

# FINAL REPORT

International Election Observation  
Mission to Serbia



Presidential and Early  
Parliamentary Elections  
**03 April 2022**





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Presidential and Early Parliamentary Elections,  
03 April 2022

The English version of this report is the only official document of ENEMO IEOM.



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# EXECUTIVE SUMMARY

Presidential, early parliamentary, and local elections in 14 localities were held on 3 April, 2022. A total of 19 electoral lists were running in the early parliamentary elections, while eight candidates were running in the presidential elections, of which three were women candidates. The Republic Electoral Commission (REC) announced that the final voter turnout was 59.3 percent. Incumbent President Aleksandar Vucic was reelected with 60 percent of the votes in the first round.

For early parliamentary elections, based on voting held on 3 April and repeated voting at 54 polling stations on 16 April, and at one polling station on 28 April, 27 May, 23 June and 30 June, the list led by the Serbian Progressive Party (SNS) won the largest share of votes. This was followed by the opposition list United for the Victory of Serbia (UZPS), and the list Ivica Dačić - Prime Minister of Serbia. In total, 12 out of 19 lists that ran in parliamentary elections passed the three percent threshold (one percent for national minority parties) required to obtain seats in the next Parliament.

The legal framework of Serbia provides grounds to hold democratic elections. At odds with international standards, the legal framework was broadly amended only two months prior to Election Day which raised concerns regarding its effectiveness in terms of implementation. Despite the inclusive amendment process, several key aspects of elections were not addressed. Amendments to campaign financing rules and media were insufficiently addressed, thus previous recommendations issued by international or domestic observer organizations are yet to be fulfilled.

The 3 April presidential and early parliamentary elections were managed by a three-tiered administration led by the REC. For the first time, established mid-level bodies were substantially involved in the election process. In addition, due to the amendments, non-parliamentary parties' temporary representation at all levels of the election administration was considered. However, not all of them could exercise this right, as a significant increase in the number of members of election commissions within short time frames made it more difficult to find members for lower levels of the administration. Regardless of a more balanced representation of political parties in the Election Administration, the political appointment of its members, which still favored the ruling party in permanent composition, remained a concern for some ENEMO interlocutors.

Overall, ENEMO positively assesses the performance of the REC as the technical aspects of the elections were managed in line with the legislation, and all legal deadlines were met. However, multiple challenges were faced, including time-constrained access while sharing the REC's provisions and bylaws with the lower level election bodies leaving space for ununified understanding as well as a prolonged process of re-voting and establishing the final results.

The REC operated in an overall transparent manner and adopted all decisions collegially by the majority of all members while ensuring quorum. Sessions broadcasted live on the REC web page were open and accessible. However, as agendas were not published in advance, the voters and interested stakeholders did not benefit from prior public notice when the sessions were broadcasted live.

The voter and civic information campaign were limited and lacked content and diversity of sources;

moreover, an effective targeted voter information campaign aimed at encouraging the participation of voters, mainly for the vulnerable groups, was not observed. ENEMO notes that although the REC was overall responsible for conducting awareness-raising campaigns, LECs could have used their capacity to ensure more participation in the elections and promotion to make a better-informed choice.

Compared to the previous elections, the errors and discrepancies in Polling Boards' final protocols were minor. However, voting results could not be established at 89 polling stations, where repeated voting was appointed. ENEMO notes that these shortcomings could be related to poor understanding of the legal framework and a lack of knowledge, since not all the PS members exercised the right to undergo the courses proposed by the REC as participation was not mandatory. As evoked above, repeated voting organized five times in Bujanovac delayed the establishment of final results for three months. Despite the REC overcoming the challenge and implementing its duties in line with the law, delays in the process impacted the work of the election administration.

In Serbia, voter registration is passive and continuous. The Ministry of Public Administration and Local Self-Government (MPALSG) is responsible for maintaining and forming the Voters' Register. ENEMO assesses that the voter registration process generally lacked transparency. Furthermore, concerns about the accuracy of the Voters' Register, mainly regarding the number of deceased voters and allegations of "phantom voters," led to the low trust of election stakeholders in the quality of the Voter Register. Despite the possibility of the inspection given to voters in person and/or through an online platform, political parties and civil society organizations lacked the opportunity for public scrutiny. In addition, ENEMO notes that the omission of the residency requirement that was introduced for the 2022 elections, could have led to granting citizenship in an organized way, leaving space for artificial migration of voters, and expresses concerns regarding the possible abuse of the right to change residence addresses, especially in the context of the local elections, particularly for voters that were previously residing in neighboring countries.

The REC registered 19 candidate lists with 2,912 candidates, including eight parties, nine coalitions, and two groups of citizens for the parliamentary elections and eight presidential candidates in a generally inclusive manner. Due to new provisions, the candidate lists had to be supported by at least 5 000 certified signatures of voters for the minority parties, which increased the electoral process's apparent competitiveness. However, ENEMO notes that the lack of a clear definition of how national minority status was determined affected legal certainty as well as the integrity of the candidate registration process and left space for manipulation. In addition, unequal treatment and unnecessary restrictions were reported by ENEMO interlocutors while verifying the supporters' signatures as the process was perceived as excessively arduous and overly bureaucratic. Furthermore, contrary to international standards, the possibility for voters to express their support for a multiparty democratic system was limited, as each voter was able to support only one electoral list.

The electoral campaign was inclusive and fundamental freedoms were mostly respected, with candidates generally free to conduct their campaigns. However, the environment was heavily marred by allegations of misuse of state resources, abuse of incumbency, vote-buying and voter intimidation especially towards public employees by ruling coalition parties. Many of these forms of pressure were quoted as continuous, and started well before the official start of the electoral process. ENEMO assessed that allegations of voter intimidation and vote-buying affected general trust in the electoral process, while longstanding practices of misuse of state resources and abuse of incumbency did not provide for a level-playing field. In general, the blurring of line between party and state, at odds with international standards, negatively impacted the campaign environment.

Despite improved provisions on campaign finance transparency which brought the legal framework more in line with GRECO recommendations, longstanding issues related to unreported expenses in elec-



toral campaigns remain of particular concern. Interlocutors of the mission emphasized that oversight and sanction mechanisms remain largely inefficient in preventing violations. ENEMO observed that several interim financial reports on campaign expenditures were not available on the Agency for the Prevention of Corruption (ACA) website by the legal deadline, which hindered campaign finance transparency. The mission noted a lack of proactive stance by the ACA to address shortcomings in time, and an absence of sanctions taken before Election Day for non-compliance with the new interim financial reporting requirement. Generally, by limiting sanctions mostly to warnings, the ACA did not use the array of reinforced sanctions which it had at its disposal in the amended law, such as administrative fines.

The lack of diverse perspectives in broadcast media limited voters' access to pluralistic information. There was an extensive concern over media independence restricting independent reporting, due to the fact that media are prone to political and economic pressures as a consequence of non-transparent ownership and financing. Many ENEMO media interlocutors expressed concerns about public media being biased towards the government and a number of mainstream private media partial towards some segments of the opposition. The ruling party used the President's position to its benefit, since extensive reporting about his activities dominated in most media outlets.

Coverage by state owned media, particularly the public broadcaster, was inclined to give greater advantage to the ruling party at the expense of the other parties, despite being obliged by the law to give unbiased coverage to all contestants. In addition, social networks were used extensively to point targeted advertisements and to communicate directly with voters. Although social media were seen as an increasingly influential campaign tool, many ENEMO interlocutors expressed concerns in regard to dissemination of messages which could have misinformed voters and created misperception.

Overall, the REM persisted unassertive in regulating media conduct during the campaign. Many stakeholders from the media sector emphasized the lack of proactiveness and accountability of the REM, especially when it comes to monitoring of the election campaign. They do not perceive REM as an authority, which undermines its public credibility. Despite the array of sanctions at its disposal, the REM limited its sanctions to warnings, which had a limited effect and did not function as a dissuasive sanction to prevent further violations.

The legal framework related to complaints and appeals was significantly amended and addressed previous recommendations in terms of providing adequate time limits for submitting as well as for reviewing complaints. However, complaints submitted to LECs lacked transparency in general, as there is no unified public registry of complaints at the LEC level.

In the limited number of polling stations observed by ENEMO on Election Day (3 April), procedures including counting were generally conducted efficiently and in accordance with the law. However, the mission was informed of cases of attacks and physical altercations in the vicinity of polling stations, violence towards candidates, and long queues of voters outside polling stations. Reportedly, although voters in queues at the time of closing (20:00) were generally allowed to vote with delays, several voters in queues were denied the possibility to exercise their right. Accordingly, this caused delays in the counting and tabulation process.

# INTRODUCTION AND ACKNOWLEDGMENTS

On 01 February, the European Network of Election Monitoring Organizations (ENEMO), following of-  
ficial accreditation by the Republic Election Commission of Serbia, deployed an International Election  
Observation Mission (IEOM) to Serbia to observe the 3 April 2022 Presidential and Early Parliamentary  
Elections.

ENEMO deployed six Core Team experts, of whom five experts were based in Belgrade. The Mission  
was headed by Mr. Pierre Peytier. The IEOM additionally deployed 10 Long-Term Observers (LTOs) to  
observe electoral preparations. The mission did not engage additional short-term observers and, as a  
result, did not conduct a comprehensive observation of the voting and counting process on Election  
Day. However, the mission provided information on the preparation and conduct of the elections, and  
observed a number of selected polling stations on the day of voting<sup>1</sup>.

The mission monitored and assessed the overall political and electoral environment, conduct of election  
management bodies, candidate registration, voter registration, campaigning, electoral dispute resolu-  
tion and other crucial aspects of the process, based on international standards for democratic elections  
and the legal framework of Serbia.

In the course of observation, in order to obtain relevant information, Core Team experts conducted 374  
meetings with different interlocutors such as election management bodies, political entities, state offi-  
cials, media, embassies, international and domestic civil society organizations.

The IEOM published an Interim Report and a Statement of Preliminary Findings and Conclusions, on 22  
March<sup>2</sup> and 4 April<sup>3</sup>, respectively.

This Final Report is based on ENEMO's findings from the pre-election period, the Election Day and  
post-election developments. It also contains a total of 46 recommendations addressed to various stake-  
holders for improving the legislative framework and identified shortcomings in the electoral process.

ENEMO would like to express its gratitude to all state authorities, especially the Republic Electoral Com-  
mission, as well as other interlocutors, including civil society, international community, media and polit-  
ical entities for their cooperation during the monitoring mission.

ENEMO's International Election Observation Mission would also like to thank the National Endowment  
for Democracy (NED), for financially supporting the mission.

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<sup>1</sup> On Election Day, ENEMO deployed five multinational teams of observers to follow the process of preparation and opening of polling stations,  
the voting and counting process, as well as the transfer and intake of election materials by LECs. Observation teams, composed of the mission's  
10 Long Term observers, monitored the opening procedures in five polling stations, voting in 90 polling stations, and closing and counting in  
five polling stations. Additionally, ENEMO observed the intake of election materials and tabulation of results in five LECs.

<sup>2</sup> <http://enemo.eu/uploads/file-manager/ENEMOInterimReportIEOMSerbia2022.pdf>

<sup>3</sup> [http://enemo.eu/uploads/file-manager/ENEMOStatementofPreliminaryFindingsandConclusionsSerbia2022\\_SRB.pdf](http://enemo.eu/uploads/file-manager/ENEMOStatementofPreliminaryFindingsandConclusionsSerbia2022_SRB.pdf)

# I. BACKGROUND AND POST-ELECTION DEVELOPMENTS

On 3 April 2022, three elections were held on the same day in the Republic of Serbia: presidential, early parliamentary, and local elections in 12 municipalities and two cities, including Belgrade<sup>4</sup>. Early parliamentary elections were called on 15 February, following President Aleksandar Vucic's dissolution of the National Assembly (Parliament). In accordance with provisions enshrined in the Constitution, regular presidential elections were called on 2 March, and officially announced by the President of Parliament.

The Parliament was dissolved on the basis of the legal provisions enshrined in Article 109 par. 1 of the Constitution, according to which the President of the Republic can dissolve the National Assembly upon a reasoned proposal of the Government. ENEMO notes that these provisions are unclear, as they do not specify the notion of "reasoned proposal", and therefore remain highly subject to interpretation<sup>5</sup>.

Previous presidential elections were held in 2017, with a victory of then Prime Minister Vucic, nominated by the Serbian Progressive Party (SNS). Mr. Vucic has headed the SNS since 2012, and the party has dominated the political landscape in a strongly polarized environment between the majority and opposition parties.

Previous parliamentary elections in 2020 were postponed from April to June that year<sup>6</sup>, in the context of the first months of the COVID-19 pandemic, with limited opportunities for campaigning. Additionally, they were subject to a boycott by the political opposition, which claimed unfair campaign conditions and a biased media environment. SNS obtained an absolute majority in the National Assembly, and the government took office in August 2020 with a renewed majority coalition between SNS and the Socialist Party of Serbia (SPS), along with three other parties<sup>7</sup>. Shortly after the 2020 parliamentary elections, President Vucic announced that early parliamentary elections would be held in 2022. On 29 October 2021, an agreement was reached among several political parties and the government to hold early parliamentary, presidential and municipal elections on the same day (3 April 2022).

Following the 2020 parliamentary elections, three different initiatives were taken with an aim to improve the electoral process. The first was an inter-party dialogue under international mediation by the European Parliament. The second was a national dialogue between governmental parties and opposition parties in Parliament. The third was a Working Group, led by the government in cooperation with the OSCE-ODIHR, which intensified in December 2020. The first initiative (inter-party dialogue) led to the adoption of 16 measures to improve the conduct of elections, despite several opposition parties deeming these measures insufficient.

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<sup>4</sup> ENEMO's 2022 IEOM to Serbia was officially observing the presidential and early parliamentary elections. However, the mission has reported on aspects of the local elections' process, provided that these aspects had a relevant impact on the other two processes.

<sup>5</sup> The mission additionally notes that during the observation process, the Decision officially announcing the elections and including the rationale behind the dissolution of the National Assembly, therefore triggering early parliamentary elections, was not publically available.

<sup>6</sup> See ENEMO Final Report on the conduct of the 21 June 2020 parliamentary elections: <http://enemo.eu/uploads/file-manager/ENEMOFinal-Report.pdf>

<sup>7</sup> Party of United Pensioners of Serbia (PUPS), United Serbia (JS), and Social Democratic Party of Serbia (SDPS).

The 2022 election preparations unfolded in a considerably polarized socio-political context. This includes in particular public protests in 2021 which culminated on 4 December and later in January 2022, related to environmental issues<sup>8</sup> and the adoption of two laws in particular<sup>9</sup>. Roadblocks and protests continued in the midst of the holding of a Constitutional referendum with an aim to reform the judiciary, held on 16 January.

Elections in Serbia were also held in a highly tense international context, following the military aggression by the Russian Federation on Ukraine, initiated by President Vladimir Putin on 22 February 2022. Additionally, all three electoral processes unfolded while discussions on potential NATO and EU membership accession remain ongoing in the country, as well as pending negotiations regarding the status of Kosovo.

Additional tensions in these elections were caused by a disagreement regarding the possibility for Serbian voters in Kosovo to exercise their right to vote in presidential and parliamentary elections. As of November 2013, local elections in any municipality in Kosovo are no longer organized by Serbia, but those with Serbian ID cards could vote in parliamentary and presidential elections. A change occurred in January 2022 in the framework of the referendum on constitutional amendments. Likewise in these elections, Pristina decided not to allow polling stations to open in Kosovo, and buses were organized to transport voters from Kosovo to Serbian cities<sup>10</sup>.

A total of 18 electoral lists were running in the early parliamentary elections, while eight candidates were running in the presidential elections, of which three were women candidates.

Final results for the presidential elections were announced on 9 May, with incumbent President Aleksandar Vucic being reelected with 60 percent of the votes in the first round. However, the announcement of early parliamentary election final results were announced with very significant delays, due to the need to conduct repeated voting at several polling stations on 16 April and 28 April<sup>11</sup>, 27 May, 23 June and 30 June at one polling station. Voting at some polling stations was therefore repeated several times, hampering the announcement of results for the parliamentary elections in particular by one polling station in Veliki Trnovac (municipality of Bujanovac) where repeated voting was conducted for the second time on 27 May, a third time on 23 June, and a fourth time on 30 June<sup>12</sup>. This delay in the official announcement of final results further delayed the formation of the new government, while leaving considerable uncertainty in the process.

12 lists are expected to enter into Parliament, with the previously SNS-led coalition losing its majority in Parliament (see full results in annex).

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8 Namely protests to halt lithium exploitation in Serbia, and against the government's backing of the Anglo-Australian multinational mining corporation Rio Tinto.

9 A Law on Referendum and Public Initiatives and a Law on Expropriation.

10 On 22 March, President Vučić held separate meetings with the Ambassadors of the Quint countries (USA, UK, France, Germany and Italy) and with political representatives of the Serbs from Kosovo. Prior to those meetings, a session of the National Security Council was held in Serbia. On 22 March, the EU confirmed that Kosovo rejected the proposal of the Quint states regarding a solution proposed for the voting of Kosovo Serbs in the elections. On 24 March, the REC decided that voters from Kosovo could vote in Bujanovac, Raska, Kursumlija and Tutin.

11 Voting in the presidential elections was repeated at 36 polling stations, and at 54 in the parliamentary elections.

12 Elections there were repeated twice within one month in this locality, following a complaint from the "Coalition of Albanians" list which led to the annulment of the voting conducted on 28 April.

## II. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

### Legal framework

Parliamentary elections and Presidential elections are primarily regulated by the 2006 Constitution<sup>13</sup>; the Law on the election of members of Parliament and the Law on the election of the President of the Republic<sup>14</sup>. Other laws regulate several important aspects of elections such as: the Law on the Unified Electoral Register<sup>15</sup>, the Law on Administrative Disputes<sup>16</sup>, Law on Financing Political Activities and Law on political parties<sup>17</sup>; Law on Prevention of Corruption and the Law on local elections<sup>18</sup>.

Early Parliamentary and Presidential elections were conducted under a significantly amended legal framework. As a result of inter-party dialogues, on 18 January, 2022, the Government introduced proposals for four new election laws that were adopted by the National Assembly on 4 February, 2022. Together with the adoption of the new electoral laws, the Law on Prevention on Corruption was amended. Despite the review process being inclusive, some key aspects of the electoral legal framework were amended only two months prior to the elections, which is at odds with international standards and affected the stability of the electoral law.<sup>19</sup> ENEMO noted that in some cases, late amendments led to misunderstanding of some procedures and confusion during Election day.

*ENEMO recommends considering all fundamental amendments to the legislation within a reasonable time-frame, giving an equal possibility of participation in elections to all electoral contestants.*

These legal amendments did not fully address several key election-related issues, including rules governing media coverage, campaign finance regulations and misuse of administrative resources. Many ENEMO interlocutors raised concerns regarding the lack of substantial and effective legal guarantees to overcome cases of intimidation and pressure on voters. Moreover, insufficient and inconsistent regulations regarding misuse of administrative resources undermined the principle of equality among contenders, as those in power enjoyed uncompetitive access.

The revised legislation provided a different structure for election management bodies by introducing local electoral commissions, which replaced the previously existing two-tier system of the REC and Polling

<sup>13</sup> The Official Gazette of the Republic of Serbia, No. 98/2006 and 115/2021 from 11 November 2006.

<sup>14</sup> The Official Gazette of the Republic of Serbia, No. 14/2022 from 7 February 2022; The Official Gazette of the Republic of Serbia, No. 14/2022 from 7 February 2022.

<sup>15</sup> The Official Gazette of the Republic of Serbia, No. 104/2009 and 99/2011 from 16 December 2009.

<sup>16</sup> The Official Gazette of the Republic of Serbia, No. 111/2009 from 29 December 2009.

<sup>17</sup> The Official Gazette of the Republic of Serbia, No. 14/2022 from 7 February 2022; The Official Gazette of the Republic of Serbia, No. 36/2009 and 61/2015 from 15 May 2009.

<sup>18</sup> The Official Gazette of the Republic of Serbia, No. 35/2019, 88/2019, 11/2021, 94/2021 and 14/2022 from 21 May 2019; The Official Gazette of the Republic of Serbia, No. 14/2022 from 7 February 2022.

<sup>19</sup> Paragraph II.2.b of the 2002 Venice Commission's Code of Good Practice in Electoral Matters notes that the fundamental elements of electoral law should not be open to amendment less than one year before an election, or should be written in the constitution or at a level higher than ordinary law.

Boards. LECs were responsible for organizing technical preparations for elections, providing support to polling boards, as well as revising PB's decisions.

*Although the existing legal framework provides sufficient grounds for the conduct of democratic elections, ENEMO recommends improving the transparency and timeliness of the process, in order to guarantee efficient preparations by electoral management bodies and safeguard electoral contestants' and voters' rights.*

Among other amendments, the rules governing the dispute resolution process were modified with extended time limits for submitting complaints, as well as for the adjudication of election related disputes. Campaign financing rules were also significantly modified, although the efficiency of these amendments required to be implemented in a more accountable manner by electoral contestants as well as other relevant stakeholders (see Campaign Finance section).

*Large-scale amendments to the electoral legal framework should not be undertaken less than a year prior to Election Day, to ensure legal certainty and stability of the electoral legal framework.*

Following the amendments to the electoral legal framework, the REC, within its mandate, adopted several instructions further detailing aspects of the electoral process. Important legal sources for regulating elections were decisions adopted by the REC that were available on the REC webpage. Although the REC operated according to its Rules of Procedures<sup>20</sup>, ENEMO notes that in several cases the REC was responsible for filling gaps and inconsistencies in the legislation, putting the stability of the electoral legislation at risk and contrary to international standards.

*The main areas pertaining to electoral matters should be regulated by the law. Further amendments must limit areas requiring REC decisions regulating key electoral issues.*

## Electoral System

The 250 members of the National Assembly were elected through direct elections by secret ballot for four-year terms<sup>21</sup>. MPs were elected based on a party-list proportional representation system (List PR) with closed lists, where voters casted a single vote for their preferred party rather than voting for a candidate from that party in one nationwide constituency<sup>22</sup>.

Electoral lists that surpass three per cent of votes cast have the right to participate in the distribution of seats. The distribution of seats to candidate lists was calculated using the D'Hondt method.

The legal threshold was different for lists of national minorities. National minority parties and coalitions of such parties could participate in the distribution of mandates even if they received less than 3 percent of the total number of votes cast. When the highest quotients system is applied to the distribution of the mandates, the quotients of all electoral lists of national minority political parties or coalitions of national minority political parties should increase by 35 percent.<sup>23</sup>

According to the Constitution and the Law on the elections of the President of the Republic the president of Serbia is directly elected, by secret ballot, for a five-year term. A candidate is considered to be elected

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<sup>20</sup> The Official Gazette of the Republic of Serbia, No. 14/2022 from 7 February 2022.

<sup>21</sup> Article 100 of the Constitution of the Republic of Serbia.

<sup>22</sup> Articles 5; 128 and 129 of the law on the Election of Members of Parliament.

<sup>23</sup> Article 140 of the law on the Election of Members of Parliament.

if he/she received over one half of votes cast.<sup>24</sup>

According to the legislation, if no candidate receives more than 50 percent of the votes cast in the first round, a second round is held within 15 days between the two candidates who received the highest number of votes in the first round.

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<sup>24</sup> Article 18 of the law on the Election of the President of the Republic.



### III. ELECTION MANAGEMENT BODIES

Early Parliamentary and Presidential Elections were organized and conducted by a three-tiered Election Administration comprising the Republic Electoral Commission (REC), 166<sup>25</sup> Local Election Commissions (LECs) and 8, 267 Polling Boards<sup>26</sup> (PBs). Additionally, in order for each district of Serbia to manage electoral preparations, some 50 of its members were appointed as Regional Coordinators.

However, before the amendments introduced by the National Assembly in February 2022<sup>27</sup>, LECs operated only for local municipal elections, and the REC was mainly in charge of establishing a mid-level (intermediate) administration for other general elections known as Working bodies (WBs) to provide a logistical and technical link between the REC and PSs. The new provisions allowed LECs to be involved substantially in the election process for these presidential and parliamentary elections.

In addition, due to the amendments, the permanent composition of election management bodies was increased, enabling non-parliamentary parties' temporary representation at all levels of the election administration. Since the previous provisions were maintained, all registered political contestants were also allowed to appoint a member and a deputy in the extended composition to all levels of the election administration. However, not all of them were in capacity of exercising this right, as evidenced in the assessment below.

Generally, the Election Administration managed technical aspects of the electoral preparations efficiently and complied with the legal deadlines. LECs and PBs were provided with adequate resources and logistical support. The EMBs held regular meetings with the required quorum, and decisions were taken transparently and collegially. All observed EMBs were cooperative and open to observers. However, ENEMO observed a lack of preparedness of polling boards to adequately organize and conduct voting at polling stations. The professionalism of lower level commissions was deemed inadequate in several instances, leaving space for further improvements.

#### Republic Electoral Commission

The REC is a permanent independent election administration body organizing and implementing elections in Serbia. The REC is overall responsible for administering elections, including taking care of the legal conduct, registration, and proclamation of candidate/party lists, establishing and appointing members of lower-level commissions, conducting trainings for election administrators, and discussing and adjudicating complaints, determining election results, etc.<sup>28</sup>

<sup>25</sup> From the beginning, the REC determined 161 LECs for administering elections in the territory of Serbia. Later, the REC, based on its "Decision 02 Number 013-1009/22" in four municipalities, namely Bujanovac, Kuršumljija, Raška, and Tutin, created five LECs for the voters from Kosovo.

<sup>26</sup> Initially, 8 115 PBs were created in the territory of Serbia. Later, 29 polling stations were established in prisons, 77 - in 34 countries for out-of-country voting, and 46 - for voters from Kosovo.

<sup>27</sup> The Law on the Election of Members of Parliament, Law on the President of the Republic, and Law on Local Elections were amended and adopted by the National Assembly in February 2022.

<sup>28</sup> Article 24 of the Law on the Election of Members of Parliament.



According to the legislation, the composition of the REC consists of a chairperson, 16 members, a member responsible for statistical issues, and a secretary. The composition is proportional to the number of seats held by the parliamentary parties. The chairperson and members of the REC are appointed by the National Assembly, for four years, at the proposal of the parliamentary groups in the National Assembly. The Secretary, a member responsible for statistical issues, and their deputies are non-voting members of the REC.

For the 3 April elections, due to the amendments, the permanent composition of the REC was increased. In addition to the chairperson, 16 members and their deputies appointed by the parliamentary groups, there were an additional six members and deputy members assigned at the REC, based on the proposal of the President of the National Assembly<sup>29</sup>.

During the election period, the REC worked in its extended composition consisting of the chairperson and an additional 42 voting members for the parliamentary elections and 31 voting members for the presidential elections<sup>30</sup>. In compliance with the new legal provision<sup>31</sup>, gender balance in the REC composition was ensured.<sup>32</sup> Each registered contestant was entitled to appoint a member and a deputy, in line with the legislation.<sup>33</sup>

New provisions in the election legislation altered the composition of the Election Administration to increase public confidence through a more balanced representation of political parties. However, although the REC is an autonomous and independent body that managed to deal with the tasks assigned by the law respectively, the political appointment of REC's members, which significantly favored the ruling party in composition, remained a concern for some ENEMO interlocutors<sup>34</sup>.

*The composition formula of the Election Administration could be reconsidered, in order to increase trust and public perception in its impartiality and independence. The appointment rule could be revised to ensure a more balanced political representation and limit the dominance of a single party.*

The REC did not have a permanent service, while the National Assembly Service (NAS) provided professional and technical assistance. Despite the technical capacity offered by the NAS not hindering the functioning of the REC, the lack of permanent service limited its performance in conducting better voter informational campaigns, educational programmes for PS members and other technical aspects of elections<sup>35</sup>.

*ENEMO recommends further steps to increase the reliability and performance of the election administration by improving its technical and human capacity. This can be achieved by delivering targeted educational programmes for service employees, applying software platforms for the electronic registration of election stakeholders, providing gender-disaggregated statistics, making voting and election-related information more accessible, etc.*

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29 Non-voting members: A Secretary and a participant were responsible for statistical tasks, and their deputies were men.

30 In addition, non-voting deputies had the same rights while replacing their substitutes.

31 Article 19 of the Law on the Election of Members of Parliament.

32 The extended composition of the REC for the parliamentary elections comprised 42 voting members, including 14 women. Out of 41 deputies, 16 were women. The REC consisted of 31 voting members for the presidential elections, including 14 women and 31 deputies - 12 women.

33 According to the law, the REC worked and decided in an extended composition until the commission determined and announced the election results.

34 Paragraph 20 of the General Comment 25 to the ICCPR (<https://www.osce.org/files/f/documents/4/a/19154.pdf>) underlines the need to conduct the electoral process "fairly, impartially and in line with established laws compatible with the Covenant." The Code of Good Practice (<https://rm.coe.int/090000168092af01>) stipulates that "an impartial body must be in charge of applying electoral law"

35 For instance, according to ENEMO interlocutors, the election administration could not benefit from applying new software and platforms while registering LEC and PB members, observers, and media representatives because of the lack of human and sufficient financial resources.

The REC operated in an overall efficient and transparent manner, and adopted all decisions collegially by the majority of all members while ensuring quorum<sup>36</sup>. As the election legislation provides mainly general provisions, ENEMO positively assessed the REC's performance in clarifying and detailing election-related preparations and adopting several regulatory acts<sup>37</sup>. However, as the REC started its functions in its complete extended composition on 20 March, some of the essential regulations determining the electoral processes were adopted by the permanent composition. Some ENEMO interlocutors expressed concerns regarding the short timeframes, as the by-laws were adopted just several days before the official calling of elections. Furthermore, a matter of concern was time-constrained access while sharing all legislative provisions with the lower level election bodies, leaving space for various interpretations. The lack of clear, uniform, and timely guidelines for LEC members, limited the establishment of universal practices and created risk in the process.

*ENEMO recommends for the REC to define a clear and uniform interpretation of the law, promptly providing it to lower administration bodies to foster the establishment of universal practices that, as a result, would enable higher standards of credibility and trustworthiness.*

The REC met all the legal deadlines prescribed in the election legislation and election activity calendar<sup>38</sup>. During these elections, the REC held 79<sup>39</sup> sessions. The sessions were broadcasted live on the REC web page and were accessible to all interested stakeholders. All the members and accredited observers were provided with the agenda and materials before the sessions. However, even though most decisions of the REC were uploaded timely, the minutes of the sessions were not continuously published promptly<sup>40</sup>. The legislation does not require publishing agendas in advance, therefore voters and interested stakeholders did not benefit from prior public notice when the sessions were broadcasted live. Concerns should also be raised regarding the fact that the REC web page has an overly complex finding function in addition to not being user-friendly. Also, while the information was primarily updated regularly in the state language, ENEMO observed that the English version of the webpage did not contain most of the data.

*In order to increase transparency, publicity, and accessibility, consideration should be given to requiring prompt publication of all decisions, including minutes, and publishing REC session agendas in advance on the REC's web page. In addition, respective authorities should consider improving the maintenance of the REC's official web page.*

The REC conducted the voters' informational campaign and prepared educational materials, including videos accompanied by sign language. However, the voter and civic information campaign was limited and lacked content and diversity of sources. ENEMO did not observe any significant efforts to increase awareness of these elections and electoral procedures. The REC did not actively use social media platforms as an option for raising awareness on election-related topics. In addition, during the pre-election period, the REC did not conduct any press conferences or briefings to inform voters and all election stakeholders.

*ENEMO recommends developing various voter educational materials and using a diversity of sources, primarily social media, that could lead to voters making a more informed choice.*

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36 During two sessions, some REC members from the opposition accused the chairperson of lack of transparency and making decisions without consultations with all members.

37 Collection of Regulations on conducting elections scheduled for 03 April 2022.

38 On 23 February, the REC adopted the calendar for organizing and conducting the early parliamentary elections and on 3 March – for the presidential elections.

39 From calling Elections until the publishing final results.

40 Legislation does not provide any specific timeline for uploaded minutes of the REC sessions.

On Election Day, the REC provided frequent and regular updates on the conduct of voting to the media and the public. However, the preliminary results were not presented shortly after. Despite being in line with the legislation<sup>41</sup>, this lacked transparency in the process and led to space for speculations which could subsequently affect the election integrity of the elections.

*As publishing preliminary election results promptly is one of the critical aspects of election integrity, the REC should consider improving the election administration's capacity to inform all election stakeholders about Election Day conduct in a timely manner, therefore limiting space for mistrust or suspicions.*

Due to the 2022 amendments, the REC's responsibility to establish the election results of PBs was delivered to LECs<sup>42</sup>. However, the REC had an obligation of deciding ex officio on annulling the consolidated report of LECs on voting results and announce repeated voting if LECs had not established election results according to the provisions of the law.<sup>43</sup> As the REC reported, not all PBs and LECs protocols were accurate, which further led to several corrections<sup>44</sup>. Consequently, on 4 April, the REC determined the preliminary election results for parliamentary and presidential elections and repeated voting was announced for 54 polling stations for the election of MPs and 35 polling stations for the President of the Republic. At first glance, statistically, the number of polling stations for repeating voting was not high. However, errors and discrepancies could be connected with a lack of knowledge and uniform understanding of the legal framework. Although the REC organized training sessions for the LEC and PB members, not all the members exercised the right to undergo the proposed courses as participation was not mandatory. Furthermore, insufficient training was a particular concern of some ENEMO interlocutors.

*ENEMO recommends considering a more comprehensive, systematic, and all-embracing training session for all commission levels.*

In addition, mainly for the presidential elections, the conduct of repeated voting could not have changed the outcome of the elections due to the significant margin in votes received by contestants. Thus, the conduct of repeated voting constrained the REC and resulted in delays in establishing the final results<sup>45</sup>. The same can be mentioned regarding the multiple re-voting process in Bujanovac, where despite legal grounds, irregularities at the mentioned polling station could not have affected the election outcome for presidential elections, and there was no specific need to delay establishing the final results.

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41 According to Article 106 of the Law on the Election of Members of Parliament, PBs without delay, and no later than 12 hours following the closing of the PS, should deliver to the LEC the first and the second copies of the results protocols. In addition, the LEC, within 96 hours following the closing of the PS, is required to issue and submit a consolidated report on voting results to REC. Article 121 of the same law stipulates that within 96 hours following the receipt of all consolidated reports on voting results, the REC should compile and publish a general report on election results for all PSs.

42 The REC established results for the out-of-country voting.

43 Articles 119-120 of the Law on the Election of Members of Parliament.

44 488 minutes of the PBs were amended by the concerned LECs for the parliamentary elections (by Art. 108.5 of the Law on Election of MPs), and 466 minutes of the PBs were amended by the concerned LECs for the presidential elections.

45 The final results for the presidential elections were established on 9 May. <https://www.rik.parlament.gov.rs/vest/317359/70-sednica-republicke-izborne-komisije.php>

## Local Electoral Commissions (LECs)

The REC formed 166 LECs in total for the 3 April elections. Initially, 161 LECs were created within the legal deadlines and operated for organizing technical aspects of the electoral preparations. Later, on 24 March, the REC adopted a decision<sup>46</sup> allowing voters living in Kosovo to exercise their active voting rights. Subsequently, an additional five LECs in four municipalities were formed under exceptional circumstances, including 46 polling boards.

According to the legislation<sup>47</sup>, permanent LECs are municipal election commissions, city election commissions, and city municipalities of Belgrade. A permanent LEC formed by the REC has a chairman, six members, and their deputies, who are appointed at the proposal of parliamentary groups in proportion to their representation in the National Assembly. However, the size of an LEC also depends on the size of the municipality and the number of registered voters within it<sup>48</sup>.

For these elections, LECs were composed similarly to the REC and reflected the legal amendments adopted before the elections. Due to the new legal provisions, for the first time, LECs were given the possibility to be involved significantly in the election process, apart from the technical management of elections. Among other tasks, LECs also were assigned to decide on requests for annulment of the vote at polling stations in cases of irregularities during the voting process. The creation of a mid-level administration tier can be evaluated positively, mainly since the law clarified their role and responsibilities. However, ENEMO interlocutors expressed concerns regarding the short timeframes for organizing the process, as the legislation was adopted only a few days before the official calling of the elections. ENEMO notes that substantially overhauling the election administration structure one month and a half before an election creates considerable risk in the process, affects the stability of the electoral law, and is at odds with the Venice Commission's Code of Good Practice in Electoral Matters<sup>49</sup>.

Despite providing additional opportunities for electoral contestants to appoint commission members, not all were capable of exercising this right<sup>50</sup>, especially minority and smaller parties. Also, by law, election contestants were free to replace their appointees at LECs except on Election Day. Even though the mission did not observe a significantly high number of replacements, the legal provisions in force leave space for possible abuse to the right to replace LEC members and arbitrary dismissals.

*ENEMO recommends enhancing the legislation by including clearer provisions to limit arbitrary replacements of election commission members beyond a reasonable time before Election Day.*

ENEMO assesses that, in general, LECs operated effectively and transparently, holding frequent meetings open to election stakeholders. However, in some cases, LECs were late publishing their decisions and minutes. The law stipulates that the decisions of the LEC should be published on the website without delay and no later than 24 hours following the session at which decisions were made. But some LECs, instead of posting their normative acts on the REC webpage, made decisions public through the municipalities' webpages and misled election stakeholders while acquainting them with decisions.

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<sup>46</sup> Decision 02 Number 013-1009/22

<sup>47</sup> The Law on Local Elections.

<sup>48</sup> Article 18 of the Law on Local Elections.

<sup>49</sup> II. 2. b. "The fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions, and the drawing of constituency boundaries, should not be open to amendment less than one year before an election or should be written in the constitution or at a level higher than ordinary law" of the Venice Commission's Code of Good Practice in Electoral Matters.

<sup>50</sup> However, some LECs rejected several PB members' appointments from two political subjects, and later REC granted them by abolishing LEC's decisions.

*In order to further increase transparency and confidence in the election administration, each LEC should have its own, timely updated site/link on the REC webpage, including an easy searching system.*

Regarding LECs' performance, ENEMO interlocutors expressed concerns that only permanent commission members carried out essential tasks. In contrast, members in extended composition had considerably less work and were mainly assembled for sessions. Some LEC members performed other duties at their current workplace, limiting their full commitments to their commission member tasks.

*Consideration could be given to aligning the legislation to provide more clear regulations for complete dedication to the work of commission members, and requiring their mandatory presence in all key tasks of the commission.*

On Election Day, the mission observed a lack of unified understanding of the legislation and the REC's instructions. Increased responsibilities of LECs such as verifying protocols and handling complaints were deemed challenging. In addition, the LECs' approaches in terms of different duties varied.

Within its competence, the LECs organized a series of training sessions for poll workers, where ENEMO observers noted an insufficient attendance by PB members. Additionally, the training was not mandatory for the members of the extended composition. Moreover, no voters' informational campaigns organized by the LECs were observed, and the LECs did not use their capacity to ensure more participation in the elections.

*To increase public trust in the electoral process and enhance the awareness of election-related issues, ENEMO recommends developing additional voter informational campaigns and require LECs to be involved in this process more actively.*

According to the new legal provisions, LECs were able to correct PBs' summary protocols in order to eliminate errors. New requirements defined actions to be undertaken in case of severe and minor errors. For the parliamentary and presidential elections, approximately 950 summary protocols were corrected by the LECs.

For the repeated voting conducted on 16 April, approximately 30 LECs provided technical management for re-voting in the 89 polling stations<sup>51</sup>. On 28 April, voting was repeated at another polling station for the parliamentary elections. According to ENEMO interlocutors, the length of the electoral process negatively affected the work of the election administration. Decisions by the LEC in Bujanovac that were made contrary to the law were annulled by the REC, resulting in multiple re-voting. Thus, parliamentary elections were organized five times at that particular polling station. All decisions of the REC regarding the Bujanovac case were made unanimously, and there was no substantial difference in the views of the members. Therefore the announcement of the final results was delayed due to these multiple processes of repeated voting (see Complaints and Appeals section). The REC established the final election results for the presidential elections on 9 May and, three months after Election day parliamentary election results were announced on 5 July.

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<sup>51</sup> For the parliamentary and presidential elections.



## Polling Stations (PS) and Polling Boards (PBs)

In total 8,267 PBs were created throughout and outside the country. The REC established 8,115 Polling Boards (PBs) by 23 March. Further, 29 PBs were established in prisons, 77 - in 34 countries, and 46 - for voters from Kosovo. PBs were composed in the same manner as the upper-level EMB. They consisted of three permanent members: those nominated by registered contestants and an additional member appointed by the REC at the proposal of the President of the National Assembly. During these elections, the PBs worked in extended composition. Aside from members for polling stations created in exceptional cases<sup>52</sup> within a different time frame, all other PB members were appointed within the legal deadlines.

The election legislation does not clearly define functions assigned according to the Election Day procedures. Thus, in several cases PB members lacked functions to perform, mostly while performing in extended composition. Therefore, the number of members in election commissions significantly exceeded the tasks and needs.

The primary duties of the PBs included conducting voting at the polling station, ensuring the regularity and the secrecy of the vote, and establishing voting results and other relevant tasks.

The PS should be designated in such a way as to be accessible to voters and to enable them to vote without difficulty. The maximum number of voters at PS is 2,500 and a minimum of at least 100<sup>53</sup>. However, the law considers exceptions in the case of special circumstances. Thus, just a few days before the elections, the REC chairperson informed all local election commissions by letter that a change in the layout of PSs' concerning the layout prescribed in the legislation would not be considered as a violation.

*ENEMO notes that decisions on establishing new procedures should be taken in a transparent manner, based on clear and well-defined criteria to avoid misunderstandings and confusion of election stakeholders.*

Some difficulties were observed in forming PBs, as some opposition parties failed to fully utilize their quota in the PBs. ENEMO interlocutors expressed their concerns that timeframes for the selection of PS members remained overly constrained. Based on ENEMO's observation, the same people were nominated by several political parties in some cases, which led to a significant number of replacements.

*ENEMO recommends considering the adjustment of the timeframes for submission of PB nominees, to allow relevant counterparts a proper review of application documents and ensure more political representation.*

The REC and LECs organized a series of training for all PBs, including the training of replaced commissioners so as not to affect the overall quality of work of the PSs. However, as this activity was not mandatory for the commissioners working in extended composition, not all of them enjoyed the possibility to undergo training. In addition, the lack of proper training was revealed in some cases when PB members were not fully familiar with the regulations adopted by the upper-level administration, thus preventing a unified approach. According to observations by domestic organizations<sup>54</sup>, the lack of preparedness of PB members was reflected in the work of the commissions during Election Day. This led to a number of errors in PB protocols causing the annulment of the election results in 89 polling stations. Unfortu-

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<sup>52</sup> In the repeated voting in the parliamentary elections at polling station 6 in Bujanovac (Veliki Trnovac), a total of 697 out of 1,089 eligible voters, or 64 percent, voted.

<sup>53</sup> Instruction on the Manner of Arranging the Polling Station and the Voting Booths

<sup>54</sup> Articles 56-58 of the Law on the Election of Members of Parliament.

<sup>54</sup> According to CRTA, this procedure was confusing and led to violations and further activities regarding the layout of the PSs negatively affected the electoral process. Please, find information here: <https://cрта.rs/en/elections-2022-preliminary-report-on-observing-the-election-day/>

nately, all the content, shortcomings and corrections to protocols were not accessible to all interested stakeholders and were not available on the REC web page<sup>55</sup>.

ENEMO assesses that there is a need for a certified and longer training of PB members that should be held on a regular basis which will increase the quality and professionalism of LECs and PBs staff.

*The Election Administration should establish more effective mechanisms for overseeing the quality of training provided to PB members and revise aspects of the training methodology. More specifically, efforts should be put into delivering training to all commissioners regardless of their appointment in permanent or in extended composition, as well as focusing more on the counting procedures and filling in results protocols.*

After issuing of the REC report on the preliminary election results<sup>56</sup>, ENEMO observed an imbalance in summary protocols (both for presidential and parliamentary elections), in particular a shortage imbalance in summary protocols where the sum of votes received by contestants including invalid ballots was less than the number of voters who participated in the elections (registered their signature upon verification). This means that fewer ballots were found in the ballot box than the number of ballot papers handed out by PB members after the opening of the ballot box. However, the law does not clearly define that ballot papers are state property and it is prohibited to take them out of the polling station. The mission cannot confirm whether the ballots were lost during the voting process or counting, nor whether it was due to negligence or intentional transgression by a commission. Regrettably, the shortage of ballot papers was not considered as an electoral violation, and such instances remained unaddressed by the Election Administration.

*ENEMO notes that discrepancies in ballots in relation to the number of voters who voted should be perceived as a serious violation, with a potentially high effect on election results. Additional measures and safeguard mechanisms should be considered in the legislation to prevent such cases.*

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<sup>55</sup> The data was given per municipality and PB, but the aggregated data according to the type of errors was not available.

<sup>56</sup> <https://www.rik.parlament.gov.rs/vest/292507/51-sednica-republike-izborne-komisije.php>,

## IV. REGISTRATION OF VOTERS

According to the legislation<sup>57</sup> the Ministry of Public Administration and Local Self-Government (MPALSG) is responsible for maintaining and forming the Voters' Register. In Serbia, voter registration is passive and continuous. Maintenance of the Voters' Register by the authorized institution includes analysis of the data, entry of changes, and ensuring accuracy. For this purpose, a part of the Voters' Register is updated for the territory of a unit of self-government performed by the municipal/town administration, and includes relevant changes made ex-officio or upon a citizen's request until the deadline set for the registration closure<sup>58</sup>.

An electronic database, the Unified Voter Register (UVR), includes eligible voters. Voters were entered into the Voters' Register according to their permanent or temporary residency<sup>59</sup>. Special excerpts of the Voters' Register were formed for the military voters<sup>60</sup>, detainees, and prisoners. Voters living abroad were allowed to enter the Voters' Register according to their last permanent addresses. A particular excerpt was formed for Serbian voters from Kosovo<sup>61</sup>. Internally displaced persons (IDPs) could vote according to their place of temporary residence. In addition, the law determined procedures for voting outside the polling station<sup>62</sup> enabling a request for mobile voting even on Election Day until 11:00 a.m.<sup>63</sup>. On 01 April, the REC reported a total of 6,502,307<sup>64</sup> registered voters. Out of this number of voters, 39 777<sup>65</sup> were registered abroad, and the number of voters from Kosovo was 93, 527.

Voters could verify their registration data in person at the municipal and city administration or through an online platform<sup>66</sup> and request corrections accordingly<sup>67</sup>. Upon the closure of the voter register<sup>68</sup>, the MPALSG published the Voter Register on its website with the names and surnames of all voters<sup>69</sup>. A two-step verification process required entering the ID card's number and registration number. In addition, while confirming their data, voters had the opportunity to find the polling stations where they had been assigned to vote. However, during the verification process, ENEMO notes that voters could not obtain information about the registered voters at their addresses.

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<https://www.rik.parlament.gov.rs/vest/292501/50-sednica-republike-izborne-komisije.php>

57 The Law on the Unified Electoral Roll

58 Article 2 of the Law on the Unified Electoral Roll

59 Article 6 paragraph 1 of the Law on Unified Electoral Roll.

60 Article 86 of Law on the Election of Members of Parliament.

61 The MPALSG submitted the necessary details from the Voter Register for the voters from Kosovo.

62 Some ENEMO interlocutors raised concerns regarding the process of forming Voters' Register for voting outside the PSs.

63 Article 96 of Law on the Election of Members of Parliament.

64 REC decision 02 decision 013-1099/22 from 01 April 2022

65 REC decision 02 Decision 013-1099/22 from 01 April 2022

66 Online verification was possible only after 18 March. Before this date, the voters could check their data at the LECs or PBs.

67 The voters had the right to apply for changes to the Register of Voters to their residence's municipal or city administration no later than 20 March (15 days before the election day).

68 Applications made after the date of the conclusion of the Electoral Register were discussed by the MPALSG 72 hours before the Election Day. As voters were allowed to check their entries at the local administration level or online, a number of requests were submitted from 19-30 March.



Several ENEMO interlocutors expressed concerns about the accuracy of the voters' register, mainly regarding the number of deceased voters included in the lists, along with allegations of "phantom voters".

*ENEMO recommends that the respective authorities should undertake further actions to increase the level of trust in the voter register. Conducting a comprehensive voter register audit for instance could contribute to increasing trust, transparency, and voter list integrity.*

Despite the possibility of inspection given to voters themselves, ENEMO observers noted a very low interest of voters in this type of verification. However, due to the provisions of the current legal framework<sup>70</sup>, the opportunity for public scrutiny of the Voters' Register was not given to political parties and civil society organizations. ENEMO notes in this regard that limited access to the voters' register and lack of external revision creates a lack of transparency and a climate of mistrust towards the voters' register.

*In order to enhance public trust in the truthfulness of the electoral process as well as to increase transparency, the opportunity of public scrutiny of the voter register should be given to election stakeholders. Enabling such public scrutiny should nonetheless be implemented while respecting the confidentiality of voters' personal data.*

According to the legislation, all citizens who had reached 18 by Election Day and were not deprived of legal capacity by a court decision<sup>69</sup>, were granted the right to vote. ENEMO assessed that the new provisions of the law removed the residency requirement as one of the preconditions for participating in presidential and parliamentary elections. This especially applies to the context of the local elections, particularly for voters that were previously residing in neighboring countries.

*ENEMO underlines that any amendment in residency requirements granting citizenship in an organized way should be prescribed in a manner that limits risks of artificial migration of voters.*

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<sup>69</sup> This is an online platform: <https://upit.birackispisak.gov.rs/>

<sup>70</sup> Article 6 paragraph 1 of the Law on Unified Electoral Roll

## V. CANDIDATE REGISTRATION

According to the legislation, any citizen eligible to vote has the right to stand for presidential and parliamentary elections. The preconditions for obtaining passive or active suffrage rights are being an adult citizen of the Republic of Serbia who are not subject to extended parental guardianship or incapacitated by a court decision<sup>72</sup>. A candidate<sup>73</sup> or a candidate list<sup>74</sup> may be proposed by a political party from the Register of Political Parties, a coalition of political parties, and a citizens' group. The electoral list may not be submitted by a coalition formed by a political party and a group of citizens.

*ENEMO recommends considering amending the legislation and allowing individual citizens the right to stand as independent candidates.*

In line with the law, the candidate's proposal/party lists<sup>75</sup> were submitted directly to the REC in written and electronic form starting from the day of calling elections and lasted until 20 days before Election Day<sup>76</sup>. While submitting documentation to REC, along with additional materials, the submission of at least 10 000 written statements of voters was required. However, due to the 2022 amendments, the number of signatures needed for the proclamation of minority lists was halved<sup>77</sup>, and more small minority parties were given more opportunities to participate in elections. Despite this positive amendment, several ENEMO interlocutors doubted that some parties could use this opportunity to circumvent the supporting signature threshold without representing national minorities' interests, leaving space for possible abuse. This was evidenced<sup>78</sup> when the REC denied registration of one of the minority coalitions as none of its leaders had been registered in the claimed national minority voters list<sup>79</sup>. However, the Court disregarded the REC's legal reasoning, and the electoral list was granted registration. ENEMO notes a lack of legal certainty and clarity on how national minority candidate lists were determined and how parties, coalitions, or groups of citizens were approved as belonging to a certain national minority group.

*ENEMO recommends revising the legal framework while defining more consistent and legal criteria for determining a national minority status, to avoid possible manipulation and abuse.*

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71 Article 3 of Law on the Election of Members of Parliament.

72 Article 3 of the Law on the Election of Members of Parliament.

73 For Presidential Elections, Article 12 of the Law on the Election of the President of the Republic

74 For Parliamentary Elections

75 Parliament. 45 <https://www.rik.parlament.gov.rs/tekst/sr/43242/.php>, The form for submitting the party list is NPRS-1/22. The form IPR-1/22 for the presidential candidate.

76 Article 13 of the Law on the Election of the President of the Republic

77 Article 137 of the Law on the Election of Members of Parliament

78 Civil society organization CRTA reported that the coalition "Russian minority alliance Milena Pavlovic, Pavle Bihali" submitted forged supporting signatures during the registration process, which according to CRTA, was also known by the REC. The organization addressed the law enforcement agencies and demanded an investigation, CRTA: "Zahtevamo krivično gonjenje zbog falsifikovanja potpisa"; 24.03.2022 <https://cрта.rs/zahtevamo-krivicno-gonjenje-zbog-falsifikovanja-potpisa/>

79 Any registration of members of national minorities that obligates them to declare their national affiliation against their will, is prohibited. The members of the national minorities are entitled to have their data on nationality be entered into the official records and personal data collections, in conformity with a special law.

According to the legislation, statements of voters supporting an electoral list had to be certified by a public notary or municipal/city administration. In municipalities or cities where public notaries had not been appointed, statements of voters supporting an electoral list could be certified by municipal or city administration, as well as by relevant courts or the intake office of the basic court. Despite the number of notaries having increased, according to some ENEMO interlocutors, intense demand for notaries and lack of capacity raised concerns while delaying the certification process. Accordingly, ENEMO observers reported unequal treatment and unnecessary restrictions in some cases<sup>80</sup>. Moreover, to ENEMO interlocutors, the process was excessively arduous and overly bureaucratic.

*ENEMO recommends simplifying the process of signature collection and verification by having the signature verification process done internally by the LECs or REC.*

The law stipulates that voters could support only one electoral list with their signature<sup>81</sup>. ENEMO assesses that this limits the possibility for voters to express their support for a multiparty democratic system. In addition, the limitation allowing voters to support only one electoral list leaves space for violating the secrecy of the vote, as it potentially reveals the voter's political preference.

*ENEMO recommends allowing voters to support more than one party list with their signature, in order to further promote political pluralism without potentially revealing their political preferences.*

The REC registered 19 candidate lists with a total 2,912 candidates including eight parties, nine coalitions, and two groups of citizens for the parliamentary elections. An additional 48 hours to amend legal shortcomings were given to seven submitters of parliamentary lists. Due to non-compliance with the REC's conclusion, four lists were denied proclamation. However, after the deadline, one more minority party list<sup>82</sup> was proclaimed by the REC based on a court decision. In total, there were eight minority lists<sup>83</sup>. For presidential elections, there were a total of eight candidates registered.<sup>84</sup>

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80 In addition, the certification is subject to payment. The Ministry in charge of justice determined the fee for the certification of signatures. Unlike the previous elections, the payment amount has decreased. However, some ENEMO interlocutors evaluated the process as excessive.

81 Article 72 of the Law on the Election of Members of Parliament.

82 Russian Minority Alliance (RMS).

83 <https://www.rik.parlament.gov.rs/dokumenta/41985/document-type-2/election-round-0/additional-document-1/municipality-id-0/election-station-0/order-2/sort-1>

84 Only two submitters of presidential candidates had to rectify deficiencies in their submitted documents.

## VI. ELECTORAL CAMPAIGN AND CAMPAIGN FINANCE

### Electoral Campaign

The February 2022 amendments to the Law on the Election of MPs and the Law on Financing of Political Activities did not substantially modify the framework for electoral campaigning<sup>85</sup>. However, the amendments brought forth an extended “electoral silence” period, with a ban on the public presentation of electoral lists and candidates, campaigning events, and calls to vote or not to vote for electoral contestants 48 hours before Election Day. This ban also applied to all media outlets, including electronic editions (online media) and social media. ENEMO observed that this requirement was generally respected, with the exception of paid Google Ads which remained visible and cases of SMSes with an urge to vote for electoral contestants sent to voters after the start of the “electoral silence” period<sup>86</sup>.

If implemented in good faith, the electoral legal framework generally provides for equitable campaigning conditions for contestants. The official period of the campaign started with the day of calling the elections (15 February 2022 for early parliamentary elections, 02 March 2022 for presidential elections). However, electoral contestants could start campaigning only after their candidate list was registered, leaving space for uneven campaigning timeframes. ENEMO assessed that this contributed to a lack of level playing field, as contestants which registered first were allowed to start campaigning earlier<sup>87</sup>. Additionally, the timeframes offered for campaigning in these elections were particularly short, especially for presidential elections. This risked limiting sufficient time for presidential candidates to effectively present their programmes and hold debates, and may have affected the possibility for voters to make an informed choice.

*ENEMO recommends streamlining the timeframes for campaigning, in order to allow all deadlines for the candidate registration process to end on the same day before the official start of the campaign. This would allow all electoral contestants to begin campaigning at the same official date, thus creating a more equal level playing field. Deadlines should provide a sufficient duration to allow all candidates to properly present their platforms to voters.*

According to ENEMO observer reports, electoral campaigns on the ground for presidential and early parliamentary elections were mostly intertwined, unfolding as a single campaign. Given the decrease in the number of daily coronavirus cases, on 12 March, COVID-19 regulations/restrictions were entirely lifted by the Institute of Public Health, which also applied to campaign events, including indoors.

Electoral contestants mainly conducted their campaigns by meeting voters in person, door-to-door can-

<sup>85</sup> “Election campaign” is defined in the legislation as a set of activities of political entities which starts from the day of announcing the elections until the end of the announcement of the final election results, for the purpose of public presentation of electoral contestants and their election programmes and inviting voters to vote for them or not vote for other contestants.

<sup>86</sup> The REM also issued a warning to Nova S for broadcasting an interview with a presidential candidate after the “electoral silence” had started.

<sup>87</sup> This is especially relevant given delays in registering which were faced by some parties and candidates which struggled to collect and notarize signatures (see *Candidate Registration* section).

vassing, rallies featuring party leaders and leading members, organized stands, whistlestop tours, distribution of promotional materials, TV and Radio advertisement, and social media platforms<sup>88</sup>. According to opposition parties, access to billboard space remains a long standing issue, due to excessive prices and having been purchased in advance by other contestants. Likewise, in some cases, several parties claimed to have been denied the provision of public premises on equal grounds<sup>89</sup>.

The visibility of the campaign varied significantly depending on regions observed, starting as low-key during the first few weeks and increasing as Election Day drew nearer. The main campaigning themes included the struggle against corruption, economic development and investment, unemployment, health-care, the environment, infrastructure, etc. In addition to presenting their platforms, ruling coalition parties emphasized their successes under the SNS-led coalition<sup>90</sup>, while opposition parties criticized the current majority parties and emphasized unfair media accessibility. SNS considerably dominated the campaign in terms of visibility.

Despite being generally peaceful, the campaign was marred by cases of provocations against opposition parties from political activists from ruling majority parties<sup>91</sup>, along with some cases of verbal and physical attacks<sup>92</sup>. Hate speech and “black PR” increased in the last two weeks before Election Day, including cases of racial slur<sup>93</sup>. The mission also observed the use of fake social media profiles for promoting electoral contestants and negative advertising towards opposing parties and candidates.

*Electoral contestants and their supporters should refrain from any form of hateful speech as defined in the legislation. Authorities responsible for campaign and media oversight should signal cases of abuse to the attention of the prosecution, including on social media, which should react accordingly in line with the law.*

The President combined the roles of head of the state, leader of the ruling party, and was a candidate to his reelection. As such, and given the war in Ukraine, he featured prominently in the campaign, and his continued engagement as the incumbent president granted him considerable public exposure, without systematically clear differentiation of his roles<sup>94</sup>. According to interlocutors, mainly from opposition parties, this was part of a larger trend of incumbent officials conducting a “functionary campaign”. ENE-MO observer reports indicated several cases of public officials blurring the line between official public meetings and campaign events.

*Incumbent officials should refrain from blurring the line between their public mandate and their electoral campaigns, or campaigns of other representatives from their affiliated political party. Warnings for these cases should be followed by a loss of the right to stand for election for repeat offenders. This additionally requires adequate investigation and reinforced oversight by competent authorities such as the national police and oversight bodies.*

The campaign was heavily marred by allegations of misuse of state resources, abuse of incumbency, vote-buying and voter intimidation especially towards public employees by ruling coalition parties<sup>95</sup>.

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88 Especially Facebook, Instagram, Twitter, and Tiktok.

89 Reported in Kula and Subotica.

90 In particular, roads, infrastructure, foreign investments, as well as the plans and future regional and local projects.

91 Reported in Kragujevac.

92 Reported in Becej, Kula.

93 Reported in Nis, towards members of the Albanian minority.

94 The law requires most public officials to inform audiences during their public appearance whether they are speaking as holders of a public mandate or in the capacity of a political party.

95 Allegations of intimidation mainly range from pressure on employees in public companies to local administration and local entrepreneurs to vote for a specific party and/or candidate,, and also included pressure to attend rallies.

Allegedly, many of these forms of pressure were continuous, and started well before the official start of the electoral process. These pressures were qualified as a means to punish or reward individuals, who were expected to vote or attend rallies in favor of specific candidates or parties in power<sup>96</sup>. This included for instance threats of non-renewal of contracts, suspension of social benefits, and requirements to secure lists of voters, as well as the distribution of packages of goods (indirect vote buying)<sup>97</sup>, promises of delivering identity documents to minorities (especially Roma)<sup>98</sup>, or allegations of money in exchange for votes (direct vote buying)<sup>99</sup>.

The mission was also informed of intrusive phone calls to voters with and alleged aim to gather information on their political preference or pressure them to vote. Cases of company services allegedly transformed into call centers for the needs of the ruling party's campaign were reported to the mission. ENEMO raised concerns regarding the intrusive nature of some of these methods, as well as the use of private data for the benefit of the governing party<sup>100</sup>.

ENEMO assessed that allegations of voter intimidation and vote-buying affected general trust in the electoral process, while long standing practices of abuse of state resources significantly limited opportunities for a level-playing field. The blurring of line between party and state<sup>101</sup>, at odds with international standards, negatively impacted the campaign environment.

*Competent state authorities should systematically investigate reported cases of abuse of state resources and any forms of undue pressure on voters, including vote buying and voter intimidation, and further prosecute them wherever necessary.*

*The ACA should be required to play a more active role in coordinating with authorities responsible for prosecuting cases of abuse of state resources, and assist by delivering evidence gathered from its monitoring of the financing of electoral campaigns.*

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96 Reported in Belgrade, Obrenovac, Novi Sad, Apatin, Zrenjanin, Subotica, Kikinda, Vrsac, Nis, Merosina.

97 In the form of the distribution of oil, sugar, rice, wood for heating, etc.

98 This was especially observed in rural areas, where the number of socially vulnerable groups are higher, such as Roma and Bosnian minorities, but also low-income residents.

99 In exchange for a photo of the ballot requested from the voter as a means of proof.

100 Undue pressure on voters is at odds with paragraph 7.7 of the Copenhagen Document. See paragraph 7.7., where participating States should "ensure that law and public policy work to permit political campaigning to be conducted in a fair and free atmosphere in which neither administrative action, violence nor intimidation bars the parties and the candidates from freely presenting their views and qualifications, or prevents the voters from learning and discussing them or from casting their vote free of fear of retribution."

101 1990 OSCE Document Of The Copenhagen Meeting Of The Conference On The Human Dimension Of The CSCE (Copenhagen Document), paragraph 5.4, where participating states agree on: "a clear separation between the State and political parties; in particular, political parties will not be merged with the State.")



## Campaign Finance

The legal framework for campaign finance was amended prior to elections, in particular with the adoption of a revised Law on Financing of Political Activities<sup>102</sup>. Several substantial amendments were made to the framework for campaign finance through this new law, inter alia the introduction of interim financial reporting by contestants prior to Election Day, lowering individual and legal persons' donation limits<sup>103</sup>, public and private funding to political entities<sup>104</sup>, the system of sanctions, and financial auditing provisions.

In these elections political entities were, for the first time, obliged to submit interim reports on their campaign expenses, in line with previous ENEMO recommendations<sup>105</sup>. Generally, the mission positively assessed the amendments which contributed to addressing previous recommendations formulated by international and domestic observers. They have, in principle, brought the framework more in line with GRECO recommendations.

However, the mission was informed of issues related to unreported expenses ("shadow funding") in electoral campaigns, especially political advertising on social media. Interlocutors of the mission highlighted concerns regarding the effectiveness of the oversight mechanisms and sanctions, emphasizing that they remain largely inefficient in preventing violations.

The ACA is the main oversight body for political finance and issues related to misuse of administrative resources. The array of sanctions at its disposal was expanded, and the legislation now provides for more gradual sanctions ranging from warnings, to fines for violations and misdemeanors<sup>106</sup>, to imprisonment for criminal acts<sup>107</sup>. Other sanctions which the ACA can administer include the loss of the right to receive funds from public sources, and/or confiscation of funds. The mission was informed that the ACA disposed of 130 monitors trained and deployed in these elections, supervised by 10 coordinators<sup>108</sup>.

Political entities which submitted electoral lists, as well as candidates running in presidential elections, were entitled to public funding for their campaigns<sup>109</sup>. When it comes to private sources for financing costs

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102 Other important provisions pertaining to political finance are enshrined in the Law on Prevention of Corruption.

103 In accordance with the new law, individuals could not donate more than 10 average monthly salaries, and legal persons could not donate more than 30 average monthly salaries (per year, regardless of the number of electoral campaigns and number of elections). This represents a decrease in comparison to the provisions of the previous law. Donations amounting to more than one monthly earning had to be made public on the political entity's website.

104 Political entities which submitted electoral lists, as well as candidates running in presidential elections, were entitled to public funding for their campaigns. When it comes to private sources for financing costs of their election campaigns, political entities are allowed to collect funds from private sources, from natural and legal persons, and can use their own funds within the ceiling determined by the law. To finance the costs of the election campaign, a political entity could also use funds from loans, but only from banks and financial institutions.

105 This report had to be sent to the ACA no later than seven days before Election Day, and had to cover the period from the day of calling the elections up to 15 days before the day of voting. Reports were required to evidence the dates, origin, and amounts of funds collected and spent, both from public and private sources. Interim reports were required to be published on the ACA's website, within three days of receipt. The ACA is responsible for analyzing these reports.

106 Ranging from 20,000 to 1,000,000 RSD.

107 Ranging from three months to six years.

108 Trained observers are responsible for identifying and tracking electoral campaign events and materials on the ground on a daily basis, while coordinators are responsible for collecting all field reports and compiling them.

109 Funds from public sources are provided to cover the costs of election campaigns, in the amount of 0.07 percent of tax revenues from the state budget. In parliamentary elections, they should be distributed as follows: 65 percent allocated to electoral lists which have won mandates in previous elections (in proportion to the number of those who have won mandates); 35 percent distributed equally to other electoral lists. In presidential elections, funds in the amount of 35 percent are distributed in equal amounts to candidates who declared their interest in receiving funds from public sources. 65 percent should be distributed to candidates participating in the second round, in proportion to the number of votes won.

of their election campaigns, political entities were allowed to collect funds from private sources, from natural and legal persons, and could use their own funds within the ceiling determined by the law<sup>110</sup>. To finance the costs of the election campaign, a political entity could also use funds from loans, but only from banks and financial institutions<sup>111</sup>.

In accordance with the new law, individuals could not donate more than 10 average monthly salaries, and legal persons could not donate more than 30 average monthly salaries (per year, regardless of the number of electoral campaigns and number of elections). This represents a decrease in comparison to the provisions of the previous law<sup>112</sup>. Donations which amounted to more than one monthly earning had to be made public on the political entity's website.

Political entities were required to open a special account for their campaigns, which could not be used for other purposes. All election campaign donations and expenses were required to be paid from this account. ENEMO noted that while the ceiling for donations is capped, there is no maximum spending limit on electoral campaigns.

*Consideration could be given by the legislator on introducing a ceiling for maximum expenditures in electoral campaigns, which would increase chances for a level-playing field in the respective election.*

The law specifies that 10 days before Election Day, media are forbidden to report on official public gatherings and events at which infrastructure<sup>113</sup> are being opened, including construction works and related gatherings, when these gatherings are attended by public officials<sup>114</sup>. While this can be assessed as a positive amendment, ENEMO assesses that this relates to media coverage of these facts, rather than the prevention of the facts themselves when it comes to the misuse of state resources and abuse of incumbency.

Based on the interim financial reports published by the ACA, for parliamentary elections the largest expenditure amounts were reported by the Socialist Party of Serbia (SPS)<sup>115</sup>, SNS<sup>116</sup>, and the MORAMO coalition<sup>117</sup>. ENEMO notes that interim financial reports from five out of the 19 electoral lists were not published by the legal deadline, failing to meet the interim financial reporting requirement<sup>118</sup>. Two electoral lists submitted empty reports, with zero expenditure on their campaigns<sup>119</sup>. The mission observed at least one electoral list running in parliamentary elections which had visible campaigning outlets, yet did not have its interim financial report published by the ACA<sup>120</sup>.

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110 The Law on Financing of Political Activities provides a list of subjects which are banned from donating, including but not limited to: donations from foreign countries; anonymous donors; public institutions, public enterprises, companies and entrepreneurs performing services of general interest; institutions and companies with state participation capital; unions, associations and others, such as non-profit organizations, including foundations; churches and religious communities; gambling organizers; legal entities and entrepreneurs who have an outstanding debt based on public revenues; and persons performing activities on the basis of contracts with state bodies, autonomous provinces and local self-government units, as well as public services of which they are the founders, for two years after the termination of the contractual relationship.

111 Loans cannot amount to more than 25 percent of the amount of funds provided from public sources.

112 From 20 average monthly salaries to 10 for individuals, and from 200 average monthly salaries to 30 for legal entities.

113 And/or facilities such as factories, roads, schools, bridges, hospitals etc.

114 Including candidates for President of the Republic, MPs and councilors of cities or municipalities.

115 933,176,92 RSD.

116 558,032,90 RSD.

117 162,609,59 RSD.

118 Justice and Reconciliation Party, Together for Vojvodina, Alternative to Change, Roma party, and the Russian Minority Alliance. Together for Vojvodina's report was uploaded to the ACA's website before Election Day, but after the legal deadline.

119 Koalicija Albanaca doline, and Otete bebe lists.

120 Justice and Reconciliation Party.



For presidential elections, the highest reported amounts were from candidates Aleksandar Vučić<sup>121</sup>, Bosko Obradovic<sup>122</sup>, and Biljana Stojkovic<sup>123</sup>. Other presidential candidates reported substantially lower amounts<sup>124</sup>. ENEMO notes that reports from two out of eight presidential candidates were not published at all<sup>125</sup>, also failing to meet the interim financial reporting requirement by the legal deadline. According to the ACA, several missing reports were pending submission by post, and had not been received in time by the legal deadline.

Concerns should be raised regarding lists and candidates for which no interim financial report was published in time, which hindered campaign finance transparency. The lack of proactive stance by the ACA to address this shortcoming in time, and the absence of sanctions taken before Election Day for non-compliance with this requirement, are also reasons for concern. In addition to affecting transparency and accountability, this also deprived voters from the opportunity to properly inform themselves about all contestants' campaign spending before the day of voting. By limiting sanctions mostly to warnings, the ACA did not use more dissuasive sanctions such as administrative fines which it had at its disposal in the law.

*Effective and dissuasive sanctions provided for in the law, such as fines or loss of entitlement to public funding, should be adequately enforced by the ACA for electoral contestants who do not meet financial reporting obligations, including preliminary financial reports.*

As of 01 April, the ACA had received 14 complaints against public officials on the grounds of the Law on Prevention of Corruption. These complaints mainly pertained to the misuse of public resources or the unlawful promotion of political parties. Out of a total of 15 complaints related to the violation of the Law on Financing of Political Activities, seven cases were considered by the ACA leading to five warnings, while in the remaining two procedures, the ACA filed misdemeanor reports against a political entity. Decisions were published on the Agency's website within the legal deadline. As of 01 April, eight more proceedings had been initiated ex officio by the ACA, based on reports from their field observers.

*The ACA should generally consider using more dissuasive sanctions towards contestants which infringed the law during the campaign, by making use of the reinforced array of sanctions provided for in the new Law on Financing of Political Activities.*

According to the Law on Financing of Political Activities, electoral contestants were obliged to submit final financial reports on their campaign expenses within 30 days from the publication of the official election results. The ACA is responsible for publishing a consolidated final report no later than 120 days after contestants' final financial report submissions. On 9 June, the ACA issued a reminder to candidates which participated in the presidential elections that their final reports were due on 8 June. Delays in the announcement of final election results due to repeated voting accordingly delayed the deadlines for the ACA's consolidated report, affecting timeliness in the process, especially for the parliamentary elections.

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121 489,364,62 RSD.

122 323,608,33 RSD.

123 115,137,82 RSD.

124 Candidates Milos Jovanovic (63,998,79 RSD), Branka Stamenkovic (2,884,028 RSD), and Milica Stamenkovski (27,150 RSD).

125 Candidates Zdravko Ponos and Misa Vacic.

### Media Environment<sup>126</sup>

Despite amendments and a set of media regulations adopted recently, the Serbian media sector remained challenged by various difficulties and flaws. While visibly polarized the media landscape in Serbia is diverse with a wide variety of private and public broadcasters operating throughout the country, as well as printed and online media including 243 television channels, 335 radio stations and 941 print media. In addition, there are 850 internet portals and 89 editorially designed websites.<sup>127</sup> Although Internet sources have seen an increase in their role and number of viewers, television remained noticeably the primary source of information, thus the most influential media channel, both at the central and local level. While playing a large role in amplifying the spread of political news social networks, in particular Facebook, and online media such as news web portals and online news magazines were increasingly used to access news information offering voters extensive opportunities to inform themselves. The print media market is led by tabloid newspaper types.

While there are a high number of officially registered media broadcasters, there was an extensive concern over media independence restricting independent reporting, both at the central and local level, due to the fact that media are prone to political and economic pressures as a consequence of non-transparent ownership and financing. This decreased the quality of news in addition to tabloidization and propaganda. ENEMO interlocutors pointed out the issue of public financing of media outlets, which was predominantly distributed according to their political affiliation. Public funds intended for the media are distributed unfairly and in an unclear way, without transparent and measurable criteria and public oversight. Thus, the pressure on editorial policy is also a product of financial dependence.

Many ENEMO media interlocutors expressed concerns about public media being biased towards the government and a number of mainstream private media partial towards some segments of the opposition. Debates between contestants were organized by many channels with the refusal of leading candidates to jointly participate which deteriorated the ability of voters to make a fully informed choice. The ruling party used the President's position to its benefit, since extensive reporting about his activities dominated in most media outlets. Furthermore, campaign materials prepared by political parties were also included within news programmes.

After election day, several major election-related topics prevailed in the Serbian media. During the post-election period, the media paid the most attention to the elections held in Belgrade and some attention to the atmosphere during the Election Day, which was characterized by a large number of irregularities and physical conflicts among political activists.

<sup>126</sup> The mission did not conduct media monitoring activities. Findings and conclusions in this section are drawn from meetings with interlocutors that work in the media field in Serbia and monitoring of the activity of the body in charge of monitoring media conduct (Regulatory Authority for Electronic Media).

<sup>127</sup> <https://nuns.rs/u-srbiji-140-medija-vise-nego-prosle-godine/>

## Media Legal Framework

Media legal regulations oblige all media to provide fair and balanced political coverage. In particular, the Law on the Election of the Members of the Parliament (LEMP) contains fundamental principles, such as an obligation for the media to ensure equal coverage of all contestants without discrimination and the right of citizens to be informed about contestants' activities and electoral programmes. The Law on Electronic Media (LEM) imposes an obligation to provide free, truthful, objective, complete and timely information for all media. In addition, electoral contestants were entitled to purchase paid political advertisements for the official campaign period.<sup>128</sup> Some media outlets chose not to sell any time or space during the campaign period. Being the leading sponsor and advertiser, the state exercised substantial influence over reporting.

According to the Rulebook, adopted at the session held on 11 February, 2022 by the Council of the Regulatory Authority for Electronic Media, during the election campaign it was forbidden to show documentary, entertainment or other similar programme content in which a state official appears or a representative of the electoral list or a candidate. Additionally, media services were obliged to act in accordance with the principles of impartial, fair and balanced representation of political entities during elections in the regular news programme, as well as in special programmes dedicated to the election campaign.

The Regulatory Authority for Electronic Media (REM) supervised media compliance with relevant legislation, conducted quantitative and qualitative monitoring of broadcast media during the electoral period and published its findings on its website. On February 15, 2022, the REM began monitoring twelve media service providers.<sup>129</sup> The REM published five monitoring reports for the 15 February - 20 March 2022 period. The qualitative part of the monitoring was questionable due to methodology problems where the tonality of news is assessed. The published reports did not provide the information that was seen on television. It was noticeable that REM also added cable channels in its monitoring, which was perceived by some media interlocutors as a manipulation aimed at showing that all cable channels are against the government.

In addition, REM's last monitoring report of the campaign included the data on the representation of candidates for the presidential elections, starting on 02 March when the presidential elections were announced and concluding on 20 March, 2022. Having in mind that the activities of state officials are measured by how much they were represented in media in total, excluding the information about how many official campaigns there were, the monitoring methodology applied by REM was undistinguishable. In this regard, it was not possible to know individually how much time was dedicated to President Vucic and how much to other state officials. Moreover, the monitoring methodology was also unclear because tonalities of reporting were analyzed as monitoring topics, i.e. the topic is "negative about Vucic" or negative about another contestant. Sampling was an additional challenge. The subject of the monitoring were televisions with a national frequency, to which cable televisions of the SBB provider were added. On this occasion, no television of the state provider Telekom Srbija was taken into the sample, discriminating against one cable provider which includes televisions critical of the government.

Furthermore, according to the REM the political campaign was moderated and quiet. The REM did not record aggressive or offensive language used by political parties. In that regard, compared to previous electoral campaigns where political parties and candidates filed complaints, the REM did not receive

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<sup>128</sup> The LEM obliges all media service providers to announce tariffs for political advertising before the start of the election campaign, and to ensure that registered political parties, coalitions and candidates are represented without discrimination during the election campaign.

<sup>129</sup> Four public service channels: RTS 1, RTS 2, RTV 1 and RTV 2; four commercial media service providers: RTV Pink, Happy TV, TV B92 and TV Prva and four cable media service providers: N1, Nova S, Al Jazeera and Insider TV.

complaints from any political actors: instead only seven complaints were filed from citizens concerning overwhelming political advertisements during the prime-time news in the evening.

ENEMO also observed shortcomings regarding the capacity to impose and use deterring sanctions. While the REM cannot impose financial sanctions, it also does not exploit sanctions it has, such as a temporary ban on programmes. Many stakeholders from the media sector emphasized the lack of proactiveness and accountability of the REM, especially when it comes to monitoring of the election campaign. They do not perceive REM as an authority, which undermines its public credibility. Despite the array of sanctions at its disposal, the REM limited its sanctions to warnings, which had a limited effect and did not function as a dissuasive sanction to prevent further violations.

Moreover, the Temporary Supervisory Body was created as a result of a consensus of the authorities, the opposition and representatives of the European Parliament. The aim of this body was to rectify the situation as much as possible in given circumstances. Additionally, an appeal was sent to politicians to respond to calls from journalists and to appear on both, pro-regime and independent media. The mission was informed that during the campaign period effectiveness of the Temporary Supervisory Body was weakened by disagreements with the REM.

*The rights and responsibilities of the Temporary Supervisory Body should be clearly defined.*

Overall, the REM persisted unassertive in regulating media conduct during the campaign, yet promptly submitted requests for initiating violation proceedings against several televisions (Happy TV, B92, Nova S) for violating the election silence.

*As previously recommended by ENEMO, the Regulatory Authority for Electronic Media (REM) should undergo additional reforms that would lead to greater independence, ensure higher proactivity, transparency and independence, as well as expand its mandate to all forms of media.*

## Traditional Media

The lack of diverse perspectives in broadcast media limited voters' access to pluralistic information. Although ENEMO's mission did not conduct systematic media monitoring, it has been observed that coverage by state owned media, particularly the public broadcaster, was inclined to give greater advantage to the ruling party at the expense of the other parties, despite being obliged by the law to give unbiased coverage to all contestants. Besides, private media have an obligation to report elections in an impartial and balanced coverage too. However, one part of the media scene was reserved for state officials, while the other part was reserved for the opposition.

The programmes chosen by Radio Television of Serbia for the participation of the opposition left opposition representatives out of the most popular, most watched terms (such as the most watched news in the country, Dnevnik 2), which were reserved exclusively for government officials.<sup>130</sup> Moreover, the mission was informed that due to the war in Ukraine, the public broadcaster RTS had to cover official statements by government officials even though they were in the campaign. This granted an advantage to ruling party officials who were at the same time state officials.

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<sup>130</sup> According to CRTA's Observation Mission Report, the attempt to influence the uneven media coverage by introducing the Temporary Oversight Body did not eliminate serious shortcomings in the work of the Regulatory Authority for Electronic Media. <https://crt.rs/wp-content/uploads/2022/02/Elections-2022-Campaign-Before-the-Campaign-report.pdf>

While cases of attacks on journalists during the campaign, on election day or after the elections were not reported to the mission, cases of journalists experiencing some form of harassment, especially online that focused on their person were reported during the campaign period. According to interlocutors, these attacks were most virulent when journalists covered stories on topics normally associated with organized crime and corruption. ENEMO interlocutors emphasized that one of the main issues was not only the prevention of threats and persecution but also the undertaking of actions by law enforcement agencies.

According to some media interlocutors, compared to previous elections the media environment was slightly more diverse and more pluralistic during the pre-election period. Even so, this shift was mostly displayed by quantitative changes, rather than qualitative changes in content. Local media outlets were mostly reactive rather than proactive in terms of reporting on elections. Additionally, local media outlets were reported as being very limited, lacking capacity, funding and human resources.

The lack of publicly available information for journalists such as registries, official data on websites of governmental bodies, information obtained through official requests, significantly reduced the amount of quality investigative and analytical data available for the public.

In general a low number of political debates during the campaign period was observed at the local level. However, in the last week prior to election silence it was noted that political debates were increasingly organized. Furthermore, when it comes to local media, the mission was informed that opposition contestants were not given the space in so-called pro-government media outlets. The favored contestants were observed to be President Aleksandar Vucic, Ivica Dacic, Boris Tadic, Zdravko Ponos, Aleksandar Jovanovic, Dragan Dilas and Sasa Radulovic. Some media representatives expressed their self-censorship amid a hostile media environment, claiming that authorities used indirect pressure methods such as inspections and auditing.

*Authorities should support media pluralism and improve transparency of media ownership and public financing of the media at all administrative levels, as well as improve the overall working conditions of journalists as a means to prevent the media from being vulnerable to political and economic pressures.*

## Online and Social Media

As a strong alternative to traditional media in the campaign and election coverage, social media was progressively used by parties as one of the main campaign platforms. The mission observed that almost all parties used Facebook, Twitter and Instagram as platforms to reach voters. Social networks were used extensively to point targeted advertisements and to communicate directly with voters. Although social media were seen as an increasingly influential campaign tool, many ENEMO interlocutors expressed concerns in regard to dissemination of messages which could have misinformed voters and created misperception. In addition, some media interlocutors raised concerns about the unchecked inflammatory rhetoric that appeared on social media, in particular on Facebook.

The Mission used the Crowdtanlge platform to monitor the levels of activity of official accounts used by 22 political parties on social network Facebook (post count) as well as which subjects and topics are mainly represented in the posts. Monitoring also provided insight into which party's posts are shared, commented on and liked by Facebook users the most. The monitoring covered the period from 15 February, 2022 when the election campaign started for the Early Parliamentary elections, until Election day 03 April, 2022, including the election campaign for the Presidential elections which started on 2 March, 2022. Additionally, the mission monitored levels of activity of the mentioned accounts during the post



election period from 04 April to 04 May, 2022.

Within the period before the elections, 15 February - 03 April, the total number of content published by political parties was: 4.754 thousand out of which individually: Socialist party of Serbia – 263; Movement for renewal of Kingdom of Serbia – 300; Alliance of Vojvodina's Hungarians – 370; Freedom and justice party – 210; People's party – 272; Coalition We Must – 441; Serbian progressive party – 290; Democratic party of Serbia – 114; It's enough – Sovereignists – 216; Serbian radical party – 219; Zavetnici – Milica Djurdjevic – 141; Democratic party – 180; SDP Serbia – 245; Social democratic party – 135; Serbian movement Dveri – 297; Free citizens' movement – 106; Justice and reconciliation party – 283; Liberal democratic party – 0; Do not drawn Belgrade – 419; Democratic action party of Sandzak – 189; United peasant party – 25; United Serbia – 39.

A total of 2.45 million Facebook interactions were made on the mentioned posts, out of which specifically likes 1.84 million (75.04 percent), comments 208.7 thousand (8.51 percent) and shares 211.4 thousand (8.62 percent). The most reactions, 390.8 thousand, were made only on the posts of the Serbian Progressive Party – SNS, followed by 372.0 thousand on posts of the Zavetnici – Milica Djurdjevic posts, 299.9 thousand on posts of the Freedom and Justice Party and 276.1 thousand on posts of the Serbian movement Dveri.

Parties communicated mostly through Facebook photos (45.5 percent) and videos (27.82 percent) which had 37.6 million views in total.

When it comes to the analysis of the content of the posts, the most represented subjects were the ruling Serbian Progressive Party and Aleksandar Vučić, while on the other hand, focus was mainly on opposition leaders. The most dominant topics were related to the electoral conditions, economy and environment. Additionally, activities on the social networks of some public officials, such as the President Aleksandar Vučić, performed state visits during the election campaign, which included visits to the infrastructural projects and factories.

Within the one month after the elections, 04 April - 04 May, levels of activities of parties on Facebook significantly decreased. The total number of content published by political parties was 858, out of which individually: Socialist party of Serbia – 33; Movement for renewal of Kingdom of Serbia – 53; Alliance of Vojvodina's Hungarians – 29; Freedom and justice party – 42; People's party – 64; Coalition We Must – 69; Serbian progressive party – 49; Democratic party of Serbia – 26; It's enough – Sovereignists – 10; Serbian radical party – 53; Zavetnici – Milica Djurdjevic – 39; Democratic party – 66; SDP Serbia – 27; Social democratic party – 8; Serbian movement Dveri – 72; Free citizens' movement – 22; Justice and reconciliation party – 34; Liberal democratic party – 0; Do not drawn Belgrade – 122; Democratic action party of Sandzak – 10; United peasant party – 17; United Serbia – 13.

During this period, a total of 402.2 thousand Facebook interactions were made on the mentioned posts, out of which specifically likes 301.1 thousand (74.87 percent), comments 38.3 thousand (9.53 percent) and shares 26.4 thousand (6.57 percent). The most reactions, 110.9 thousand were made only on the posts of the Zavetnici – Milica Djurdjevic, followed by 57.2 thousand on the posts of Do not drawn Belgrade and 48.5 thousand on posts of the Serbian movement Dveri.

Parties communicated mostly through Facebook photos (43.49 percent), links (32.21 percent) and videos (14.65 percent) which had 1.74 million views in total.

After the elections, the most represented subjects were 'the dialogue of the year', as the media called it – the meeting between the President of Serbia and the opposition leader Dragan Djilas, election results and possibility of repeating elections in Belgrade as well as election irregularities at the Belgrade level.

## VIII. GENDER REPRESENTATION

There are 3,538,820 female population in Serbia which is 51% of the total population<sup>131</sup>. Serbia is signatory to the Convention on the Elimination of All Forms of Discrimination Against Women ratified in March, 2001.<sup>132</sup>

Electoral legislation of Serbia provides a mandatory gender quota requiring that electoral lists be composed of at least 40 percent of members of the underrepresented gender. Among every five candidates in the list according to their order (the first 25 five places, the next five places, and so on until the end), there should be three members of one and two members of the other gender. Moreover, the law prescribes that once the electoral list has been proclaimed, the submitter of the electoral list may not change the order of candidates in the electoral list. However, the law does not provide a so-called zipper system that guarantees the upholding of the gender quota.

All 19 registered electoral lists followed the legal requirements to respect the gender quotas. Among 19 lists, four were led by female candidates.

*ENEMO underlines the importance of safeguarding gender representation even after distribution of seats, so that in cases where an elected candidate stands down he or she is systematically replaced by a candidate of the same gender.*

ENEMO emphasizes that during the election campaign gender issues and discussions regarding women empowerment were beyond the main agenda of electoral subjects. Despite the fact that three out of eight presidential candidates were women, women remain statistically underrepresented in the political sphere.

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<sup>131</sup> Estimated number of population in the Republic of Serbia, 2020: <https://www.stat.gov.rs/en-us/vesti/20210701-procenjen-broj-stanovnika-2020/?s=1801>

<sup>132</sup> [https://tbinternet.ohchr.org/\\_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=154&Lang=en](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=154&Lang=en)

## IX. NATIONAL MINORITIES

Serbia is a diverse country with communities of 23 minority groups represented in national Councils including Bunjevci, Bulgarians, Bosniaks, Hungarians, Roma, Romanians, Ruthenians, Slovaks, Ukrainians, Croats, Albanians, Ashkali, Vlachs, Greeks, Egyptians, Germans, Slovenes, Czechs, Macedonians, Jews, Montenegrins, Russians and Poles.

The Constitution of Serbia guarantees special individual or collective rights to persons belonging to national minorities. The legislation allows national minorities to decide on certain matters related to their culture, education, information and language. The law on protection of the rights and freedoms of national minorities, in line with the Charter of Human and Minority Rights and Civil Liberties, defines several aspects of national minority issues.

ENEMO observed that all essential materials regarding E-day procedures were printed and distributed in different languages of national minorities, according to their level of representation in different localities as required by the law, followed by the instructions adopted by the REC. Ballot papers were printed in national languages with 29 variants, depending on which languages and scripts were in official use in respective municipalities/cities.

Out of 19 political party lists eight were national minority lists among which 5 minority party lists gained 14 seats at the National Assembly<sup>133</sup>. However, many ENEMO interlocutors raised concern about limited political participation of national minorities in decision-making. Some ENEMO interlocutors stated that national minority representatives on local councils at times experienced verbal attacks based on issues they raised regarding issues related to ethnic minorities.

During the election period there were allegations that some 6,000 ethnic Albanian minorities in Presevo Valley were reported to have found themselves removed from voters list. Earlier, there were concerns expressed by the EU working group report emphasizing that revision of residence status of ethnic Albanians lead to the “passivation” of certain addresses, and called upon authorities to better explain to the public how the scrutiny is conducted.

Guarantees for exercising political rights prescribed by the electoral legislation are further reflected in the instruction on uniform standards for election materials adopted by the REC on 12 February, 2022. It contains detailed instruction on use of languages and scripts in ethnic minority languages for respective municipalities.

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133 Savez vojvođanskih Mađara ( Alliance of Vojvodina Hungarians) - 5 seats; Muftijin amanet (Justice and Reconciliation Party) - 3 seats; Zajedno za Vojvodinu( DSHV-ZZV) - 2 seats; SDA Sandzak ( Sandzak Democratic Action Party) - 2 seats; Koalicija Albanaca doline ( Coalition of Albanians of the Presevo Valley) - 2 seats; Albanska demokratska alternativa ( Albanian Democratic Alternative) - 0 Romska partija ( Roma party) - 0; Ruski manjinski savez (Russian minority Alliance) - 0



*The removal of ethnic minority voters from the voters list based on technical issues close to elections without substantiation should be prevented, as it constitutes a violation of the right to vote.*

Particular concern should be raised regarding the reports on the vulnerability of the Roma population as the most marginalized and underrepresented minority group that is vulnerable to pressure from the government through threats of deprivation of social assistance if they do not vote in accordance with the will of the ruling party. ENEMO assesses this phenomenon as a major issue, as their voting rights could be violated, leaving space for abuse and manipulations.

## X. INCLUSION OF PERSONS WITH DISABILITIES

Serbia is a signatory of the Convention on the Rights of Persons with Disabilities (the CRPD) ratified in July 2009.<sup>134</sup> Furthermore, the Law on Prevention of Discrimination of Persons with Disabilities establishes the principle of equality, right and opportunity to vote and to be elected. According to Serbian legislation, voters with disabilities have the right to be provided with support to ensure their unimpeded participation in the election process.

The REC took steps to fulfill its obligations and facilitate the participation of PWDs by publishing guidelines and public service announcements available on the REC's webpage and respective social media platform.

*ENEMO recommends the implementation of a more extensive and proper voter information campaign to ensure that PWDs are aware of the possibility to exercise their right.*

The mission was informed that the REC established a special working group in cooperation with representatives of respective organizations to ensure polling station facilities were accessible for persons with physical disabilities. Before the elections the REC adopted a Manual for the Work of Polling Boards which includes detailed instruction for poll workers in terms of communication and support to voters with disabilities during the voting process. The instruction prescribed that polling stations must be designated in such a way as to be accessible to voters and to enable them to vote without difficulty. Moreover, the REC issued a recommendation for LECs to provide accessible polling station premises where possible. The premises were required to have a pedestrian crossing without obstacles, a parking space for PWDs and other characteristics for uninterrupted access. However, on Election day ENEMO observers noted that most observed polling station premises were not accessible for the PWDs. Most sites had steps; some sites were not located on the first floors of buildings; ramps were equipped only at school buildings; while additional equipments for people with visual impairment and hearing problems were not provided.<sup>135</sup>

According to CRTA's data, in the parliamentary and presidential elections, 55 percent of the polling stations were not accessible to people with disabilities. In Belgrade, relatively more polling stations were better-equipped and were more accessible to persons with disabilities.<sup>136</sup>

While persons with disabilities were also allowed to vote outside polling stations by using mobile voting or personal assistance at polling stations, some ENEMO interlocutors noted that PWDs demonstrated a low level of trust towards the integrity of mobile voting, including a lack of trust towards personal assistants.

On Election Day, ENEMO observers noted that most observed polling station premises were not accessible for PWDs. Most sites had steps; some sites were not located on the first floors of buildings; ramps were equipped only at school buildings; additional equipment for people with visual impairment and hearing problems were not provided.

*ENEMO notes that PWDs must be offered to vote at polling stations that fulfill the accessibility criteria.*

<sup>134</sup> [https://tbinternet.ohchr.org/\\_layouts/15/TreatyBodyExternal/Treaty.aspx?Treaty=CEDAW&Lang=en](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?Treaty=CEDAW&Lang=en)

<sup>135</sup> Statement of Preliminary Findings and conclusions; 04 April, 2022 <http://enemo.eu/uploads/file-manager/ENEMOStatementofPreliminaryFindingsandConclusionsSerbia2022.pdf>

<sup>136</sup> Elections 2022 – Preliminary Report on Observing the Election Day; 14.04.2022; <https://crt.rs/en/elections-2022-preliminary-report-on-observing-the-election-day/>

## XI. COMPLAINTS AND APPEALS

The legislation of Serbia guarantees the right to challenge any action, decision or inaction related to a violation of electoral rights. Every voter, candidate and submitter of an electoral list, political party, parliamentary group has the right to file complaints regarding violations of the election law. Complaints related to the violation of one's electoral right can be filed before the LECs, REC and Administrative Courts. As a result of the 2022 legal amendments, the deadline for submission and for adjudication of complaints has been extended to 72 hours.

The regulatory framework for election dispute resolution underwent significant amendments as part of the broader amendments to the electoral legislation. The respective regulations enshrined in the law on the elections of members of the Parliament now provides more prompt and effective standards of protection of electoral rights. Positively, and in line with international standards, norms governing the complaints and appeals process exclude possibility of parallel jurisdiction.

Any voter who has been denied the right to vote, or whose right to secrecy of voting has been violated, has the right to file a complaint at the local commission, which is responsible for handling complaints. Decisions adopted by the local commission can be further challenged to the REC. Decisions of the REC can be appealed to the Administrative court. The submitters of electoral lists have the broader right to file objections, in all stages of the electoral process.

ENEMO observed that electoral contestants as well as other stakeholders confirmed that despite late adoption of legal amendments, they were well-aware of the procedures. However, many ENEMO interlocutors expressed low trust in the judiciary system and thus a reluctance to follow the legal procedures. ENEMO further notes that many verbal complaints related to alleged irregularities and criminal offenses were not followed by formal complaints, as many authorized subjects were reluctant to file complaints within the respective bodies due to extremely low trust in the judiciary.

ENEMO observed some 111 complaints submitted to the REC among which 4 complaints were granted, 82 complaints were not satisfied, and 25 were dismissed as according to the REC's decision most of them were submitted by an unauthorized person. ENEMO further observed 43 decisions adopted by the REC appealed to the administrative court, among which 41 cases were not granted while two cases were satisfied.

After 3 April, repeated elections were held at 54 polling stations on 16 April 2022. At polling station number 6 in Bujanovac (Veliki Trnovac) election results were annulled four times and repeated elections were held on 28 April, 27 May, 23 and 30 June 2022. This resulted in circumstances where elections scheduled on 3 April were concluded only three months after the first Election Day. According to international good practice, if the irregularities may have affected the outcome, the decision-making body can annul the results even in one polling station.<sup>137</sup> However, the same international standards specify the importance of timeliness of elections, specifically while explaining appeal procedures the Venice Commission points out that "decisions on the results of elections must also not take too long, especially where the political climate is tense".

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<sup>137</sup> In particular, the Code of Good Practice in Electoral Matters, an effective system of appeal 3.3.e reads as follows: "The appeal body must have authority to annul elections where irregularities may have affected the outcome. It must be possible to annul the entire election or merely the results for one constituency or one polling station. In the event of annulment, a new election must be called in the area concerned".

## XII. ELECTION DAY

On Election Day<sup>138</sup> 3 April 2022, ENEMO deployed five multinational teams of observers to follow the process of preparation and opening of polling stations, the voting and counting process, as well as the transfer and intake of election materials by LECs. Observation teams, composed of the mission's 10 Long Term observers, monitored the opening procedures in five polling stations, voting in 90 polling stations, and closing and counting in five polling stations. Additionally, ENEMO observed the intake of election materials and tabulation of results in five LECs.

In the limited number of polling stations observed by ENEMO, Election Day procedures, including counting, were generally conducted efficiently and in accordance with the law. However, the mission was informed of cases of attacks and physical altercations in the vicinity of polling stations, violence towards candidates, and long queues of voters outside polling stations. Reportedly, although voters in queues at the time of closing (20:00) were generally allowed to vote with delays, several voters in queues were denied the possibility to exercise their right. Accordingly, this caused delays in the counting and tabulation process.

### Opening procedures

ENEMO observers reported on opening procedures at five polling stations, which were all assessed positively. However, at one polling station observed, campaign materials were visible near the polling station entrance<sup>139</sup>.

Opening procedures were assessed as transparent in all observed polling stations, and all stationary ballot boxes were sealed in accordance with the procedures.

Three observed polling stations opened on time (by 7:00), one with less than 15 minutes delay<sup>140</sup> and one with 30 minutes delay due to the need to remove above mentioned campaign materials<sup>141</sup>.

The setup of all observed polling stations was assessed as adequate. Observed polling stations were equipped with all essential materials needed for voting at the moment of opening. PBs generally conducted the opening in an orderly manner, and according to the prescribed procedures. No formal complaints related to the opening procedures were filed at observed polling stations.

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138 The mission observed the Election Day process on 3 April 2022. The mission was no longer present in the country for the repeated voting process which took place in Bujanovac, and therefore did not directly observe repeated voting in that locality. The mission did, however, remotely follow developments which occurred. 137 Polling Station #17, Vracar.

139 Polling Station #77, Novi Pazar.

140 Polling Station #17, Vracar.

141 Polling Station #76, Novi Pazar.

## Voting process

ENEMO observers assessed the process of voting at 90 polling stations throughout the day. Overall, the voting process was assessed positively, with some technical issues and irregularities in a number of polling stations observed.

The environment around polling stations was assessed as regular in nearly all polling stations observed<sup>142</sup>. At one polling station observed in Novi Pazar<sup>143</sup>, observers noticed the presence of campaign materials in the vicinity of the polling station.

The setup of 10 out of 90 Polling Stations was assessed as unacceptable, mostly due to small polling station premises.

The accessibility of 22 Polling Stations was assessed as easy accessible, while 37 required minor assistance, and slightly over one third (31 polling stations) were assessed as unsuitable for PwDs voting. Only five polling stations observed had special equipment for PWD.

All essential materials were present at 74 polling stations observed. However at one polling station a protocol was absent; the missing of a stamp was observed at 15 polling stations; and the collective electoral lists of candidates were missing at two polling stations observed.

At all observed polling stations, stationary ballot boxes were properly sealed, except one in Kragujevac<sup>144</sup>, where the PB put all four seals on one ballot box.

Voter identification procedures were followed properly in all observed polling stations. One polling station in Kragujevac<sup>145</sup>, was opened with a delay of over 30 minutes due to a broken UV lamp, although the LEC provided a new one. However, several cases of existing deceased voters in the voters' register were observed. Also, there were instances when voters' could not find themselves in the voters' registry.

At 78 out of 90 polling stations observed, the secrecy of voting was respected. However, violations to the secrecy of voting were observed in nine polling stations, mostly due to inadequate set up of voting screens<sup>146</sup>, or more than one person in the voting booth in five polling stations observed<sup>147</sup>.

*Additional steps should be taken by election management bodies in providing adequate premises and equipment to safeguard the secrecy of the vote. Voting with more than one voter per booth at a time should be investigated by the national police, except under special circumstances justifying assisted voting provided for in the law.*

ENEMO observers assessed the observation process positively at 87 out of 90 polling stations, however improper observation conditions were reported in three overcrowded polling stations.

At 73 polling stations observed, no facilities for PwDs were provided, while ramps for wheelchairs and parking space for PwDs near the polling station premises were observed only at 15 polling stations.

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<sup>142</sup> 89 out of 90 polling stations observed.

<sup>143</sup> Polling Station #76, Novi Pazar.

<sup>144</sup> Polling Station #165.

<sup>145</sup> Polling Station #127.

<sup>146</sup> Polling Stations #119, Novi Beograd; #37, #127, Kragujevac; and #102, Novi Sad.

<sup>147</sup> Assessed as "family voting", at polling Stations #37, Kragujevac; #105, #123, Novi Sad.

At 84 polling stations observed, PBs generally conducted voting in an orderly fashion and according to the procedures, but the PB lost control over the precinct at two polling stations observed. At two polling stations observed, some minor or unfounded formal complaints were filed.

ENEMO observers assessed that PBs managed the voting process as “good” or “very good” at 86 polling stations observed, while four polling stations observed were evaluated as “bad” due to negligence by PB commissioners.

ENEMO observers in Kursumlija observed a chaotic environment of the voting process, where 16 polling stations observed were located in one building. Furthermore, the mass transportation of voters from Kosovo to Kursumlija created queues and confusion both outside and inside the building<sup>148</sup>. There was even more queue and confusion inside the building, as the voters brought in were unable to find specific polling stations. This led to limiting access of voters to polling stations observed, as well as limiting access to observe the process.

*For additional polling stations created, election management bodies should guarantee adequate premises for the orderly conduct of the voting process, as well as a sufficient number of polling stations for voters attributed to those localities.*

## Counting process

ENEMO followed the closing and counting procedures at five polling stations. All observed polling stations closed in time, and no voter queues were reported at any polling stations observed at the moment of closing. All PBs at observed polling stations were operating with enough members.

The counting process started on time at all polling stations observed (from 20:05 to 20:30). At nine out of ten observed polling stations, counting procedures were followed properly and protocols were filled out in accordance with the law.

All observers present were able to observe and take photos of protocols. No formal complaints were submitted at polling stations observed during the counting. At all observed polling stations, election materials were packed and sealed in accordance with the law, without substantial deviation from the procedures. The assessment of PBs during the counting was either “very good” or “good” at all observed polling stations.

## Transfer of materials to local electoral commissions (LECs)

ENEMO observers monitored the transfer of election materials and respective intake at 5 LECs<sup>149</sup>. The transfer of materials was done in an orderly manner, following the procedures in all commissions in which ENEMO observed this process.

In all observed LECs, authorized observers were able to observe properly, and two out of five LECs did not seem overcrowded. However, observed LECs in Novi Pazar and in Kragujevac had long queues of PB com-

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<sup>148</sup> 13 Polling Stations were created for voters from Kosovo and 3 Polling stations were created for voters from Kursumlija located in the same building.

<sup>149</sup> Nis, Novi Pazar, Stari Grad, Kragujevac, Novi Sad.

missioners. All observed LEC premises were assessed as adequate and with proper setup for the delivery of election materials.

In the Vojvodina region, there were cases where PBs did not fill the protocol in 4 languages, as required (Hungarian, Slovak, Rusin, Serbian), but only in Serbian, since none of the PB commissioners knew other languages.

*For localities which require results' protocols to be filled in several languages, LECs should ensure that at least one PB member per polling station and per language has command of minority languages in respective polling stations.*

The evaluation of the work of LECs by ENEMO observers was positive (very good or good) in all observed LECs, and their work was assessed as straightforward and transparent in all observed cases.



## XIII. OBSERVERS

The legislation sets forth two main preconditions for domestic organizations to grant accreditation for elections. It is mandatory to be a registered association in the Republic of Serbia and to have election monitoring as a goal. The deadline for accreditation expires seven days prior to Election Day. In order to grant authorization, an application submitted to the REC must include a list of observers in the prescribed format.

For the 2022 presidential and early parliamentary elections, the REC accredited nine domestic organizations with 4,687<sup>150</sup> observers and 23 international/foreign countries with 537 observers.

The REC website does not disclose the total number of international or domestic observers accredited by each organization. ENEMO received the above statistics from the REC, but only upon request.

*In order to increase transparency, ENEMO recommends the systematic publication on the REC official website of all accredited individuals, along with the organizations they are affiliated to, as well as the total number of accredited domestic and international observers.*

Among nine accredited domestic observer organizations, only two organizations – CRTA and CeSID - were signatories of the Global Principles for Non-Partisan Election Observation and Monitoring by Citizen Organizations.

The previous electoral legislation did not provide sufficient regulations regarding observers, at odds with international standards.<sup>151</sup> Positively, the recent amendments to the electoral legislation addressed the rights and responsibilities of observers and determined their legal status.

Despite positive amendments, ENEMO notes that a number of issues remain to be addressed in order to facilitate election observation by domestic and international observers. Specifically, observer organizations in these elections were required to be accredited in specific localities in order to observe, including on Election Day, and could not observe outside of these designated areas. ENEMO assesses that this undue limitation creates an obstacle for international observers to freely observe the electoral process, at odds with international standards<sup>152</sup>. Additionally, there is theoretically no limit to the number of localities where an international observer can be accredited, which renders moot the obligation to accredit observers in each locality.

*ENEMO recommends lifting provisions which unduly limit international observers' opportunity to observe in all localities. International observers should receive an accreditation which is valid throughout the country.*

ENEMO further notes that the legislation does not grant the right to domestic observer organizations to file Election Day complaints, thus limiting their role in the complaint process.

<sup>150</sup> Црта – 3207, Грађани на стражи – 7, Цесид – 947, Јуком – 2, Форум 5 – 10, Локални фронт – 173, ОФИД – 122, Суверенисти – 94, Унија младих Града Пенчева - 130.

<sup>151</sup> Paragraph 8 of the 1990 OSCE Copenhagen Document underlines that “the participating States consider that the presence of observers, both foreign and domestic, can enhance the electoral process for States in which elections are taking place”.

<sup>152</sup> Code of Good Practice in Electoral Matters, paragraph 3.2., a: “Both national and international observers should be given the widest possible opportunity to participate in an election observation exercise.”

# RECOMMENDATIONS

## Priority Recommendations

1. Although the existing legal framework provides sufficient grounds for the conduct of democratic elections, ENEMO recommends improving the transparency and timeliness of the process, in order to guarantee efficient preparations by electoral management bodies and safeguard electoral contestants' and voters' rights.
2. ENEMO recommends further steps to increase the reliability and performance of the election administration by improving its technical and human capacity. This can be achieved by delivering targeted educational programmes for service employees, applying software platforms for the electronic registration of election stakeholders, providing gender-disaggregated statistics, making voting and election-related information more accessible, etc.
3. Authorities should support media pluralism and improve transparency of media ownership and public financing of the media at all administrative levels, as well as improve the overall working conditions of journalists as a means to prevent the media from being vulnerable to political and economic pressures.

## Other Recommendations

### To the Parliament of Serbia

4. Large-scale amendments to the electoral legal framework should not be undertaken less than a year prior to Election Day, to ensure legal certainty and stability of the electoral legal framework.
5. The main areas pertaining to electoral matters should be regulated by the law. Further amendments must limit areas requiring REC decisions regulating key electoral issues.
6. ENEMO recommends considering all fundamental amendments to the legislation within a reasonable timeframe, giving an equal possibility of participation in elections to all electoral contestants.
7. The composition formula of the Election Administration could be reconsidered, in order to increase trust and public perception in its impartiality and independence. The appointment rule could be revised to ensure a more balanced political representation and limit the dominance of a single party.
8. ENEMO recommends considering the adjustment of the timeframes for submission of PB nominees, to allow relevant counterparts a proper review of application documents and ensure more political representation.
9. ENEMO recommends enhancing the legislation by including clearer provisions to limit arbitrary replacements of electoral commission members beyond a reasonable time before Election Day.
10. Consideration could be given to aligning the legislation to provide more clear regulations for complete dedication to the work of commission members, and requiring their mandatory presence in all key tasks of the commission.
11. To increase public trust in the electoral process and enhance the awareness of election-related issues, ENEMO recommends developing additional voter informational campaigns and require LECs to be involved in this process more actively.

12. ENEMO notes that discrepancies in ballots in relation to the number of voters who voted should be perceived as a serious violation, with a potentially high effect on election results. Additional measures and safeguard mechanisms should be considered in the legislation to prevent such cases.
13. ENEMO recommends considering amending the legislation and allowing individual citizens the right to stand as independent candidates.
14. ENEMO underlines that any amendment in residency requirements granting citizenship in an organized way should be prescribed in a manner that limits space for artificial migration of voters.
15. ENEMO recommends revising the legal framework while defining more consistent and legal criteria for determining a national minority status, to avoid possible manipulation and abuse.
16. ENEMO recommends simplifying the process of signature collection and verification by having the signature verification process done internally by the LECs or REC.
17. ENEMO recommends allowing voters to support more than one party list with their signature, in order to further promote political pluralism without potentially revealing their political preferences.
18. ENEMO recommends streamlining the timeframes for campaigning, in order to allow all deadlines for the candidate registration process to end on the same day before the official start of the campaign. This would allow all electoral contestants to begin campaigning at the same official date, thus creating a more equal level playing field. Deadlines should provide a sufficient duration to allow all candidates to properly present their platforms to voters.
19. Consideration could be given by the legislator on introducing a ceiling for maximum expenditures in electoral campaigns, which would increase chances for a level-playing field in the respective election.
20. Effective and dissuasive sanctions provided for in the law, such as fines or loss of entitlement to public funding, should be adequately enforced by the ACA for electoral contestants who do not meet financial reporting obligations, including preliminary financial reports.
21. The rights and responsibilities of the Temporary Supervisory Body should be clearly defined.
22. As previously recommended by ENEMO, the Regulatory Authority for Electronic Media (REM) should undergo additional reforms that would lead to greater independence, ensure higher proactivity, transparency and independence, as well as expand its mandate to all forms of media.
23. ENEMO recommends lifting provisions which unduly limit international observers' opportunity to observe in all localities. International observers should receive an accreditation which is valid throughout the country.

## To Political Parties and Candidates

24. Electoral contestants and their supporters should refrain from any form of hateful speech as defined in the legislation. Authorities responsible for campaign and media oversight should signal cases of abuse to the attention of the prosecution, including on social media, which should react accordingly in line with the law.

## To the Republic Electoral Commission

25. ENEMO recommends for the REC to define a clear and uniform interpretation of the law, promptly providing it to lower administration bodies to foster the establishment of universal practices that, as a result, would enable higher standards of credibility and trustworthiness.
26. ENEMO notes that decisions on establishing new procedures should be taken in a transparent manner, based on clear and well-defined criteria to avoid misunderstandings and confusion of election stakeholders.
27. In order to increase transparency, publicity, and accessibility, consideration should be given to requiring prompt publication of all decisions, including minutes, and publishing REC session agendas in advance on the REC's web page. In addition, respective authorities should consider improving the maintenance of the REC's official web page.

28. ENEMO recommends developing various voter educational materials and using a diversity of sources, primarily social media, that could lead to voters making a more informed choice.
29. As publishing preliminary election results promptly is one of the critical aspects of election integrity, the REC should consider improving the election administration's capacity to inform all election stakeholders about Election Day conduct in a timely manner, therefore limiting space for mistrust or suspicions.
30. ENEMO recommends considering a more comprehensive, systematic, and all-embracing training session for all commission levels.
31. The Election Administration should establish more effective mechanisms for overseeing the quality of training provided to PB members and revise aspects of the training methodology. More specifically, efforts should be put into delivering training to all commissioners regardless of their appointment in permanent or in extended composition, as well as focusing more on the counting procedures and filling in results protocols.
32. In order to further increase transparency and confidence in the election administration, each LEC should have its own, timely updated site/link on the REC webpage, including an easy searching system.
33. Additional steps should be taken by election management bodies in providing adequate premises and equipment to safeguard the secrecy of the vote. Voting with more than one voter per booth at a time should be investigated by the national police, except under special circumstances justifying assisted voting provided for in the law.
34. For additional polling stations created, election management bodies should guarantee adequate premises for the orderly conduct of the voting process, as well as a sufficient number of polling stations for voters attributed to those localities.
35. For localities which require results' protocols to be filled in several languages, LECs should ensure that at least one PB member per polling station and per language has command of minority languages in respective polling stations.
36. In order to increase transparency, ENEMO recommends the systematic publication on the REC official website of all accredited individuals, along with the organizations they are affiliated to, as well as the total number of accredited domestic and international observers.

## To the Government and Other Institutions involved in the Electoral Process

37. ENEMO recommends that the respective authorities should undertake further actions to increase the level of trust in the voter register. Conducting a comprehensive voter register audit for instance could contribute to increasing trust, transparency, and voter list integrity.
38. In order to enhance public trust in the truthfulness of the electoral process as well as to increase transparency, the opportunity of public scrutiny of the voter register should be given to election stakeholders. This opportunity should nonetheless avoid possible abuses of personal data of voters. Enabling such public scrutiny should nonetheless be implemented while respecting the confidentiality of voters' personal data.
39. Incumbent officials should refrain from blurring the line between their public mandate and their electoral campaigns, or campaigns of other representatives from their affiliated political party. Warnings for these cases should be followed by a loss of the right to stand for election for repeat offenders. This additionally requires adequate investigation and reinforced oversight by competent authorities such as the national police and oversight bodies.
40. Competent state authorities should systematically investigate reported cases of abuse of state resources and any forms of undue pressure on voters, including vote buying and voter intimidation, and further prosecute them wherever necessary.
41. The ACA should be required to play a more active role in coordinating with authorities responsible for prosecuting cases of abuse of state resources, and assist by delivering evidence gathered from its monitoring of the financing of electoral campaigns.

42. The ACA should generally consider using more dissuasive sanctions towards contestants which infringed the law during the campaign, by making use of the reinforced array of sanctions provided for in the new Law on Financing of Political Activities.
43. ENEMO underlines the importance of safeguarding gender representation even after distribution of seats, so that in cases where an elected candidate stands down he or she is systematically replaced by a candidate of the same gender.
44. The removal of ethnic minority voters from the voters list based on technical issues close to elections without substantiation should be prevented, as it constitutes a violation of the right to vote.
45. ENEMO recommends the implementation of a more extensive and proper voter information campaign to ensure that PWDs are aware of the possibility to exercise their right.
46. ENEMO notes that PWDs must be offered to vote at polling stations that fulfill the accessibility criteria.

# ABOUT ENEMO

The European Network of Election Monitoring Organizations (ENEMO) is an international nongovernmental organization that represents a network of national nongovernmental civic organizations founded on September 29, 2001, in Opatija, Croatia. It consists of 20 leading domestic monitoring organizations from 16 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 IEOMs 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 39 international election observation missions to 11 countries: Serbia 2022, Presidential and Early Parliamentary Elections; Hungary 2022, Parliamentary Elections; Kosovo 2021, Local Elections; Georgia 2021, Local Elections; Moldova 2021, Parliamentary Elections; Albania 2021, Parliamentary Elections; Moldova 2020, Presidential Elections; Montenegro 2020, Parliamentary Elections; Serbia 2020, Parliamentary Elections; Ukraine 2020, Local Elections; Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2018-19, Parliamentary Elections; Armenia 2018, Early Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Regular Local Elections; Ukraine 2014, Parliamentary Elections; Ukraine 2014, Presidential Elections; Ukraine 2013 – re-run of Parliamentary Elections 2012 in 5 MECs; Kosovo 2013, Local Elections, first round; Ukraine 2012, Parliamentary Elections; Kosovo 2011, Re – run of Parliamentary Elections; Kosovo 2010, Parliamentary Elections; Kyrgyzstan 2010, Parliamentary Elections; Ukraine 2010, Presidential Elections, second round; Ukraine 2010, Presidential Elections, first round; Kosovo 2009, Local Elections; Moldova 2009, Parliamentary Elections; Georgia 2008, Presidential Elections; Kyrgyzstan 2007, Parliamentary Elections; Ukraine 2007, Parliamentary Elections; Ukraine 2006, Local Elections in Poltava, Kirovograd and Chernihiv; Ukraine 2006, Parliamentary Elections; Kazakhstan 2005, Presidential Elections; Albania 2005, Parliamentary Elections; Kyrgyzstan 2005, Presidential Elections; Kyrgyzstan 2005, Parliamentary Elections; Ukraine 2004, Presidential Elections, second round re-run; Ukraine 2004, Presidential Elections.

ENEMO member organizations are: Center for 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; Political Accountability Foundation, Poland; Center for Research, Transparency and Accountability (CRTA), Serbia; Obcianske OKO (OKO), Slovakia; Committee of Voters of Ukraine (CVU), Ukraine.

# LIST OF ABBREVIATIONS

**REC** – Republic Electoral Commission

**LEC** – Local Electoral Commission

**PB** – Polling Board

**PS** – Polling Station

**WB** – Working bodies

**EMB** – Election management bodies

**MPALSG** – Ministry of Public Administration and Local Self – Government

**ACA** – Agency for the Prevention of Corruption

**REM** – Regulatory Authority for Electronic Media

**LTO** – Long-term observer

**IEOM** – International Election Observation Mission

**SNS** – Serbian Progressive Party

**SPS** – Socialist Party of Serbia

**MP** – Members of Parliament

**UVR** – Unified Voter Register

**IDP** – Internally displaced persons

**LEMP** – Law on Election of the Members of the Parliament

**LEM** – Law on Electronic Media

**RTS** – Radio Television of Serbia

**CRDP** – Convention on the Rights of Persons with Disabilities

**PWD** – Persons with disabilities .



## Annex 1. Early Parliamentary election results

List	Number of votes	Percentage of votes	Number of seats attributed in Parliament
Together we can do everything	1.635.101	44,28 %	120
United for the victory of Serbia	520.469	14,1 %	38
Ivica Dacic - Prime Minister of Serbia	435.274	11,78%	31
A national democratic alternative- NADA	204.444	5,53 %	15
We must	178.733	4,84 %	13
Dveri-POKS	144.762	3,92 %	10
Serbian Party Patrons	141.227	3,82 %	10
Sovereignists	86.362	2,33 %	0
Serbian Radical Party	82.066	2,22 %	0
SDS-Nova	63.560	1,73 %	0
Alliance of Vojvodina Hungarians	60.313	1,64 %	5
Justice and Reconciliation Party- Mufti's bequest	35.850	0,97 %	3
Otete bebe	31.196	0,84 %	0
DSHV-ZZV	24.024	0,65 %	2
Sandzak Democratic Action Party	20.553	0,56 %	2
Coalition of Albanians of the Presevo Valley	10.165	0,27 %	1
Russian Minority Alliance	9.569	0,26 %	0
Roma party	6.393	0,17 %	0
An Alternative to Change	3.267	0.09 %	0

## Annex 2. Presidential election results

Candidate	Parties	Number of votes	Percentage
Aleksandar Vucic	Serbian Progressive Party	2.224.914	60,00%
Zdravko Ponos	United for the victory of Serbia	698.538	18,84%
Milos Jovanovic	National Democratic Alternative	226.137	6,1%
Bosko Obradovic	Dveri-POKS	165.181	4,45%
Milica Djurdjevic Stamenkovski	Serbian Party Zavetnic	160.553	4,34%
Biljana Stojković	Moramo	122.378	3,3%
Branka Stamenković	Sovereignists	77.031	2,07%
Miša Vacić	Serbian right	32.947	0,9%
		3.707.679	100%

## Annex 3. Core Team composition

Position	Name	Country	ENEMO Member Organization
Head of Mission	Pierre Peytier	France	Coalition for Democracy and Civil Society
Deputy Head of Mission/ Media Analyst	Maja Milikic	Montenegro	CeMI
Election Administration Analyst/CEC Observer	Ana Mikeladze	Georgia	ISFED
Legal Analyst	Nino Rizhamadze	Georgia	ISFED
LTO Coordinator	Stanislav Zholudiev	Ukraine	CVU
Logistics and Finance Manager	Teodora Gilic	Montenegro	CeMI

## Annex 4. Long-Term Observers (LTOs) composition

Name	Country	ENEMO Member Organization
Vladan Radunovic	Montenegro	CeMI
Alma Tafani	Albania	KRIIK
Mladen Kobasevic	Croatia	GONG
Ditmar Mara	Albania	SDC
Raushan Sadyrbaeva	Kyrgyzstan	CDCS
Ismayil Hajiyeu	Azerbaijan	EMDS
Miriam Hoveyan	Armenia	TIAC
Asem Murzalieva	Kyrgyzstan	CDCS
Rigers Bena	Albania	SDC
Levani Chutlashvili	Georgia	ISFED





