



Office for Democratic Institutions and Human Rights

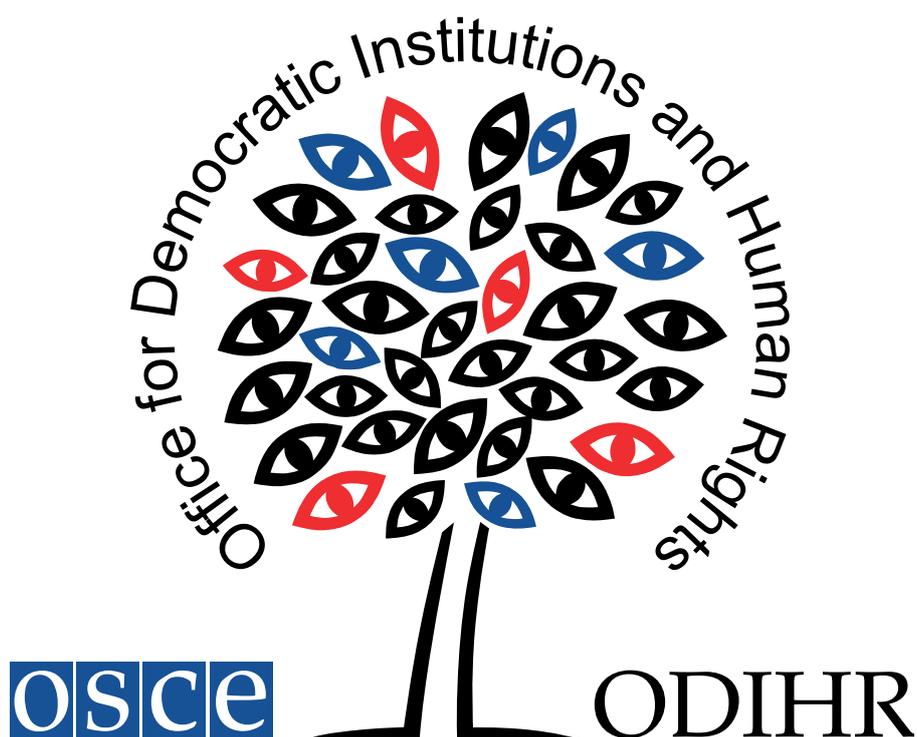
BULGARIA

EARLY PARLIAMENTARY ELECTIONS

19 April 2026

ODIHR NEEDS ASSESSMENT MISSION REPORT

16 – 19 February 2026



Warsaw
3 March 2026

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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

Following an invitation to observe the 19 April 2026 early parliamentary elections in the Republic of Bulgaria, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 16 to 19 February 2026. The NAM was composed of Kseniya Dashutsina, ODIHR Senior Election Adviser, and Ranko Vukčević, ODIHR Election Adviser.

The purpose of the NAM was to assess the pre-election environment and preparations for the parliamentary elections. Based on this assessment, the NAM recommends whether to deploy an ODIHR election-related activity for the forthcoming elections and, if so, what type of activity best meets the identified needs. The NAM held meetings with officials from state institutions as well as with representatives of parliamentary political parties, media, and civil society. A list of interlocutors is annexed to this report.

ODIHR would like to thank the Ministry of Foreign Affairs for its co-operation and assistance in organizing the NAM. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and for sharing their views.

II. EXECUTIVE SUMMARY

Following the October 2024 parliamentary elections, a minority government was formed, but a March 2025 Constitutional Court decision led to a recalculation of mandates, which altered the composition of the National Assembly, reducing the ruling coalition to the minimum majority. The government resigned in December 2025 amid public protests and allegations of corruption. The President first offered successive exploratory mandates to the three largest parliamentary groups to form a new government, all of which were returned unfulfilled. He then resigned, with a stated aim of participating in the upcoming elections, and the Vice President assumed the presidency and appointed a caretaker government. The forthcoming elections are the eighth parliamentary elections since 2021, and take place in a context of continued political fragmentation, heightened polarization, and declining public trust in key state institutions.

The electoral legal framework has remained largely unchanged since the last parliamentary elections, and several draft amendments suggested were not adopted prior to these elections. The February 2026 amendments introducing an upper limit of 20 polling stations per non-EU country outside Bulgarian diplomatic and consular representations were criticized by several ODIHR NAM interlocutors for their late adoption and disproportionate effect on voters in several countries with large Bulgarian diaspora. Most ODIHR NAM interlocutors noted that while the legal framework offers an overall adequate basis for the conduct of elections, there are gaps and inconsistencies, and none of the legislative attempts constituted a comprehensive review of the legislation, and were viewed by some as politically driven. Moreover, several ODIHR recommendations remain unaddressed.

Election preparations are ongoing, including procurement for machine voting, servicing of equipment, voter information campaign, and cascade trainings for lower-level commissions. The CEC informed

the ODIHR NAM that, despite the early nature of the elections, it is confident in administering the process efficiently, citing experience from repeated early electoral cycles since 2021. Most interlocutors met by the ODIHR NAM expressed varied levels of confidence in the technical capacity of election administration, with several noting issues related to the perceived impartiality of the CEC, the transparency, and politicization of its decision-making. Most representatives of civil society and political parties mentioned concerns about the appointment criteria and frequent replacement of lower-level election commissioners without training, noting numerous prior instances of incorrect completion of results protocols. Alleged instances of interference by local authorities in the work of PECs, particularly in smaller municipalities and rural areas, as well as the absence of legal provisions preventing the reappointment of polling station members implicated in the violations identified by the 2025 Constitutional Court decision, were highlighted by some ODIHR NAM interlocutors as issues meriting attention.

On election day, voting will be conducted using either machines or paper ballots in polling stations with at least 300 registered voters. The legal requirement to video record key stages of election day procedures aims to enhance transparency; however, previous instances of incomplete recording and the absence of specific sanctions for non-compliance were noted by ODIHR NAM interlocutors as affecting public confidence. Some interlocutors also expressed concerns regarding the concentration of technical responsibilities related to machine voting and result processing, as well as the continued reliance on a single private service provider.

Some 6.6 million voters will be included in the voter lists. The legislation retains restrictions on suffrage rights for voters serving a prison sentence and for persons deprived of legal capacity by a final court decision. The 2024 amendments allowed citizens without a registered permanent address to be included in voter lists based on an address designated by the municipality. ODIHR NAM interlocutors did not express concerns regarding the accuracy of the voter lists, but many noted that the mandatory permanent-residence registration system, which includes all citizens, including those residing abroad for extended periods, may contribute to voter lists being inflated.

Candidates may be nominated on the lists of registered political parties or coalitions, or stand independently in a constituency. The 2023 constitutional amendments removed the prohibition on dual citizens standing for parliamentary office, while introducing an 18-month residency requirement prior to election day. Political parties and other interlocutors did not raise concerns regarding the candidate registration process.

Women remain underrepresented in public and political life. In the outgoing National Assembly, 69 of 240 members are women. In the last elected Council of Ministers, 1 of 21 members was a woman, while in the newly appointed caretaker government, 6 of 21 members are women. There are no special legislative measures to promote women's participation in parliamentary elections, despite longstanding ODIHR recommendations to consider such steps, and most parties met by the ODIHR NAM stated that they do not have specific internal policies aimed at promoting women.

Most parties met by the ODIHR NAM stated that they expect to conduct their campaign without undue hindrance, but several expressed concerns regarding the tone of the campaign, including the use of divisive rhetoric and polarizing narratives. Several ODIHR NAM interlocutors expressed concerns regarding the misuse of social networking platforms, including artificial amplification of content, disinformation, and polarizing narratives, and stated that activities in the online space remain insufficiently monitored. Most interlocutors also referred to long-standing allegations of vote-buying and so-called "controlled" voting, particularly in economically and socially vulnerable communities,

alongside entrenched clientelistic practices and potential misuse of administrative resources at the local level.

Campaigning online is not regulated, and social networks are not classified as media service providers for the purposes of campaign regulation. Several ODIHR NAM interlocutors raised concerns about the potential misuse of online platforms, including artificial amplification of content and disinformation, and noted the absence of a dedicated interinstitutional framework to co-ordinate emerging cyber and information-related threats in the electoral context. Responsibilities are dispersed across multiple bodies, and mechanisms for structured information exchange, joint risk assessment, public awareness initiatives, and engagement with online platforms remain limited. Bulgaria has designated the Communications Regulation Commission as Digital Services Coordinator under the EU Digital Services Act (DSA). In this capacity, the CRC oversees the application of the DSA at the national level, with CRC representatives noting that, at present, the scope of their authority is limited.

Political parties receiving annual public subsidies may use them to finance election campaigns, while those not entitled to public funding may receive limited state support for media advertising. Overall, most ODIHR NAM interlocutors did not raise major concerns regarding the legal framework for campaign finance, but noted that it would benefit from further revision, particularly with respect to the absence of interim reporting requirements and the limited regulation and oversight of online campaign-related expenditure to enhance transparency.

The Election Code requires balanced reporting and equal treatment of contestants in broadcast media, with detailed rules governing paid and free airtime; however, several ODIHR NAM interlocutors noted that strict equal-time formulas may limit editorial discretion and substantive debate. The media environment is diverse but highly concentrated, and parts of the private media sector are perceived as politically aligned. Defamation remains criminalized, and strategic lawsuits against journalists persist. The oversight of broadcast media is exercised by the Council for Electronic Media, which reports potential breaches of election-related provisions to the CEC.

The law provides expedited procedures for election-related complaints. Any citizen may submit alerts regarding election violations to the election administration, while decisions of lower-level commissions may be appealed to higher election bodies and subsequently to the administrative courts. Parliamentary election results may be challenged only before the Constitutional Court by a limited number of state actors, and contestants do not have direct standing. ODIHR NAM interlocutors did not raise major concerns regarding the functioning of the election dispute resolution system.

The Election Code provides for citizen and international observation of all stages of the electoral process. No large-scale nationwide citizen election observation is conducted. Several civil society organizations met by the ODIHR NAM indicated their intention to follow specific aspects of the electoral process and to deploy observers to a limited number of polling stations. Some ODIHR NAM interlocutors from political parties stated that they intend to nominate a large number of proxies and commission representatives, citing their aim to strengthen oversight of election day procedures in light of concerns raised during previous electoral cycles.

Most ODIHR NAM interlocutors underlined the need for a robust ODIHR election observation presence in light of political polarization and declining public trust in electoral integrity, viewing observation as a means to promote confidence in the electoral process. Particular concerns were raised over the capacity and performance of the election administration, conduct of the campaign, including online and in the media, implementation of the legal framework, and election day procedures. Interlocutors also highlighted issues that would merit attention by an ODIHR election observation

activity, including allegations of vote buying, clientelistic practices, and possible pressure and voter intimidation, particularly in smaller and economically disadvantaged municipalities.

Based on the findings in this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the 19 April 2026 early parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 16 long-term observers to follow the electoral process countrywide, as well as 200 short-term observers to observe election day proceedings. In line with ODIHR's standard methodology, the EOM will include a media monitoring component and will assess the campaign environment and activities across traditional media, online outlets, and social media platforms. The mission will also assess institutional preparedness and effectiveness in identifying and responding to disinformation, misinformation, and potential foreign and domestic interference, as well as existing co-operation mechanisms with social media platforms.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

Since 2021, Bulgaria has experienced a prolonged period of political instability marked by difficulties in forming durable governing coalitions, recourse to caretaker governments appointed by the President, and repeated early parliamentary elections. The 19 April 2026 elections will be the eighth parliamentary elections since 2021.

Following the October 2024 early parliamentary elections, a minority government was formed, headed by Prime Minister Rosen Zhelyazkov and composed of Citizens for European Development of Bulgaria (GERB) in coalition with the Union of Democratic Forces (SDS), Bulgarian Socialist Party (BSP) – United Left, and There Is Such A People (ITN), with the Alliance for Rights and Freedoms (APS).

Five political parties challenged the legitimacy of the October 2024 early parliamentary elections before the Constitutional Court.¹ In March 2025, following four months of proceedings, the Constitutional Court annulled the results of selected polling stations and ordered a recalculation of mandates, leading to the reallocation of 16 parliamentary seats and the entry of the Velichie party into the National Assembly.² This reduced the governing coalition to the minimum required majority. The decision sparked protests over allegations of electoral fraud, and claims that the Prosecutor's Office had concealed evidence and, together with the Central Election Commission (CEC), sought to obstruct the recount. According to the majority of ODIHR NAM interlocutors, this significantly influenced public discourse and affected the perception of electoral integrity.

¹ We Continue the Change–Democratic Bulgaria (PP–DB), Vazrazhdane, ITN, BSP–United Left, and Velichie.

² The Constitutional Court ordered a recount of votes in 2,204 of 12,879 polling stations (some 17 per cent). In 1,768 polling stations, the recount examined the number of valid votes and their distribution among the candidates, and identified discrepancies with the CEC's final results in 46.75 per cent of precincts. In 436 precincts, the recount focused on the number of invalid votes, with discrepancies identified in 35.78 per cent. The Court established that the most misattributed votes concerned the DPS–NN (1,110), GERB (452) and Revival (108), while Velichie had 59 votes not counted. The court decided to annul the results in seven precincts where ballots were missing despite protocols indicating 780 votes cast. The Chairperson of the Constitutional Court publicly claimed that Prosecution had evidence, data and voting machines from the Central Election Commission that was not made available to the Court. See [decision No. 13 of 13 March 2025 on Constitutional Case No. 33/2024, Constitutional Court of the Republic of Bulgaria](#).

In April 2025, APS withdrew its support after the Movement for Rights and Freedoms–New Beginning (DPS–NN) pledged backing for the government. The government resigned in December 2025 following large-scale protests related to the 2026 state budget proposal and allegations of corruption. President Rumen Radev first offered successive exploratory mandates to the three largest parliamentary groups to form a new government, all of which were returned unfulfilled. He subsequently resigned, with a stated aim of participating in the upcoming elections. Vice-President Iliana Iotova assumed the role of acting president and, after constitutionally required consultations, appointed Andrey Gyurov, Deputy Governor of the Bulgarian National Bank, to form a caretaker cabinet.³

The forthcoming elections will take place in a context of continued political fragmentation and public debate regarding governance and institutional accountability. Some ODIHR NAM interlocutors expect a higher voter turnout compared to recent elections, citing the mobilization of younger voters following recent protests and the anticipated candidacy of the former president Radev, who currently enjoys relatively high levels of public support according to opinion polls.

Women remain underrepresented in public and political life. In the outgoing National Assembly, 69 of 240 members (28.75 per cent) are women. Within the last elected Council of Ministers, only 1 of 21 members (4.8 per cent) was a woman. In the new caretaker government, 6 of 21 members (28.5 per cent) are women. By contrast, women hold 6 of 12 seats (50 per cent) on the Constitutional Court, and 8 out of 15 members (53.3 per cent) of the CEC are women.

ODIHR has previously observed 15 elections in Bulgaria.⁴ Most recently, ODIHR deployed an Election Expert Team (EET) for the June 2024 early parliamentary elections.⁵ The final report, issued in September 2024, contains 15 recommendations, including 5 priority ones, for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Parliamentary elections are regulated primarily by the 1991 Constitution, the 2014 Election Code, and the 2005 Political Parties Act, as well as by relevant provisions of the Code of Administrative Procedure and the Criminal Code.⁶ Bulgaria is a party to major international and regional instruments related to the conduct of democratic elections.⁷

³ Following the December 2023 amendments to the Constitution, the discretion of the President's to appoint caretaker governments was narrowed by specifying eligible categories of office-holders for a caretaker prime minister and introducing a two-month period for holding parliamentary elections following the appointment of a caretaker government. Prior to appointing a caretaker government, the President must consult parliamentary groups and appoint a caretaker cabinet upon the proposal of the designated caretaker prime minister.

⁴ See all previous [ODIHR election-related reports on Bulgaria](#).

⁵ ODIHR was invited to observe the 27 October 2024 early parliamentary elections; however, after careful consideration, ODIHR informed the authorities that it was not in a position to deploy an election observation activity.

⁶ Other relevant legislation includes the 1999 Civil Registration Act, 2009 Direct Citizen Participation in State and Local Government Act, 1998 Radio and Television Act; as well as Territorial Administration Act, and the Local Self-Government and Local Administration Act, which regulate administrative-territorial structures and local authorities' competences.

⁷ Including the [1950 European Convention on Human Rights \(ECHR\)](#), [1966 International Covenant on Civil and Political Rights](#), [1965 International Convention on the Elimination of All Forms of Racial Discrimination](#), [1979 Convention on the Elimination of All Forms of Discrimination against Women \(CEDAW\)](#), [1995 Council of Europe Framework Convention for the Protection of National Minorities](#), [2003 UN Convention against Corruption](#), and the [2006 Convention on the Rights of Persons with Disabilities \(CRPD\)](#). Bulgaria is also a member of the Council of Europe's Venice Commission and the Group of States against Corruption (GRECO). As of the time of reporting, Bulgaria has signed but not ratified the [2011 Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence](#).

The legal framework has remained largely unchanged since the last parliamentary elections. In 2024 and 2025, several draft amendments to the Election Code were introduced by different parliamentary groups, but most amendments were either not adopted or addressed technical rather than structural issues previously identified by ODIHR.⁸ In February 2026, parliament adopted amendments introducing a limit of 20 polling stations per non-EU country outside Bulgarian diplomatic and consular representations, overriding the earlier presidential veto. Several ODIHR NAM interlocutors expressed dissatisfaction with the late changes and noted that the limitation might disproportionately affect voters in several countries with sizeable Bulgarian diaspora.⁹

Most ODIHR NAM interlocutors noted that while the legal framework offers an overall adequate basis for the conduct of elections, there are gaps and inconsistencies, and none of the legislative attempts constituted a comprehensive review of the legislation, with several interlocutors describing them as primarily politically driven.¹⁰ Moreover, several ODIHR recommendations remain unaddressed, including those related to voting and candidacy rights, participation of women and persons belonging to minorities, abuse of state resources, and effective electoral dispute resolution.

The 240 members of the National Assembly are elected for a four-year term under a proportional representation system in 31 multi-member constituencies. The constituencies correspond to the 28 administrative districts, with the City of Sofia divided into three constituencies and the District of Plovdiv divided into two.¹¹ The number of mandates allocated to each constituency is determined on the basis of the most recent census data and population figures, with each constituency assigned at least four seats.¹²

Parties and coalitions must obtain at least four per cent of the valid votes cast nationwide, including those cast abroad, to be eligible for seat allocation. Seats are allocated within each constituency using the *D'Hondt* highest averages method. Independent candidates must obtain at least the constituency electoral quota to be elected.¹³ The system provides for open lists. Voters may express a preference for one candidate on the list of their chosen party or coalition.¹⁴

⁸ These were related to voting technology, voter registration, vote counting, out-of-country voting arrangements, and the composition of the CEC. Some of the initiatives involved consultations with civil society organizations.

⁹ Estimates indicate that among non-EU countries, Turkey hosts the largest Bulgarian community (around 300,000), followed by the United States (over 100,000), and the United Kingdom (tens of thousands).

¹⁰ In April 2025, the CEC submitted a report to the parliament underlining a number of deficiencies in electoral legislation, but these were left without consideration during legislative process. In its 2025 [decision](#), the Constitutional Court underlined that the fact that “Election Code was amended 27 times since its adoption does not contribute to building and strengthening trust in the electoral process and its results, guaranteeing the universal, equal and direct right to vote by secret ballot for every citizen”.

¹¹ By law, the President determines the constituencies’ names, numbering and boundaries no later than 56 days before election day. The 2022 amendments to the Election Code postponed the establishment of a separate constituency for out-of-country voters until January 2025; subsequent amendments postponed its entry into force until January 2028.

¹² The [18th Population and Housing Census](#) was held from 7 September until 10 October 2021.

¹³ The constituency electoral quota is calculated by dividing the total number of valid votes cast in the constituency by the number of seats allocated to it.

¹⁴ To obtain a preferential mandate, a candidate must receive at least seven per cent of the votes cast for the respective list in the constituency. If no preference is indicated, the vote is attributed to the candidate placed first on the list.

C. ELECTION ADMINISTRATION

The election administration is composed of the CEC, 31 District Election Commissions (DECs), and some 12,000 Precinct Election Commissions (PECs).¹⁵ The CEC is a permanent body composed of 15 members appointed for a 5-year term.¹⁶ Of these, eight members, including the chairperson, are women. DECs consist of either 13 or 17 members, depending on the number of parliamentary mandates allocated to the constituency, and are appointed for each election by the respective higher-level election commission, following consultations among the parliamentary parties and coalitions within the constituency or municipality.¹⁷ PECs comprise between 5 and 9 members, depending on the number of registered voters in the precinct.

The CEC is mandated to oversee electoral preparations and implement them jointly with the government, local authorities, and other actors.¹⁸ Preparations are ongoing, and the CEC informed the ODIHR NAM that, despite the early nature of the elections, it is confident in its ability to administer the process, citing institutional experience from previous early electoral cycles. The CEC initiated preparatory activities, including procurement related to machine voting, servicing of equipment, and planning of the voter information campaign. The CEC plans to conduct cascade trainings of lower-level commissions and a number of interactive activities focused on electoral day procedures and voter information, including online materials and public outreach.

Most interlocutors met by the ODIHR NAM expressed varied levels of confidence in the technical capacity of election administration. Some noted that the CEC has limited capacity to deliver on its mandate, and that the distribution of responsibilities across multiple institutions may limit its direct operational control over technical aspects of the process, while others voiced concerns over perceptions of impartiality and politicized and non-transparent decision-making. Most representatives of civil society and political parties met by the ODIHR NAM expressed concerns about the lack of criteria for appointment of lower-level commissioners, their frequent last-minute replacements without mandated training, and insufficient capacity to manage counting procedures, noting numerous prior instances of incorrect completion of results protocols. Some interlocutors also alleged instances of interference by local authorities in the work of PECs, particularly in smaller municipalities and rural areas, and raised concerns that the law does not prohibit the reappointment of members of polling stations implicated in the violations identified by the 2025 Constitutional Court decision.

The law requires municipalities to designate polling stations accessible to voters with visual impairments and reduced mobility within each constituency, but does not require that all polling stations be accessible. Mobile voting is available upon request for voters with physical disabilities; however, this mechanism does not ensure independent voting. Tactile ballot templates are provided at polling stations to facilitate independent voting by visually impaired voters. Previous ODIHR reports noted that not all polling stations were accessible and that accessibility remained uneven in practice.

¹⁵ In October 2024 early parliamentary elections, 719 polling stations were established abroad in 60 countries.

¹⁶ By law, the CEC should proportionally reflect the composition of the parliament. However, as the current CEC was appointed in May 2021 and has remained in place throughout several early elections, its composition does not correspond to the current parliamentary distribution of seats.

¹⁷ Parliamentary parties have primary nomination rights, but if positions remain vacant, other registered parties or coalitions may nominate members to fill the vacancies.

¹⁸ In line with the law, a government decision tasked a deputy prime minister with the co-ordination of the organizational preparations of the elections. Civil Registration and Administrative Services General Directorate (GRAO), within the Ministry of Regional Development and Public Works, verifies supporting signatures and cross-checks candidate data against population registers. Information Services, a state-owned enterprise, develops and maintains the software used for machine voting and result tabulation. The private contractor, selected through public procurement, provides technical deployment, configuration, and logistical support for voting machines.

The CEC website includes basic accessibility features such as an adjustable font size. No sign language interpretation or closed captioning is provided for live or recorded CEC sessions.

D. USE OF TECHNOLOGIES

On election day, voters may vote either using voting machines or paper ballots in all polling stations with at least 300 registered voters. The CEC informed the ODIHR NAM that pre-election technical checks of the machines identified deficiencies in approximately 1,000 devices. According to the CEC, corrective measures are being undertaken, and a sufficient number of machines remain available for deployment. The law requires video recording of the opening, voting, counting, and tabulation processes in polling stations. While the measure aims to enhance public confidence, previous elections saw several cases in which recording devices were not activated or functioned only partially.¹⁹ The Election Code does not provide specific sanctions for failure to record, and interlocutors expressed concerns regarding the effectiveness of enforcement. The CEC informed the ODIHR NAM that it had instructed DEC's to review such cases; however, several interlocutors questioned whether adequate follow-up measures were undertaken.

Several ODIHR NAM interlocutors expressed concern about insufficient institutional control of voting machines exercised by the CEC, as well as the fact that the use of the voting machines was reduced to the printing of 'machine ballots', cast and counted in the same way as paper ballots, and regretted the loss of other benefits associated with their use. Although the CEC conducts procurement procedures ahead of each election, it has continued to contract the same private company to provide election-related software, IT support, logistics, and training for election officials. Several ODIHR NAM interlocutors criticized this practice, noting that it may limit competition and transparency. In recent months, discussions on the possible introduction of optical ballot box scanners as an alternative or complement to machine voting were renewed, but did not result in legislative amendments prior to the announcement of early parliamentary elections.²⁰

E. VOTER REGISTRATION

Citizens over the age of 18 have the right to vote. The legislation retains restrictions on suffrage rights for persons deprived of legal capacity by a final court decision, including those with intellectual or psychosocial disabilities.²¹ The legislation also retains restrictions on suffrage rights for prisoners serving a prison sentence, irrespective of the gravity of the offence.²² Some 6.6 million voters were registered for the last early parliamentary elections.

The voter registration is passive and based on the permanent and continuously updated National Population Register maintained by the Civil Registration and Administrative Services General

¹⁹ According to the CEC, 63 polling stations out of a total of 11,626 polling stations that should have been equipped with CCTV did not provide a live video feed and recording of the October 2024 elections.

²⁰ According to the [March 2025 Constitutional Court decision](#), the chronology of amendments related to machine voting shows an absence of a consistent legislative approach, producing inconsistent technological solutions, which undermined public confidence in machine voting, and created obstacles and uncertainty for the free exercise of citizens' active electoral rights.

²¹ In March 2025, the [Constitutional Court reiterated Article 42\(1\) of the Constitution](#) in unchanged terms, thereby confirming that the constitutional framework governing these restrictions has not been amended.

²² According to Articles 12 and 29 of the [CRPD](#), "State Parties shall recognize that persons with disabilities enjoy legal capacity on an equal basis with others in all aspects of life" and ensure their "right and opportunity [...] to vote and be elected". Paragraph 48 of the CRPD Committee's [General Comment No. 1 to Article 12 of the CRPD](#) states that "a person's decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising [...] the right to vote [and] the right to stand for election". See the ECtHR judgements in [Kulinski and Sabev v. Bulgaria](#), [Marinov v. Bulgaria](#) and [Dimov and others v. Bulgaria](#).

Directorate (GRAO) within the Ministry of Regional Development and Public Works. Eligible voters with a permanent address in Bulgaria are automatically included in the voter list of their precinct. The 2024 amendments to the Civil Registration Law introduced provisions allowing citizens without a registered permanent address to be entered into voter lists based on an address designated by the municipality.²³ Voter lists are compiled by municipal administrations prior to each election and made available for public inspection online and at polling stations 40 days before election day. Requests for corrections may be submitted until seven days before election day, and court-ordered changes must be implemented no later than two days before election day.²⁴

Most ODIHR NAM interlocutors did not express specific concerns regarding the accuracy of voter lists. However, many noted that the permanent residence registration system, which all citizens are required to maintain, including those residing abroad for extended periods, may contribute to voter lists being inflated and may partly explain the relatively low voter turnout observed in recent elections.

F. CANDIDATE REGISTRATION

Eligible voters who are at least 21 years of age have the right to stand for election. Candidates may be nominated on the lists of political parties or coalitions registered by the CEC for the election. Independent candidates may stand in a constituency upon submission of at least 1,000 supporting signatures from voters in the respective constituency and payment of a financial deposit. The 2023 constitutional amendments removed the prohibition on dual citizens standing for parliamentary office, but introduced a requirement to reside in the country for at least 18 months prior to election day in order to run, contrary to international standards and good practice.²⁵

To register for the elections, political parties and coalitions must submit to the CEC supporting signatures of at least 2,500 voters and a financial deposit of BGN 2,500.²⁶ Nomination committees supporting independent candidates must submit to the respective DEC supporting signatures of at least 1 per cent of voters in the constituency, but not more than 1,000 signatures, as well as a deposit of BGN 100. Voters may sign in support of only one contestant in the elections.²⁷ Political parties and other interlocutors met by the ODIHR NAM did not raise concerns regarding the candidate nomination and registration process.

There are no special legislative measures to promote women's participation in parliamentary elections, despite longstanding ODIHR recommendations to consider such steps. Most parties met by the ODIHR

²³ See [decree No. 247](#) on the basis of article 98, paragraph 4 of the Constitution.

²⁴ Voters not included in the voter list at their permanent address may also be added on election day upon presentation of an official document issued by the respective municipal administration. In such cases, voters are required to submit a written declaration that they have not voted and will not vote elsewhere.

²⁵ Paragraph 15 of the [UN CCPR General Comment 25](#) states that “any restrictions on the right to stand for election, such as minimum age, must be justifiable on objective and reasonable criteria. Persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent, or by reason of political affiliation”. See also paragraph 24 of the [1990 OSCE Copenhagen Document](#) and sections I.1.1.c.iii. and I.1.1.iv of the [Venice Commission Code of Good Practice in Electoral Matters](#).

²⁶ Deposits are refunded to political parties and coalitions that obtain at least one per cent of the valid votes nationwide. Independent candidates are refunded if they receive not less than one quarter of the electoral quota in the respective constituency. Following Bulgaria's adoption of the Euro on 1 January 2026, monetary amounts currently stipulated in BGN are to be applied in Euro in accordance with the official fixed conversion rate (EUR 1 equals BGN 1.95583).

²⁷ Registration documents and candidate lists are verified by the respective election commissions and by GRAO, which verifies the validity of supporting signatures. Prospective contestants may remedy deficiencies identified in their documentation within three days of notification or replace ineligible candidates.

NAM stated they do not have specific internal policies aimed at promoting women candidates, and no legislative mechanisms to improve gender balance in elected bodies have been adopted.

G. CAMPAIGN ENVIRONMENT

The official campaign period starts 30 days before and ends 24 hours prior to election day. By law, campaign materials must identify the issuer and include a statement that vote-buying and selling constitute criminal offences. The Election Code also prescribes that the campaign be conducted only in the Bulgarian language, contrary to a prior ODIHR recommendation. Some political party interlocutors expressed regret regarding the language requirement, noting that sanctions had previously been imposed for the use of languages other than Bulgarian during campaign events. Prior ODIHR recommendations to strengthen safeguards against the abuse of state resources remain unaddressed.

Most parties met by the ODIHR NAM stated that they expect to conduct their campaign without undue hindrance, but several expressed concerns regarding the expected tone of the campaign and the potential use of harsh and divisive rhetoric, including the presence of extreme nationalist and polarizing narratives. Political parties met by ODIHR NAM stated that the campaign will focus on issues of corruption, governance, and institutional accountability, following the resignation of the previous government amid public protests linked to allegations of corruption and dissatisfaction with the 2026 state budget.²⁸ Parties indicated that they intend to organize in-person campaign events and use traditional media and online platforms.

Most ODIHR NAM interlocutors referred to longstanding allegations of vote-buying and so-called “controlled” voting, particularly in economically and socially vulnerable communities. A number of interlocutors also described entrenched clientelistic practices at the local level, especially in smaller municipalities, including pressure exerted on municipal employees and voters.²⁹ In addition, several interlocutors raised concerns regarding the potential misuse of administrative resources during the campaign.

Campaigning online and by third parties is not regulated. According to the law, social networks are not classified as media service providers for the purposes of campaign regulation.³⁰ Several ODIHR NAM interlocutors raised concerns about the potential misuse of online platforms, including artificial amplification of content and disinformation. At present, Bulgaria has no dedicated inter-institutional framework focused on the systematic exchange of information related to emerging cyber and information-related threats in the electoral context, nor on co-ordinating public awareness initiatives and monitoring publicly available online information relevant to cybersecurity and disinformation risks.

Bulgaria has adopted national legislation implementing the EU Digital Services Act (DSA) in 2025 and designated the Communications Regulation Commission (CRC) as the national Digital Services Co-ordinator. The CRC, alongside the Council for Electronic Media (CEM) and Personal Data

²⁸ Due to the failure to adopt a new budget, the parliament approved a bill on 17 December 2025, extending the 2025 budget into the first part of 2026.

²⁹ ODIHR has consistently highlighted allegations of vote-buying and controlled voting in its previous election observation reports, citing, *inter alia*, numerous alerts, criminal investigations and warnings reported by law-enforcement authorities. See also [Freedom House, Nations in Transit 2024: Bulgaria](#), which refers to persistent allegations of vote-buying and describes entrenched patronage networks, including at the local level.

³⁰ As such, election-related content disseminated via online platforms does not fall under the same regulatory framework applicable to broadcast media, and the CEC does not exercise oversight over online political advertising or campaign content on social networks.

Protection Commission, were designated as competent authorities.³¹ The CRC formally began exercising its full functions under the DSA in November 2025, and its representatives noted that the scope of their authority is limited, including the absence of legal instruments to enforce actions or sanction violations against very large online platforms, and that additional clarification of competences and co-operation between different bodies would be beneficial in the electoral context.³² The CRC representatives indicated plans to organize consultations with major social media platforms and the CEC ahead of the upcoming elections. At the same time, they acknowledged that co-operation and responsiveness from certain major platforms have thus far been limited. In addition, the EU Regulation on the transparency and targeting of political advertising has not yet been implemented through the necessary national measures.³³ Many ODIHR NAM interlocutors raised concerns that activities in the online space remain insufficiently monitored, and noted that the absence of a clear framework for political advertising online may affect the transparency of digital campaigning.

H. PARTY AND CAMPAIGN FINANCE

The Election Code and the Political Parties Act regulate political and campaign finance. Parties and coalitions that received at least one and four per cent of the valid votes nationwide in the previous elections, respectively, are entitled to annual public funding, which may be used for campaign purposes.³⁴ Campaigns may be financed by contestants' own funds and by monetary or in-kind donations from natural persons. Donations exceeding one minimum monthly wage must be accompanied by a declaration on the origin of the funds.³⁵ The law does not cap individual donations. Contributions from legal entities, religious institutions, anonymous or foreign sources are prohibited. Transactions exceeding BGN 1,000 must be conducted via bank transfer, and contestants are required to maintain a dedicated campaign account. Campaign expenditure is capped at BGN 3 million for parties and coalitions and BGN 200,000 for independent candidates.

The National Audit Office (NAO) oversees political and campaign finance. Contestants are required to disclose campaign income and media contracts during the campaign; however, they are not obliged to report campaign expenditure prior to election day. In addition to contestants' reports, the NAO cross-checks information against invoices and documentation submitted by media outlets and agencies providing public opinion services, as applicable. Within 30 days after the elections, contestants must submit final reports, which the NAO publishes as received and subsequently audits.³⁶ The law does not regulate or provide for effective oversight of expenses related to third-party campaigning or campaigning on social networks.³⁷ Some ODIHR NAM interlocutors raised concerns about the possible use of cryptocurrencies in campaign-related activities, which the legislation does not explicitly address in the context of political finance.³⁸

³¹ This includes the Council for Electronic Media.

³² As no major online platforms are registered in Bulgaria, the CRC mainly receives and forwards alerts concerning potential violations and participates in cross-border co-operation mechanisms foreseen by the DSA.

³³ [Regulation \(EU\) 2024/900](#) of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising, which establishes EU-wide rules to enhance transparency in political advertising, including requirements for the disclosure of sponsors, funding sources and targeting criteria, as well as restrictions on the use of personal data for political advertising, with the aim of safeguarding democratic processes and preventing manipulation.

³⁴ In 2025, 12 political parties received direct public funding.

³⁵ On 1 January 2026, the minimum monthly wage in Bulgaria was increased to EUR 620.20.

³⁶ The NAO has a six-month deadline to complete the audit of the information provided.

³⁷ As social media does not qualify as "media" under the Election Code, related expenditure is not covered by the existing oversight framework.

³⁸ Cryptocurrencies are legal and regulated in Bulgaria under the [EU Markets in Crypto-Assets](#) (MiCA) regime and national law.

The legislation provides for sanctions and, in some instances, suspension of public funding for non-compliance. Representatives of NAO noted that the frequency of elections has significantly increased the Office's workload and that the low BGN 1,000 threshold triggers extensive verification requirements. In January 2026, Parliament adopted amendments to the National Audit Office Act that reassigned a significant part of the functions previously exercised by the former anti-corruption commission to the NAO, framing this as a strengthening of the NAO's role in the prevention of corruption.

Overall, most ODIHR NAM interlocutors did not raise major concerns regarding the legal framework for campaign finance, but noted that it would benefit from further revision, particularly with respect to the absence of interim reporting requirements and the limited regulation and oversight of online campaign-related expenditure to enhance transparency.

I. MEDIA

The media landscape is diverse, with television (TV) remaining the primary source of news, followed by online outlets. Public service broadcasters, Bulgarian National Television (BNT) and Bulgarian National Radio (BNR), remain among the most trusted news sources, according to recent public opinion surveys.³⁹ Internet penetration exceeds 80 per cent, and the influence of online news portals and social networks as sources of political information continues to grow. Several ODIHR NAM interlocutors expressed concerns about the professional security of journalists and the broader environment for editorial independence.⁴⁰ They noted that dismissals or removals of journalists following public statements or perceived political positioning are not uncommon, and may contribute to a climate of caution within newsrooms.⁴¹ Such developments, according to interlocutors, risk encouraging self-censorship among journalists. In addition, there are delays in implementing the European Media Freedom Act (EMFA), including the temporary suspension of a governmental working group responsible for advancing related reforms.⁴²

Following a prolonged period during which the CEM had not appointed a permanent Director General of BNT, the CEM elected Milena Milotinoва as Director General for a three-year term, one day after the announcement of early parliamentary elections.⁴³

The media market is characterized by a high degree of ownership concentration. Two major groups, PPF Group and United Group, hold significant positions in the television and telecommunications sectors.⁴⁴ Several ODIHR NAM interlocutors described the media environment as polarized and noted that parts of the private media sector are perceived as having clear editorial leanings or being closely

³⁹ See the [research](#) on Bulgaria conducted by the Reuters Institute in 2025.

⁴⁰ According to the 2025 mission, organized by the [Council of Europe's Safety of Journalists Platform](#) and the [Media Freedom Rapid Response](#), "previous cases involving attacks on journalists by police have suffered from delayed justice," and "certain stakeholders raised ongoing concerns about politicized investigations by prosecutorial authorities against the media".

⁴¹ See Association of European Journalists – Bulgaria, "[Top Bulgarian TV anchor taken off air amid fears of political interference](#)".

⁴² [Regulation \(EU\) 2024/1083](#) of the European Parliament and of the Council of 11 April 2024 establishing a common framework for media services in the internal market and amending Directive 2010/13/EU (European Media Freedom Act).

⁴³ CEM was not able to finalize the procedure due to pending court appeals. On 13 February 2026, the Supreme Administrative Court declared the appeals inadmissible, after which the CEM resumed the procedure and elected a new Director General. The previous Director General had continued to serve in an acting capacity following the expiration of his mandate in 2022.

⁴⁴ In February 2024, United Group further expanded its presence through the [acquisition of Bulsatcom](#), a satellite television and telecommunications operator, consolidating its position in the market.

aligned with particular political actors. Some interlocutors also expressed the view that increasing concentration of ownership may affect the diversity of viewpoints and editorial independence.⁴⁵

The legal framework provides constitutional guarantees for freedom of expression and the right to information. The 2019 amendments reduced certain penalties, including the removal of imprisonment for defamation; however, defamation remains a criminal offence punishable by fines. The EU Anti-Strategic Lawsuit Against Public Participation (SLAPP) Directive entered into force in April 2024 and requires transposition by Member States by 7 May 2026.⁴⁶ The Ministry of Justice initiated preparatory work, including the establishment of working groups to examine potential legislative measures addressing SLAPP. However, at the time of reporting, no specific legislation transposing the Directive had been adopted. Several ODIHR NAM interlocutors indicated that further clarification from the authorities would be beneficial regarding the planned approach and timeline for transposition.

By law, only the public service broadcasters, BNT and BNR, are required to cover elections in accordance with the principles of equitability and objectivity and allocate free airtime to each contestant. The BNT mentioned plans to cover the elections extensively, including through talk shows and debates between contestants and their representatives. Election coverage by private broadcasters is largely unregulated. While the legal provisions requiring the allocation of equal time are intended to contribute to a level playing field, several ODIHR NAM interlocutors noted that, in practice, the strict application of equal-time formulas may limit the ability of broadcasters to structure substantive debates and prioritize issues of public interest. Some interlocutors noted that when numerous parties and coalitions contest elections, the allocated time per contestant becomes limited, reducing opportunities for in-depth discussion. Some interlocutors also expressed the view that the current framework restricts editorial discretion, as public broadcasters are required to provide access to all registered contestants under the same conditions, irrespective of their political platforms.

The oversight of broadcast media, including during the election campaign, is exercised by the CEM, which reports potential breaches of election-related provisions to the CEC, which is competent to establish violations and impose sanctions under the Election Code. In addition, the National Council for Journalistic Ethics, a self-regulatory body established in 2005, may issue opinions and decisions concerning harmful or unethical content based on the Code of Ethics of Bulgarian Media; however, its decisions are not legally binding, and it does not possess sanctioning powers.⁴⁷ The Radio and Television Act contains provisions prohibiting incitement to hatred and discrimination, and empowers the CEM to impose sanctions on audiovisual media service providers for related violations. Amendments adopted in recent years aligned the national framework with the revised EU Audiovisual Media Services Directive, including provisions concerning video-sharing platforms.⁴⁸ Several ODIHR NAM interlocutors nevertheless expressed the view that existing safeguards against hate speech remain insufficient in practice, particularly in the online environment and on social networks.

J. ELECTION DISPUTE RESOLUTION

Election disputes are handled by election commissions and the administrative courts, with standing to file complaints limited to persons with a legitimate legal interest in accordance with the Administrative

⁴⁵ The [2025 European Commission Rule of Law Report for Bulgaria](#) also noted risks related to ownership concentration and its potential impact on media pluralism.

⁴⁶ [Directive \(EU\) 2024/1069](#) of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings.

⁴⁷ See the [Ethical Code of the Bulgarian Media](#).

⁴⁸ Amendments to the Radio and Television Act adopted in 2020 transposed the [EU Directive \(EU\) 2018/1808](#). Subsequent amendments in 2022 further clarified supervisory competences of the CEM.

Procedure Code.⁴⁹ In addition, any citizen may submit an alert concerning election-related violations to the election administration. The Election Code provides expedited procedures, with deadlines ranging from three days to as little as one hour on election day. Decisions of the CEC may be further appealed to the competent administrative court or, in certain cases, directly to the Supreme Administrative Court (SAC), which serves as the final judicial instance in electoral matters. Parliamentary election results may be challenged only before the Constitutional Court within 15 days of their announcement. Contestants do not have direct access to the Constitutional Court to challenge election results, a limitation previously noted by ODIHR as inconsistent with international standards concerning effective legal remedy.⁵⁰

ODIHR NAM interlocutors did not raise major concerns regarding the legal framework or the functioning of the system for resolving election disputes. While broader judicial reforms have been undertaken in recent years, including constitutional amendments affecting the governance of the judiciary, interlocutors did not indicate that these reforms have directly affected the handling of electoral disputes.⁵¹

K. CITIZEN AND INTERNATIONAL OBSERVERS

The Election Code provides for observation of all stages of the electoral process by citizen and international observers. Organizations must apply for accreditation to the CEC no later than seven days before election day. Registered contestants are entitled to appoint representatives to follow the work of election commissions at all levels and proxies to observe the work of PECs during voting and counting.⁵² Several political party representatives informed the ODIHR NAM that they intend to nominate a large number of proxies and commission representatives, citing their aim to strengthen oversight of election day procedures in light of concerns raised during previous electoral cycles.

No large-scale nationwide citizen election observation is conducted. However, several civil society organizations met by the ODIHR NAM expressed their intention to follow specific aspects of the electoral process and to deploy observers to a limited number of polling stations, and some of them stated they will try to monitor streaming from video cameras on election day to detect and record any possible violations. In addition, a Civil Society Council operates as a consultative body to the CEC, providing a platform for dialogue between the election administration and civil society organizations.⁵³

IV. CONCLUSIONS AND RECOMMENDATIONS

Most ODIHR NAM interlocutors underlined the need for a robust ODIHR election observation presence in light of political polarization, and declining public trust in electoral integrity, viewing observation as a means to promote confidence in the electoral process. Particular concerns were raised

⁴⁹ Decisions of lower-level election commissions are appealed to the respective higher-level election commission.

⁵⁰ Article 2.3 of the [ICCPR](#) states that “[a]ll persons whose rights or freedoms are violated shall have an effective remedy [...]”; see also paragraph 5.10 of the [1990 OSCE Copenhagen Document](#). Standing to file such a petition is limited to at least one-fifth of the Members of Parliament, the President of the Republic, the Council of Ministers, the Supreme Court of Cassation, the Supreme Administrative Court, or the Prosecutor General.

⁵¹ The [2025 European Commission Rule of Law Report for Bulgaria](#) indicates that perceived judicial independence remains relatively low and highlights outstanding reforms concerning the Inspectorate to the Supreme Judicial Council and safeguards against political influence.

⁵² Only one proxy per contestant may be present at a polling station at a time.

⁵³ The [2025 European Commission Rule of Law Report for Bulgaria](#) notes that civil society organizations continue to play a role in public policy consultation and governance oversight, while facing challenges related to funding sustainability.

over the capacity and performance of the election administration, conduct of the campaign, including online and in the media, implementation of the legal framework, and election day procedures. Interlocutors also highlighted issues that would merit attention by an ODIHR election observation activity, including allegations of vote buying, clientelistic practices, and possible pressure and voter intimidation, particularly in smaller and economically disadvantaged municipalities.

Based on the findings in this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the 19 April 2026 early parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 16 long-term observers to follow the electoral process countrywide, as well as 200 short-term observers to observe election day proceedings. In line with ODIHR's standard methodology, the EOM will include a media monitoring component and will assess the campaign environment and activities across traditional media, online outlets, and social media platforms. The mission will also assess institutional preparedness and effectiveness in identifying and responding to disinformation, misinformation, and potential foreign and domestic interference, as well as existing co-operation mechanisms with social media platforms.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs

Ivan Naydenov, Permanent Secretary

Hristiana Grozdanova, Director of Human Rights

Milena Ivanova, Head of International Humanitarian Organization Department and Focal Point for Election Observation Missions

Central Election Commission

Kameliya Neykova, Chairperson

Emil Voynov, Vice-chairperson

Rositsa Mateva, Vice-chairperson

Tsvetozar Tomov, Vice-chairperson

Sevintch Solakova, Secretary

Georgi Bahanov, Members

Elka Stoyanova, Member

Erhan Chaushev, Member

Yordanka Gancheva, Member

Gergana Stoyanova, Member

Ljubomir Georgiev, Member

Tsvetanka Georgieva, Member

Information Services

Alexander Stanev, Director of System Integration and Innovations

Penka Borisova, Head of Legal Department

Civil Registration and Administrative Services General Directorate, Ministry of Regional Development and Public Works

Ventsislav Hristov, Director General

Nina Simeonova, Head of Methodology and Control Department

Supreme Administrative Court

Marinika Cherneva, Judge, Acting Chairperson

Tanya Damyanova, Judge

Diana Garbatova, Judge

Tatyana Hinova, Judge

Krasimir Kanchev, Judge

Vladimir Parvanov, Judge

Todor Petkov, Judge

Maria Radeva, Judge

Mira Raycheva, Judge

Ralitsa Romanova, Judge

Svetoslav Slavov, Judge

Milena Ilieva, Judicial Assistant to the Cabinet of the Chairperson

National Audit Office

Dimitar Glavchev, President
Margarita Nikolova, Vice President
Ekaterina Percheva, Director of the Specific Audits Directorate

Council for Electronic Media

Simona Veleva, Chairperson
Zornitsa Gyurova, Director of the Monitoring and Analysis Directorate
Galina Georgieva, Member
Kadrinka Kadrinova, Member
Gabriela Naplatanova, Member
Prolet Valkova-Velkova, Member

Communications Regulation Commission

Nikolay Petrov, Director of International Activity and Digital Services Directorate
Marta Ivanova, Head of International Activity and Digital Services Department
Miglena Peychinova-Zaharinova, State Expert, International Activity and Digital Services Department
Irena Simeonova, State Expert, International Activity and Digital Services Department
Stepan Khimuk, Chief Legal Counsel, Court Presentation and Administrative Penalties Department, Legal Directorate

Public Broadcaster – Bulgarian National Television

Alexander Kumanov, Head of International Communications Department
Valery Marinov, Head of Unit, International Communications Department
Dobrina Cheshmedjieva, Deputy Head of the News and Current Affairs Directorate

Political Parties⁵⁴

Hayri Sadakov, Chairperson of the Parliamentary Group, Alliance for Rights and Freedoms
Sevim Ali, Deputy Chairperson of the Parliamentary Group, Alliance for Rights and Freedoms
Taner Ali, Deputy Chairperson of the Parliamentary Group, Alliance for Rights and Freedoms
Nataliya Kiselova, Chairperson of the Parliamentary Group, BSP – United Left
Mariana Boyadzhieva, Deputy Chairperson of the Parliamentary Group, BSP – United Left
Maya Dimitrova, Member of the Parliamentary Group, BSP – United Left
Rumyana Siderova, Member of the Parliamentary Group, BSP – United Left
Delian Dobrev, Member of the Parliamentary Group, GERB – UDF
Yordanka Fandakova, Member of the Parliamentary Group, GERB – UDF
Stanislav Anastassov, Deputy Chairperson of the Parliamentary Group, Movement for Rights and Freedoms – New Beginning
Iskra Mihaylova, Deputy Chairperson of the Parliamentary Group, Movement for Rights and Freedoms – New Beginning
Atidzhe Alieva-Veli, Member of the Parliamentary Group, Movement for Rights and Freedoms – New Beginning
Krasimira Katincharova, Deputy Chairperson of the Parliamentary Group, Velichie
Pavlin Petrov, Deputy Chairperson of the Parliamentary Group, Velichie
Stiliana Bobcheva, Secretary of the Parliamentary Group, Velichie
Larisa Savova, Secretary of the Parliamentary Group, Velichie
Kostadin Hadzhiyski, Member of the Parliamentary Group, Velichie
Ivaylo Lazarov, Member of the Parliamentary Group, Velichie

⁵⁴ ODIHR offered meetings to all parliamentary political parties.

Nikolay Denkov, Co-Chairperson of the Parliamentary Group, We Continue the Change – Democratic Bulgaria

Nadejda Iordanova, Co-Chairperson of the Parliamentary Group, We Continue the Change – Democratic Bulgaria

Media

Maria Cheresheva, Association of European Journalists – Bulgaria

Alexander Detev, Editor, Deutsche Welle Bulgaria

Genka Shikerova, Radio Free Europe

Civil Society

Vanya Nusheva, Chief Assistant Professor, Sofia University St. Kliment Ohridski; External Expert, Transparency International – Bulgaria

Nadezhda Gologanova, Civil Initiative for Free and Democratic Elections; Chairperson of the Civil Society Council to the CEC

Tsvetelina Peneva, Democracy and the Rule of Law Association; Deputy Chairperson of the Civil Society Council to the CEC

Diana Eftimova, Chair of the Board, Institute for Public Environment Development

Lilian Nikiforova, Expert, Institute for Public Environment Development

Stoil Titzelkov, Coalition for Fair Election

Mario Rusinov, Coalition for Fair Elections/Anti-Corruption Fund

Daniel Stefanov, Programs Director, Center for Election Studies, New Bulgarian University

International Community⁵⁵

Representatives of diplomatic missions of Denmark, Finland, France, Germany, Italy, Moldova, Montenegro, Serbia, Slovakia, and Slovenia.

⁵⁵ The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in Bulgaria.