party attempting to sponsor a video⁸⁷ for the period of June 7–8 in which Peter Magyar addresses voters. Meta⁸⁸ removed the video, stating that it violated their rules regarding ads about social issues, elections, or politics⁸⁹. Also, it is important to note that Peter Magyar employed a different strategy for online communication as he did not invest in Facebook advertisements. Instead, Peter Magyar used a Discord channel⁹⁰ to recruit supporters, encouraging them to watch his live videos, share his Facebook posts, comment on his posts and those of other actors, and share all relevant election-related information. Fidesz strategically allocated enormous financial resources to dominate Facebook. According to Lakmusz's report⁹¹, Fidesz's Facebook ads expenditures reached 279,185,539.48 HUF⁹² from the beginning of 2024. Alongside Fidesz, various individuals and organizations affiliated with the party, such as Megafon influencers, Civil Összefogás Fórum (CÖF), and media outlets like ORIGÓ and Magyar Nemzet, featured prominently in the funding distribution.

Additionally, during the reporting period, ENEMO observed that TV2⁹³ supported Fidesz's campaign through paid Facebook ads⁹⁴.

In terms of qualitative analysis of Facebook posts, alongside informative political content, many of them focused on Hungary's potential involvement in the Russian-Ukrainian war. Through its posts, Fidesz often accused the EU and the US of supporting the war, aiming to discredit Brussels and its policies. Conversely, influencers of Megafon, the main Fidesz's proxy, influencers employed derogatory language, sarcasm, and mockery to undermine Magyar's credibility⁹⁵. Such rhetoric was not observed on Fidesz's official Facebook account, indicating that the party likely preferred to maintain a more formal and less inflammatory tone in its official communication.

ENEMO expresses significant concerns regarding the lack of legal regulation over social media, with a gap in legislation allowing political parties and their affiliates to conduct extensive and unrestrained social media campaigns. The absence of regulatory oversight opens the door to potential misuse, the spread of inflammatory narratives, misinformation, and unbalanced campaigning, which can significantly influence public opinion and electoral outcomes without accountability.

⁸⁷ <https://fb.watch/szVjJaDqHd/>

⁸⁸ https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=ALL&view_all_page_id=307317902468615&search_type=page&media_type=all

⁸⁹ The ad ran without a required disclaimer:

https://www.facebook.com/ads/library/?active_status=all&ad_type=all&country=ALL&view_all_page_id=307317902468615&search_type=page&media_type=all

⁹⁰ [Discord](#) – the name of Peter Magyar's discord channel includes the words "Talpra, Magyar!", referring to a famous phrase from Hungarian national poem "Nemzeti dal" (National Song) by Sándor Petőfi, written in 1848. Translating to "Rise up, Hungarian!", it was a rallying cry during the Hungarian Revolution of 1848 against the Habsburg monarchy. The phrase symbolizes a call to action and national unity, urging Hungarians to stand up for their rights and identity. Today, it is used to inspire patriotism and proactive responses to challenges. In the context of the Discord group, "Talpra, Magyarok!" encourages active participation, emphasizes national unity, and invokes historical significance, aligning the group with a tradition of civic activism and national pride.

⁹¹ [ELECTIONS 2024 – Litmus \(lakmusz.hu\)](#).

⁹² Approx. 714.156,61 EUR.

⁹³ TV2's program, Fact Extra, disseminated videos on Facebook that closely align with the thematic elements of Fidesz's election campaign, specifically regarding the dichotomy between war and peace, summarized in the phrase: "War or Peace? You decide!". Online news portal 444.hu# reported that they identified six such videos. However, ENEMO identified four Fact Extra videos in the Meta Ad Library# under the title "War or Peace? You decide!". As of 6 June, three of these videos are active, while one has been inactive since the same date. All videos were also accessible on Fact Extra's Facebook page.

⁹⁴ [tv2's news program pushes Fidesz's campaign in Facebook ads \(444.hu\)](#).

⁹⁵ Megafon influencers used terms like "Psycho Petty," often accompanied by a clown emoji.

Gender Representation

The Hungarian National Assembly is among the worst in the EU in terms of gender representation. Currently, only 28 out of 199 National Assembly members are women (14.07%). Women are somewhat better represented in local administration, especially in Budapest's district where approximately 25% of local politicians are women. The 20th district of Budapest is particularly notable, with women making up 47% of its local politicians. Nationally, 20% of municipalities are led by female mayors, and women hold 18% of seats in larger county assemblies.⁹⁶

ENEMO assesses that the level of women's representation in Hungarian politics remains worryingly low, due to an insufficient legal framework to enhance their involvement. Numerous initiatives to introduce legal quotas to increase women's representation in politics have repeatedly failed due to a lack of political will⁹⁷.

One of the significant events during the campaign period was the withdrawal⁹⁸ of Alexandra Szentkirályi on June 7 from the Budapest mayoral race, where she endorsed Dávid Vitézy. Her decision followed a study by Századvég, published on Friday, which indicated that Vitézy could potentially defeat the current mayor, Gergely Karácsony, if Szentkirályi stepped down and her supporters from the governing parties backed Vitézy.⁹⁹

ENEMO did not observe signs of sexism or hate speech directed at female candidates by political actors. However, ENEMO notes that certain female candidates felt the need to highlight their roles as mothers to appeal to “traditional family values”.¹⁰⁰

In the NEC, there were only three female commissioners.

National Minorities

The Fundamental Law consecrates the rights of national minorities living in Hungary. The 2011 Act CLXXIX on the Rights of Nationalities lists 13 officially recognized national minorities¹⁰¹ in Hungary, and further regulates their rights including the election of national minority self-governments and their competencies. Hungary is a party to the Framework Convention for the Protection of National Minorities.¹⁰²

⁹⁶ [In Hungary, Politics Is Mainly A Man's Game \(rferl.org\)](#)

⁹⁷ Additionally, the Hungarian Parliament has not yet adopted the Istanbul Convention, aimed at preventing and combating violence against women and domestic violence, as its definition of gender as a social construct is incompatible with Hungarian values. Read more at the link: [Index - In English - Hungarian Parliament refuses to ratify the Istanbul Convention for its asylum provisions and inclusion of gender](#)

⁹⁸ This outcome was recognized as a possible scenario by many ENEMO's interlocutors (see Background section)

⁹⁹ [Telex: Alexandra Szentkirályi withdraws from race for mayor of Budapest, endorses Dávid Vitézy.](#)

¹⁰⁰ At the mayoral debate of the very few female mayoral candidates in Pilisvörösvár (Pest), one of the candidates stressed out that she is mother and wife, who left her job in Budapest to raise her kids in Pilisvörösvár.

¹⁰¹ Armenian, Bulgarian, Croatian, German, Greek, Polish, Roma, Romanian, Ruthenian, Serbian, Slovakian, Slovenian, and Ukrainian.

¹⁰² Framework Convention for the Protection of National Minorities, February 1995, <https://rm.coe.int/16800c10cf>.

Candidates from national minorities had the opportunity to run in the minority self-government elections and to register national minority lists in local elections in each settlement. The registration process for national minorities running for election was generally inclusive.¹⁰³ For the minority elections, the NEO registered 109 National minority nominating organizations, and rejected the registration of 11 organizations.¹⁰⁴ There were 126 national minority lists running in elections at the local level. The Slovenian national minority did not have a list running in the minority elections.

In total, 328,019 voters from national minorities¹⁰⁵ were entitled to vote in the minority elections¹⁰⁶. The mission observed that a Roma national minority list was not registered in numerous settlements, due to mistakes during the signature collection process, where the signatories were not registered as minority voters in the voter lists. According to ENEMO interlocutors, one of the reasons for the limited participation of Roma in the election process is also the low registration rate attributed to discrimination fear and difficulties in reaching unregistered individuals.

Civil society organizations, such as the 1 Hungary Initiative¹⁰⁷, play a crucial role in advocating for marginalized groups, especially the Roma community. However, according to several ENEMO interlocutors, Roma minorities are often the target of vote buying due to their challenging economic and social conditions. Allegedly, the ruling party provides social benefits to leaders of the Roma minority to ensure their support, and it is noticeable on social media that some Roma leaders are openly supporting the ruling coalition.

In terms of addressing minorities during the campaign for local elections, the mission observed a lack of messages specifically targeting national minorities.

Inclusion of Persons with Disabilities

The legal framework contains regulations on the rights of persons with disabilities. Hungary has been a party to the Convention on the Rights of Persons with Disabilities (CRPD) since 2007. Additionally, specific legal norms are provided in the Act on Election Procedures for ensuring the participation of persons with disabilities during elections.

In line with the law, the NEO provided poll cards in braille and/or easy read materials, for voters who submitted requests before Election Day. Voters could request an accessible polling station no later than four days before elections.¹⁰⁸ If the polling station on the voter's registered address was not accessible, the LEO had to assign the voter to an accessible polling station, within the same settlement and constituency. Voters could find information regarding which polling station in each constituency was fully accessible for wheelchairs, on the NEO's website. Video material was available on the NEO's

¹⁰³ However, following approval by the NEC, the NEO produced ballot papers only in 11 national minority languages, which included all national minorities with the exception of Roma and Armenian languages.

¹⁰⁴ <https://vtr.valasztas.hu/onk2024/valasztopolgaroknak/jelolo-szervezetek/?tab=organizations>.

¹⁰⁵ The following number of voters from national minorities are entitled to vote in the minority elections: Bulgarian: 1382, Greek: 3052, Croatian: 11260, Polish: 3349, German: 54 085, Armenian: 2994, Roma: 222 349, Romanian: 7697, Ruthenian: 4234, Serbian: 2509, Slovakian: 12 100, Slovenian: 844, Ukrainian: 2164.

¹⁰⁶ The NEO website contains information on how national minorities can participate in the candidate nomination process, and video material with information on how to vote in minority elections, but the content is not included in national minority languages.

¹⁰⁷ According to ENEMO interlocutors, 1 Hungary Initiative's efforts during the 2024 local elections are pivotal in advocating for the Roma community, ensuring their issues are addressed by future leaders, and empowering them through education to actively participate in the democratic process.

¹⁰⁸ The deadline for requesting accessible polling stations was 5 June.

website, containing information on how to request registration at an accessible polling station, mobile ballot box and Ballot papers in Braille.

However, the disenfranchisement of citizens based on intellectual disability is at odds with international standards¹⁰⁹ (see Candidate Registration section). This is additionally criticized by the National Associations of Persons with Intellectual Disabilities and their Caretakers.¹¹⁰

Several associations mentioned the need for state institutions to provide more user-friendly documentation regarding their voting rights and procedural requirements, to enable persons with disabilities to exercise their passive and active suffrage rights. With regards to the participation of persons with disabilities in the electoral process, although the State invested efforts, additional steps are required to achieve proper level of access, participation and proactive role of persons with disabilities in the election process.

According to ENEMO observers, on Election Day 75 percent of observed polling stations were accessible; 19 percent required minor assistance and 6 percent were inaccessible. Usage of Braille template

ENEMO assesses that during the electoral campaign, contestants did not address the needs and problems of persons with disabilities, nor did the mission observe any particular campaign messages encouraging PWDs to participate in the elections.

Complaints and Appeals

The electoral legal framework contains detailed provisions for the handling of complaints and appeals in municipal elections. Special rules apply to objections relating to printed and internet media content, with deadlines and conditions tailored to the type of media.

The legal framework governing election dispute resolution is designed to ensure a clear and hierarchical process, excluding the possibility of parallel jurisdiction, requiring the complainant to exhaust all available legal remedies before being entitled to appeal to the courts. The prohibition of parallel jurisdiction ensures consistency and uniformity in decision-making for dispute resolution.

The complaints to the NEC as well as observed TECs and LECs were considered publicly, and decisions of the NEC as well as the Court were available promptly on the designated web-page. Non-binding templates for objections and appeals are available online. The decisions of the lower level are not subject to publishing in the unified registry.

¹⁰⁹ Article 29 of the [Convention on the Rights of Persons with Disabilities](#) (CRPD); Paragraph 48 of the General Comment No.1 (2014) to Article 12 of the CRPD states that “a person’s decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising their political rights, including the right to vote, the right to stand for election and the right to serve as a member of a jury”, <https://bit.ly/3K3dMN0>

¹¹⁰ This organization provides voter education ahead of the elections. It also issued a letter to the candidates, with a message requesting they advocate for the interests of persons with intellectual disabilities during the campaign and after the elections, as well as instructions for persons with intellectual disabilities to self advocate during the campaign: [Ascend Kezikonyv WEB 2023.pdf \(efoesz.hu\)](#); [Ascend ONK Tajekoztato WEB.pdf \(efoesz.hu\)](#); [Letter to candidates - ÉFOÉSZ \(efoesz.hu\)](#).

The right to file objections is granted to voters, candidates, nominating organizations and other natural and legal persons and organizations without legal personality affected by the case. ENEMO assesses that this restriction whereby only affected subjects are entitled to file an objection limits the access of interested stakeholders to the dispute resolution process in case of violations, as does the legal basis to reject the complaint.

Objections must be submitted in writing to the relevant electoral commission within three days of the alleged violation. By law, objections should include a detailed description of the violation, evidence, and the submitter's personal details. These preconditions are over-regulated, mostly setting out excessive formalism often the reason for rejections of complaints without considering the merits. A considerable number of cases were rejected on procedural grounds when the complaints failed to meet specific formal requirements. More specifically, some 27 objections/appeals out of 56 filed before the NEC¹¹¹ were rejected on procedural grounds including details such as the complainant's address, personal identification number, or specific legal references due to insufficient legal reasoning, lack of evidence, or missing deadlines.¹¹²

Moreover, there is no legal ground for the complainant to rectify format deficiencies within a reasonable timeframe, or the relevant EMB to ex officio consider alleged violations if the objection is dismissed on formal grounds.

Thirteen objections and 12 appeals were submitted concerning media-related issues, mostly about illegal campaigning, biased reporting, equal opportunity and debates. Nine objections were dismissed on procedural grounds, seven were rejected on the merits and seven were fully or partially satisfied.

In some instances, when the NEC identified a violation, it only issued a prohibition on further infringements without imposing sanctions¹¹³. Twenty five NEC decisions have been further appealed to the Court, with the majority of NEC decisions upheld by the Curia.

The complaints and appeals process at the local level was intensive. Many objections were rejected on procedural grounds, and EMBs were consistent in their decisions in this regard. Some interlocutors expressed general mistrust in the judicial or administrative mechanisms, believing that the complaints process is insufficient, as they are rejected on formal grounds, also noting the short deadline for the EMBs to investigate submitted complaints and the issuance of vague final decisions without imposing fines.

Some political interlocutors confirmed that they generally understand the complaints and appeals process and know how to structure and file a complaint. However, others lack sufficient experience and

¹¹¹ As of June 7, the NEC adjudicated some 56 disputes, among them 17 objections were brought to the NEC as first instance body, and the rest 39 were appeals against the TEC decisions.

¹¹² For example: Case Numbers: #308 (complainant's address and personal identification number); #312 (missed complainant's address and legal references); #348 (missed deadline) Case #338: (insufficient legal reasoning and lack of specific legal references.) Case #362 inadequate legal reasoning to support the claims; #344 (lack of adequate evidence to support the claims) #346 (insufficient to establish a violation); # 348 (lack of sufficient evidence).

¹¹³ For example, On May 24, 2024, the NEC [reviewed an appeal](#) filed by András Krisztián Szűts, an independent individual list candidate, who challenged the decision of the Fejer TEC from May 20, 2024, which dismissed his complaint alleging that the mayor of Sukoró, violated election laws by using schoolchildren as campaign tools during a public event on May 15, 2024. The NEC overturned the Fejer TEC's decision by an 11 to 2 vote, finding that the mayor violated Sections 2(1)(c) and (e) of Act XXXVI of 2013 on Electoral Procedures. The mayor was determined to have used schoolchildren as campaign tools during school hours without parental consent. The NEC prohibited the mayor from further violations and specified that the decision can be appealed to the Curia.

knowledge to structure a legally substantiated complaint in line with formal requirements. This lack of general serviceability has influenced their passive attitude toward the process.

The mission is in the process of analyzing election day and post-election complaints and appeals.

Election Day

On Election Day, ENEMO deployed 4 multinational teams of observers to follow the process of preparation and opening of polling stations, the voting and counting process, as well as the transfer and intake of election materials by LEOs¹¹⁴. Core Team experts additionally observed the process at 5 polling stations in Budapest. Observation teams observed the opening procedures at 4 polling stations, voting at 63 polling stations, and closing and counting at 4 polling stations. Additionally, ENEMO observed the intake of election materials and tabulation of results in 4 LEOs.

Based on the mission's observation, in the limited number of polling stations observed by ENEMO, Election Day procedures were generally conducted efficiently and in accordance with the law.

PSCs mostly conducted the opening process in order and according to procedure at polling stations observed, except at one polling station where the PSC did not fill out the control sheet and started issuing ballots without sealing the ballot boxes.

During voting, at polling stations observed, PSCs were operating with a sufficient number of members and sufficient number of ballot boxes, voting booths, and electoral materials, in line with the law. At 4 polling stations observed, ENEMO noted that some voters could not find themselves in the voters' register. The issuing of ballot papers went according to procedure at all polling stations observed. At one polling station observed in Budapest, the Core Team was able to verify an unusually large number of alleged Venezuelan refugees included in that polling station's register.¹¹⁵ Approximately at least two fifths of such voters out of 1,406 voters were included in the voter register at that polling station. The mission will continue to follow developments pertaining to this case.

The secrecy of the vote was respected at 85 percent of polling stations observed. However, at 9 percent of polling stations, observers noted more than one person in the voting booth. At 3 percent of polling stations observed, voters were revealing their ballots, and voters could not vote secretly due to the setup of booths at 3 percent of polling stations observed. Generally, no serious violations were observed inside polling stations observed. However, observers reported on alleged vote buying outside one polling station observed¹¹⁶, and reported carousel voting at one polling station¹¹⁷. The PSC was

¹¹⁴ In accordance with standard practice for limited ENEMO EOMs, the mission did not observe the Election Day in a systematic or comprehensive manner.

¹¹⁵ Polling station #4, District 1, Budapest.

¹¹⁶ Reported from a polling station in Hajdú-Bihar.

¹¹⁷ Reported from a polling station in Budapest, District 8. The police was investigating the case upon the arrival of ENEMO observers.

assessed as conducting the process in an orderly manner at all polling stations observed, and were evaluated as “very good” in 67 percent of cases, 37 “good”, and bad in 3 percent¹¹⁸.

Sufficient members were present during counting procedures at polling stations observed, which all closed on time¹¹⁹. All pre-counting and counting procedures were followed properly at polling stations observed, and protocols were filled out and distributed in accordance with the law. Closing at 3 polling stations observed was assessed as “good”, and one as “very good”.

The transfer of materials to LEO’s was positively assessed in three cases. In one case, ENEMO observers reported that the process was poorly organized¹²⁰. The observed LEOs’ activity was assessed as transparent and straightforward in all cases, and premises were adequately set up for the intake of materials. No overcrowding was observed, and protocols were processed according to the law in all cases observed. Three out of four LEOs observed were assessed as “very good”, and one as “good”.

Observers

The legal framework does not contain provisions pertaining to domestic non-partisan election observation. ENEMO assesses that the lack of possibility for civil society to observe at the polls is at odds with best practices.

Each nominating organization had an opportunity to delegate members to the vote counting committees. Reportedly, this number was significantly lower¹²¹ by approximately one-third less compared to previous local elections, with the exception of the TISZA party, and generally lower than for the 2022 parliamentary elections.¹²²

Additionally, nominating organizations had the possibility to appoint delegates to observe postal voting in EP elections. ENEMO notes that only Fidesz appointed observers to follow this process.

International observers are accredited by the NEO, with the right to observe all stages of the electoral process. In total, 47 international observers were accredited in these elections, including diplomatic representations and two organizations aside from ENEMO.¹²³

ENEMO observers were generally able to observe electoral preparations and conduct without obstruction, including on Election Day. The mission benefited from the openness and cooperation of EMBs, both on the national level and on the territorial/local level throughout the process.

¹¹⁸ In both cases, due to negligence.

¹¹⁹ 19:00.

¹²⁰ Budapest, District 7.

¹²¹ Interlocutors informed the mission that the lower number of delegates compared to the 2022 elections was due to parties' reluctance to appoint vote counters in municipal elections to other districts, as they would otherwise lose their opportunity to vote in their own districts due to the residency requirement in municipal elections.

¹²² <https://www.szabadeuropa.hu/a/a-tisza-part-kivetelevel-a-partokat-most-nem-erdekelte-civil-szavazatszamlalok-delegalasa/32977265.html>

¹²³ OSCE-ODIHR (2); Election-Watch.EU (4); Embassy of Kazakhstan (3); Embassy of Indonesia (1); Georgia (2); Turkey (2); Azerbaijan (2); ; Kazakhstan (3); Uzbekistan (2); Montenegro (2); Bosnia and Herzegovina (1).

About ENEMO

The European Network of Election Monitoring Organizations (ENEMO) is an international nongovernmental organization that represents a network of national nongovernmental civic organizations founded on September 29, 2001, in Opatija, Croatia. It consists of 21 leading domestic monitoring organizations from 17 countries of Central and Eastern Europe and Central Asia, including two European Union countries.

ENEMO seeks to support the international community's interest in promoting democracy in the region by assessing electoral processes and the political environment and offering accurate and impartial observation reports. ENEMO's international observation missions use international benchmarks and standards for democratic elections to evaluate the electoral process and the host country's legal framework. ENEMO and all its member organizations have endorsed the 2005 Declaration of Principles for International Election Observation and the Declaration of Global Principles for Nonpartisan Election Observation and Monitoring by Citizen Organizations. Each ENEMO observer signed the Code of Conduct for International Election Observers.

To date, ENEMO has organized 40 international election observation missions to 11 countries: Moldova 2023, Local Elections; Serbia 2022, Presidential and Early Parliamentary Elections; Hungary 2022, Parliamentary Elections; Kosovo 2021, Local Elections; Georgia 2021, Local Elections; Moldova 2021, Parliamentary Elections; Albania 2021, Parliamentary Elections; Moldova 2020, Presidential Elections; Montenegro 2020, Parliamentary Elections; Serbia 2020, Parliamentary Elections; Ukraine 2020, Local Elections; Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2018-19, Parliamentary Elections; Armenia 2018, Early Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Regular Local Elections; Ukraine 2014, Parliamentary Elections; Ukraine 2014, Presidential Elections; Ukraine 2013 – re-run of Parliamentary Elections 2012 in 5 MECs; Kosovo 2013, Local Elections, first round; Ukraine 2012, Parliamentary Elections; Kosovo 2011, Re – run of Parliamentary Elections; Kosovo 2010, Parliamentary Elections; Kyrgyzstan 2010, Parliamentary Elections; Ukraine 2010, Presidential Elections, second round; Ukraine 2010, Presidential Elections, first round; Kosovo 2009, Local Elections; Moldova 2009, Parliamentary Elections; Georgia 2008, Presidential Elections; Kyrgyzstan 2007, Parliamentary Elections; Ukraine 2007, Parliamentary Elections; Ukraine 2006, Local Elections in Poltava, Kirovograd and Chernihiv; Ukraine 2006, Parliamentary Elections; Kazakhstan 2005, Presidential Elections; Albania 2005, Parliamentary Elections; Kyrgyzstan 2005, Presidential Elections; Kyrgyzstan 2005, Parliamentary Elections; Ukraine 2004, Presidential Elections, second round re-run; Ukraine 2004, Presidential Elections.

ENEMO member organizations are: Center for Free Elections and Democracy – CeSID, Serbia; Center for Research, Transparency and Accountability (CRTA), Serbia; Center for Civic Initiatives CCI, Bosnia and Herzegovina; Center for Democratic Transition – CDT, Montenegro; Centre for Monitoring and Research – CeMI, Montenegro; Gong, Croatia; International Society for Fair Elections and Democracy – ISFED, Georgia; KRIIK Association, Albania; Citizens Association MOST, Macedonia; Promo- LEX, Moldova; OPORA, Ukraine; Society for Democratic Culture SDC, Albania; Transparency International Anti-Corruption Center (TIAC), Armenia; Election Monitoring and Democratic Studies Center (EMDS), Azerbaijan; Belarussian Helsinki Committee (BHC), Belarus; FSCI, Kazakhstan; Kosovo Democratic Institute (KDI), Kosovo; Coalition for Democracy and Civil Society, Kyrgyzstan; Obcianske OKO (OKO), Slovakia; Committee of Voters of Ukraine (CVU), Ukraine; Political Accountability Foundation (PAF), Poland.