



ENEMO International Election Observation Mission

Parliamentary Elections and Referendum, 3 April - Hungary 2022

INTERIM REPORT

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The elections are being held in a polarized political environment, with campaigning characterized by an uneven playing field, as a result of misuse of state resources throughout the country, which leads to blurring of the line between the state and the ruling coalition, as well as unequal access to media. Personal attacks and discrediting rhetoric is widely present in the campaign. The lack of effective oversight mechanism for campaign funding and regulations of third-party campaigning funds does not ensure equality between the contestants. The election management bodies are cooperative with observers and are managing the process efficiently.

On 1 February 2022, the European Network of Election Monitoring Organizations (ENEMO) deployed an International Election Observation Mission (IEOM) to Hungary to observe the upcoming Parliamentary Elections and Referendum of 3 April 2022.

ENEMO has accredited a total of 7 Core Team experts, based in Budapest. The Mission is headed by Mr. Dritan Taulla. ENEMO has additionally deployed 10 long-term observers (LTOs) in five teams throughout the country. The IEOM will be reinforced by around 200 short-term observers (STOs), who will observe the opening of polling stations, voting, counting and tabulation of results on Election Day.

This is ENEMO's first election monitoring mission to Hungary. The aim of the IEOM is to improve the transparency of the electoral process, assess its integrity and compatibility with international standards for democratic elections and the Hungarian legislation, as well as provide - and advocate for - recommendations for potential areas of improvement.

The mission is monitoring and assessing the overall political and electoral environment, conduct of election management bodies, campaigning, gender equity, voting and tabulation processes,

electoral dispute resolutions and other crucial aspects of the process. Up until 18 March, ENEMO's mission conducted 151 meetings with all relevant interlocutors, including the election management bodies, political parties and candidates, domestic civil society organizations and media, in addition to observing campaign activities (meetings or rallies) of election contestants.

This interim report is based on ENEMO's findings observed from 1 February 1, including 18 March. The mission will issue its preliminary statement of findings and conclusions after the Election Day and will remain in the country to also follow the potential complaints and appeals after Election Day. The final report will be issued within sixty days from the certification of results.

ENEMO's International Election Observation Mission for the 3 April 2022 Parliamentary Elections in Hungary is financially supported by the National Endowment for Democracy (NED). The content of the document is the sole responsibility of ENEMO and does not necessarily represent the position of the donor.



Executive summary

The April 2022 Parliamentary Elections are being held against the background of a highly polarized political environment. The ruling coalition is contesting for a fourth consecutive term, while the several opposition parties have joined forces in a single coalition. The Russian invasion of Ukraine, on 24 February, changed the key topics of discussion and political discourse, dominating the public debate, while increasing the political polarization. Several ENEMO interlocutors have raised concerns about the worsening of the overall conditions for democratic elections.

The legal framework regulates all aspects of elections, yet some regulations do not adequately ensure transparency and effective prevention of violations. This mostly concerns campaign funding and abuse of state resources. The adoption of the latest electoral amendments in an expedited manner, without guaranteeing inclusive consultations, could be considered a missed opportunity for improving the electoral environment based on consensus. Apart from that, it should be noted that over the years, regulations on freedom of media and expression, civil society organizations, and access to information have undergone adverse changes that negatively influence the campaign environment and conduct of democratic elections in general.

The strong discrepancy in the number of voters between constituencies is at odds with international best practice and the domestic legal framework, and it violates the equality of vote principle.

The EMBs are managing the process efficiently, in line with legal requirements and deadlines, and all technical preparations are ongoing. NEC sessions were open to international observers and media, the sessions' agenda was published in advance, decisions were published right after the sessions, and the minutes within a few days. CoECs and CoEOs have been providing access to their work to observers and published session's announcements, decisions and minutes on the websites of respective local authorities. ENEMO assesses the work of the EMBs during the observed period as overall transparent.

ENEMO positively assesses the review and adoption of the guidelines by the NEC before the announcement of Election Day, with all elected and delegated members involved. However, the lack of cross-party oversight during the interim period, still remains an unaddressed gap in the legal framework. ENEMO IEOM interlocutors expressed varied levels of confidence towards EMBs, especially with regards to the appointment of election commission members, at all levels.

Some 8.2 million voters will vote on April 3rd, approximately 450,000 of whom can vote by mail, lacking an address in Hungary. Voters residing abroad who do have an address in Hungary can only vote in person, including in one of the 146 Hungarian diplomatic missions abroad. Some ENEMO interlocutors have raised concerns on the limited number and locations of polling stations abroad, pointing out that this might restrict the possibilities of citizens living there to exercise their right to vote. Most ENEMO IEOM interlocutors did not express distrust on the accuracy of the voters' list. However, the lack of removal of data of deceased people from abroad from the by-mail voter registry still remains a concern.

In an overall inclusive process and within the legal deadline, the NEC registered six national lists with 1,035 candidates, including 205 women, and 12 national minorities with 111 candidates, including 48 women. The CoECs registered in total 664 SMC candidates, including 116 women

and 34 running as independents. Some 106 SMC candidates were not registered, mainly due to lack of sufficient signatures. In general, the right to stand for election has been respected. However, ENEMO deems that the increase in the number of candidates to be nominated in the single-member constituencies creates barriers for political parties to run in proportional elections and does not contribute to competitiveness of elections.

High competitiveness along with deep polarization, inflammatory rhetoric, as well as personal accusations and counter-campaigning are key features of the campaign. The Russian invasion of Ukraine in the middle of the campaign significantly changed the agenda of the contestants, increasing polarization. Geopolitical choices and security became the main topics, mostly overshadowing the discussion on social-economic development, healthcare, education, corruption, wages, and social protection. The referendum and LGBTQ topics as its core has practically disappeared from the mainstream campaigning.

Pervasive overlapping between the state and ruling parties, as well as unhindered systemic misuse of administrative resources remain an unaddressed concern that contributes to creating an unlevel playing field. Hungarian legislation itself creates the legal ground for such practice as legitimate behavior, despite contradiction with the basic principles of electoral procedures and international standards.

Public and private funding can be used for campaigning. No requirements are in place to make transparency on campaign finance prior to election day. The lack of effective legal control and regulations of third-party campaigning funds, even during the official campaign period, as well as legal gap on online political advertising, are among the main threats for equal opportunities between contestants.

The media landscape is diverse and includes public and commercial broadcasters, as well as a variety of printed press and electronic media with local and national coverage. High concentration of media ownership and economic and political interests of the owners are widely perceived to be influencing media reporting and limiting media pluralism. Unequal access of electoral contestants to media, biased news reporting, and negative rhetoric and campaigning towards candidates were present during the electoral period. Social media has shown a crucial role for the engagement of the electorate and spread of political messages.

Women are underrepresented in politics and the legislative body. This problem is also demonstrated by the low number of women candidates registered for the upcoming elections. Women are better represented on national minority lists. There is no legal mechanism for promoting women participation in politics. Also, there were isolated instances of discrediting messages against women politicians in social media.

Domestic civil society organizations are not allowed to observe elections, which contradicts best international practice and does not ensure large scale non-partisan and civic observation. Those civil society organizations that are critical towards the Government are often targets of discrediting rhetoric, conducted mostly by the ruling party. These practices are shrinking the space for civil society organizations.

Background

Hungary is a unitary parliamentary constitutional republic. The legislative body is the unicameral Parliament, officially called National Assembly, which is elected for a four-year term. The executive power is vested in the Government, led by the Prime minister, which is appointed by the Parliament. The President is the head of the state with limited, mainly ceremonial, powers. The President is indirectly elected by the Parliament for a five-year term, with a two-term limit.

On 10 March 2022, the Parliament elected Katalin Novák as the new, and the first woman president of Hungary, with 137 votes¹. She will take office on 10 May 2022. Prior to being elected as President, Katalin Novák was vice-president of the ruling party Fidesz (Hungarian Civic Alliance) and a minister without portfolio, responsible for youth and family affairs.

The last Parliamentary elections in Hungary were held on 8 April 2018, and the alliance between Fidesz and KDNP (Christian Democratic People's Party) won 133 seats out of 199, ensuring a two thirds majority for the third consecutive term.

This year's Parliamentary elections are the 9th elections since the collapse of the communist regime in Hungary. The election is being held against the background of a highly polarized political environment. The Russian invasion of Ukraine, on 24 February, changed the key topics of discussion and political discourse, dominating the public debate, while increasing the political polarization. Several ENEMO interlocutors have raised concerns about the worsening of the overall conditions for democratic elections.

Six opposition parties, the Democratic Coalition (DK), Movement for a Better Hungary (Jobbik), Momentum Movement (M), Hungarian Socialist Party (MSZP), Hungary's Green Party (LMP) and Dialogue for Hungary (P), are contesting the election as a joint alliance. This follows the cooperation between opposition parties for local elections of 2019, in which candidates backed by an alliance of opposition parties won in 10 cities with county rights, including the capital city, Budapest.

During September and October 2021 the first countrywide two-round primary elections in the political history of Hungary were organized and conducted by the opposition parties. Péter Márki-Zay, elected mayor of Hódmezővásárhely in 2019, won in the second round and is campaigning as the United Opposition candidate for the prime minister².

A national referendum will also be held in Hungary on 3 April - on the same day as Parliamentary elections. The referendum was initiated by the Government and is dedicated to LGBTQ issues on 4 questions³. In November, the Parliament changed the Referendum Act to allow holding of Parliamentary elections and referendums on the same day.

¹ The only other candidate, Péter Róna, proposed by the opposition parties, received 51 votes.

² In the first round Péter Márki-Zay was in third place, after Klára Dobrev (DK) and Gergely Karácsony (Dialogue–MSZP–LMP). Just before the second round, Karácsony withdrew his candidacy in favor of Péter Márki-Zay, who was also supported by Momentum. Péter Márki-Zay won the second round.

³ Since spring 2021, the LGBTQ issues became one of the key topics of both the Government's and ruling parties' Fidesz-KDNP rhetorics and actions: in June, the Parliament adopted the so-called "anti-LGBT law", or Children Protection Act, which was massively criticized inside the country and in the EU; in July, Viktor Orbán announced the referendum regarding the Law.

Legal framework and electoral system

Legal Framework

Legislative framework of Hungary comprises several legal acts regulating elections. Among them, the most important is the Fundamental Law (Constitution),⁴ followed by the Act XXXVI of 2013 on Election Procedures, Act CCIII of 2011 on the Election of the Members of the National Assembly and Act LXXXVII of 2013 on the Transparency of Campaign Costs related to the Election of the Members of the National Assembly. Some aspects of elections are regulated by the Act CLXXXV of 2010 on Media Services and on the Mass Media, the Act CLXXIX of 2011 on the Rights of Nationalities and Act C of 2012 on the Criminal Code.⁵ Additionally, referendums are regulated by Act CCXXXVIII of 2013 on Initiating Referendums, the European Citizens' Initiative and Referendum Procedure.

These legal acts are supplemented by legally non-binding guidelines of the National Election Commission.⁶ Apart from domestic legal acts, Hungary is a party to a number of international and regional human rights acts also concerning elections.⁷

Latest wide-scale amendments to the legislation regulating elections were carried out in December 2020. Amendments concerned several legal acts related to the elections.⁸ The package of amendments was initiated by the Government during the state of emergency in November 2020, and adopted by the Parliament several weeks later.⁹ Allegedly, the process was conducted without wider public consultations and without the involvement of all relevant stakeholders. ENEMO considers that an expedited adoption of amendments without an inclusive process damages the public trust towards the whole electoral process and does not contribute to the substantial improvement of electoral legislation.

The most important amendments concerned the electoral system, in particular, political entities should nominate candidates in sharply increased numbers of single-member constituencies in order to contest with a nationwide proportional list. Also, conditions for receiving public funding were

⁴ A new Fundamental Law of Hungary was adopted in April 2011 and entered into force on 1 January 2012.

⁵ There is also the Act on the Operation and Financial Management of Political Parties; Act CIV of 2010 on the Freedom of the Press and the Fundamental Rules of Media Content.

⁶ NEC started reviewing guidelines in October 2021 and in December adopted [Guideline 2/2021](#) amending the guidelines 2/2014, 7/2014, 11/2014, 12/2014, 1/2015, 2/2015, 3/2015, 4/2015 and 4/2018. The Guideline was adopted with the participation of members appointed by opposition political parties.

⁷ Those include the European Convention on Human Rights and Fundamental Freedoms; International Covenant on Civil and Political Rights; Convention on the Rights of Persons with Disabilities; 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 Act on Electoral Procedures, Act on the Election of Members of the National Assembly, Act on the Transparency of Campaign Costs related to the Election of the Members of National Assembly, Act on Initiating Referendums, the European Citizens' Initiative and Referendum Procedure, Act on the Election of Municipal Representatives and Mayors.

⁹ Amendments were submitted to the Parliament on 10 November and accepted by the Parliament on 15 December 2020.

changed, requiring nomination of candidates in an increased number of single-member constituencies. These amendments could be considered as deteriorating compared to previously existing regulations. Besides, the deadline for applying for absentee voting was reduced; an additional 15 days deadline for adjudicating certain complaints was introduced, as well as a regulation for determining final election results by the Supreme Court in case the NEC fails to do so after the respective court decision; conflict of interest norm was established, although only for elected election commission members; etc.

At the same time, the new amendments did not address legislative shortcomings related to the campaign financing; delimitation of constituency boundaries; misuse of state resources and other. Many of the amendments were technical in nature.¹⁰

In 2021 the concept of place of residence was changed, allowing registration at the address without residing there.¹¹ Previous requirement of living at the registered place of residence was annulled. This amendment entered into force on 1 January 2022.¹² According to some of ENEMO's interlocutors, the amendment raised concerns that it might be used to raise the number of voters in specific single-member constituencies.

Overall, the Hungarian legal framework is comprised of relevant legal acts regulating the conduct of elections, yet some regulations do not ensure effective prevention of violations, nor a level playing field for all election contestants and sufficient transparency. Those mainly concern regulations on the abuse of state resources and campaign financing, including third party campaigning. Additionally, it should be noted that over the years regulations on freedom of media and expression, civil society organizations, and access to information have undergone adverse changes¹³ that negatively influence the campaign environment and conduct of fair elections in general.

Electoral System

The National Assembly of Hungary consists of 199 members elected for a four-year term through a mixed electoral system. 106 members are elected through a majoritarian electoral system in single-member constituencies (first-past-the-post) and 93 through a nationwide proportional national list, with a compensatory mechanism.¹⁴ According to the latest amendments adopted in 2020, for contesting in proportional elections a political party should nominate candidates in at

¹⁰ Some of those amendments determined that election commission meetings can be held online; regulations on the use of public spaces do not apply to campaign activities; members of the election commission or election office should not be observers; general rules apply in case of a repeat election; additional data to be provided by the person responsible for collecting signatures in order to ensure integrity of the signatures' collection process; etc.

¹¹ Act LXVI of 1992 on the Register of Personal Data and Residential Addresses of Citizens.

¹² Members of the National Assembly filed a complaint to the Constitutional Court challenging the constitutionality of the amendment. They claimed that as the register of addresses no longer provides a proof of the actual residence that is important in a mixed electoral system, the introduced changes violated the rule of law and restricted the right to vote. The Court dismissed the complaint stating that the amendment had legislative reasons as the registered addresses do not reflect reality.

¹³ [2021 Rule of Law Report](#), Country Chapter on the rule of law situation in Hungary, European Commission, SWD(2021) 714 final, 20 July 2021; [Hungary, Events of 2020](#), Human Rights Watch;

¹⁴ Votes that do not produce a mandate (i.e. votes of losing candidates and surplus votes of the winning candidate) are added to the votes of the respective party, if the party has already crossed the legal threshold.

least 71 single-member constituencies within at least 14 counties and in Budapest.¹⁵ ENEMO considers that the increase in the number of candidates to be nominated in the single-member constituencies creates barriers for political parties to run in proportional elections and does not contribute to competitiveness of elections.¹⁶

A voter has the right to cast a vote for one candidate in a single-member constituency and for one party list. In a single-member constituency, a candidate who receives the most valid votes will become a member of the National Assembly. In proportional elections, the threshold for political parties is five percent, 10 percent for joint lists of two political parties and 15 percent for joint lists of more than two parties.

Each of the 13 national minority self-governments has a right to nominate a national minority list.¹⁷ Persons recorded in the electoral registry as national minority voters, have the right to vote for a single-member constituency candidate and their particular national minority list, but cannot vote for the national proportional list.

There is a preferential threshold for minority lists. In order to gain a seat, one-quarter of votes required for a regular mandate should be secured by the minority list. National minority that failed to gain a mandate is entitled to have a spokesperson in the Parliament, but without the right to vote.

According to the Act on the Election of Members of the National Assembly, if the deviation in the number of voters in the single-member constituency is more than 20 percent from the national average, the National Assembly should amend the boundaries of the constituencies. For these elections there are eleven single-member constituencies with deviations of more than 20 percent. This is at odds with international best practice and the domestic legal framework, and it violates the equality of vote principle, which is one of the important requirements for ensuring a fair electoral system.

Election administration

The Parliamentary Elections of 3 April 2022 are managed by a three-level election administration:¹⁸ The National Election Commission (CEC), 106 Constituency Election Commissions (CoECs) and more than 10,000 Polling Station Commissions (PSCs). The

¹⁵ Before the amendment it was required to nominate candidates in 27 constituencies (in total there are 106 constituencies), within 9 counties (out of 19) and Budapest.

¹⁶ The introduction of the amendment was justified with the need to prevent previous practice of some political parties misusing public funding received for campaigning. While the prevention of misuse of public funds is an important argument, ENEMO deems that this purpose can be achieved by introducing or improving other regulations; establishing a requirement that restricts political entities' participation in elections cannot be an acceptable solution.

¹⁷ For these elections only the Roma national minority has not nominated a national minority list.

¹⁸ According to Act XXXVI of 2013 on Election Procedure, the Regional Election Commissions should operate as well in the Parliamentary Elections, while having limited tasks, such as establishing the partial regional result of the election for the national list and deciding on appeals challenging a decision by the parliamentary single-member constituency election commission on announcement of candidates.

Commissions are respectively supported by a similar, parallel structure¹⁹ of Election Offices, including the National Election Office (NEO), 97 Constituency Election Offices (CoEOs) and 1,244 Local Election Offices (LEOs).

By law, Election Commissions should be independent bodies whose primary task is to administer the elections, by establishing their result, ensuring their fairness and lawfulness, ensuring impartiality and, if necessary, restoring the lawful order of election. 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.

To date, the EMBs are managing the process in line with legal requirements and deadlines, and all technical preparations are ongoing. ENEMO IEOM interlocutors expressed varied levels of confidence towards EMBs, especially with regards to the appointment of Election Commission members, at all levels. However, most interlocutors agree that EMBs act independently and in an impartial manner.

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

The National Election Commission (NEC) is a permanent independent body, composed of a president and six members, appointed for a nine-year term, on the proposal from the President of the Republic, with votes of two thirds of the Members of the Parliament present. The current NEC was elected in September 2013. Three members of the NEC, including the Vice-President, are women.

The competencies of the NEC include: registering nominating organizations and national lists, issuing guidelines to lower level commissions, considering complaints, and establishing election results. In connection with the national referendum conducted in a joint procedure with the Parliamentary elections, the NEC supervises the counting of votes cast by post and votes cast at foreign representations, and establishes the referendum result.

The political parties that form a fraction in the Parliament can delegate an additional member of the NEC each, whose mandates expire upon announcement of the date for the next Parliamentary elections. After this date, the registered national lists should each delegate an additional member of the NEC, whose mandate ends at the first session of the newly elected Parliament. The registered national minorities should delegate members to the NEC with the right to vote only in matters affecting national minorities; in other matters, they may participate in sessions of the NEC in a consultative capacity. From the announcement of the date for Parliamentary elections until the registration of national lists, a period during which key decisions such as registration of nominating organizations and national lists were taken and complaints were reviewed, the NEC was composed of only elected members. Most decisions during this interim period were taken without any debate.

¹⁹ There are 20 Regional Election Offices involved as well, in proposing to the NEC the members for Regional Election Commissions, appointing heads of CoEOs and LEOs in case of vacancies, instructing the heads of CoEOs and LEOs regarding the performance of their tasks, supplementing PSCs by delegating members of PSCs from other settlements, if the number of members is less than required by law, in cases when it is impossible for LEOs to do so, and transmitting a copy of the minutes on the partial regional result of the national list election to the NEO immediately after the resolution establishing the partial regional result of the national list election becomes final.

Five²⁰ parties and coalitions (out of six registered) and five²¹ national minorities (out of twelve registered), delegated members to the NEC, after the registration of their national lists or national minorities' lists.

At the initiative of the President of the National Election Commission, the NEC started reviewing its guidelines in October 2021, when delegated members were involved, unlike in previous elections, when the review and adoption of guidelines took place during the interim period, when the NEC was composed only by elected members. The NEC guideline 2/2021²² which also included amendments proposed by members delegated from parliamentary fractions was adopted unanimously, with the vote of all fourteen NEC members. ENEMO positively assesses the review and adoption of the guidelines before the announcement of Election Day, with all elected and delegated members involved. However, the lack of cross-party oversight during the interim period, still remains an unaddressed gap in the legal framework.

From the announcement of the date of the Parliamentary elections - 11 January to March 18, the NEC has held 25 sessions. The ENEMO IEOM observed 14 NEC sessions. The sessions are convened by the President of the NEC. According to the 2020 amendments of the Act on Election Procedure,²³ the sessions of the NEC may be held also using electronic communication means, if the President decides so. These sessions, as well as other in person NEC sessions, are not broadcasted and can be observed only at the NEC premises. The sessions' agenda is published online²⁴ in advance. The decisions are published right after the sessions and the minutes within a few days. The Elections website is maintained by the National Election Office (NEO) and contains information in Hungarian, as well as in English, German and French languages. The website version in Hungarian is updated on a regular basis and contains key-election data such as information on candidates, nominating organizations, national lists, decisions, instructions, etc.²⁵ ENEMO assesses the work of the NEC during the observed period as transparent.

As of 18.03.2022, the NEC adopted a total of 175 resolutions²⁶ related to Parliamentary elections and referendum of 3 April, since the announcement of the date of the Parliamentary elections. Most adopted resolutions were related to registration of nominating organizations, registration of national lists and adjudication of complaints.

The National Election Office (NEO) is an independent, autonomous state administration organ subordinated only to the law, which should perform tasks related to the preparation and conduct of elections, such as the impartial information of voters, candidates and nominating organizations, assisting the NEC, ensuring the creation of materials and technical conditions necessary for the conduct of elections, maintaining the central voter registry and managing the work of regional and

²⁰ Solution Movement; Democratic Coalition – JOBBIK (Movement For a Better Hungary) – Momentum Movement - Hungarian Socialist Party - LMP (Green Party of Hungary) - Dialogue for Hungary; Hungarian Two-Tailed Dog Party; Our Homeland Movement; FIDESZ (Hungarian Civil Association) - KDNP (Christian Democratic People).

²¹ German, Slovak, Armenian, Greek and Polish national minorities.

²² NEC Guidelines [2/2021](#) which amended the guidelines 2/2014, 7/2014, 11/2014, 12/2014, 1/2015, 2/2015, 3/2015, 4/2015 and 4/2018, were amended in December 2021.

²³ Section 40/A

²⁴ The sessions' agenda, decisions and minutes are being published in the official [website](#) of the elections.

²⁵ The other three versions of the website contain only general information.

²⁶ Out of a total number of 183 resolutions adopted in that specific period.

local election offices. Its president is appointed by the President of Hungary on the prime minister's proposal, for a nine-year term.

Starting from 26 January to 11 February, the NEO has completed the process of delivery of notifications to voters. The NEO is conducting a voter information campaign at the national level, which include posters,²⁷ short videos²⁸ broadcasted in social and traditional media, and a simplified guide²⁹ for voters. An information center at the central level is also being operated by NEO.

To date, processes such as accreditation of international observers, printing of ballot papers for the Parliamentary elections and national referendum, postal delivery of the voting package to by-mail voters and training sessions for lower level EMBs, are ongoing.

Constituency Election Commissions (CoECs) and Constituency Election Offices (CoEOs)

The representative body in a settlement constituting the seat of a parliamentary single-member constituency should elect three members to the parliamentary single-member constituency election commission (CoEC),³⁰ on the proposal from the head of the parliamentary single-member constituency election office (CoEO). Each electoral contestant in a constituency is allowed to delegate one member to the respective CoEC.

CoECs should register single-member constituency candidates, establish the result of the single-member constituency elections, decide on complaints against the activities and decisions of the polling station commissions (PSCs) and assess complaints related to local media.

In general, CoECs act independently, in a fair and impartial manner and are able to work freely, without interference or intimidation. To date, they complied with legal deadlines and worked in a collegial and constructive manner. CoECs and CoEOs act transparently by providing access for their work to be observed by accredited observers and by publishing session's announcements, decisions and minutes and other useful information on websites of respective local authorities.

Each parliamentary single-member constituency should have a Constituency Election Office headed by the clerk of the settlement that is the seat of the parliamentary single-member constituency. In total, 97 CoEOs are assisting the 106 CoECs in these elections.³¹

CoEOs publish the expected date, detailed agenda and decisions of the CoEC sessions. They have collected and verified the recommendation sheets for the single-member constituency candidates and prepared the respective registration decision for the CoEC; they have prepared the decision regarding the draw of candidates for the CoEC and submitted to the CoEC the draft of the single-member constituency ballot paper for approval of its data content.

²⁷ So far, three posters have been published, including [information](#) on the date and time of voting, voting [procedures](#) and [how to cast](#) a valid ballot.

²⁸ Of the seven [videos](#) produced, five are being broadcasted, while a video will be broadcasted the last two weeks and another one the the last week before E-Day.

²⁹ <https://bit.ly/37KCaF6>

³⁰ After the date for the Parliamentary Elections is set, but not later than on the 42nd day before Election Day.

³¹ There are eight CoEOs which assist and support more than one CoEC.

Polling Station Commissions (PSCs) and Local Election Offices (LEOs)

The representative body of the settlements' local government should elect the necessary number of members to the polling station commission (PSC),³² on a proposal from the head of the local election office (LEO). Three elected members should be assigned to each polling station commission. Each electoral contestant in a constituency is allowed to delegate two members with voting rights to each PSC.³³ PSCs should hold a constitutive session within eight days before voting day, after their members are assigned. The constitutive sitting should be convened by the head of the LEO. At this constitutive sitting, the election commission should elect its chairperson and deputy chairperson from among the elected members.

To date, the process of the election of the PSC members has been completed without any significant difficulty, while the process of delegating of PSC members by electoral contestants is still ongoing. Most elected commission members are experienced. In some single-member constituencies the training sessions for the PSC members have already started, while in most constituencies the EMBs are waiting for the PSCs to be completed with delegated members, in order to train all commission members.

PSCs should make minuted decisions on any disputed issues occurring in the course of the preparation and conduct of voting. At least one member of the LEO should act as the keeper of the minutes of the polling station commission.

LEO should be headed by the local government clerk. Some 1,244 LEOs will assist more than 10,000 PSCs in these elections.

Registration of voters

Voter registration for Hungarian citizens with an in-country address is passive and continuous. All citizens who attain the age of 18 years by Election Day, as well as married citizens who are 16 years or over,³⁴ are eligible to vote, except for those disenfranchised by an individualized court decision due to criminal offense or limited mental capacity. Deprivation from the right to vote on the basis of a mental disability is contrary to international standards.³⁵

The central voter registry is an electronic register extracted from the register of personal data and address of citizens and other registers,³⁶ and is maintained by the National Election Office (NEO).

³² After the date for the Parliamentary Elections is set, but not later than on the 20th day before Election Day.

³³ At the latest on the 9th day before election day.

³⁴ Upon request.

³⁵ Article 29 of the [CRPD](#) requires States to “guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others”. Paragraph 48 of [General Comment No. 1](#) to Article 12 of the CRPD states that “a person’s decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising their political rights, including the right to vote, the right to stand for election and the right to serve as a member of a jury”.

³⁶ The data in the central voter registry for those voters not recorded in the registry of personal data and address of citizens, is generated from the central registry of travel documents and the registry of driving licenses, furthermore

Starting from December 2021, the NEO is publishing weekly data regarding voter registration.³⁷ As of 18 March, the total number of citizens eligible to vote and included in the central voter registry was 8,222,913, of whom 7,766,439 were citizens with an in-country address.³⁸

Voters abroad with an in-country address can vote for both national lists and single-member constituency candidates, and only in person, at one of the 146 Hungarian diplomatic missions abroad. While compared to previous parliamentary elections, the number of diplomatic missions where voters abroad with an in-country address could vote has increased,³⁹ mission's interlocutors expressed concerns that the number is still limited and could possibly lead to voter disenfranchisement. As of 18 March, 45,497 voters were registered to vote at one of the Hungarian diplomatic missions abroad.

Eligible voters with no address in Hungary could request registration, renewal of registration, or modification of data related to them in the voter registry until 9 March.⁴⁰ Voters without an in-country address can only vote for a party list and for the national referendum. They receive the voting package by post or in person, and can deliver it in person or by proxy to the diplomatic missions and CoEOs, or vote by mail. By-mail voters who will establish an address in Hungary no later than on 27 March,⁴¹ should be deleted from the postal voter electoral registry⁴² and included in the respective polling station voter registry, and should be able to vote for single-member constituency candidates. Concerns were raised by the missions' interlocutors on the possibility of voters to register in allegedly fictitious addresses in contested single-member constituencies, as with the amendments of the Law on the Records of Citizens Personal Data and Address, the definition of the residence was reduced to the address used by citizens for official communication.⁴³

As of 18 March, the registry of by-mail voters contained 456,311 registered voters, of whom 2,752 living in Hungary.

Any voter belonging to a national minority could request (until 18 March) to be entered in the voter registry as a national minority voter in Parliamentary elections. Once registered as national minority voters, they could vote for single member candidates and for the respective national minority list. The NEO should delete the voter's data relating to belonging to a national minority from the polling district's voter registry, if the national minority in question does not have a

from the registry of adult citizens without suffrage, from the polling district and constituency registry and from the polling district electoral registry.

³⁷ Voter registration data published on the [website](#) is detailed at county, single-member constituency and settlement level.

³⁸ Only voters with an in-country address are eligible to vote for both single-member constituency candidates and national lists.

³⁹ In Parliamentary Elections of 2018, voters abroad with an in-country address in Hungary could vote in one of the 118 diplomatic missions abroad.

⁴⁰ The 25th day before Election Day.

⁴¹ The 7th day before Election Day.

⁴² Section 267 a) of Act XXX VI of 2013 on Election Procedure.

⁴³ Section 5 (2) [Act LXVI of 1992](#) on the Register of Personal Data and Residential Addresses of Citizens. A petition by Members of Parliament seeking to find unconstitutional and annul the section in question has been dismissed by the Constitutional Court with the [decision Nr. II/5048/2021](#) of 08.02.2022.

national minority list. As of 18 March, 75,196 voters⁴⁴ were registered in the national minorities' voter registry.

Until 25 March, voters can request for absentee voting.⁴⁵ The deadline for absentee voting requests has been changed with the 2020 amendments of the Act on Election Procedure, from four days to nine days before Election Day. As of 18 March, 79,140 voters requested to change their polling district.

Voters with disabilities and health issues can apply for mobile voting in person - until 1 April, online or by post, without identification - until 30 March, as well as online or by proxy, with identification - until 12:00 on Election Day. Voters with disabilities can also request to vote in an accessible polling station within their constituency⁴⁶ and can request for a Braille ballot template.⁴⁷

One day before Election Day, the Local Election Offices should print the updated voters' lists and deliver them to Polling Station Commissions.

Most ENEMO IEOM interlocutors did not express distrust on the accuracy of the voters' list. However, the lack of automatic removal of data of deceased people from abroad from the by-mail voter registry still remains a concern.⁴⁸

Candidate registration

Every citizen with voting rights has the right to stand as a candidate for Parliamentary Elections. A candidate may run in a single-member constituency and on the national list at the same time, but only in one single member constituency. In general, the right to stand for election has been respected. No major challenges in this regard were reported to ENEMO.

In order to nominate candidates in single-member constituencies, political parties had to register as nominating organizations with the NEC.⁴⁹ In total, 43 parties were registered, while the requests of seven parties⁵⁰ were rejected⁵¹ by the NEC.

⁴⁴ Including 32,777 voters from the Roma national minority, which does not have a national minority list in these elections.

⁴⁵ Voting in a polling district which is different from their address, while voting for a candidate of the single-member constituency where they are registered.

⁴⁶ Until March 30th.

⁴⁷ Until March 25th.

⁴⁸ The removal of the data of deceased people abroad from the postal voter registry can be done only upon official request from their relatives, as such mechanisms to provide for their automatic removal do not exist.

⁴⁹ The NEC should decide to register a party as a nominating organization if the application for registration complies with the requirements of the law, by verifying the existence and the authenticity of the concerned party data in the court register of non-governmental organizations.

⁵⁰ Hungarian National Order Party; Hungarian Social Party; Hungarian Social Democratic Party; Party of Women's Values; Opre Roma; Plato Party and Party of the Poor.

⁵¹ For non-compliance with the statutory requirements.

Independent candidates and nominating organizations had to collect at least 500 signatures from eligible voters in a specific constituency and submit them to the Single-Member Constituency Election Office (CoEO) until 25 February,⁵² which was the deadline for the announcement⁵³ of candidates. The number of signatures requested is in line with international good practice.⁵⁴ A voter may sign in support of more than one candidate, which is in line with international good practice.⁵⁵ The signature verification was conducted by CoEOs. Once established that the number of valid recommendations reached 500, the detailed verification of recommendations may be discontinued, in line with international good practice.⁵⁶

For the first time, in these elections voters could check⁵⁷ online if they signed the recommendation sheets collected by parties and candidates and checked by the election offices.

From the 43 registered nominating organizations, only 20 succeeded to register at least one candidate in single-member constituencies. In total, 664 SMC candidates, including 116 women, were registered. In 31 constituencies there are no women candidates. Some 106 SMC candidates were not registered, mainly due to lack of sufficient signatures, while seven registered candidates withdrew. Out of the total number of SMC candidates, 34 are running as independents.

In order to register a national list for the proportional race, each party or coalition needed to nominate candidates in at least 71 single-member constituencies (out of 106) within 14 counties (out of 19) and Budapest.⁵⁸ The deadline for the announcement of national lists was 26 February.⁵⁹ The NEC should register the national list no later than on the second day after the day of announcement. A total number of seven coalitions and parties submitted requests within the legal deadline to register national lists. In total, six nominating organizations (two coalitions and four

⁵² 37th day before Election Day.

⁵³ Candidates should be announced to the CoEC competent to register them by handing over the recommendation sheets to the respective CoEO. Voters who wish to stand as independent candidates and the nominating organizations that wish to nominate candidates should hand over all recommendation sheets they received to the election office within the deadline for the announcement of candidates. In the event of non-compliance with this obligation, the election commission competent to register the candidate in question should impose a fine for each missing recommendation sheet.

⁵⁴ As per the Venice Commissions' [Code of Good Practice in Electoral Matters](#), Paragraph 1,3 i., the number of signatures should be lower than 1 percent of the voters in the constituency concerned.

⁵⁵ Paragraph 96 of the 2nd edition of Venice Commission and OSCE/ODIHR [Guidelines on Political Party Regulation](#) states that "It should be possible to support the registration of more than one party, and legislation should not limit a citizen or other individual to signing a supporting list for only one party".

⁵⁶ As per the Venice Commissions' [Code of Good Practice in Electoral Matters](#), Paragraph 1,3 iv., the checking process must in principle cover all signatures; however, once it has been established beyond doubt that the requisite number of signatures has been collected, the remaining signatures need not be checked.

⁵⁷ By submitting an application, after successful authentication on the personalized administration interface magyarorszag.hu/szuf, within the section "Information on the recommendation - Who did I recommend?".

⁵⁸ In the 2018 Parliamentary Elections, the requirement for the parties and coalitions to run for the proportional race was to nominate candidates in 27 constituencies in 9 counties and Budapest. This requirement was increased within the 2020 amendments, allegedly to address the problem with parties which run only to obtain public funding.

⁵⁹ 36th day before Election Day.

parties) were registered,⁶⁰ while the request of one party was rejected,⁶¹ due to non compliance with the legal requirements regarding the number and distribution of single-member constituency candidates. There are 1,035 candidates, including 205 women, in the national lists of coalitions and parties.

National minority self-governments could submit candidate lists on a separate ballot for national minorities. They had to collect supporting signatures from at least one percent of voters included in the specific minority's register, but no more than 1,500 signatures. Within the legal deadline, 12 national minorities⁶² were registered, with 111 candidates in total, including 48 women.

Election campaign and campaign finance

Electoral Campaign

The electoral campaign in Hungary is regulated mainly by the Act XXXVI of 2013 on Electoral Procedure.

The election campaign period starts 50 days before election day and lasts until the polls close, on election day. The campaigning officially started on 12 February. The start of the campaign before the process of candidate registration is finalized disadvantages candidates and parties with fewer resources, who need more time to collect the supporting signatures and, thus, start the campaign later.

Formally, the election campaign is being held in an official state of emergency⁶³, but all restrictions, which may limit the freedom of assembly, were lifted, and ENEMO did not observe any impact on the campaign in this regard. The legislation allows the campaigning to continue on Election Day, although with several legal restrictions. In particular, no election rallies should be held, no political advertisement should be published, as well as no campaigning may be conducted in public areas within 150 meters from polling stations.

The law determines campaign activities as “the use of campaign resources in the campaign period, and any other activity in the campaign period aimed at influencing or attempting to influence voters' choices”⁶⁴. At the same time, the law states, that “the activities of election bodies, personal communication between citizens as private persons, regardless of its content and form, the

⁶⁰ Democratic Coalition – JOBBIK (Movement For a Better Hungary) – Momentum Movement - Hungarian Socialist Party - LMP (Green Party of Hungary) - Dialogue for Hungary; Party of Normal Life; Hungarian Two-Tailed Dog Party; Our Homeland Movement; Solution Movement; FIDESZ (Hungarian Civil Association) - KDNP (Christian Democratic People).

⁶¹ Our Party - IMA registered within the legal deadline only 10 single-member constituency candidates in only 7 counties and the capital. The NEC rejected their request to register the national list with the [decision](#) 104/2022 of 27 February 2022.

⁶² Out of 13 officially recognized minorities.

⁶³ The state of emergency because of the coronavirus pandemic will last in Hungary until 1 June 2022, and was extended to this date by the parliament in December 2021.

⁶⁴ Section 141 of the Act XXXVI of 2013 on Electoral Procedure

activities arising from functions determined by law and performed by the Constitutional Court, courts, local self-governments and other State entities shall not be considered as election campaign”⁶⁵.

ENEMO considers such regulation of the state representatives’ activities as the legal ground for overlapping between the state and ruling parties, which contradict with one of the basic principles of electoral procedures, determined by the same law – “equal opportunities for candidates and nominating organizations”.⁶⁶ In practice, this leads to unhindered systemic misuse of administrative resources and an uneven playing field, which is at odds with international standards.⁶⁷

Since November 2021, three months before the official election campaign started, the Hungarian Government presented a series of socio-economic measures, such as capping the prices of fuel⁶⁸ and certain foods⁶⁹, 13th month pensions⁷⁰, increasing the minimum wage in the country and wages of public administration, etc.⁷¹

In November 2021 an official governmental informational campaign was launched to promote these and many other initiatives of the Government. The motto of the campaign was “Hungary is going forward, not backwards!”⁷², which overlaps with the official slogan of the election campaign by the ruling Fidesz-KDNP alliance “Let’s go forward, not backwards!”⁷³. In both campaigns, the opposition, in particular the joint opposition’s prime ministerial candidate, Péter Márki-Zay is targeted as “backwards”.

The opposition alliance, “United for Hungary” is campaigning under the slogan “Let Hungary belong to all of us!”⁷⁴, its key talking points being demonopolization of the country in a broader sense and re-establishing Hungary as a western democracy⁷⁵. The opposition is also practicing

⁶⁵ Section 142 of the Act XXXVI of 2013 on Electoral Procedure

⁶⁶ Section 2 of the Act XXXVI of 2013 on Electoral Procedure

⁶⁷ See Article 5 (para 5.4) of the [Document of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE](#).

⁶⁸ From 15 November 2021 the Hungarian Government froze the prices of the regular 95 petrol and gas oil at 480 HUF per liter. Initially the measure was established for 3 months, until 15 February 2022, but then was extended until 15 May. This decision was announced by the Prime Minister during his state-of-the-nation speech, delivered on 12 February – exactly the date when the official election period started.

⁶⁹ On 12 January 2022, the Prime Minister announced via his Facebook page that the Government would freeze the maximum prices of 6 staple foods to the 15 October 2021 levels. The measure came into power on 1 February 2022 and will be in force until 1 May.

⁷⁰ Initially the Hungarian government announced that the first full 13th month pension shall be paid in 2024, but on 7 December 2021, the Prime Minister informed on his Facebook page that the Government’s decree ordering 13th month pensions to be paid out in February 2022 was signed. In December 2021, a uniformed pension bonus of 80,000 forints was distributed as well.

⁷¹ Earlier, the Government also announced that people under 25 years of age will not have to pay personal income tax from 2022, as well as that all working parents should receive a rebate on their 2021 personal income tax in February 2022. The latter measure covers approximately 1,9 million people and tax rebate worth a total of 600 billion Forints.

⁷² Original title in Hungarian – “Magyarország előre megy, nem hátra”

⁷³ Original title in Hungarian – “Előre menjük, ne hátra!”

⁷⁴ Original title in Hungarian – “Legyen Magyarország mindannyiunké!”

⁷⁵ United Opposition campaigning also includes narratives on fighting against corruption and changing the corrupt government, re-building bridges to the West, abandoning the “East”, meaning Russia and China, re-establishing Hungary as the core of EU and Europe.

personal targeting of the opponents: for instance, in early February their nationwide billboards campaign⁷⁶ was launched with the motto “Viktor Orbán lies, that’s why he is afraid to debate”⁷⁷, calling for public debates between candidates for prime-minister position. Public offer for debates was rejected⁷⁸.

The Campaign of the other parties is less visible, especially in the countryside. Our Homeland exploits right-wing and anti-Western narratives,⁷⁹ as well as anti-COVID agenda, protesting against mandatory vaccinations. The Solution Movement, led by Hungarian billionaire György Gattyán,⁸⁰ promotes digitalization of Hungary in the broader sense, and focused on social media campaigning. The satirical Two-Tailed Dog Party is running with “stickers campaigns”, public performances and social initiatives, as well as social media activity. The Party of Normal Life, launched in 2021 by well-known in Hungary anti-vaccine influencer Dr. György Gödény, campaigns just with party-branded posters of the leader with the general motto along with the party name.

Generally, high competitiveness along with deep polarization, inflammatory rhetoric, as well as personal accusations and counter-campaigning are key features of the campaign. The 15 March National Day, which commemorates the Revolution of 1848-49, was used by several contestants for massive rallies⁸¹, in particular by the ruling alliance, united opposition and Our Homeland. Both the ruling alliance and the united opposition are campaigning in the regions and country-side, also holding joint meetings of the constituencies’ candidates, along with one of the party leaders. A number of cases of destruction of campaign materials were observed in different constituencies. Few interlocutors complained about struggling to rent the venue for campaign events for political reasons. Most of the contestants that registered a national list for this election, have presented specific election programs, with the exception of the ruling coalition.

The invasion of Ukraine by Russia on 24 February changed the narrative of the campaign and polarized it even more. Geopolitical and security topics overshadowed the discussion on social-economic development, healthcare, education, corruption, wages, and social protection.

The united opposition is calling to choose peace and Europe, campaigning for full support to Ukraine along with NATO and EU positions. In the case of the Fidesz-KDNP, the narrative of “peace” and keeping Hungary out of the war is promoted so far through a governmental

⁷⁶ The campaign was initiated by the “Hungary is for Everyone Movement” (“Mindenki Magyarországa Mozgalom”) led by Péter Márki-Zay, and covered 1300 billboards.

⁷⁷ Original title in Hungarian – “Viktor Orbán hazudik, ezért fél vitázni”.

⁷⁸ On 16 January 2022 István Hollik, the communications director for Fidesz, posted on Facebook the public answer to the call for debates between Péter Márki-Zay and Viktor Orbán along with the ruling alliance narrative regarding the opposition. Approximate translation of the answer sounds “there is no sense to debate with a subordinate of Ferenc Gyurcsány”.

⁷⁹ Such as “Hungary belongs Hungarians” (“Magyarország a magyaroké”), “life after the EU”.

⁸⁰ The party was officially established just on December 24, 2021, but before that, in November, György Gattyán announced the launching of the new party with possible intentions to take part in future Parliamentary elections.

⁸¹ Pro-governmental so-called “peace march” was organized formally by CSO with national symbols prevailing over party ones, Viktor Orbán was a key-speaker. The united opposition rally with speeches of the opposition leaders held simultaneously in time. Our Homeland Movement also conducted the rally, which was promoted as a “pro-independence” event against the deployment of the NATO troops into Hungary. Two-Tailed Dog Party organized a fundraising party for Ukrainian refugees.

information campaign⁸². Simultaneously, there is an ongoing campaign, involving the government's and Fidesz-KDNP channels, accusing the opposition of aiming to drag Hungary into the war.⁸³ On the other hand, the opposition is presenting the incumbent Prime Minister, Orbán, as Putin's main ally in its campaign⁸⁴.

Both sides are using third-party campaigning, but with large disproportion in resources in favor of the ruling alliance. Both the opposition and the ruling coalition have been supported by foreign politicians in campaigning.⁸⁵

Online advertising and campaigning in social networks are significant during this Parliamentary elections, used by all political contestants. ENEMO brings attention to the lack of regulations for such activities within elections. In particular, the definition of the political advertisements, does not properly cover the advertising on social media and creates space for misinterpretation by state entities⁸⁶ and election management bodies. Thus, there is a challenge that a big part of campaigning activities during Parliamentary elections 2022 will be partly out of the legal framework or vaguely regulated.

The referendum on LGBTQ issues, which is scheduled for the same day as the Parliamentary elections as the tool to mobilize and frame the agenda of the Parliamentary elections (according to many interlocutors) has practically disappeared from the mainstream campaigning after the Russian invasion started.

Campaign Finance

Party and campaign finance are regulated mainly by the Act XXXVI of 2013 on Electoral Procedure and the Act LXXXVII of 2013 on the Transparency of Campaign Costs Related to the Election of Members of the National Assembly, as well as by the Act XXXIII of 1989 on the Operation and Financial Management of Political Parties.

The Hungarian legislation provides public campaign funding, as well as allows the use of other sources for election campaigns, for instance, private donations, parties' own funds, loans, etc. Donations from legal persons or organizations without legal personality, as well as donations from foreign citizens and entities are prohibited.

Public funding for campaigning in Parliamentary elections is provided both for parties and candidates for single-member constituencies, as well as for minority lists.

⁸² Under the motto "Keep the peace and security of Hungary" – "Őrizzük meg Magyarország békéjét és biztonságát".

⁸³ In the end of February, the information newsletter with the phrase "we consider it irresponsible and do not support the opposition's stance that Hungary should send troops and weapons to Ukraine" was spread by the government to all those who had previously registered for Covid-19 vaccination. In his public speech on March 15 Viktor Orbán stated that in April people will choose between "pro-peace Right" and "pro-war Left".

⁸⁴ For example, on March 15, along with the pro-governmental "peace march" route, there were few counter-campaign activities with trolling messages based on Viktor Orbán's quotations about Russia and Putin related issues.

⁸⁵ Donald Tusk, former President of the European Council and President of the European People's Party, attended the united opposition's rally on March 15 and gave a speech. On the other hand, in the middle of March former U.S. President Donald Trump sent a public letter in support of Prime Minister Viktor Orbán, similar to the letter with "endorsement for reelection" sent in January 2020.

⁸⁶ The part of the report "Rules for Political Content in Social Media" (A Ve. szabályai a közösségi médiában megjelenő, politikai hirdetés jellegű tartalmak vonatkozásában), <https://bit.ly/3lb0KeD>

Each candidate for a single mandate constituency is entitled to financial support from public funds, in the amount of 1 million Forints, which should be increased by the consumer price index, calculated by the Hungarian Central Statistical Office. During the campaign 2022 it is 1,182,896 HUF (approx. 3,200 EUR). Candidates for single-member constituencies, nominated by the party, can allow the party to use public funds available for them.

After the 2020 amendments, only parties that nominate candidates in at least 71 constituencies for the Parliamentary elections may receive financial support from the state budget. The law determines a distinct three-levels gradation⁸⁷ system for public fundings for the parties' election campaign, depending on the number of registered candidates in constituencies. According to this system, parties for the Parliamentary elections campaign 2022 are entitled to receive approximately from 471 to 706 million HUF in public funds (approx. from 1.4 to 1.9 million EUR). Only the ruling alliance Fidesz-KDNP and united opposition alliance "United for Hungary" are funded at the maximum amount in this campaign.

The national minority self-governments having a minority list at the Parliamentary elections are jointly entitled to state support, for approximately 353 million HUF (approx. 940,000 EUR), which should be equally shared among all 12 registered national minority lists.

The funds are allocated prior to the campaign⁸⁸ and a party that does not reach at least one percent of votes, as well as a candidate for the single-member constituency that does not reach at least two percent of votes or withdraws, should return them. Concerns were raised by several ENEMO interlocutors that some political parties might not return state funds allocated for campaigning, despite not reaching the threshold.⁸⁹

The Hungarian State Treasury (ST) is responsible for providing state support and any technical assistance in this regard, particularly signing agreements with the candidates and parties, opening card coverage accounts, etc. The support from the state budget may only be used during the election campaign period to cover costs related to campaign activities. The Treasury card cannot be used to withdraw cash.

There is the limit on campaign spendings at 5 million HUF (+ consumer price index) for each single-member constituency candidate and national minority self-government⁹⁰. For the Parliamentary elections 2022 it is approximately 5.9 million HUF (approx. 16,000 EUR). For the party which registered the party list, the cap of campaign spendings depends on the number of its registered candidates both for single-mandate constituencies and party list, but not more than the number of mandates that can be obtained. Thus, the maximum cap of party spendings for

⁸⁷ Section 3 of the Act LXXXVII of 2013 on the Transparency of Campaign Costs Related to the Election of the Members of the National Assembly.

⁸⁸ The Treasury should disburse the first installment of the support to the parties within 3 working days after the registration of the party list becomes effective, and to the single-mandate constituency candidates within 5 working days after the procedure for the registration.

⁸⁹ After the Parliamentary elections 2018 16 parties out of 23 officially registered didn't reach 1% of support and had to pay back the amount of campaign public funds. Only 3 out of these 16 parties paid back – Together (Együtt), The Hungarian Workers' Party (Magyar Munkáspárt) and Hungarian Justice and Life Party (Magyar Igazság és Élet Pártja). According to Transparency International Hungary, as of May in 2020 the tax authorities (NAV) were able to get back only 56 million HUF out of 810 million HUF debt. For more details <https://bit.ly/3Js9rCM>

⁹⁰ Section 7 of the Act LXXXVII of 2013 on the Transparency of Campaign Costs Related to the Election of the Members of the National Assembly

nationwide Parliamentary elections 2022 is approximately 1.174 million HUF (approx. 2.3 million EUR).

According to the Hungarian legislation, a party may not accept anonymous donations, but at the same time there is only strict requirement to disclose contributions over 500,000 HUF (approx. 1,300 EUR)⁹¹, which does not lead in a practice to full transparency of such donations and their donors. There are no limits on private donations in the legal framework, which could potentially lead to strong dependence of parties to large donors, as well as to disproportions in resources that different parties can use in between elections. The latter can critically affect the official campaign period and final results.

No requirements to make transparency prior to Election day are in place. All candidates and nominating organizations, which signed an agreement with the State Treasury for public fundings, are obliged to submit a financial statement to the ST within 15 days after the election results have become effective. All candidates and nominating organizations should publish in the Official Gazette of Hungary the amount, source and use of state and other funds, spent on the election within 60 days after the election of the Members of the National Assembly. Within one year from the elections, the State Audit Office (SAO) of Hungary should, ex officio, perform a compulsory audit at the ST or, if necessary, at the candidate or at the party nominating the candidate, concerning the use of public support.

Several of ENEMO's interlocutors expressed concerns on the mix of the formal and biased approach of the ST and the SAO, as well as their efficiency and willingness to control and verify in-depth the spending of the public funds.

ENEMO welcomes the public declaration by the SAO, that online political advertising, paid by candidates and nominating organizations⁹² will be scrutinized according to the current legislation and election campaign spending limits, despite legal gaps on online political advertising⁹³. However, the SAO's self-limitation on verifying just the finance reports of the candidates and nominating organizations might lead to inefficient and incomplete supervision of this expenditure, which is substantial.

The SAO provided additional guidance on financial reporting for the Parliamentary Elections 2022, but essential gaps are still not fulfilled, particularly, third-party campaigning before and during the official election period, lack of an effective reporting mechanism, no instruments to prevent campaign overspending.

ENEMO considers that lack of effective legal control and regulations of financing of third-party campaigning even during the official campaign period are among the main threats for the equal opportunities for candidates and nominating organizations during Parliamentary Elections 2022.

Moreover, ENEMO notes that there is no expenditure limit on the campaign regarding the referendum, which is initiated formally by the Government and will be held on the same day as

⁹¹ This requirement is mentioned in the Annex 1 to the Act XXXIII of 1989 on the Operation and Financial Management of Political Parties

⁹² More details: <https://bit.ly/3KW8AdW>.

⁹³ In 2020 the State Audit Office stated that advertising on social media cannot be confined within the current domestic legislation on political advertising, hence financial spendings by candidates and parties on online advertising couldn't be scrutinized by the SAO. More details: <https://bit.ly/3Ib0KeD>

the Parliamentary Elections 2022. Thus, potentially unlimited funds could be used for the referendum campaign, which overlaps with the election campaign. As such, the critical imbalance in resources of different contestants could be created during the official election period, contradicting one of the basic principles of electoral procedure, determined by the legislation, – “equal opportunities for candidates and nominating organizations”.

Different social media networks’ efforts to ensure transparency regarding the sources of paid advertisements through Ad Library and Transparency Reports on the number of ads and total amount spent by contestants have so far been insufficient to prevent online campaign finance violations, as unregulated social media environment and technological advancements in online political tactics make it difficult to monitor money flow in digital space.

Based on the data available in the Meta Ad Library Report,⁹⁴ according to the disclaimer, the advertisers with the highest amount of money spent on ads about social issues, elections or politics on Facebook are: Megafon, Mediaworks Hungary Zrt., erosito.hu, EzaLényeg.hu, Fidesz, Aktuális Média, and kormányvaltok.hu.⁹⁵ Megafon (PR company), Mediaworks Hungary Zrt. (media company), Fidesz (political party), and Aktuális Média (media) promoted content in support of the ruling party, while erosito.hu (media amplifier), EzaLényeg.hu (media) promoted pro-opposition posts, and kormányvaltok.hu funded 83 percent of paid ads of profile Márki-Zay Péter.

The most money spent on paid ads in the respective period have the Solution Movement, Fidesz, and Unity of Hungary,⁹⁶ while among profiles categorized as a “politician” most funds spent on paid ads have: Péter Márki-Zay, Viktor Orbán, and Dóra Dúró.⁹⁷

According to the Google Transparency Data on political advertising in the European Union on Google, YouTube, and partner properties, Fidesz is among top 10 advertisers in the EU.⁹⁸ Google data on political advertising in Hungary,⁹⁹ since 12 February 2022, shows that Fidesz¹⁰⁰ and Aktuális Média Nonprofit Kft.¹⁰¹ are top advertisers based on the money spent on ads.

⁹⁴ The data analyzed is for the 30 days period, 15 February - 16 March 2022.

⁹⁵ According to the Ad Library, the following amounts were spent: Megafon (242.939.333 HUF), Mediaworks Hungary Zrt. (187.979.284 HUF), erosito.hu (109.567.923 HUF), EzaLényeg.hu (95.357.684 HUF), Fidesz (94.665.151 HUF), Aktuális Média (94.135.658 HUF), and kormányvaltok.hu (87.814.705 HUF).

⁹⁶ According to the Ad Library, the mentioned pages spend the following amounts: the Solution Movement (60.966.593 HUF), Fidesz (46.003.571 HUF), and Unity of Hungary (23.252.954 HUF).

⁹⁷ According to the Ad Library, the mentioned profiles spend the following amounts: Márki-Zay Péter (69.999.548 HUF), Orbán Viktor (33.999.585 HUF), and Dúró Dóra (30.329.424 HUF).

⁹⁸ Since 20 March 2019, a total of 66 political ads and 553.450 EUR spent. [Google Transparency Report](#)

⁹⁹ [Google Transparency Report](#)

¹⁰⁰ A total of 27 ads and 46.300 EUR spent. [Google Transparency Report](#)

¹⁰¹ A total of 2 ads and 42.850 EUR spent. [Google Transparency Report](#)

Media

Media environment

Overall, the media landscape in Hungary is diverse and includes public and commercial broadcasters, as well as a variety of printed press and electronic media with local and national coverage. However, high concentration of media ownership and economic and political interests of the owners are widely perceived to be influencing media reporting and limiting media plurality, as well as voters' possibility to make a truly informed choice.

The Internet has become one of the most important sources of news, putting in second place TV and radio,¹⁰² as the online sphere is rated as the most independent segment of the Hungarian media space.¹⁰³ According to ENEMO interlocutors, people from the urban areas mainly use the internet to access the news, while in the rural areas public TV and local press are main sources of information.

The Constitution guarantees the right to freedom of speech and expression. It recognizes and protects the freedom and diversity of the press, and ensures the conditions for free dissemination of information necessary for the formation of democratic public opinion.¹⁰⁴ The media legal framework (the Media Act and the Press Act) provides general preconditions for media freedoms. The Media Act establishes the National Media and Info-communication Authority (NMHH) and Media Council as independent bodies mandated to oversee and guarantee the freedom of press within the framework of the Media Act and Press Act, including carrying out the supervisory and oversight responsibilities defined by law; operating a program monitoring and analyzing service, etc.

The conduct of media during the campaign is regulated by the Electoral Procedures Act, which obliges media to cover the campaign by providing equal and unbiased conditions to contestants. The NEC decides upon complaints relating to the violation of the provisions of the Electoral Procedures Act concerning media service providers and the press, while parliamentary single-member constituency election commission decides upon complaints relating to a district, local or on-demand media service or a press product.¹⁰⁵

On 13 January 2022, the public media established the Public Election Office (KVI) responsible for ensuring that all media content services in the public media comply with the provisions of the Civil Service Code and relevant legal provisions during the campaign and elections. The KVI supervises the legal and equal opportunity publication of political advertisements in public media, balanced coverage of other election-related media content, such as news programs and political briefings, and the allocation of airtime for public service media services accordingly.

¹⁰² University of Oxford, Reuters Institute for the Study of Journalism, [2021 Digital News Report](#)

¹⁰³ Freedom House, Data on Freedom on the Net 2021, [Hungary Report](#)

¹⁰⁴ The Constitution of Hungary, Article IX

¹⁰⁵ The Election Procedure Act, Section 151 (1)

Traditional media

During the campaign period, the public media is required by law to broadcast political advertisements by parties and national minority lists free of charge, while commercial broadcasters can decide whether to provide advertising or not, but it must do so free of charge for all contestants.¹⁰⁶ From among the commercial broadcasters only RTL Televízió Zrt.¹⁰⁷ is registered to provide free of charge political advertisement suggesting a decline in media interest to get involved in politics related matters.¹⁰⁸ When it comes to the referendum campaign, the Government and the seven parties with the parliamentary faction are entitled to publish their political advertising in public media.¹⁰⁹

ENEMO observers, both on the local and national level, reported unequal access of electoral contestants to media, biased news reporting, and negative rhetoric and campaigning towards candidates. In particular, public media is perceived to reflect biased reporting with the lack of investigative journalism.

On 6 March, the opposition parties protested in front of MTVA complaining about unequal opportunities and media space for all election participants given the fact that the opposition could not appear on public television. They also protested against the spread of pro-Russian propaganda through public media. Few days later, the Public Election Office (KVI) made the decision to grant 5 minutes for opposition parties' presentations on public broadcaster M1 and public radio Kossuth.¹¹⁰

ENEMO notes that given the overall media environment and strongly present self-censorship, the public service media is inadequate to provide voters with objective and impartial information about the electoral contestants.

Electronic media

Paid advertisement is allowed in print and electronic media, which are obliged to determine and publish their price lists within legally defined deadlines.¹¹¹ ENEMO notes that among registered electronic media, the biggest independent outlets showed no intention to provide political ads.

¹⁰⁶ Public media have to devote a total of 470 minutes to the political advertisement of the parties running in the elections. This means that the parties are allowed to publish their political advertisements in the public media services for 78 minutes and 20 seconds per party list (The National Electoral Commission, Decision No. 124/2022). National minority lists get less time, a total of 130 minutes, thus lists running for these elections may publish their political advertisements in the public media services for 10 minutes and 50 seconds per minority list (The National Electoral Commission, Decision No. 125/2022).

¹⁰⁷ The national broadcaster RTL KLUB is entitled to publish political advertisement for a period of 39 minutes 10 seconds for a party list (The National Electoral Commission, Decision No. 126/2022), and 5 minutes 25 seconds for a national minority list (The National Electoral Commission, Decision No. 127/2022).

¹⁰⁸ During the 2018 elections, there were three commercial media registered to provide political advertisement.

¹⁰⁹ For a period of 37 minutes 30 seconds each on the public broadcasters (The NEC, Decision No. 5/2022), and for a period of 18 minutes and 45 seconds on RTL KLUB (The NEC, Decision No. 54/2022).

¹¹⁰ Representatives of political parties receive airtime to present their election program every Wednesday and Thursday from 16 March in the program M1 – This Morning before the 8 o'clock news, Kossuth Radio - Good Morning, Hungary! Representatives of the national minority lists will be able to present their program on Duna television on 25 March and 1 April, in the five-minute time frame as well.

¹¹¹ State Audits Office, <https://www.asz.hu/hu/valasztasok>

ENEMO media analysis has shown that the electoral campaign was visible in electronic media even before 12 February, when the campaign officially started. However, after 24 February, the political campaigning in the media was conducted in the shadow of the Russo-Ukrainian war, when the number of media articles regarding the elections 2022 was reduced from almost 8 to 5 articles per day on average. Namely, political rhetoric in the media was highly influenced by the invasion of Ukraine, which caused a quick switching of narratives of both the ruling coalition and the opposition during the campaigning period.

With regards to the electronic media, ENEMO used a media monitoring methodology that focused on content-based quantitative and qualitative analysis. The quantitative measurements include data on the amount of election related media articles in electronic media, while the qualitative measurements comprise the tone of the article (positive, negative or neutral) with additional assessment of the balance in media reporting. By analyzing the media coverage in detail, it may be concluded that in the monitoring period¹¹² the observed electronic media¹¹³ generally reported in neutral tone (66 percent), negatively (28 percent) and least positively (4 percent) on electoral contestants.¹¹⁴ The data suggests that the electronic media endeavors to preserve its independence, although in some cases unbalanced reporting is noted. At the same time, media articles often refer to Facebook statuses and YouTube videos as their main source of information to report about some events. This reflects the importance political parties give to social media during these elections.

Social media

Social media platforms are crucial for these elections and political campaigns show the fact that political parties maintain their internet presence and engage directly with voters through social networks, mostly Facebook. Other social media channels, such as YouTube and Instagram were used, as well as alternative apps popular among younger generations like TikTok and Spotify podcasts. Hiring professionals for social media campaigning, i.e. PR and communication companies, as well as local influencers for the dissemination and multiplication of political content were used too.

Since the Internet presents an important source of news and plays a significant role in the campaign coverage, the lack of specific regulation regarding social media raises concerns about the influence of campaigns targeting a high number of recipients and therefore may have an impact on the forming of political opinion.

ENEMO social media analysis has shown a high activity of meme pages during the run up to the elections. It is noted that both pro-government and pro-opposition meme accounts have a relevant share in political content creation. Cases of dissemination of content created with the aim to discredit political opponents and women in politics were visible as well.

¹¹² Monitoring was conducted for the period from the official start of the electoral campaign, 12 February 2022, until 12 March 2022 for the Interim report.

¹¹³ Monitored electronic media: 24.hu, Origo, Index, Hirado, Telex, HVG.

¹¹⁴ In total 1092 articles published during the monitoring period were analyzed, out of which 1067 articles were inspected in terms of the reporting tone. 25 articles were not accessible due to the paywall system.

Gender representation

The Fundamental Law of Hungary establishes that women and men are equal and “by means of separate measures, Hungary shall help to achieve equality of opportunity and social inclusion.” Hungary has ratified the Convention on the Elimination of All Forms of Discrimination against Women in 1980. Although the engagement of women in politics remains low, there is no specific legal mechanism aiming to increase women participation in politics. Some political parties introduced voluntary political party quotas. Namely, Hungarian Socialist Party (MSzP) introduced a 20 percent quota for women, while the Hungary’s Green Party (LMP) introduced electoral lists with maximum two repeated candidates of the same sex that may follow each other.¹¹⁵

Women are underrepresented both at the Parliament and the Government. Only 26 of 199 Hungarian National Assembly members are women, or 13 percent.¹¹⁶ Consequently, on the international level, Hungary ranks 151 out of 190 countries in the world based on women representation in the Parliament. Also, only 3 out of 14 cabinet ministers are women of which two are ministers without portfolios. In this respect, an important event was the election of the first woman president, Katalin Novak, by the parliament on 10 March.

Low engagement of women is well demonstrated by the number of women candidates registered for the upcoming elections, in particular, for single-member constituency elections out of 657 candidates, 116 are women (17.65 percent); for proportional race, out of 1,035 candidates on national party lists, only 205 are women (19.80 percent). Women are better represented on national minority lists as out of 111 candidates there are 48 women (43 percent). It should be also noted that four of them are in the first place of their respective national minority lists.

When it comes to the media representation of women in politics during these elections, ENEMO notes that from the monitored content in electronic media only 5 percent addressed women. The most mentioned women were Judith Varga, Klara Dobrev and Katalin Novak. As political campaigns took place on social media, content with the discrediting elements aiming at women in politics through graphic and video modifications and the use of technology was visible as well, mainly through the posts created by the meme pages.¹¹⁷

National minorities

The Fundamental Law determines national minorities living in Hungary as constituent parts of the State and determines their basic fundamental rights such as the right to use their language, promote

¹¹⁵ [Gender Quotas Database, Hungary](#), International IDEA,

¹¹⁶ The EU average is 30.4 percent, the world average is 25.5 percent.

¹¹⁷ Some examples include: <https://www.facebook.com/180410562652019/posts/931245487568519>, <https://www.facebook.com/543343849207697/posts/1933788413496560>, <https://www.facebook.com/106012238192043/posts/376453011147963>, <https://www.facebook.com/368910719950610/posts/2123292787845719>.

culture, receive education in their language, as well as the right to establish their self-governments.¹¹⁸

Act CLXXIX of 2011 on the Rights of Nationalities regulates in more detail the rights of national minorities, including the election of national minority self-governments and their competencies. According to the law, there are 13 officially recognized national minorities in Hungary.¹¹⁹ National minorities received the right to present a minority list based on Act CCIII of 2011 on the Election of the Members of the National Assembly and had an opportunity to use this right for the first time in parliamentary elections of 6 April 2014¹²⁰

As ENEMO received information from some of its interlocutors, due to economic and social conditions Roma minorities are often targets of vote buying and pressure in order to ensure their support for certain political contestants.

Ballot papers for a national minority list drawn up by a national minority self-government should contain a reference to the national minority. Part of the ballot should be printed in the language of the specific national minority.

Complaints and appeals

Filing of complaints and appeals related to election violations is regulated by the Act on Election Procedures. Any natural or legal person affected by the violation of election regulations has the right to lodge a complaint with the competent authority. CoECs are adjudicating complaints regarding the activities and decisions of the PSCs and other acts committed at polling stations, complaints concerning the single-member constituency election, as well as complaints related to district, local or on-demand media service providers. NEC is authorized to adjudicate all other complaints and appeals against the decisions of CoECs. Decisions of election administration can be appealed to the Supreme Court, while the constitutionality of the Supreme Court decisions can be challenged to the Constitutional Court.

Complaints should be filed within three days from the date of respective violation and/or decision. Complaints should be adjudicated within three days from the receipt of a complaint. Taking into account short timeframes of elections, ENEMO considers that established timelines for filing and adjudicating complaints are acceptable. As ENEMO observed and based on information received from the NEC, complaints were mostly adjudicated within determined deadlines.

At the NEC sessions attended by ENEMO, complainants were never present, although as ENEMO was informed they can attend sessions, where their complaints/appeals are considered. Draft decisions for complaints are prepared by the NEO which are mostly approved without changes by

¹¹⁸ Article XXIX of the Fundamental Law.

¹¹⁹ Armenian, Bulgarian, Croatian, German, Greek, Polish, Roma, Romanian, Ruthenian, Serbian, Slovakian, Slovenian and Ukrainian.

¹²⁰ In the last parliamentary elections held in 2018 German national minority list won one mandate.

the NEC. The Supreme Court and the Constitutional Court adjudicate complaints without public hearing.

During the reporting period, NEC received a total of 56 complaints and appeals. Complaints concerned alleged violations in respect of abusing state resources in campaign, posting/sharing of information on social networks by commission members, placing of posters, collection of signatures; etc. 18 complaints and appeals were rejected without examining merits. In most cases the reason was the lack of required personal data, violation of deadlines, complaints were filed by unauthorized persons, etc. 14 complaints were upheld/partially upheld by the NEC, while 24 complaints/appeals were rejected. 32 appeals were submitted to the Supreme Court, out of those eight were rejected without examining on merits. Five constitutional complaints were lodged with the Constitutional Court, out of which in two cases the Constitutional Court overruled the decision of the Supreme Court.¹²¹

Observers

Domestic civil society organizations are not allowed to observe elections, which contradicts best international practice¹²² and does not ensure a large-scale non-partisan and civic observation. Apart from that, legislative regulations establish unreasonable requirements for CSOs. In 2021, the parliament adopted a new law on the transparency of non-governmental organizations active in the field of public policy.¹²³ According to the new law, the State Audit Office is authorized to check organizations with balance sheets exceeding a certain amount during the year.¹²⁴ Besides that, CSOs, especially those critical towards the Government have to operate under pressure, because of discrediting rhetoric, conducted against them mostly by the ruling party.¹²⁵ Another problem that CSOs face in Hungary is lack of funding, which in conjunction with the existing legislation prevents them from being actively and effectively engaged in monitoring elections.

International observers have the right to observe all stages of elections. Election management bodies, primarily NEO and NEC, were cooperative, transparent and provided all the requested information to ENEMO's observers. Accreditation of ENEMO observers was conducted in a timely manner without any hindrance, that should be positively assessed. As of 18 March, the NEO has accredited 557 international observers in total.¹²⁶

¹²¹ Other three cases are still pending.

¹²² Paragraph 8, [1990 Document of Copenhagen Conference](#).

¹²³ The adoption of the act was caused by the judgment of the Court of Justice of 18 June 2020, *Commission v. Hungary*, C-78/18. With the adoption of the new law the Act LXXVI of 2017 on the Transparency of Foreign Funded Organizations was abolished, as according to the Court of Justice it violated the EU Treaties and fundamental rights.

¹²⁴ [XLIX of 2021 Law on the Transparency of Non-governmental Organizations Active in the Field of Public Life](#)

¹²⁵ 2021 Rule of Law Report, Country Chapter on the rule of law situation in Hungary, European Commission, SWD(2021) 714 final, 20 July 2021.

¹²⁶ [Accredited observers](#): ENEMO - 285 observers; OSCE/ODIHR - 43; OSCE PA - 102; Silba - Initiative for Dialogue and Democracy - 50; AGORA Election Observation - 35; IRI - 11; Sejm of Poland - 7; Embassy of France in Budapest - 4; Civil Alliance for Development (Georgia) - 4; British Embassy - 3; Embassy of the Kingdom of Norway - 11; Civic Chamber of the Russian Federation - 2.

As regards partisan observation, organizations that delegate members to the NEC are entitled to appoint up to five observers to the NEO for verifying the lawfulness of voters' identification documents and ballot counting. National self-governments of national minorities do not enjoy this right. Also, Political parties and independent candidates can have not more than two observers at each diplomatic mission. Accredited media representatives have the right to observe voting and counting procedures at polling stations.

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 29 September 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.

ENEMO member organizations have monitored more than 250 national elections and trained more than 240,000 observers.

To date, ENEMO has organized 38 international election observation missions to 10 countries: Serbia 2022, Presidential and Parliamentary Elections; Georgia 2021, Local Elections; Kosovo 2021, Local Elections; Albania 2021, Parliamentary Elections; Moldova 2021, Parliamentary Elections; Moldova 2020, Presidential Elections; Ukraine 2020, Local Elections; Montenegro 2020, Parliamentary Elections; Serbia 2020, Parliamentary Elections; Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2019, Parliamentary Elections; Armenia 2018, Early Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Local Elections; Ukraine 2014, Parliamentary Elections; Ukraine 2014, Presidential Elections; Ukraine 2013 – re-run of Parliamentary Elections 2012 in 5 DEC; Kosovo 2013, Local Elections; 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 rerun; Ukraine 2004, Presidential Elections;

ENEMO member organizations are: Center for Civic Initiatives CCI, Bosnia and Herzegovina; Center for Democratic Transition – CDT, Montenegro; Centre for Monitoring and Research – CeMI, Montenegro; Center for Free Elections and Democracy – CeSID, Serbia; 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; Center for Research, Transparency and Accountability (CRTA), Serbia; Obcianske OKO (OKO), Slovakia; Committee of Voters of Ukraine (CVU), Ukraine.