



ENEMO International Election Observation Mission

HUNGARY MUNICIPAL ELECTIONS, 09 JUNE 2024

INTERIM REPORT

20 April - 25 May 2024

May 29th

The 2024 elections are unfolding in a polarized environment, with frequent blurring of lines between party and state negatively affecting the playing field. The campaign is marred by black PR, inflammatory rhetoric, and smear campaigns, as well as biased media reporting and a lack of equal access to media coverage. The absence of provisions for campaign finance specific to the municipal and EP elections, and lack of third-party campaigning regulations, affect the integrity of political finance and enable shadow funding practices. The preparatory phase conducted by EMBs is diligent, professional and generally in line with the law, despite the complexity of the elections.

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. Additionally, the mission will conduct limited observation on the day of voting, where mission members will observe the opening of polling stations, voting and counting processes on Election Day.

This is ENEMO's second mission to Hungary. The presence of ENEMO during the 2024 Municipal Elections will provide the national and international community with elaborate findings about the electoral process. Up until 25 May, ENEMO CT experts and observers have conducted 214 meetings, 82 with election management bodies, 26 with political parties, 33 with candidates, 19 with state officials, 22 with media, 27 with domestic civil society organizations and five with other interlocutors, in addition to observing seven campaign activities (meetings or rallies).

ENEMO will raise the awareness of the domestic and international community regarding the main challenges and problems observed in the elections, thus advocating for adequate policy changes through the adoption of concrete recommendations in its final report. This interim report is based on ENEMO's findings on the national level and throughout the regions observed from 20 April to 25 May 2024, where ENEMO CT experts and LTOs focused on assessing the work of election administration bodies, registration of political parties and candidates, conduct of the election campaign, election-related complaints and appeals and other election related activities. The mission will issue its statement of preliminary findings and conclusions after Election Day and will remain in the country to also follow potential complaints and appeals. The final report 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.

Executive summary

The political environment leading up to these elections has been profoundly shaped by a series of events and policy decisions. Early 2024 witnessed a major clemency scandal that shook the political sphere, culminating in the resignation of President Katalin Novák and former Justice Minister Judit Varga. The scandal has marked the Hungarian political scene, contributing to a climate of uncertainty and distrust in the existing political leadership.

The Fidesz government, led by Prime Minister Viktor Orbán, has been characterized by its controversial policies, particularly its antimigrant and anti-LGBT+ stances. The administration has also enacted laws that restrict the operations of opposition groups, journalists, universities, and nongovernmental organizations (NGOs) critical of the ruling party. Protests have been a recurring feature in Hungary since 2023, involving diverse groups such as teachers, influencers, and political figures. These protests reflect widespread discontent with the government's policies and actions.

Overall, the legal framework governing the upcoming elections includes sufficient regulations addressing various aspects of elections. However, some key areas, specifically campaign finance and the abuse of state resources, remain insufficiently regulated. The electoral legal framework has undergone several amendments following the 2022 parliamentary elections. However, many previous ENEMO recommendations were not taken into account. The top priority recommendation, in particular, emphasized the need for an inclusive and transparent electoral reform. Furthermore, gaps and insufficient regulations remain unaddressed, especially those related to campaign financing, misuse of state resources, the blurring of lines between the state and political parties, media, and citizen observation.

ENEMO notes that the legal amendment which changed the electoral system of the City Assembly of Budapest six months ahead of election day is at odds with international good practice. Implementing such a fundamental amendment close to the election risks disrupting administrative preparations, and creates an unpredictable playing field for electoral contestants. Additionally, the lack of inclusive consultations with stakeholders during the adoption of the law further deviates from international best practices, which underline the importance of transparency and inclusiveness.

ENEMO notes the overall trust from stakeholders in both election commissions and offices. During the reporting period, stakeholders emphasized the professionalism and impartiality demonstrated by EMBs at all levels. However, while the majority of the mission's interlocutors expressed confidence in the professionalism and efficiency of EMBs, some raised concerns regarding the appointment process of election commission members favoring the ruling majority party. EMBs demonstrated openness and transparency towards ENEMO observers. Despite the complexity of the upcoming elections, the election administration at the national level, as well as at the observed territorial and local levels, met legal requirements and deadlines.

In general, the passive and continuous voter registration process through the Central Electoral Register administered by the NEO enjoys the trust of the public and stakeholders. However, ENEMO notes that the deprivation of voting rights on the basis of an intellectual disability remains contrary to international standards, as does the distinction based on marital status. Some mission interlocutors raised concerns regarding the risk of unusually large numbers of voters being registered at the same address, especially in smaller settlements.

Following a generally inclusive candidate registration process, by the legal deadline a total of 39,236 candidates from 551 nominating organizations are running in the municipal elections (with a total of 775 lists registered). However, some opposition parties struggled to collect enough signatures in local communities, or faced challenges in forming the list of candidates. Most rejected candidacies were due to an insufficient number of valid signatures collected, or their decision to withdraw. In some instances, the local election commission issued a decision (reprimand) to Fidesz candidates for claiming to be running as independent candidates following their registration, which was deemed misleading to voters.

The ongoing campaign is characterized by the extensive use of inflammatory rhetoric and black PR, with the governing party leveraging its resources and media control to shape the political narrative and undermine opposition figures. The highly charged and polarized atmosphere highlights the contentious nature of the upcoming elections.

The governing Fidesz party often employs proxies such as government-organized NGOs (GONGOs), top-down influencer platforms, and government-controlled media to amplify its messages. Fidesz and its satellite organizations dominate the dissemination of hostile disinformation narratives in Hungary, often targeting European leaders, accusing them of pro-war stances and other inflammatory rhetoric. Domestically, opponents of Prime Minister Viktor Orbán are branded as "pro-war, pro-migration, and pro-gender", and accused of serving the "globalist lobby". Opposition parties and independent media are derided as "foreign agents funded by George Soros". On the other hand, opposition politicians have referred to government officials, including former President Novák and Prime Minister Orbán, as "pedophile saviors" due to their involvement in controversial decisions.

Foreign funding is prohibited for both European Parliament and municipal elections, ensuring that campaign finances are domestically sourced. Parties and associations are prohibited from using foreign funds to influence voters' decisions. The absence of legal limits on campaign spending is a critical issue, unlike parliamentary elections where limits exist. This allows candidates and parties to spend without restrictions, creating an uneven playing field. While the legislation includes severe penalties for the misuse of public funds, the lack of an appeals process significantly weakens the enforcement of sanctions and undermines accountability and fairness.

The media landscape in Hungary exhibits a high degree of external pluralism, divided among pro-government, independent, and gray-zone media outlets. Hungary's media environment is frequently criticized for its disproportionate access to media and the level of funding attributed to the ruling coalition compared to opposition parties. This imbalance affects media coverage, undermining equality of opportunity in elections. In addition, democratic principles are challenged by limited access to public information for independent journalists, intimidation of media workers, cyber-attacks, legal and financial pressures, thus creating an environment un conducive to a fully informed and engaged electorate.

Beyond electoral issues, the media narrative is largely dominated by the ongoing war in Ukraine. Fidesz frequently accuses the European Union and the United States of supporting the war, whereas the Hungarian government positions itself firmly as an advocate for peace.

Political pressure is evident in local media, especially in municipalities where the ruling party holds political power. Contestants in municipal elections do not enjoy equal access to media. Media outlets, especially those with ties to Fidesz, tend to favor the ruling party and its affiliates, providing them with more coverage and positive portrayals. In contrast, opposition parties and independent candidates often

receive limited and less favorable coverage. Fidesz and its proxies significantly outspend other political actors on Facebook advertisements, with expenditures exceeding 1 billion HUF.

The representation of women in politics remains a critical issue, largely due to the persistent lack of political will to address the matter through the implementation of mandatory quotas for women. Candidates from national minorities had the opportunity to run in the minority self-government elections. The registration process for national minorities running for election was generally inclusive. However, some national minority interlocutors mentioned a lack of interest and financial support from the state, negatively impacting their visibility especially during elections.

The electoral legal framework contains detailed provisions for the handling of complaints and appeals in municipal elections. ENEMO notes that the appeals and objections submitted to the NEC are accessible online with respective decisions and decisions of courts, if the decision is subject to judicial review. However, there is no unified online registry for objections submitted to the LECs and TECs. Objections, appeals and judicial reviews over the reporting period were filed mostly concerning candidate registration and alleged illegal campaigning or campaign materials. The deadlines for submitting and adjudicating complaints were respected. In some instances, when the NEC identified a violation, it only issued a prohibition on further infringements without imposing sanctions. Some complaints were rejected on procedural grounds, such as missing the legal address of the complainant or incorrect personal identification number.

Despite previous recommendations from international observers, including ENEMO, there are no legal provisions related to domestic non-partisan election observation. There is therefore no opportunity for domestic civil society to observe, at odds with best practices.

ENEMO has the largest number of accredited international observers in these elections. ENEMO observers are generally able to observe ongoing electoral preparations without obstruction, and the mission has benefitted so far from the openness and cooperation of EMBs.

Background

Municipal elections in Hungary were scheduled for 9 June 2024¹, marking a significant moment in the country's political landscape. This decision by the government to hold elections on this date is notable for its timing and the implications it carries. For the first time, Hungary will hold its Municipal and European Parliament elections (hereinafter EP elections) on the same day, a strategic move claimed by the government to aim towards reducing the expenses related to organizing separate elections.

The political environment leading up to these elections has been profoundly shaped by a series of events and policy decisions. Early 2024 witnessed a major clemency scandal that shook the political sphere, culminating in the resignation of President Katalin Novák and former Justice Minister Judit Varga. The scandal has marked the Hungarian political scene, contributing to a climate of uncertainty and distrust in the existing political leadership.

Péter Magyar, the ex-husband of Judit Varga, has emerged as a significant political figure, intensifying divisions in the already polarized Hungarian political landscape.² Magyar submitted his application to the NEC, announcing his candidacy for the June elections under the banner of the Tisza Party. However, the rise of Peter Magyar as a prominent dissenting voice in Hungary has sparked speculation and suspicion about his underlying motivations. According to ENEMO's interlocutors, a significant portion of Hungarians believe that Magyar's agenda remains unclear, highlighting the widespread presence of speculating theories and geopolitical tensions within Hungary's socio-political environment. This phenomenon has ignited a heated debate about the future trajectory of Hungarian governance, leading to increased introspection and demands for accountability.

The Fidesz government, led by Prime Minister Viktor Orbán, has been characterized by its controversial policies, particularly its antimigrant and anti-LGBT+ stances. The administration has also enacted laws that restrict the operations of opposition groups, journalists, universities, and nongovernmental organizations (NGOs) critical of the ruling party.³ These actions have drawn significant criticism both domestically and internationally. Additionally, this upheaval has occurred against the broader backdrop of the war in Ukraine, which has led to an influx of refugees and become another polarizing political issue within Hungarian society. The government's response to the refugee crisis and its stance on the conflict have further intensified political divisions and public discourse.

The context of the municipal elections adds another layer of complexity. Many opposition-controlled municipalities, which did not align with the ruling party, were previously deprived of significant budgetary resources, especially during the COVID-19 pandemic⁴. The decision to hold municipal elections earlier than their scheduled term, which was supposed to last until autumn, raises questions

¹ The elections were announced in the Hungarian Gazette on 12 March 2024, issue no. 30: <https://magyarkozlony.hu/>.

² Tisza was founded in 2021 but started to gain significant support after the clemency scandal. Peter Magyar's accusations against the government, including the Prime Minister and several ministers, have substantially resonated in the public space. Magyar, once a member of Fidesz's inner circle and a senior official in state-owned companies, has been particularly vocal against the party and voiced his criticism towards the government's actions. His public rallies, drawing tens of thousands of supporters, led to the rise of his recent political party poised to challenge both the governing Fidesz and all opposition parties.

³ For example, Act LXXXVIII of 2023 on the Protection of National Sovereignty; Act XXV of 4 April 2017 on the Amendment of the Act CCIV of 2011 on National Tertiary Education; Act CLXXXV on Media Services and the Mass Media and Act CIV on the Freedom of the Press.

⁴ In the five-year cycle since the 2019 municipal elections, HUF 400 billion has been withdrawn from the municipalities of large cities with a total of 3.7 million inhabitants. The data indicates that opposition metropolitan municipalities have been significantly more affected by government cuts, compared to municipalities led by Fidesz. <https://g7.hu/kozelet/20240402/a-kormany-budapest-elleni-bunkosbotja-nehany-falun-is-nagyot-ut/>.

about the political motivations behind this timing. This move is perceived by some as an attempt to curtail the competencies of opposition-led municipalities, further fueling political tensions.

In December 2023, the Hungarian Parliament adopted Act LXXXVIII of 2023 on the Protection of National Sovereignty. This Act, which has two main components, established a new Sovereignty Protection Office (SPO) to conduct investigations. The Criminal Code was amended to penalize electoral candidates and representatives of nominating organizations who use prohibited foreign funds for campaigning with up to three years of imprisonment.⁵ The legislation faced substantial opposition, with over 100 civil society organizations (CSOs), more than 15,000 citizens, and 10 independent media outlets denouncing it. The Council of Europe Commissioner for Human Rights also called for the proposal to be abandoned.⁶

Protests have been a recurring feature in Hungary since 2023, involving diverse groups such as teachers, influencers, and political figures. These protests reflect widespread discontent with the government's policies and actions. Moreover, the Hungarian Civic Alliance (Fidesz) and the Christian Democratic People's Party (KDNP) have maintained an official party alliance, contesting every national election together since the 2006 parliamentary election.

In response to the ruling party's dominance, the opposition parties DK, MSZP, and Párbeszéd have entered into a joint strategic cooperation agreement. This alliance aims to enhance their chances in the upcoming European Parliament and municipal elections, presenting a united front against Fidesz. On the local level, various coalitions were created among opposition parties.

Furthermore, Hungary will hold the rotating presidency of the Council of the European Union from July 1 to the end of 2024. This period of leadership comes at a turbulent time, following the formation of a new European Parliament and during negotiations on the composition of the new European Commission. Hungary's presidency will therefore be crucial in shaping EU policies during a critical juncture.

Legal framework and electoral system

Legal Framework

For the first time in Hungary, the upcoming elections simultaneously cover the EP elections, as well as municipal and minority self-government elections.

In the framework of the above, key legal documents include The Fundamental Law of Hungary (Constitution) which sets out the foundational principles for all elections, ensuring the democratic exercise

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 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).

of power and protection of citizens' rights. The Act XXXVI of 2013 on Electoral Procedure provides comprehensive procedural rules for conducting elections, covering general aspects of electoral procedures and is applicable for all types of elections. Act L of 2010 on the Election of Local Government Representatives and Mayors specifically regulates the election of local government officials, including mayors and municipal representatives, and exclusively provides details of the electoral system specifically for local government bodies. Act CLXXIX of 2011 on the Rights of Nationalities guarantees that national minorities in Hungary can elect their own local and national self-governments, safeguarding minority representation. Act CXIII of 2003 on the Election of Members of the European Parliament establishes the guidelines for Hungary's European Parliament elections. In addition, Act CCIII of 2011 on the Elections of Members of Parliament, while primarily related to national elections, also impacts local elections through general provisions affecting the composition of the election administration.

Hungary is a party to a number of international and regional human rights acts, also related to elections. This includes the European Convention on Human Rights and Fundamental Freedoms.⁷

Additionally, numerous legal acts regulate various elements of the electoral process, which are supplemented by non-binding guidelines from the National Election Commission.

Overall, the legal framework governing upcoming elections includes sufficient regulations addressing various aspects of elections. However, some of the key areas, specifically campaign finance and abuse of state resources remain inadequately regulated.

The electoral legal framework has undergone several amendments following the 2022 parliamentary elections. Some of these amendments addressed shortcomings and gaps in parliamentary elections, but amendments carried out from July 2022 to 2024 impacted the municipal, European Parliament (EP), and minority elections. Some amendments in the electoral regulatory framework aimed to address various issues within the electoral system, with mixed reactions regarding their consistency, inclusiveness, and alignment with international recommendations.

Despite several amendments to the electoral legal framework, many previous ENEMO recommendations were not taken into account. The top priority recommendation, in particular, emphasized the need for an inclusive and transparent electoral reform. Furthermore, gaps and insufficient regulations remain unaddressed, especially those related to campaign financing, misuse of state resources, the blurring of lines between the state and political parties, media, and citizen observation.⁸

According to recent amendments to the Fundamental Law and the Act on Electoral Procedures, starting from 2024, the EP elections, as well as municipal and national minority elections will be conducted concurrently on the same day, a process referred to as the Joint Procedure. This reform, introduced by the ruling majority Fidesz party, was rationalized to streamline the electoral process, reduce administrative costs, and potentially increase voter turnout. However, several stakeholders raised concerns that the simultaneous conduct of multiple elections may pose challenges for electoral contestants and the general public.⁹

⁷ 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.

⁸ International Election Observation Mission to Hungary Parliamentary Elections and Referendum 2022; Final Report, June 2022.

⁹ Hungarian Helsinki Committee [notes](#) that there are concerns that the complexity of holding multiple elections simultaneously could hinder parties and candidates in developing effective campaign strategies. Moreover, it may complicate the electoral process for the general public, potentially causing confusion

Amendments to the Electoral system have been implemented sporadically, targeting specific election types. Significant changes include adjusting county assembly sizes based on population, raising the threshold for registering a compensatory list in local government elections for towns and cities with populations exceeding 10,000 residents¹⁰ and revising procedures for vacancy succession.¹¹

On 12 December 2023, the Parliament also enacted amendments reinstating the party list electoral system in Budapest. This legislative change reintroduces the option for voters in the capital to vote for party lists, a practice that was abolished in 2014. Consequently, the 33-member city assembly will now be composed of 32 representatives elected from party lists plus the Budapest mayor, as opposed to district mayors, while the mayoral election will continue to be conducted through direct voting.¹²

The reception of these amendments has been polarized. Some mission interlocutors perceive the changes as an opportunity to improve representation within the Budapest city assembly. Conversely, other critics contend that the ruling majority has utilized these amendments as a strategic maneuver to consolidate power, thereby favoring larger, well-organized parties at the expense of smaller, less structured ones.

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 practice¹³. Implementing such a fundamental amendment close to the election risks disrupting administrative preparations, and creates an unpredictable playing field for electoral contestants. Additionally, the lack of inclusive consultations with stakeholders during the adoption of the law further deviates from international best practices, which underline the importance of transparency and inclusiveness.

Act LXXXVIII on the Protection of National Sovereignty adopted in December 2023¹⁴, with corresponding amendments to the Law on Electoral Procedures and the Criminal law, is of major concern to a broad majority of stakeholders. Many mission interlocutors view it as a dangerous instrument to shape

and reducing understanding of the different elections. *“The Threat Assessment of the 2024 European Parliamentary and Local Elections in Hungary”*; May 2, 20204;

¹⁰ Section 10 of Act L of 2010 on the Election of Local Government Representatives and Mayors [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.

¹¹ According to these amendments, no by-elections can be scheduled until the subsequent year's local government elections and any previously scheduled by-elections will only occur if the campaign has already commenced.

¹² In October 2023, Gábor Fodor, formerly of the SZDSZ and now an independent, introduced a proposal to revert the Budapest Metropolitan Assembly election system to its pre-2014 format. This proposal quickly gained traction in the media and among political circles. By November 2023, Mi Hazánk Mozgalom, represented by István Szabadi, submitted official amendments to change the municipal and parliamentary election laws, aiming to implement Fodor's proposal for Budapest lists and to reintroduce the list system for parliamentary elections. On November 28, 2023, an extraordinary parliamentary session was announced for November 30 to hear the State Audit Office report, but it was unexpectedly revealed that the agenda would also include discussions on the proposed election rule amendments. During this session, the focus shifted from the State Audit Office report to debates on the proposed changes to the election laws. Key points included discussions on the fairness and potential impacts of the amendments, particularly concerning the size of local assemblies and the introduction of compensatory lists. On December 12, 2023, the Hungarian Parliament voted on and passed the amendments proposed by Mi Hazánk Mozgalom. The [voting details](#) were as follows: 135 votes in favor (primarily from Fidesz and KDNP), 40 votes against (primarily from opposition parties including MSZP, DK, and Párbeszéd), and 6 abstentions (with Mi Hazánk Mozgalom representatives abstaining).

Notably, the same format reversion amendments related to parliamentary election rules proposed by Mi Hazánk [did not pass](#), with only 13 votes in favour and 156 against.

¹³ 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”.

¹⁴ 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. Alongside the Act, on December 12, 2023, Parliament adopted the 12th Amendment to the Fundamental Law. This amendment introduced Article R(4), which mandates that every state organ is obligated to protect Hungary's constitutional identity and Christian culture. It further stipulates that “to protect constitutional identity, an independent organ established by a cardinal Act shall operate.”

public opinion and silence critical voices towards the ruling party. It is also perceived as a means to threaten the opposition during an election.¹⁵

Electoral System

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.

Municipal 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.

The 2010 Act on the election of local government representatives and mayors establishes that the composition of local government representative bodies and county general assemblies is determined based on the population count as of September first in the year preceding the local government and mayoral elections.¹⁶

For settlements with 10,000 or fewer inhabitants, the area constitutes a single constituency that operates under a multi-member list electoral system.¹⁷ In elections with a multi-member list system, candidates who receive the highest number of valid votes will be elected, based on the number of available seats. If there is a tie, the winning candidate will be chosen by drawing lots. Voters can vote for as many candidates as there are seats available in the multi-member list. If a candidate on a multi-member list is elected as mayor, they will be removed from the list, and the candidate with the next highest votes will take their place.¹⁸

In larger settlements exceeding 10,000 inhabitants, as well as in capital districts, representatives are elected using a mixed electoral system. This system combines single-member constituencies and compensatory lists. Beyond these thresholds, the number of representatives in single-member constituencies increases by one for every additional 10,000 inhabitants, while the number of compensatory list representatives increases by one for every additional 25,000 inhabitants.¹⁹

¹⁵ According to the [Venice Commission opinion](#), Paragraph 92-93: the revision to Act XXXVI of 2013 on Election Procedure introduces a prohibition against candidates and nominating organizations receiving foreign support during elections, along with a requirement to declare the absence of such support. Additionally, the Criminal Code has been amended to establish a new offense titled "Illegal Influence of the Will of Voters" (Article 350/A of the Criminal Code). This amendment also includes modifications to the penalty provisions (Article 52 of the Criminal Code) and to the definitions section (Article 459(1) of the Criminal Code). *Furthermore, the Venice Commission notes that "restrictions on foreign funding of political parties and election campaigns are usual and in principle in line with international best practices and standards. In principle, an effort to close existing loopholes in the existing legal framework could meet standards of legitimacy. However, the legal amendments fail to clearly define what kind of campaign activities are prohibited and how to establish that they have been financed by foreign funds. They neither take into account co-operation of political parties at international level, nor do they exclude funding by international organisations and provide for the respect of international obligations and among these the obligations emanating from membership of the European Union."* On Act LXXXVIII of 2023 on the Protection of National Sovereignty. March 18, 2024.

¹⁶ Section 3 of the Act L of 2010 on the election of local government representatives and mayors

¹⁷ section 4 *ibid*. The number of representatives is determined by population size as follows: 2 representatives for up to 100 inhabitants, 4 for up to 1,000, 6 for up to 5,000, and 8 for up to 10,000 inhabitants.

¹⁸ Section 13 *ibid*.

¹⁹ Section 5; Section 14 *ibid*. The number of representatives for up to 25,000 inhabitants, there are 8 mandates from single-member constituencies and 3 from compensatory lists; for up to 50,000 inhabitants, there are 10 and 4 mandates respectively; for up to 75,000 inhabitants, 12 and 5 mandates respectively; and for up to 100,000 inhabitants, 14 and 6 mandates respectively, with one additional single-member constituency representative per further 10,000 inhabitants and one additional compensatory list representative per further 25,000 inhabitants.

Seats on the compensatory list and the national minority compensatory list are allocated based on the total number of unused votes in the constituency.²⁰

System for Budapest city assembly

Budapest, as the capital city, is treated as a single electoral district. The 33-member city Assembly will be composed of representatives elected based on party lists rather than district mayors, as it has been since 2014. Thirty-two mandates in the Budapest-Capital General Assembly will be allocated to persons on the capital party lists, joined with a directly elected Mayor who according to the legislation is a member of the Assembly.²¹

The electoral threshold for party-list representation is set at 5%, meaning that a political party or alliance of parties must receive at least 5% of the total valid votes to qualify for seats in the Assembly under the party-list system.

County Elections

Voters in each county will elect their local government representatives based on county-specific candidate lists. Each county serves as a single electoral district. However, towns with county rights and the capital city are not included in these electoral districts. The number of representatives in the county general assembly is determined by the county's population.²²

For a joint county list to qualify for representation, it must achieve a specific threshold of votes. If the list is composed of up to two nominating parties/organizations, the required threshold is 10% of the valid votes cast for county lists.

However, if the joint county list is formed by more than two nominating organizations, the threshold increases to 15% of the valid votes. It is important to note that only valid votes cast for joint county lists composed of the same nominating organizations can be aggregated to meet these thresholds.

Election Administration

The 9 June 2024 Joint Procedure is managed by a parallel-tiered structure of Election Management Bodies, comprising the Election Commissions which are respectively supported by a similar, parallel structure of Election Offices.²³

The different types of election commissions operating in the upcoming elections are the National Election Commission/National Election Office, 20 territorial election commissions and corresponding 20 territorial

²⁰ Section 14 *ibid*.

²¹ Section 6 of the Act L of 2010 on the election of local government representatives and mayors

²² Counties with up to 400,000 inhabitants have one representative for every 20,000 inhabitants, with a minimum of 15 representatives. Counties with populations up to 700,000 have 20 representatives, plus one additional representative for every 30,000 inhabitants beyond 400,000. In counties with more than 700,000 inhabitants, there are 30 representatives, plus one additional representative for every 40,000 inhabitants above 700,000.

²³ Chapter XVI of the Act XXXVI of 2013 on Electoral Procedure.

election offices; 3,177 Local Election Commissions/1,264 Local Election Offices, and some 10,119 Polling Station Commissions.

The election commissions are independent bodies, accountable exclusively to the law. The law establishes principles that mandate these commissions to determine election results, maintain the integrity and legality of the electoral process, uphold impartiality, fairness and lawfulness and, if required, restore the legal order of the election. The commissions are bodies responsible for election dispute resolution and campaign activities, as well as other election-related tasks.

The Election Offices are electoral bodies that carry out tasks related to the preparation, organization and conduct of elections. These offices support, assist and act as secretariats of the respective Election Commissions on the corresponding levels.

Despite the complexity of the upcoming elections, the election administration at the national level, as well as at the observed territorial and local levels, met legal requirements and deadlines. The process involved the intricate verification of recommendation sheets (i.e. signatures) for candidate registration, the approval of ballot papers, and the completion of other related tasks.

The NEO maintains the web page which provides various online resources to the stakeholders as well as voters. The electoral calendar is an available online interactive format, and all stakeholders as well as voters can follow it in real-time.

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

The National Election Commission (NEC) is a permanent independent body, composed of elected and delegated members. Seven members and three substitute members are elected by the National Assembly with votes of two-thirds of the Members present for a nine-year term on the proposal of the President of the Republic.²⁴ The president and the vice president of the NEC are elected among the commission members.

The political parties that have a parliamentary group can each delegate members to the NEC. One additional member of the NEC can be appointed by the nominating organizations that established the list for the EP elections and do not have delegated members as the parliamentary group. Delegated members of the EP established party lists do not have the right to vote, but can participate in the meeting of the NEC with the right of deliberation.²⁵²⁶ Since the announcement of the Elections on 12 March 2024, the NEC held 26 Sessions. Sessions are open to authorized subjects, agendas are published ahead of the sessions, and decisions are adopted publicly and published on the webpage. Election commissions and offices observed by the mission, on the national level as well as in territorial and local levels, were conducting their activities in a transparent manner. Election administrations at all levels including commissions as well as offices are open to international observers and other authorized subjects. The sessions of the NEC are announced in advance and agendas are published beforehand. Topics are

²⁴ Seven members and three substitute members of the NEC were elected on 9/26/2022; The president and vice-president of the NEC were elected on 10/03/2022.

²⁵ Section 27, paragraphs 2 and 3 and section 45, paragraph 5 of the Act XXXVI of 2013 on Electoral Procedure.

²⁶ Section 333, paragraph 2 of the Act XXXVI of 2013 on Electoral Procedure.

discussed and all members present can express their opinion. The decisions of the NEC as well as the NEO's are published on their respective websites.

The competencies of the NEC for the upcoming 9 June Joint Procedure vary according to the types of elections being conducted. For municipal elections, the NEC is the appellate body for the TEC decisions on objections.²⁷ However, its functions expand significantly when addressing nationality self-government elections and EP elections.

In the context of minority self-government elections, the NEC calls for the general elections of representatives, oversees the registration or rejection of candidate lists drawn up for these elections, and determines the ordinal numbers for the national lists. Additionally, the NEC approves the content of the ballot papers and addresses any objections specifically related to these elections. It also establishes the results of the national elections, determines which lists have reached the required vote threshold, and allocates seats to the elected candidates accordingly.

For the EP elections, the NEC is responsible for registering nomination organizations and lists, addressing electoral disputes, as well as approving ballot papers. It supervises the counting of votes cast by post and at foreign missions, determines the results of the elections, and issues material letters to representatives who obtained a mandate. Furthermore, the NEC is tasked with publishing announcements regarding the election results.

The NEC issues guidelines for the election bodies to ensure a uniform application of election-related legislation. The guideline does not have a binding legal effect, it is only indicative in nature, and there is no legal remedy against it.²⁸

The NEO is an independent autonomous state administrative body subordinated only to the law, which states that it should perform its tasks separately from other bodies and free from influence²⁹.

The NEO is headed by the President appointed by the President of the Republic, on the proposal of the Prime Minister, from among Hungarian citizens with a higher education who can be elected in the elections of members of the National Assembly. The NEO is responsible for tasks related to the preparation and conduct of elections. These tasks include providing impartial information to voters, assisting the NEC, ensuring the creation of materials and technical conditions necessary for the elections, maintaining the central voter registry, overseeing the operations of territorial and local election offices and coordinating 147 foreign representation election offices.

The NEO conducted the notification of voters, as well as a voter information campaign, and has produced and disseminated special posters on elections, produced television Public Service Announcements (PSAs) and has produced necessary information on the NEO website³⁰. The local election officials are also distributing invitation/information cards for voters.

²⁷ As the higher instance appellate body of EMBs the NEC has decided 28 appeals As of May 24, 2024.

²⁸ For the upcoming elections, the NEC has issued two guidelines on the interpretation of election procedure laws. The first [guideline #3/2024](#) pertains to Act L of 2010, which governs the election of local government representatives and mayors, specifically addressing the nominations of candidates entitled to claim the capital list.

The second [guideline #4/2024](#), initiated by the president of the NEO, focuses on assisted voting as per Act 2013 XXXVI.

²⁹ Tasks for the NEO can only be prescribed by law.

³⁰ The information booklets and Public Service Announcement [are available](#) online as well as on social media.

The NEO has also issued information materials for local levels of election commissions in the form of guidebooks and PSAs available online.³¹ In parallel with in-person trainings, the NEO has implemented an online training module tailored to the mandate of polling station commission members.³²

The NEO has implemented a complex national electronic system designed to enhance electoral processes. This system encompasses multiple functionalities, including voter registration, general election preparation, integration of election day data (such as voter turnout) and the rapid transfer of results. 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 second round of testing was conducted without issues, attributed to the timely IT support provided by the NEO.

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 the overall trust from stakeholders in both election commissions and offices. During the reporting period, stakeholders emphasized the professionalism and impartiality demonstrated by EMBs at all levels. However, while the majority of the mission's interlocutors expressed confidence in the professionalism and efficiency of EMBs, some raised concerns regarding the appointment process of election commission members favoring the ruling majority party.

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

20 TECs and TEOs are operating for upcoming elections, corresponding to the number of counties and the capital. The composition of the TEC consists of both elected and delegated members.

Three members and at least two alternate members of the Regional Election Commission are elected by the Capital and County Assemblies in the year preceding the general election of local government representatives and mayors.³³

After the date for the election of local government representatives and mayors is set, the nominating organizations that drew up a county list or a capital list, or nominated a Capital Mayor candidate, as well as the independent Capital Mayor candidates, should each delegate an additional member to the TEC.³⁴

Among other duties, the TECs are responsible for registration of the county lists and the capital 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.³⁵

The work of the TECs is supported by the corresponding TEOs, who are responsible for the organization, preparation and conduct of elections.

³¹ Information [materials](#) for EMB members are available online.

³² The distance [learning module](#) is accessible upon registration.

³³ This election process occurs between 1 October and 30 November. The Head of the Regional Election Office is responsible for making a motion for the election of these members.

³⁴ For nominating organizations that nominated a joint candidate or created a joint list, the delegation of election commission members is done jointly. A single nominating organization or political party, or an independent candidate, may only delegate members to the election commission on one legal ground. This restriction applies even if multiple legal grounds are available to exercise this right.

³⁵ Section 307 (2) of the Act XXXVI of 2013 on Electoral Procedure.

Regional election offices are headed by the clerks of the county self-government or the chief clerk of the local government of the capital. The heads of election offices appoint election office members. Public administration officials and public servants may be appointed as members of election offices.

TECs and TEOs demonstrated openness and transparency towards ENEMO observers. Political parties, from both the ruling party and the opposition, have expressed confidence in their professionalism and impartiality.

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

On the local level, the upcoming elections are managed by 3,177 local election commissions and 1,264 local election offices. In settlements with a single polling district, LECs consist of at least five members, while in settlements with multiple polling districts, the commissions have at least three members. By law, LEOs serve as independent bodies that ensure the lawfulness and impartiality of elections.

LEOs manage and coordinate the administrative and logistical aspects of elections. The head of the LEO is responsible for several key tasks, including arranging polling districts, managing electoral registers, and overseeing the preparation and conduct of the election. LEOs play an important role in ensuring that the technical and operational parts of elections perform efficiently. Among other tasks, the LEO was responsible for notifying nominating organizations of their registration status and managing the verification process for nominations and voter recommendations.

All observed TECs and LEOs/LECs have been registered on the Election Administration System (VAKIR)³⁶. This registration streamlines the process of managing electoral tasks and accessing necessary information.

Registration of voters

The right to vote in municipal elections is granted to every citizen at least 18 years of age on the day of voting. However, married citizens over the age of 16 are also entitled to vote. Individuals may be disenfranchised by an individualized court decision due to mental incapacity, as well as criminally convicted individuals.³⁷ ENEMO notes that the deprivation of voting rights on the basis of an intellectual disability is contrary to international standards³⁸, as is the above-mentioned distinction based on marital

³⁶ The Election Administration System (VAKIR) is an information sharing system which carries out and organizes administrative tasks related to electoral processes.

³⁷ As of 24 May, 74,403 people are registered in the non-voters register, including 26,774 persons excluded for criminal offenses, and 47,629 persons are excluded on the grounds of mental incapacity.

³⁸ The 2006 UN Convention on the Rights of Persons with Disabilities, Article 29, states that steps should be undertaken to “ensure that persons with disabilities can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected”. Furthermore, the 2013 CRPD Committee Communication No. 4/2011, par. 9.4, emphasizes that “an exclusion of the right to vote on the basis of a perceived or actual psychosocial or intellectual disability, including a restriction pursuant to an individualized assessment, constitutes discrimination on the basis of disability, within the meaning of article 2 of the Convention”.

status.³⁹ Hungarian citizens, refugees, individuals with long-term residency, and EU citizens have the right to vote in municipal elections.⁴⁰

Voter registration in Hungary is passive and continuous. The Central Electoral Register is maintained by the NEO in the form of an electronic register extracted from the register of personal data and address of citizens and other registers.⁴¹ In order to exercise their right to vote in municipal elections, voters must have a residence or domicile in Hungary. Since the 2021 amendment to the law (Act LXVI of 1992 on Keeping Records on the Personal Data and Address of Citizens), the definition of residency was changed to the address used by an individual for communication with the state. Additionally, voters can vote only at the polling station where they reside. Voters with another registered place of residence have an opportunity to choose in which municipality to vote, provided they submitted the request at least 30 days before the election was set.⁴² Specifically in municipal elections, voting by mail is not allowed.⁴³ Voters may apply for absentee voting no later than 31 May, and thereby vote in their registered address.

As of 25 May, 7,678,134 Hungarian citizens, 137,078 citizens of another EU member state with a Hungarian address, and 35,779 refugees with long-term residence permits were included in the Central Electoral Register and eligible to vote in local government elections.⁴⁴

ENEMO observer reports indicate a general trust in the accuracy and reliability of the voter register, without significant shortcomings. However, some interlocutors raised concerns regarding the risk of unusually large numbers of voters being registered at the same address, especially in smaller settlements. Additional concerns they mentioned to the mission included possible misuse of personal data and/or voter data leaks.

Candidate registration

The right to stand in municipal elections is granted to every citizen with voting rights. A Hungarian citizen without a Hungarian address can stand for election, provided that they have been included in the central voter register. In order to stand in the municipal election, nominating organizations had to register to the NEC. Additionally, nominating organizations and candidates running in elections had to collect recommendation sheets (i.e. signatures)⁴⁵.

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

³⁹ General Comment No. 25 on Article 25 of the ICCPR, par. 3: “no distinctions are permitted between citizens in the enjoyment of voting rights on the grounds of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.”

⁴⁰ Additionally, for the European Parliament elections, Hungarian citizens have the right to vote as well as EU citizens having requested to be registered for European Parliament elections in Hungary. For the minority elections, Hungarian citizens who have a Hungarian address and requested to be registered as minorities can vote in the minority elections.

⁴¹ Provisions related to the Central Electoral Register are included under Chapter V of the 2013 Act XXXVI on election procedure. 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.

⁴² Voters had an opportunity to do so [online](#).

⁴³ However, voting by mail is allowed in the European Parliament elections.

⁴⁴ According to [the Central Electoral Register](#). Additionally, in EP elections, 7,678,134 Hungarian citizens with a Hungarian address, 4,659 citizens of other EU member states registered to vote with a Hungarian address, and 127,082 voters entitled to vote by mail were included in the register.

⁴⁵ When it comes to collecting signatures, multiple nominations are possible. A voter may sign the nomination form of several candidates or lists, including lists for the European Parliament, candidates for the local government, mayor candidates and county lists.

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.

Following the registration process, by the legal deadline⁴⁶ a total of 39,236 candidates from 551 nominating organizations are running in the municipal elections (with a total of 775 lists registered).⁴⁷ Although the candidate registration process was generally inclusive, the mission was informed that some opposition parties struggled to collect enough signatures in local communities, or faced challenges in forming the list of candidates. Most rejected candidacies were due to an insufficient number of valid signatures collected, or their decision to withdraw.⁴⁸

ENEMO observer reports in Budapest and Pecs indicate allegations of Fidesz collecting signatures for independent candidates/affiliated nominating organizations, casting doubt on the actual independence of these candidates. In some instances, the local election commission issued a decision (reprimand) to Fidesz candidates for claiming to be running as independent candidates following their registration.⁴⁹ In another case, the local election commission issued a similar decision to candidates which were running as Fidesz-KDNP, but had campaign materials which only mentioned the name of a third nominating organization.

Several mission interlocutors raised concerns about the authenticity of some nominating organizations' signatures collected. Additionally, at least one criminal investigation was opened in the case of nominating organizations using signatures collected from previous elections and resubmitted in these elections despite the list containing the names of deceased individuals.⁵⁰

The mission was also informed of counties including several small settlements with only one candidate running in the mayoral race, limiting the competitiveness and array of choices for voters in those settlements.⁵¹

⁴⁶ Candidates for mayor, single list candidates, single constituency candidates and candidates for minority self-government had until 6 May to register. For county lists, nominating organizations for regional and national minority lists had until 7 May to submit their nominations. For EP elections, the deadline was 3 May.

⁴⁷ Additionally, 313 candidates from 38 nominating organizations are running on 11 registered lists for the EP elections; and 12,488 candidates from 109 nominating organizations are running in minority elections (with a total of 155 lists registered).

⁴⁸ The following number of individuals saw their candidacies rejected: 80 for mayor; 1 for capital mayor; 57 single list candidates; 262 single constituency candidates; 38 candidates from compensatory lists; 55 candidates for county lists; and 351 minority candidates for settlement elections. <https://vtr.valasztas.hu/onk2024/valasztopolgaroknak/varmegyek-telepulesek/varmegyek/01/telepulesek/001?tab=candidates&filter=constituency>.

⁴⁹ In Siófok, the local election commission stated in its decision that two Fidesz candidates declaring themselves as independents was deceiving to voters and violated the basic principles of the Act on electoral procedure.

⁵⁰ In Zala county, a criminal investigation was opened after the TEO discovered the name and signature of a former mayor who passed away during the COVID-19 pandemic on a candidate recommendation list during the signature verification process. The verification system does not indicate if a person is deceased, only if they are or aren't entitled to recommend a candidate. As the former mayor obviously was not on the list of entitled persons, the TEO referred the case to the population registry office, which found 12 more signatures from deceased individuals on the same list. The case was then forwarded to the police, who initiated an investigation against the person responsible for collecting the recommendations. Nevertheless, the nominating organization was still registered, as the remaining valid signatures exceeded the required threshold.

⁵¹ For instance, several settlements in Baranya county and Somogy county.

Electoral Campaign and Campaign Finance

Since the date for the 2024 Municipal elections was set on June 9, the campaign officially started on April 20. Although the official campaign period lasts only 50 days, in practice, electoral campaigns in Hungary begin much earlier, resulting in a state of continuous election campaigning. The law defines campaign activities broadly, encompassing any actions aimed at influencing voters' choices, such as posters, direct contact by candidates, political advertisements, and election rallies.⁵² Activities conducted by election bodies and personal communication between citizens, however, are not considered part of the election campaign.

Despite the absence of an official silence period before and on election day, certain campaign activities are prohibited. ENEMO's interlocutors raised concerns regarding the potential abuse of state resources for campaigning. Notably, over the reporting period campaign and political messages have been sent using email addresses collected during COVID-19 vaccination registrations, raising ethical questions about such data usage.⁵³

The governing Fidesz party often employs proxies such as government-organized NGOs (GONGOs), top-down influencer platforms, and government-controlled media to amplify its messages. Fidesz and its satellite organizations dominate the dissemination of hostile disinformation narratives in Hungary, accounting for 98% of the total spending on such narratives.⁵⁴ These narratives often target European leaders, accusing them of pro-war stances and other inflammatory rhetoric.⁵⁵

Domestically, opponents of Prime Minister Viktor Orbán are branded as "pro-war, pro-migration, and pro-gender,"⁵⁶ and accused of serving the "globalist lobby"⁵⁷. Opposition parties and independent media are derided as "foreign agents funded by George Soros"^{58,59}. Pro-governmental Facebook pages have invested over EUR 370,000 to discredit the new opposition figure Péter Magyar. Additionally, opposition politicians have referred to government officials, including former President Novák and Prime Minister Orbán, as "pedophile saviors" due to their involvement in controversial decisions.⁶⁰

Within the weeks prior to the municipal elections, the campaign is not yet in full swing. Campaign activities within the reporting period were not very visible in many areas, with ruling government political parties holding closed meetings for vetted citizens, often bussing them to events to avoid critical questions.

⁵² Act XXXVI of 2013 on election procedure, Article 68. Campaign period and campaign tools.

⁵³ This occurrence was reported to mission by several interlocutors.

⁵⁴ According to [Political Capital](#).

⁵⁵ Prominent figures such as Ursula von der Leyen, Emmanuel Macron, Donald Tusk, Olaf Scholz, and several ministers from Germany and Poland are frequently targeted.

⁵⁶ <https://youtu.be/74OUXkrwjs0?si=Psjip-11bZ-0X4Qx>.

⁵⁷ In April, CPAC Hungary held their conference with Viktor Orbán as one of the speakers. The foundation emphasizes its "pro-peace" and "anti-globalist" approach. <https://www.cpachungary.com/en/>.

⁵⁸ István Hollik, the communications director of Fidesz, for example, said in a statement in 2023 that a significant part of the campaign contributions of left-wing parties came from George Soros' network, and that this money was used to influence Hungarian elections. <https://www.fidesz.hu/hirek/a-gurulo-dollarok-ugye-soros-gyorgy-halozatahoz-vezet>.

⁵⁹ Another example is the narrative used by Fidelitas (Fidesz's youth organization) during the demonstration against foreign funding of opposition parties: https://fidesz.hu/hirek/az-ellenzeki-partok-kulfoldi-finanszirozasa-ellen-demonstralt-a-fidelitas_0628.

⁶⁰ [Political Capital](#) approximated that the opposition politicians spent 2% of their total social media campaign spendings promoting hostile narrative over the clemency scandal, with Democratic Coalition (DK) spending the majority. Hostile terms used to promote this narrative were "Orbán pedophile network"; "pedophile protector president"; "pedophile groomers"; "a vile child protection law"; "hunting ground for Fidesz pedophiles".

Inflammatory language is often used on social media⁶¹, along with numerous cases of black PR in posters and billboards.^{62,63}

ENEMO's observers identified several instances of misusing state resources for the purpose of campaigning. In Debrecen and Nyíregyháza, local authorities have impeded opposition candidates by making it challenging to obtain permits for campaign spaces, and pressuring public sector employees to support or vote for the ruling Fidesz party. In Szeged, the mayor representing the Socialist Party has utilized official events to deliver politically charged speeches, merging ceremonial duties with campaign rhetoric. Similarly, in Pécs, mayoral candidates have accused the incumbent of monopolizing public advertising spaces, highlighting the pervasive blurring of the line between state resources and party campaigning, irrespective of the party in control. This is at odds with the Copenhagen Document⁶⁴, Article 5.4., which states that a clear separation between the State and political parties must be ensured. In particular, political parties should not be merged with the State. ENEMO raises concerns over common cases of exploitation of state resources, which affect the fairness and integrity of the electoral process. Such negative practices undermine democratic principles by creating an uneven playing field, where state mechanisms are leveraged to benefit certain political entities over others.

The ongoing campaign is characterized by the extensive use of inflammatory rhetoric and black PR, with the governing party leveraging its resources and media control to shape the political narrative and undermine opposition figures. The highly charged and polarized atmosphere highlights the contentious nature of the upcoming elections.

Campaign Finance

Campaign finance in Hungary is regulated by Act XXXVI of 2013 on Electoral Procedure (Electoral Procedure Act) and Act LXXXVII of 2013 on the Transparency of Campaign Costs Related to the Election of the Members of the National Assembly, both of which were amended in 2020. Campaign finance oversight is conducted by the State Audit Office and the State Treasury. However, the lack of possibilities to appeal their assessments, conclusions, or imposed fines, undermines accountability and the fairness of the system.

The absence of legal limits on campaign spending is a critical issue, unlike parliamentary elections where limits exist. This allows candidates and parties to spend without restrictions, creating an uneven playing field. Additionally, neither candidates nor nominating organizations receive central campaign funding for the municipal elections. Candidates can access public funds only if they demonstrate sufficient voter support and must account for their expenses within 15 days following the day of voting. Misuse of these funds results in severe penalties, such as repaying twice the received amount.

Foreign funding is prohibited for both EP and municipal elections, ensuring that campaign finances are domestically sourced. Parties and associations are prohibited from using foreign funds to influence

⁶¹ In Budapest, on TikTok, Szentkirályi ridicules Mayor Gergely Karácsony for his lack of English proficiency and absence of a driving license. In response, Karácsony previously claimed avoiding learning to drive after his father's death in a car accident. Cases of inflammatory language used online were observed by ENEMO's observers in Eger and Debrecen.

⁶² In Debrecen, black PR towards opposition candidates has been evident, with defamatory posters in Miskolc.

⁶³ In Győr, independent mayoral candidate Pintér Bence is targeted in discreditation campaign. Posters that indicate his affiliation to the MSZP party were posted across the county.

⁶⁴[1990 Copenhagen Document](#).

voters' decisions. The State Audit Office is mandated to audit campaign finances within a year of the election, scrutinizing the use of public funds.

Despite these regulations, the financial transparency of parties remains inadequate. There is no strict deadline for publishing financial reports on their websites, and the reports lack sufficient details for thorough public scrutiny. Most political parties claim to fund their campaigns through membership fees and micro-donations, while candidates often rely on personal funds or those from nominating organizations. Lack of measures to prevent excessive funding of political parties including established limits on expenditure on electoral campaigns is in contrast with GRECO recommendations.⁶⁵

Interlocutors of the mission raised concerns overshadow funding practices, including the use of government-organized NGOs (GONGOs) and state companies, as well as unreported sources of funding. These concerns were particularly directed towards the ruling parties, whose campaign finances are often managed at the national level if they have directly nominated candidates. In addition, allegations of disproportionate access to funding for the ruling coalition compared to opposition parties further exacerbate the inequalities in the campaign process.

Campaign finance rules for municipal elections are at odds with the Venice Commission's standards. For example, the Venice Commission stipulates that spending by political parties should be limited to ensure equality of opportunity.⁶⁶ ENEMO notes that there are no legal limits on campaign spending for municipal elections, in contrast with the regulated limits for parliamentary elections. This discrepancy allows unrestricted spending, creating an uneven playing field that disadvantages smaller parties and independent candidates, violating the principle of strict or proportional equality.

While the legislation includes severe penalties for the misuse of public funds, the lack of an appeals process significantly weakens the enforcement of sanctions. This deficiency undermines the effectiveness of campaign finance oversight, contrary to the Venice Commission's guidelines. Equality of opportunity in campaign finance requires either strict or proportional distribution of public funds. However, central campaign funding is not provided to candidates or nominating organizations. Candidates and nominating organizations can access public funds only if they demonstrate sufficient voter support and must account for their expenses after the election. This requirement potentially disadvantages new or smaller parties that cannot initially demonstrate voter support, thus failing to align with the equality principles set forth in international standards.

The absence of spending limits, inadequate transparency, lack of equitable public funding, disproportionate media access, and shadow funding practices all contribute to an uneven playing field. Additionally, the lack of an appeals process for oversight decisions undermines accountability and fairness.

⁶⁵ Recommendation Rec(2003)4 of the Committee of Ministers to member states on common rules against corruption in the funding of political parties and electoral campaigns (GRECO) indicates that "states should consider adopting measures to prevent excessive funding needs of political parties, such as, establishing limits on expenditure on electoral campaigns."

⁶⁶ [Venice Commission's Code of Good Practice in Electoral Matters](#).

Media

Media landscape overview

Hungary's latest Press Freedom Index score is 62.96⁶⁷ out of 100, placing it 72nd out of 180 countries. This makes Hungary one of the two EU countries with the lowest ranking in the World Press Freedom Index. Additionally, Prime Minister Orbán is on Reporters Without Borders' (RSF) list of 37 press freedom predators.⁶⁸ Hungary's media environment is frequently criticized for its disproportionate access to media and the level of funding attributed to the ruling coalition compared to opposition parties.⁶⁹ This imbalance affects media coverage, undermining equality of opportunity in elections. In addition, democratic principles are challenged by limited access to public information for independent journalists, intimidation of media workers, cyber-attacks, legal and financial pressures, thus creating an environment un conducive to a fully informed and engaged electorate.

According to research conducted on media ownership in Hungary, almost 80% of the market consists of pro-government media headed by KESMA Foundation.⁷⁰ 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.⁷¹ The list of pro-government media is frequently expanding with an increasing number of propaganda websites, such as Megafon Központ which was established in 2020⁷² to amplify the voice of the right-wing and allegedly to "counter the domination of the left-liberal mainstream on the internet"⁷³. Megafon organizes free of charge⁷⁴ training sessions for right-wing supporters to become professional Megafon influencers.⁷⁵

Despite the domination of pro-government media, independent media do exist in Hungary, which according to ENEMO interlocutors are not under the influence of the ruling party. Among these are the RTL Klub television network, the YouTube channel Partizán, the weekly HVG, the daily Népszava⁷⁶, and online portals such as 24.hu and 444.hu. Allegedly, 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.

According to ENEMO interlocutors, the main sources of independent media's funding include readership contributions, YouTube revenues, book publishing, advertising, and a small percentage from grants. Despite such a small portion of financial support, the ruling party and pro-government media often derogatorily label these independent media as "dollar media"⁷⁷, accusing them of being funded by George Soros, with the purpose of serving foreign interests.

⁶⁷ Reporters Without Borders' World Press Freedom Index, information available at the link: [Hungary | RSF](#).

⁶⁸ [Hungary's sovereignty law is Viktor Orbán's new dangerous provocation targeting independent media | RSF](#).

⁶⁹ [Venice Commission's Code of Good Practice in Electoral Matters](#) emphasizes the need for balanced media coverage in Hungary and equitable access to airtime and advertising space.

⁷⁰ [Fidesz-friendly media dominate everywhere - Mérték \(mertek.eu\)](#).

⁷¹ The frequent occurrence of identical typos across multiple pro-government outlets is another clear indication of a centralized media ecosystem.

⁷² [National Company Directory » Megafon Digital Incubator Center Nonprofit Ltd. \(nemzeticetar.hu\)](#).

⁷³ [Home - Megaphone \(megafon.hu\)](#).

⁷⁴ [FAQ - Megafon](#).

⁷⁵ [Home - Megaphone \(megafon.hu\)](#): "Facebook is full of left-wing fake news. In Brussels, they are demanding social media censorship on the right, the left is already sensitizing on TikTok. At Megaphone, we don't sit idly by and watch the woke take over the feeds. We launch training and are present on the net with new content every day. Become a digital freedom fighter!"

⁷⁶ [Hungary | RSF](#).

⁷⁷ [How dollar media are financed from abroad - ORIGO](#).

The third group of media are so-called “gray-zone” media, which do not openly declare their ties to the government but have some connection nonetheless. Index.hu is a prominent example of such a gray-zone online news portal. Although Index.hu generally publishes narratives that appear unbiased, it occasionally serves government interests by featuring stories favorable to the ruling party and avoids criticism towards the government. As such, several interlocutors referred to this medium as a “Trojan horse project”, suggesting that while this medium maintains an appearance of neutrality, it subtly advances the agenda of the government.

The mission was informed that independent journalists face significant obstacles in accessing public information from government and Fidesz party representatives, often being labeled as traitors who work for foreign interests. Their inquiries for public information from state institutions are often delayed, with a typical response time extending up to two months, when the information is usually no longer relevant. Additionally, independent journalists are often not called to attend Fidesz/Prime Minister’s press conferences or refrain from attending as they are unlikely to be permitted to ask questions, further limiting the transparency and accountability of the ruling party.

ENEMO interlocutors clarified that they, as journalists, have never faced any physical attacks from the ruling party and do not expect such situations to occur during this election cycle. However, they claimed that their media were victims of DDoS⁷⁸ attacks in December 2023 and March 2024.⁷⁹

Legal framework

The Fundamental Act guarantees the right to freedom of speech and expression. It recognizes and protects the freedom and diversity of the press, and ensures conditions for free dissemination of information necessary for the formation of democratic public opinion. Aside from the Fundamental Act, the Hungarian media legislation comprises Act CLXXXV on Media Services and the Mass Media (the MS Act) and Act CIV od 2010 on the Freedom of the Press and the Fundamental Rules on Media Content.

The concept of political advertising refers to programs which serve to promote or encourage the support of a party, political movement or government, or promotes their name, purpose, activity, slogan, or emblem, appearing or published in a manner similar to advertising, with a ban on attaching an opinion or evaluative explanation to the political advertisement.⁸⁰ Paid advertisements are permitted in both print and electronic media, which are required to establish and publish their price lists on the State Audit Office's website⁸¹ within the legally defined deadlines. To date, 138 media outlets have complied with this requirement. According to interlocutors, Fidesz refrains from advertising in independent media, while pro-government media are reluctant to publish their price lists to prevent the opposition from securing advertising space.

The new Act LXXXVIII of 2023 on the Protection of National Sovereignty approved in December 2023 raises significant concerns. It establishes a new entity, the Sovereignty Protection Office⁸², which is granted extensive powers to request information on the financing and activities of any media outlet

⁷⁸ A distributed denial-of-service attack is a malicious attempt to disrupt the normal traffic of a targeted server, service or network by overwhelming the target or its surrounding infrastructure with a flood of Internet traffic. Read more on: [What is a distributed denial-of-service \(DDoS\) attack? | Cloudflare](#)

⁷⁹ Following this, several media outlets informed the mission that they strengthened their servers in case of similar attacks.

⁸⁰ Act CLXXXV of 2010 on Media Services and Mass Media, Article 203, point 55.

⁸¹ [Price lists – State Audit Office \(asz.hu\)](#).

⁸² Act LXXXVIII of 2023 on the Protection of National Sovereignty.

and to investigate its reporting.⁸³ Although Hungarian media legislation traditionally safeguards the confidentiality of journalists' sources, the new Office, anchored in Hungary's Basic Law, can bypass these protections. The law imposes prison terms of up to three years for those convicted of violating its provisions.⁸⁴

The enactment of this law has prompted widespread criticism. 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"⁸⁵. Independent media organizations informed the mission of their concerns that the Sovereignty Protection Office may attempt to shut them down due to their foreign sources of funding. These concerns stem from the ruling Fidesz party's efforts to label independent media as a "national threat," thus discrediting and undermining their credibility. Adding to these concerns, Fidesz's parliamentary leader, Máté Kocsis, openly stated that the law's objective is to "make things difficult for left-wing journalists"⁸⁶. Such a statement has created a fear that the legislation is being used as a political tool to suppress political opposition and control the media narrative.

The National Media and Infocommunications Authority (NMHH) functions as the country's public broadcasting regulator.⁸⁷ Although this body is legally bound to operate as an independent body, ENEMO interlocutors claim that the NMHH is politically dependent and subordinated to the ruling coalition due to its power distribution, and that the NMHH is closed to any cooperation with independent NGOs or journalists.

Traditional and online media

The media landscape includes both public and private media outlets. The two main national commercial television channels are TV2 and RTL Klub. These channels are free-to-air and have a significant influence on public opinion due to their wide reach and popular programming. The main public service broadcaster is MTVA (Media Service Support and Asset Management Fund), funded by the Hungarian state, through the National Media and Info communications Authority. Both TV2 and MTVA are considered to support Orban's government, and as such they significantly influence the narrative of other pro-government media.

ENEMO interlocutors describe pro-government media as a propagandist machine whose aim is to intimidate and demobilize "the other side" (meaning opposition political actors) by discrediting them and destroying their public image. In this election cycle, the most discrediting narratives thus far are clearly aimed at Peter Magyar. Aside from discrediting narratives, Russian influenced narratives are frequently spread in the Hungarian media landscape. Online portals such as Daily News Hungary and

⁸³ "(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 fulfilment 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.

⁸⁴ Act LXXXVIII of 2023 on the protection of national sovereignty, Section 350/A.

⁸⁵ [Telex: The "Sovereignty Protection Authority" is harmful and against the rule of law, yet it will not intimidate independent media.](#)

⁸⁶ <https://telex.hu/english/2023/11/21/hungarian-parties-and-candidates-who-accept-money-from-abroad-could-face-up-to-three-years-in-prison>".

⁸⁷ The NMHH consists of its president, the Media Council, and the Office of the Media Council. The president of the NMHH is selected by the prime minister and appointed by the president of Hungary for a nine-year term, during which they cannot be removed from office. The members of the Media Council are nominated by the parliament, where the Fidesz-KDNP coalition holds a two-thirds supermajority, which they use to appoint individuals with connections to the ruling party and a clear political profile.

many other pro-government media⁸⁸ spread narratives about the EU and USA forcing Hungary into participating in the war⁸⁹ and that the Fidesz government wants peace instead. Recently, 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 war to continue.⁹⁰ The rhetoric which pro-government media use is systematically chosen 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 are also disseminated on Facebook. Political actors spend large sums of money to further spread these narratives and increase their reach.

Political pressure is evident in local media as well, especially in municipalities where the ruling party holds political power.⁹¹ Contestants in municipal elections do not enjoy equal access to media. Media outlets, especially those with ties to Fidesz, tend to favor the ruling party and its affiliates, providing them with more coverage and positive portrayals. In contrast, opposition parties and independent candidates often receive limited and less favorable coverage. At the local level, ENEMO observers noted that a similar situation exists in Kaposvár, where KaposTV, a local TV station, is under the control of the incumbent mayor.⁹² In Debrecen an online news portal debreciner.hu is considered independent and, allegedly, is on Fidesz's blacklist. According to ENEMO interlocutors, its reach and influence is limited.

Within the reporting period, there were clear indications of pro-government media attempts to mislead the public. Namely, the CEO of MTVA sent information⁹³ to the participating parties for the leaders' debate in the EP elections, claiming to have compiled the four topics based on the results of the 2024 spring Eurobarometer poll commissioned by the European Parliament. According to MTVA, these topics include 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) as the most important for Europeans and should be part of the EP election campaign. However, the actual Eurobarometer results show that the four most important topics for Europeans are 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).⁹⁴

Social media⁹⁵

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

⁸⁸ "[Tamás Menczer: The Hungarian government wants peace, Joe Biden and his man in Budapest want the war to continue - ORIGO](#)"

⁸⁹ "[Orbán's party: Joe Biden and his man in Budapest want to squeeze Hungary into the war - Daily News Hungary](#)".

⁹⁰ 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](#).

⁹¹ [MertekFuzetek25.pdf](#), page 49.

⁹² Károly Szita (Fidesz party).

⁹³ Dr. Molnár Csaba published on his Facebook page an invitation he received, available at: <https://shorturl.at/zCM6C>.

⁹⁴ Eurobarometer is available at the link: [EP Spring 2024 Survey: Use your vote - Countdown to the European elections - April 2024 - Eurobarometer survey \(europa.eu\)](#).

⁹⁵ 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.

Fidesz has strategically allocated enormous financial resources to dominate social media. According to Lakmusz's report⁹⁶, on social media spending, Fidesz spending increased dramatically starting from early April, culminating in a peak expenditure of approximately 376,720,059 HUF⁹⁷ by mid-May. Although significantly less than Fidesz, the DK party also invested in social media advertising, approx. 56,177,901 HUF⁹⁸ and Momentum 27,859,159 HUF⁹⁹ for the period December 31, 2023 until May 18 2024. The remaining parties maintain relatively low and stable spending patterns, ranging from 147,963 HUF¹⁰⁰ (Munkáspárt) to 12,370,391 HUF (MSZP). Opposition parties are not only trailing Fidesz in social media advertising spending, but also lag behind Fidesz proxies such as Megafon influencers (Ibolya Csenge, Daniel Bohar, etc.). According to Lakmusz's most recent weekly¹⁰¹ breakdown on spending, the Facebook page of opposition candidate Klara Dobrev ranks 9th among the top 10 advertised pages.¹⁰² Her account is positioned below those of Fidesz, Megafon influencers, and the pro-government medium hirado.hu.

Fidesz's posts focus on accusing the EU and the US of supporting the war and discrediting Brussels and its politics. On the other side, Megafon influencers use derogatory language, sarcasm and mockery narratives to undermine Magyar's credibility.¹⁰³ Such rhetoric is not seen on Fidesz's official Facebook account, which means that Fidesz likely prefers to maintain a more formal and less inflammatory tone in its official communication.

In response to Fidesz's campaign that the EU is for war, Péter Márki-Zay has a counter-campaign aimed to expose what he describes as the hypocrisy of Fidesz's accusations. Through his social media posts¹⁰⁴, he highlights statements from Fidesz officials that suggest a preference for militarization, such as Lázár János's endorsement of building weapon factories in Hungary. Márki-Zay also emphasized Fidesz's legislative changes that facilitate the transport of lethal weapons. This post is designed to paint the ruling party as the true proponents of war, contrasting sharply with their public stance against EU and US policies.

One of the primary concerns is that social media remains unregulated by law. Additionally, under Hungarian law only political parties have spending limits, but this does not apply to other actors within their campaign system. This creates an opportunity for party proxies to conduct extensive social media campaigns without any legal restrictions.

Gender Representation

The 2023 Gender Equality Index by the European Institute of Gender Equality placed Hungary 26th out of 27 EU member states, marking it among last in terms of power dynamics. Despite Hungary's Fundamental Law¹⁰⁵ affirming gender equality and mandating measures for equal opportunity and social

⁹⁶ [Elections 2024 – Lakmusz](#)

⁹⁷ Approx. 977,072 EUR.

⁹⁸ Approx. 145,704 EUR.

⁹⁹ Approx. 72,256 EUR.

¹⁰⁰ Approx. 384 EUR.

¹⁰¹ 05/12/2024 - 05/18/2024.

¹⁰² [Elections 2024 – Lakmusz](#).

¹⁰³ For instance, Megafon's influencers repeatedly targeted Péter Magyar, derogatorily nicknaming him "Psycho Peti" and suggesting that he is afraid of public debate. Available at: <https://shorturl.at/kyzoR>; [\(1\) Facebook](#).

¹⁰⁴ [\(1\) Facebook](#).

¹⁰⁵ The Fundamental Law of Hungary: [73811993-c377-428d-9808-ee03d6fb8178](https://www.parlament.hu/73811993-c377-428d-9808-ee03d6fb8178) ([parlament.hu](https://www.parlament.hu/)).

inclusion¹⁰⁶, women's participation in politics remains notably low, with an insufficient legal framework to enhance their involvement. Over the years, there have been several initiatives to introduce legal quotas to increase women's representation in politics but have repeatedly failed due to a lack of political will.

The Hungarian National Assembly is among the worst in the EU for gender representation.¹⁰⁷ Currently, only 28 out of 199 National Assembly members¹⁰⁸ are women (14,07%). Hungary had a woman president from 10 May, 2022, until 26 February, 2024. Katalin Novák was the first woman and the youngest president, assuming office at the age of 44. Following the child abuse pardon scandal, Novák resigned live¹⁰⁹ on television on 11 February¹¹⁰. Subsequently, the then Justice Minister Judit Varga, who approved the pardon, also resigned in the same month. Currently, there are no female ministers in the Hungarian government.

Women are 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 percent of its local politicians. Nationally, 20 percent of municipalities are led by female mayors, and women hold 18 percent of seats in larger county assemblies.¹¹¹

In the NEC, there are only two female commissioners.

National Minorities

The Fundamental Law consecrates the rights of national minorities living in Hungary.¹¹² The 2011 Act CLXXIX on the Rights of Nationalities lists 13 officially recognized national minorities in Hungary¹¹³, and further regulates their rights including the election of national minority self-governments and their competencies.

Candidates from national minorities had the opportunity to run in the minority self-government elections. The registration process for national minorities running for election was generally inclusive. 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.

The NEO website contains information on how national minorities can participate in the candidate nomination process, and video material with information how to vote in minority elections¹¹⁴, but the content is not included in national minority languages. There are 126 national minority lists running in elections at the local level.¹¹⁵ The Slovenian national minority does not have a list running in the minority

¹⁰⁶ (Article XV, point 4).

¹⁰⁷ Gender Equality Index 2022, available at: [HU_2022_factsheet.pdf \(europa.eu\)](https://ec.europa.eu/equality/gender-equality-index-2022).

¹⁰⁸ [List of MPs - House of the National Assembly - Országgyűlés \(parlament.hu\)](https://www.parlament.hu/orszaggyulas/orszaggyulas-2022-02-10-11-12-13-14-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100-101-102-103-104-105-106-107-108-109-110-111-112-113-114-115-116-117-118-119-120-121-122-123-124-125-126-127-128-129-130-131-132-133-134-135-136-137-138-139-140-141-142-143-144-145-146-147-148-149-150-151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-175-176-177-178-179-180-181-182-183-184-185-186-187-188-189-190-191-192-193-194-195-196-197-198-199-200-201-202-203-204-205-206-207-208-209-210-211-212-213-214-215-216-217-218-219-220-221-222-223-224-225-226-227-228-229-230-231-232-233-234-235-236-237-238-239-240-241-242-243-244-245-246-247-248-249-250-251-252-253-254-255-256-257-258-259-260-261-262-263-264-265-266-267-268-269-270-271-272-273-274-275-276-277-278-279-280-281-282-283-284-285-286-287-288-289-290-291-292-293-294-295-296-297-298-299-300-301-302-303-304-305-306-307-308-309-310-311-312-313-314-315-316-317-318-319-320-321-322-323-324-325-326-327-328-329-330-331-332-333-334-335-336-337-338-339-340-341-342-343-344-345-346-347-348-349-350-351-352-353-354-355-356-357-358-359-360-361-362-363-364-365-366-367-368-369-370-371-372-373-374-375-376-377-378-379-380-381-382-383-384-385-386-387-388-389-390-391-392-393-394-395-396-397-398-399-400-401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418-419-420-421-422-423-424-425-426-427-428-429-430-431-432-433-434-435-436-437-438-439-440-441-442-443-444-445-446-447-448-449-450-451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472-473-474-475-476-477-478-479-480-481-482-483-484-485-486-487-488-489-490-491-492-493-494-495-496-497-498-499-500-501-502-503-504-505-506-507-508-509-510-511-512-513-514-515-516-517-518-519-520-521-522-523-524-525-526-527-528-529-530-531-532-533-534-535-536-537-538-539-540-541-542-543-544-545-546-547-548-549-550-551-552-553-554-555-556-557-558-559-560-561-562-563-564-565-566-567-568-569-570-571-572-573-574-575-576-577-578-579-580-581-582-583-584-585-586-587-588-589-590-591-592-593-594-595-596-597-598-599-600-601-602-603-604-605-606-607-608-609-610-611-612-613-614-615-616-617-618-619-620-621-622-623-624-625-626-627-628-629-630-631-632-633-634-635-636-637-638-639-640-641-642-643-644-645-646-647-648-649-650-651-652-653-654-655-656-657-658-659-660-661-662-663-664-665-666-667-668-669-670-671-672-673-674-675-676-677-678-679-680-681-682-683-684-685-686-687-688-689-690-691-692-693-694-695-696-697-698-699-700-701-702-703-704-705-706-707-708-709-710-711-712-713-714-715-716-717-718-719-720-721-722-723-724-725-726-727-728-729-730-731-732-733-734-735-736-737-738-739-740-741-742-743-744-745-746-747-748-749-750-751-752-753-754-755-756-757-758-759-760-761-762-763-764-765-766-767-768-769-770-771-772-773-774-775-776-777-778-779-780-781-782-783-784-785-786-787-788-789-790-791-792-793-794-795-796-797-798-799-800-801-802-803-804-805-806-807-808-809-810-811-812-813-814-815-816-817-818-819-820-821-822-823-824-825-826-827-828-829-830-831-832-833-834-835-836-837-838-839-840-841-842-843-844-845-846-847-848-849-850-851-852-853-854-855-856-857-858-859-860-861-862-863-864-865-866-867-868-869-870-871-872-873-874-875-876-877-878-879-880-881-882-883-884-885-886-887-888-889-890-891-892-893-894-895-896-897-898-899-900-901-902-903-904-905-906-907-908-909-910-911-912-913-914-915-916-917-918-919-920-921-922-923-924-925-926-927-928-929-930-931-932-933-934-935-936-937-938-939-940-941-942-943-944-945-946-947-948-949-950-951-952-953-954-955-956-957-958-959-960-961-962-963-964-965-966-967-968-969-970-971-972-973-974-975-976-977-978-979-980-981-982-983-984-985-986-987-988-989-990-991-992-993-994-995-996-997-998-999-1000).

¹⁰⁹ [Hungarian President Katalin Novak resigns over child-abuse pardon scandal \(bbc.com\)](https://www.bbc.com/news/world-europe-61484444).

¹¹⁰ On February 26, 2024, the Parliament approved her resignation. [Parliament accepted Katalin Novák's resignation \(fidesz.hu\)](https://www.fidesz.hu/en/parliament-accepted-katalin-novak-s-resignation).

¹¹¹ [In Hungary, Politics Is Mainly A Man's Game \(rferl.org\)](https://www.rferl.org/content/hungary-politics-is-mainly-a-mans-game/31252761.html).

¹¹² Article XXIX of the Fundamental Law provides that “National minorities living in Hungary shall be constituent parts of the State. Every Hungarian citizen belonging to a national minority shall have the right to freely express and preserve his or her identity. National minorities living in Hungary shall have the right to use their mother tongue, to use names in their own languages individually and collectively, to nurture their own cultures, and to receive education in their mother tongues.”

¹¹³ Armenian, Bulgarian, Croatian, German, Greek, Polish, Roma, Romanian, Ruthenian, Serbian, Slovakian, Slovenian, and Ukrainian.

¹¹⁴ <https://www.valasztas.hu/2024-evi-europai-parlamenti-onkormanyzati-es-nemzetisegi-valasztasok>.

¹¹⁵ Roma 64, German 16, Romanian 10, Croatian 8, Slovakian 6, Ukrainian 6, Serbian 5, Rusyn 4, Greek 3, Polish 2, Bulgarian 1, Armenian 1.

elections. In total, 328,019 voters from national minorities are entitled to vote in the minority elections.
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Some national minority interlocutors mentioned a lack of interest and financial support from the state, negatively impacting their visibility especially during elections.

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 provisions are included in the Act on Election Procedures for ensuring the participation of persons with disabilities in elections.¹¹⁷ Section 88 regulates assistance to voters with disabilities¹¹⁸, setting forth that PWDs can request different types of assistance for exercising their right to vote, such as poll cards in braille; information materials in accessible format; accessible polling stations; ballot papers in braille¹¹⁹; voting by mobile ballot box¹²⁰.

According to information provided to the mission, there are 47,629 persons deprived of the right to vote by a court decision based on mental incapacity. Disenfranchising citizens based on intellectual disability is at odds with international standards (see Candidate Registration section). Additionally, this is criticized by the National Associations of Persons with intellectual disabilities and their caretakers.¹²¹

In order to ensure accessibility of information for PWDs, political advertisements published in audio-visual media outlets should be subtitled or provided with sign language interpretation. Those commissioning political advertisements are responsible for complying with these requirements.

In line with the law, the NEO provides poll cards in braille and/or easy read materials to a voter, if the respective request is submitted no later than sixty-eight days before the Election Day. The voter can request an accessible polling station no later than four days before elections¹²². If the polling station on the voter's registered address is not accessible, the LEO should assign the voter to an accessible polling station, within the same settlement and constituency. On the NEO website, voters can find information on which polling station in each constituency is fully accessible for wheelchairs.¹²³ Video material is

¹¹⁶ 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.

¹¹⁷ Section 3 of the Act on Election Procedure defines a voter with disability as a “voter who has significantly limited or no sensory abilities, especially vision and hearing, or significantly limited or no locomotor abilities, or mental capacity, or who has considerably limited communication abilities, and this puts him at a permanent disadvantage in terms of actively participating in social life”.

¹¹⁸ Article 181 (1) A voter who is unable to read, or who is prevented from voting by physical disability or for any other reason, may use the assistance of an assistant of his choice or, failing that, of two members of the electoral commission jointly.

¹¹⁹ Braille voting template shall be provided in polling stations where there are voters recorded in the polling district electoral register who requested assistance pursuant to section 88 c) not later than on the ninth day before voting day, (May 31).

¹²⁰ Deadline for requesting voting by mobile ballot box is June 9, by 12.00.

¹²¹ 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 \(efoesz.hu\)](#).

¹²² The deadline for requesting accessible polling stations is 5 June.

¹²³ [National Election Office - Local Government Elections \(valasztas.hu\)](#).

available on the NEO website¹²⁴, containing information on how to request being registered at an accessible polling station, mobile ballot box and Ballot papers in Braille.

Complaints and Appeals

The electoral legal framework contains detailed provisions for the handling of complaints and appeals in municipal elections.¹²⁵ Special rules apply to objections relating to printed and internet media content, with deadlines and conditions tailored to the type of media (see Media section).

Objections may be filed by voters, candidates, nominating organizations and other natural and legal persons and organizations without legal personality affected by the case. Objections must be submitted in writing to the relevant electoral commission within three days of the alleged violation. Objections should include a detailed description of the violation, evidence, and the submitter's personal details.

The NEO provides templates on its website for eligible stakeholders wishing to submit an objection or appeal. These templates serve as recommended guidelines ensuring that complainants include all legally required details without omission.

LECs adjudicate objections against the activities and decisions of polling station commissions, and objections regarding other acts committed at polling stations and all objections that are specifically related to a multi-member list, single-member constituency, compensatory list or mayoral election. LEC decisions can be further appealed to the TEC, which serves as the appellate body for decisions made by the LECs. TECs adjudicate all objections specifically related to county or capital local government elections and the election of the Capital Mayor, as well as acts which occur within the jurisdiction of the TEC and fall outside the competence of LECs.

ENEMO notes that there is no unified online registry for objections submitted to the LECs and TECs. However, the appeals and objections submitted to the NEC are accessible online with respective decisions and decisions of courts if the decision is subject to judicial review.

The NEC decides on all objections which do not fall under the competencies of LECs and TECs, and is the competent body for the decisions adopted by the TECs. Furthermore, positively, the NEC conducts public sessions for handling complaints and appeals. Its decisions, along with those of the Supreme Court, are promptly published on the website, enhancing the transparency of the process. The competent election commission may reject an objection without examining its merits if it was submitted by an ineligible person, was submitted late or lacks the required information. Objections may be withdrawn until the election commission adopts a final decision. In cases where multiple objections relate to similar issues, the commission may combine them for joint examination and assessment. Upon receipt, the electoral commission is obliged to decide on the objections within three days. If the objection relates to an ongoing

¹²⁴ <https://www.valasztas.hu/2024-evi-europai-parlamenti-onkormanyzati-es-nemzetisegi-valasztasok>.

¹²⁵ Act XXXVI of 2013 on Electoral Procedure, Chapter XII, sets out detailed provisions for legal remedies, and specific provisions for legal remedies are outlined in article 138/K., section 307/P-307/Q-307/R for the election of local government representatives and mayors; Article 156 section 330 for the election of the national minority self-government representatives; and Article 167 section 345 for the election in joint proceedings of the EP elections as well as of the local government representatives and mayors and the national minority self-government representatives.

activity, it can be submitted during the activity period, with the deadline being calculated from the last date on which the contested situation still exists.

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.¹²⁶ before being entitled to appeal to the courts.¹²⁷ The prohibition of parallel jurisdiction ensures consistency and uniformity in decision-making for dispute resolution.

Any natural or legal persons, as well as organizations without legal personality that are affected by a second-instance final decision by a relevant election commission or a conclusive decision adopted by the NEC, are entitled to submit a judicial review application before the Supreme Court (Curia).¹²⁸ An application for judicial review of a decision of the head of an LEC regarding the arrangement of single-member constituencies must be submitted within the publication period of the resolution. This application should be adjudicated by the regional court.¹²⁹¹³⁰

As of May 25, there are 345 cases contained in the NEC registry concerning the upcoming elections. Among these, 28 cases are appeals against the decisions of the TECs, mostly concerning candidate registration and alleged illegal campaigning or campaign materials¹³¹. In some instances, when the NEC identified a violation, it only issued a prohibition on further infringements without imposing sanctions¹³². Sixteen NEC decisions have been further appealed to the Court for judicial review, with the majority of NEC decisions being upheld by the Court.

Some judicial review applications were rejected on procedural grounds, such as missing the legal address¹³³ of the complainant or incorrect personal identification numbers¹³⁴. Some were rejected due to missed deadlines for appeals at the second-level decision stage.

¹²⁶ For example, the Court returned the appeal to the NEC for review because not all levels of the EMB had been exhausted.

¹²⁷ Natural and legal persons, as well as organizations affected by a case, may apply for judicial review against second-instance final decisions adopted by the competent election commission, as well as conclusive decisions adopted by the NEC. Judicial review shall only take place if all legal remedies have been exhausted or if legal remedies are expressly excluded by the provisions of the law. Decisions recorded in minutes are not subject to judicial review.

¹²⁸ Section 222 (1)-(3) of Act XXXVI of 2013 on Electoral Procedures.

¹²⁹ Section 307/Q of Act XXXVI of 2013 on Electoral Procedures.

¹³⁰ The court must render a decision within three days of receiving the application, but this period can extend to fifteen days if the application pertains to an election for which the date has not yet been finalized. During these proceedings, the court examines both the objected conclusive decision and the procedural conduct underlying it. The court can either uphold the original decision or amend it based on its findings.

¹³¹ In total, thus far the Court has issued 62 decisions on applications for judicial review. Most of these cases are related to candidate or list registration, as well as illegal campaigning or campaign materials. One of the significant cases involves the mails sent out by the Government Information Center's On May 10, 2024 from info@kormany.hu about NATO's plans to citizens who had provided their email addresses for vaccination purposes during Covid-19. The complainant filed an objection to the NEC arguing that the fact constituted a misuse of personal data for electoral purposes and thus violating election principles. The NEC [rejected](#) the objection, that was further submitted to the Curia. The Curia found the applicant's request [inadmissible](#), as the fact did not directly affect his rights or obligations under election law.

¹³² 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 Fejér 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 Fejér 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.

¹³³ For example, the LEC refused to register an applicant as an independent mayoral candidate due to insufficient valid recommendations. The Hajdú-Bihar County TEC rejected the applicant's appeal, referring to the missing of a legal basis and the applicant's address. The applicant requested a judicial review, claiming the appeal included necessary explanations and references. The [Court found](#) the request unfounded, affirming the appeal lacked the applicant's address, and upheld the TEC's decision.

¹³⁴ For example the [judicial review](#) is rejected because the applicant did not include the personal identification number.

Observers

Despite previous recommendations from international observers, including ENEMO, there are no legal provisions related to domestic non-partisan election observation. There is therefore no opportunity for domestic civil society to observe, at odds with best practices.

Nominating organizations with parliamentary representation had an opportunity to delegate members to the electoral commissions. However, ENEMO notes that there is no provision for nominating organizations running in the municipal elections to nominate observers to polling station commissions. The right to send an observer to the vote counting committee is only granted to national minority lists which nominated a candidate at the local level or have a regional (county) list in the minority elections.

International observers are accredited by the NEO, and have the right to observe all stages of the electoral process¹³⁵. As of 25 May, three international organizations¹³⁶ and delegations from eight countries¹³⁷ have accredited observers, with a total of 47 observers registered.

ENEMO has the largest number of accredited international observers for the 2024 elections. ENEMO observers are generally able to observe ongoing electoral preparations without obstruction, and the mission has benefitted so far from the openness and cooperation of EMBs.

¹³⁵ The deadline for registering international observers is the ninth day before Election Day.

¹³⁶ ENEMO, OSCE-ODIHR, and Election-Watch.EU.

¹³⁷ Kazakhstan, Uzbekistan, Azerbaijan, Indonesia, Turkey, Georgia, Montenegro, Bosnia and Herzegovina.

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.