



Office for Democratic Institutions and Human Rights

BOSNIA AND HERZEGOVINA

**Early Election of the President of Republika Srpska
23 November 2025**

**ODIHR Special Election Assessment Mission
Final Report**



Warsaw
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BOSNIA AND HERZEGOVINA
EARLY ELECTION OF THE PRESIDENT OF REPUBLIKA SRPSKA
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ODIHR Special Election Assessment Mission Final Report¹

I. EXECUTIVE SUMMARY

Following an invitation from the Central Election Commission (CEC) of Bosnia and Herzegovina (BiH), the OSCE Office for Democratic Institutions and Human Rights (ODIHR) deployed a Special Election Assessment Mission (SEAM) for the 23 November 2025 early election of the president of Republika Srpska (RS). The ODIHR SEAM assessed compliance of the electoral process with OSCE commitments, other international obligations and standards for democratic elections, as well as national legislation. For election day, the ODIHR SEAM was joined by delegations of the Congress of Local and Regional Authorities of the Council of Europe and the European Parliament.

In its Statement of Preliminary Findings and Conclusions on the election issued on 24 November, the ODIHR SEAM concluded that “in the 23 November early election of the president of Republika Srpska, candidates campaigned freely but the undue advantages enjoyed by the ruling party left contestants with unequal opportunities. The election featured polarising narratives about the functions of state institutions and the role of international actors in the governance of the country and generated limited engagement. Notwithstanding discriminatory candidate eligibility requirements, candidate registration was inclusive. Election preparations were managed in an overall professional manner despite serious organisational and budgetary challenges that further strained the limited operational capacity of the election administration. While the campaign environment was open, the combined impact of the misuse of public resources, the advantage of incumbency and the abolition of public funding created an uneven playing field. Limited paid advertising and editorial coverage by private media, along with the lack of debates and disproportionate coverage of the ruling party candidate on the Republika Srpska public broadcaster, hindered voters’ ability to make an informed voting choice. In the limited number of polling stations visited, the voting process was professional, well administered and orderly.”

On 28 August 2025, the CEC announced an early election of the president of RS for 23 November, following the conviction of the former RS President Milorad Dodik by the Court of BiH and the subsequent revocation of his mandate by the CEC. The election took place amid a deepening institutional standoff between the entity- and state-level authorities, along with ongoing challenges to state institutions and the OHR. While initially the former RS president Mr. Dodik and the Republika Srpska National Assembly (RSNA) asked stakeholders not to participate in the election, they eventually reviewed their position.

The legal framework provides an adequate basis for the conduct of democratic elections. A number of prior ODIHR recommendations were addressed through extensive amendments to the BiH Election Law imposed in March 2024 by the Office of the High Representative (OHR), such as reviewing the system of appointment of polling station committees (PSCs) to enhance their impartiality, enhancing regulation on the misuse of public resources and campaign violations, the timeframes for dispute resolution, and enhancing reporting of campaign finances. However, several other prior ODIHR recommendations remain unaddressed, including those related to active and passive suffrage rights, comprehensive regulation on the misuse of public resources, women’s participation, transparency of

¹ The English version of this report is the only official document. An unofficial translation is available in Bosnian, Croatian and Serbian.

the election dispute resolution process, dissuasive sanctions for campaign finance violations and effective oversight.

The election was administered by the CEC, 64 Municipal Election Commissions (MECs) and 2,350 PSCs. The CEC held regular sessions, which were open to observers and live-streamed online, with recordings also made available on the CEC's online platforms. The election administration carried out its duties professionally; however, it encountered challenges in adhering to certain deadlines. This was due to the delayed disbursement of the CEC's budget allocation and legal disputes in the procurement process, combined with reduced operational capacity resulting from a longstanding lack of permanent staff in many key positions within its Secretariat. Overall, stakeholders' confidence in the independence and impartiality of the election administration varied, and was particularly low for PSCs due to poor prior performance and proven malpractices in past elections.

Voting rights are granted to all citizens aged 18 or older, provided they have permanent residence in Republika Srpska or Brčko District or opted to vote for RS institutions. Throughout the year and prior to elections, voters have ample opportunities to verify their data on the voter lists and request corrections. The final voter register, closed on 3 November, included 1,264,364 eligible voters. While the inclusiveness of the Central Voter Register was not questioned, concerns about a significant number of deceased people and citizens who maintain official residence in the country despite living abroad remaining on the list persisted.

To stand as candidate for RS president, citizens who are registered voters must have permanent residence in the RS and must self-declare as members of one of the three constituent peoples. Such discriminatory eligibility requirements towards citizens not self-declaring as belonging to any of the three constituent peoples are contrary to OSCE commitments and international standards. In an inclusive process, the CEC registered all six nominated candidates. The certification of the Alliance of Independent Social Democrats (SNSD) was disputed in court, with the appellant arguing that the application was signed by an unauthorized person due to Mr. Dodik's conviction.

The campaign was competitive and contestants were able to campaign freely. However, the candidate supported by the ruling party enjoyed an undue advantage of incumbency, including through the misuse of public resources and pressure on public-sector employees. The election campaign was marked by a general reluctance across the political spectrum to engage. Some parties viewed the process as imposed by the BiH authorities and the OHR, while others saw it as a significant financial strain ahead of the 2026 elections. The campaign was concentrated on issues related to national identity and the entity within the state structure, with only limited reference to broader social and economic matters.

The BiH Election Law does not adequately regulate online campaigning on the internet and social networks. The two front-running candidates made use of platforms to present their campaign messages and activities. Overall, the online campaign maintained a neutral tone, but SNSD resorted to inflammatory language and negative messages in some instances. Placing paid campaign advertisements on social networks through marketing companies that used private rather than party accounts reduced transparency of the sponsors of the advertisements supporting the two front-runners.

While women were well-represented in MECs, accounting for 46 per cent of their members, only 2 of the 7 CEC members are women, which falls short of the legally required gender quota. No female candidate stood in this election; women's participation in the campaign was limited and the candidates' platforms did not address any gender issues.

Despite the 2024 amendments, the campaign finance regulatory framework does not ensure transparency and accountability, and long-standing ODIHR recommendations remain unaddressed.

In response to the OHR suspending funding for the RS ruling parties, the RSNA abolished funding from the entity budget for all parties, which left the opposition without funding. While the law prescribes limits on donations and expenditure as well as reporting requirements, third-party campaigning is not regulated. Candidates' interim reports were submitted and published in a timely manner, but they did not appear to reflect the actual expenditures. The CEC is mandated with oversight, but it lacks sufficient resources, thus reducing the effectiveness of oversight.

The media landscape in the RS is diverse but divided along party lines, while lack of transparency in ownership allows for the influence of special interests on reporting. Freedom of expression is guaranteed, but the recriminalisation of defamation, combined with threats to the media and isolated physical attacks, negatively affects the media environment. As required by law, both Bosnia and Herzegovina Radio and Television (BHRT) and Radio and Television of Republika Srpska (RTRS) provided candidates free airtime during the campaign, but not all contestants made use of this opportunity. While RTRS did not organise any debates, no candidate accepted to participate in those organised by the BHRT, which, combined with limited paid advertising aired by private media, diminished the ability of voters to make an informed choice. RTRS displayed a clear bias in their coverage in favour of the ruling party. The Communication Regulation Agency did not conduct media monitoring of the election-related content, citing a lack of capacity and human resources.

Complaints may be filed with the CEC and the Court of BiH. The CEC reviewed complaints in public sessions and largely within the legal deadlines, while its publicly available database on complaints was not always updated. Citizen observers may not file complaints to the CEC, but can submit information notices, which can trigger *ex officio* proceedings by the CEC. Prior to election day, the CEC reviewed some 60 alleged irregularities and imposed fines on the contestants in some cases. Most disputes pertained to campaigning before the official start of the campaign, misuse of public resources, hate speech and appointments of the PSC leadership. While the law prescribes an expedient dispute resolution, efforts to build the independence and impartiality of the judiciary have been insufficient, impacting public trust.

The law provides for election observation and grants observers access to the entire electoral process. In an inclusive manner, the CEC accredited 529 citizen observers, 100 international observers and 25 observers nominated by contestants. MECs accredited 4,243 observers from political entities. While citizen observer organizations were generally unobstructed in their work, in some instances, their observers reported difficulties in accessing individual MECs in the pre-electoral period as well as polling stations on election day. Some ODIHR SEAM observers were also hindered in their work during election day, indicating a lack of understanding of procedures by PSC members.

In line with ODIHR's methodology for election assessment missions, the mission members did not carry out systematic or comprehensive observation of the voting, counting and tabulation processes. In the limited number of polling stations (PSs) visited, the process was assessed as professional, well-organized, and orderly. However, the secrecy of the vote was not always ensured as a result of the layout of the polling stations and positioning of the voting screens. Most polling stations visited were not suitable for independent access by persons with disabilities.

Soon after the closing of polling stations, the CEC published preliminary results, enhancing the transparency and accountability of the election process. The main opposition candidate did not accept the outcome of the elections. The CEC *ex officio* ordered graphological examination of the signatures on voters' lists of over 145 PSCs in 19 municipalities, verification of the ballots cast with mobile ballot boxes and a control count of the results of 76 PSCs in six constituencies. On 15 December, the CEC announced the determined election results and ordered *ex officio* recounts in another 57 PSCs in six constituencies. The law does not set clear and objective criteria for control counts or recounts ordered *ex officio* by the CEC, thus granting the commission broad discretionary powers and lacking

sufficient safeguards against arbitrary decision-making. Subsequently, the CEC annulled the election for 136 PSCs in 17 constituencies and scheduled repeat voting for 8 February 2026. Final results were announced on 13 February 2026, with the overall voter turnout at 35.77 per cent.

This report offers a number of recommendations to further align elections in Bosnia and Herzegovina with OSCE commitments and other international obligations and standards for democratic elections. Priority recommendations relate to ensuring the independence and operational efficiency of the election administration, enhancing transparency and accuracy of the voter register, regulating online campaigning, enhancing campaign finance oversight, ensuring equitable media coverage of the election contestants, and enhancing the effectiveness of election dispute resolution. ODIHR stands ready to assist the authorities in improving the electoral process and addressing the recommendations contained in this and previous reports.

II. INTRODUCTION AND ACKNOWLEDGMENTS

Following an invitation from the Central Election Commission of Bosnia and Herzegovina, and based on the recommendation of a Needs Assessment Mission conducted from 22 to 25 September 2025, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) established a Special Election Assessment Mission (SEAM) on 28 October.² The ODIHR SEAM, headed by Mátyás Eörsi, consisted of 11 experts based in Banja Luka and four regional analysts deployed in teams of two across Republika Srpska. The 16 mission members were drawn from 11 OSCE participating States. The SEAM remained in Bosnia and Herzegovina until 28 November to follow post-election developments.

For election day, the ODIHR SEAM was joined by the Congress of Local and Regional Authorities of the Council of Europe (the Congress) and a delegation from the European Parliament (EP). Each of the institutions involved in the election observation activity has endorsed the 2005 Declaration of Principles for International Election Observation. The Head of the Congress delegation was Bernd Vöhringer, and the head of the EP delegation was Sérgio Humberto. On election day, 38 observers from 25 countries were deployed across the country, including 21 observers from ODIHR, a 16-member Congress delegation and a six-member EP delegation. Women accounted for 53 per cent of observers.

The ODIHR SEAM assessed the compliance of the election processes with OSCE commitments and other standards for democratic elections, as well as domestic legislation. In line with ODIHR's methodology for election assessment missions, the mission members did not carry out systematic or comprehensive observation of the voting, counting and tabulation processes. Mission members visited a limited number of polling stations on election day. This final report follows the Statement of Preliminary Findings and Conclusions, which was released at a press conference in Banja Luka on 24 November 2025.³

The ODIHR SEAM wishes to thank the authorities of Bosnia and Herzegovina for the invitation to observe the elections and the Central Election Commission for their assistance. The mission also wishes to express its appreciation to other state, entity and local institutions, political parties, media and civil society organizations, and international community representatives for their co-operation.

² The [ODIHR NAM report](#) noted 'While the deployment of a full-scale Election Observation Mission, including both long- and short-term observers, would have been warranted given the needs identified, the high number of concurrent election-related activities, together with the human and financial resources already committed to national-level elections, renders such a deployment unfeasible within existing allocations.'

³ See previous [ODIHR election reports on Bosnia and Herzegovina](#).

III. BACKGROUND AND POLITICAL CONTEXT

Under the Constitution, established by the 1995 General Framework Agreement for Peace, commonly known as the Dayton Peace Agreement (DPA), Bosnia and Herzegovina consists of two entities: the Federation of Bosnia and Herzegovina and Republika Srpska.⁴ The Constitution grants the status of “constituent peoples” to Bosniaks, Croats, and Serbs. Citizens may also declare themselves as “others”, either by identifying with another ethnic group or by choosing not to affiliate with any group.⁵ The DPA also established the Office of the High Representative (OHR), an international body charged with overseeing the implementation of civilian aspects of the peace settlement. In 1997, the OHR was granted the power “to make binding decisions” and “take measures against public officials to ensure the effective functioning of state institutions”.⁶

In the 2022 general elections, Milorad Dodik, leader of the Alliance of Independent Social Democrats (SNSD), was re-elected president of the Republika Srpska (RS). Following allegations of election fraud, the Central Election Commission of Bosnia and Herzegovina (CEC) conducted a control count of all the votes for the election of the RS president; the results of the control count did not impact the outcome of the election. Since 2023, the Republika Srpska National Assembly (RSNA) has consistently adopted laws, decisions and conclusions that contest the authority of state institutions and the OHR, which were subsequently repealed by the OHR or the BiH Constitutional Court.⁷

On 28 August 2025, following the conviction of the former RS President Milorad Dodik by the Court of BiH and the subsequent revocation of his mandate by the CEC, the CEC announced an early election of the president of RS for 23 November.⁸ The election took place amid a deepening institutional standoff between the entity- and state-level authorities, along with ongoing challenges to state institutions and the OHR. The election was widely perceived as a dual test for the resilience of the BiH constitutional framework as well as for the ruling SNSD and Mr. Dodik’s ability to maintain party leadership ahead of the 2026 general elections.

Shortly after the verdict, the RSNA adopted conclusions rejecting the conviction of Mr. Dodik and the call of the early election, and instructed RS institutions and political stakeholders to refrain from actions related to the conduct of the election.⁹ The RSNA also called for a referendum to be held on 25 October, which did not take place.¹⁰ Following the resignation of the RS prime minister (PM), the RSNA confirmed the PM appointment of Mr. Savo Minić, nominated by Mr. Dodik. Subsequently,

⁴ In addition, the Brčko District holds special status under direct state sovereignty. Each of the two entities has its own distinctive ethnic composition and a wide degree of autonomy, including its own constitution, political structure, governing institutions, administrative, and judicial bodies.

⁵ The Law on the Protection of the Rights of Members of National Minorities recognises 18 national minorities.

⁶ See the [Conclusions of the Bonn Peace Implementation Conference](#).

⁷ These include the Laws on the Non-Application of Laws and the Ban on the Operation of Extra-Constitutional Institutions of BiH, on High Judicial and Prosecutorial Council of the RS, Amending the Criminal Code of the RS, on Special Register and Public Aspect of Work of Non-Profit Organizations and the Decision on Measures and Tasks Arising from Unconstitutional Decisions and Actions of Extra-Constitutional Institutions of BiH.

⁸ On 26 February 2025, the former RS President Mr. Dodik was sentenced to one year of imprisonment and a six-year ban on holding public office, for defying OHR decisions, based on a criminal offence (Article 203a of the Criminal Code) introduced by the OHR in July 2023. On 12 June, the Appellate Division of the Court of BiH upheld the verdict while the prison sentence was converted into a fine later. On August 6, the CEC terminated the mandate of Mr. Dodik.

⁹ See the [22 August 2025 RSNA Conclusions](#) regarding the Information on the CEC Decision on the Termination of the Mandate of the President of the RS Milorad Dodik.

¹⁰ The question of the suspended referendum was: “Do you accept the decisions of the non-elected foreigner Christian Schmidt and the judgments of the unconstitutional Court of BiH pronounced against the RS president, as well as the CEC decision to revoke the mandate of the RS President Milorad Dodik?” On 6 October, Mr. Dodik publicly announced the postponement of the referendum to 9 January 2026.

the BiH Constitutional Court issued an interim measure suspending the legal effect of certain parts of the RSNA conclusions, citing a possibility of irreparable harm, thereby prohibiting RS institutions and officials from acting on those items pending a final decision while the final decision was issued after elections (*see Election Dispute Resolution*).¹¹

Mr. Dodik initially announced that his party would boycott the election. Nevertheless, on 24 September, the RSNA eventually repealed the suspended items of its conclusions and called on political parties to decide individually on their participation in the election. On 18 October, the RSNA also repealed several laws which the BiH Constitutional Court had found unconstitutional.¹² Furthermore, it confirmed the appointment of Ms. Ana Trišić-Babić as acting RS president.¹³ Shortly after the RSNA revoked the disputed laws, the USA lifted the sanctions against Mr. Dodik and other RS public officials and legal entities.¹⁴ Subsequently, the BiH Prosecutor suspended the investigation against Mr. Dodik for ‘attacking the constitutional order’.¹⁵ The BiH Constitutional Court dismissed Mr. Dodik’s appeals against his conviction and the revocation of his mandate.¹⁶

IV. ELECTORAL SYSTEM AND LEGAL FRAMEWORK

The president of the RS is directly elected for a four-year term. The candidate who receives the highest number of votes is elected president, while the two candidates from the remaining constituent peoples with the most votes are elected vice-presidents. The legal framework does not regulate early elections for a single vacancy of the president or vice-presidents. Consequently, the CEC addressed this gap by clarifying in its instruction that, in this early election, the president would be elected from among candidates of the constituent people not already represented in the vice-presidency. The mandate of the newly elected president will run until October 2026, when the next general elections are scheduled.

Bosnia and Herzegovina is party to the main international and regional instruments related to democratic elections and the legal framework provides a sufficient basis for the conduct of democratic elections.¹⁷ A number of prior ODIHR recommendations were addressed through extensive amendments to the BiH Election Law imposed in March 2024 by the OHR, such as reviewing the system of appointment of polling station committees (PSCs) to enhance their impartiality, strengthening regulation on the misuse of public resources by executive office holders and campaign violations, prolonging the timeframes for submission and review of complaints, and enhancing

¹¹ The interim measure was issued on 10 September, pursuant to a request filed by Denis Bećirović, a member of the Presidency of Bosnia and Herzegovina and 14 members of the House of Representatives of the Parliamentary Assembly of BiH. On 27 November, the Court annulled certain parts of the conclusions, including those rejecting decisions of state institutions and the instruction to prepare a resolution on self-determination.

¹² See the list of [repealed laws](#) on the RSNA website.

¹³ The RS Constitution does not prescribe how an acting president is nominated and appointed, except in cases of temporary prevention when the president may designate a vice-president. Ms. Trišić-Babić was proposed by a group of members of the RSNA. A challenge of the constitutionality of the appointment of the acting RS president is reportedly pending with the RS Constitutional Court.

¹⁴ See the [US Department of the Treasury’s Office of Foreign Assets Control \(OFAC\) statement of 29 October 2025](#).

¹⁵ See the [BiH Prosecutor’s decision of 30 October 2025](#) to suspend the investigation against Mr. Dodik.

¹⁶ See the [announcement of the BiH Constitutional court](#). The BiH Constitutional Court rejected the appeal against the Court of BiH verdict as unfounded, noting that there was no violation of the appellant’s right to a fair trial while the conviction was based on lawful and clearly formulated legal grounds; the court also noted that the imposed security measures met the accessibility and foreseeability requirements. The court dismissed as inadmissible the appeal against the CEC decision revoking the mandate, citing incompatibility of the allegations with the Constitution.

¹⁷ The early election of the RS president is primarily regulated by the 2001 BiH Election Law and the 2012 BiH Law on Financing of Political Parties. In addition, the RS Constitution contains provisions on the electoral system. The legal framework is supplemented by CEC regulations.

reporting of campaign finances.¹⁸ However, several other prior ODIHR recommendations remain unaddressed, including those related to active and passive suffrage rights, more comprehensive regulation on the misuse of public resources, women's participation, transparency of the election dispute resolution process, dissuasive sanctions for campaign finance violations and effective oversight.

A comprehensive review of the legal framework should be undertaken, as previously recommended, to address all ODIHR outstanding recommendations, and to remove existing inconsistencies. In line with OSCE commitments and international good practice, such a review should be open, inclusive, and consultative, and conducted well in advance of elections.

V. ELECTION ADMINISTRATION

The election was administered by a three-tiered structure led by the CEC and comprising 64 municipal election commissions (MECs) and 2,350 polling station committees (PSCs).¹⁹ By law, the composition of the election bodies at all levels must reflect the ethnic composition of their respective constituencies. While women were well-represented in MECs, accounting for 46 per cent of their members, only 2 of the 7 CEC members are women, which falls short of the legally required gender quota.²⁰

The CEC is a permanent independent authority mandated to regulate and oversee the electoral process. The CEC members are appointed by parliament for a seven-year term, with the chairperson elected from among the members on a rotational basis, for a 21-month period, taking into account their ethnic self-declaration.²¹ For administrative and organizational matters, the CEC is assisted by a secretariat, led by a secretary general.

MECs are permanent bodies appointed by the respective municipal and city authorities for a seven-year term, subject to approval by the CEC. The size of each MEC depends on the size of the constituency and the number of registered voters, with compositions of either three, five or seven members. The law confers powers on MECs, among others, in overall administration of elections within the respective constituency, determination of polling premises, appointing PSC members, and supervising their work and training.

The PSCs consist of a chairperson and 2 or 4 members (3 or 5 personnel in total) appointed prior to each election. Each chairperson and all members should have a deputy. While the chairpersons and their deputies are appointed by the CEC from among non-partisan applicants, the members and their

¹⁸ The amendments gradually introduced information and communication technologies (ICTs) in the electoral process and digitalized certain aspects of election administration; however, no ICTs were used in this election. In response to the imposition, in April 2024, the RSNA adopted an election law granting the RS Election Commission exclusive competence over elections in the RS, which was subsequently repealed by the BiH Constitutional Court.

¹⁹ This includes 139 mobile teams to manage voting for homebound voters and those in social, health care and penitentiary institutions. In addition, four PSCs for out-of-country voting in Austria, Germany, and Serbia were established. Additional staff was engaged in the Main Counting Centre (MCC) for the counting of mobile, tendered, absentee and postal ballots and verification of election materials and results.

²⁰ By law, the state bodies at all levels of organization shall include at least 40 per cent of members of each gender. Based on established practice, some MECs whose composition did not comply with the gender requirement were granted exemption, if necessary, as the overall gender representation across the country was taken into consideration rather than of the individual commissions.

²¹ Following an open recruitment process, the CEC members are nominated by the *ad hoc* Commission for Selection and Nomination, composed of two representatives each from the High Judicial and Prosecutorial Council, the Joint Administrative Committee of the BiH House of Representatives (HoR) of the Parliamentary Assembly (PA) and the CEC. Subsequently, the CEC members are appointed by the BiH PA HoR. The seven CEC members include two Bosniaks, two Croats, two Serbs and one member representing "other" communities.

deputies are nominated in equal numbers by the contesting parties represented in the RSNA. Only SNSD and the Serb Democratic Party (SDS) had the right to nominate PSC members and, where they failed to do so, members were selected from MEC reserve lists of PSC members from past elections or based on new recruitment calls. Most PSC chairpersons and members and their deputies were appointed in a timely manner, although some MECs experienced difficulties with staffing polling stations, citing low remuneration, past issues with disbursement of payments and a lack of motivation. Shortly before election day, the CEC replaced several chairpersons after determining they were ineligible due to past political affiliation.²² Some members and chairpersons were also replaced following their resignations. As this was after completion of the training, the resignations diminished the training's value and impact. Positively, some MECs reported efforts to continue training up to election day.

Overall, stakeholders' confidence in the independence and impartiality of the election administration varied, and was particularly low for PSCs due to poor prior performance and proven malpractices in past elections.²³ Despite the revised appointment mechanism for the PSCs introduced in 2024, some ODIHR SEAM opined that many members who had been appointed by parties in previous elections were reappointed in this election as non-partisan chairpersons, irrespective of their past political affiliation.

The election administration carried out its duties professionally; however, it encountered challenges in adhering to certain deadlines. The delayed disbursement of the CEC's budget allocation deferred the start of election preparations by a few weeks, while legal disputes in the procurement process hampered technical preparations and logistical operations for distribution and retrieval of election materials.²⁴ The operational capacity of the CEC and its ability to fulfil its mandate independently was further strained by a longstanding lack of permanent personnel, stemming from administrative and legal constraints, in many crucial positions within the CEC Secretariat, most notably in legal, audit, communication and education, and IT departments.²⁵

To ensure independence and operational efficiency of the election administration, the authorities should guarantee adequate and timely budget allocation and operational support, including in non-election years. The capacities of the Central Election Commission's personnel should match the responsibilities vested in the Commission under the Election Law, with essential qualified staff employed on a permanent basis.

The CEC adopted new regulations and reinstated some previous ones related to voter and candidate registration, PSC appointment, and election campaign, adjusting the deadlines and rules to the early election. To coordinate their activities, the CEC maintained regular communication with the MECs.

²² Prior to the election, the CEC dismissed some 170 PSC chairpersons and deputy chairpersons and appointed around 210 new ones. On election day, some 70 additional PSC chairpersons and deputies were dismissed for failure to appear to work at polling stations.

²³ The CEC informed the ODIHR SEAM that the CEC as institution as well as individual members were the targets of hostile verbal attacks and insults related to discharge of their duties over a long period. After election day, the CEC was also confronted with attempts to question several members' impartiality, alleging their connection to political parties, both governmental and from the opposition. On this account, the CEC launched an official procedure against SDS, SNSD and ZPR for spreading false information, with a presumed aim to disinform voters and undermine the integrity of the electoral process.

²⁴ The CEC was required by law to receive the requested funds the latest 15 days after the call of the early election, i.e., by 12 September. However, the Ministry of Finance and Treasury of BiH released them only on 22 September, enabling the CEC to adopt the Instruction on Deadlines for Election Activities, effective as of 25 September.

²⁵ While the Election Law defines the CEC as an independent body which derives its authority solely from the BiH Parliamentary Assembly and reports directly to it, the internal organization of personnel within the secretariat is subject to approval of the BiH Council of Ministers. Currently, the CEC Secretariat comprises 64 personnel; which, however, includes also ancillary staff. Based on the new proposed CEC rulebook on internal organization, the CEC staff is short of 120 employees.

However, some MECs expressed dissatisfaction over cooperation with the CEC, citing insufficient guidance and compressed deadlines not reflecting the operational needs in the field, affecting the efficiency and timeliness of the electoral preparations.

The CEC held regular sessions, which were open to observers and live-streamed online, with recordings also made available on the CEC's online platforms. However, CEC sessions were not announced in advance as legally required and not all acts adopted by the CEC, such as complaints, decisions on appointment of PSC chairpersons, instructions, as well as decisions and information related to post-election activities, were published on its website in a consistent and comprehensive manner, which reduced the overall transparency. The MECs visited by ODIHR SEAM were largely assessed as competent and transparent, holding public sessions. MECs mostly published their decisions and informed on their activities via municipal websites and noticeboards, although in some smaller MECs, the approach was reported to be inconsistent.

To enhance transparency and accountability, the Central Election Commission and Municipal Election Commissions shall publish all relevant documents related to the electoral process, including decisions, regulations, and complaints, in a timely and comprehensive manner and ensure effective access to information of public interest.

The CEC provided mandatory training including online sessions for PSC chairpersons and their deputies as well as in-person sessions for all PSC members, in addition training manuals were available online. Due to time constraints, video materials produced for the 2024 local elections were used with additional explanation on the specificities of this election, which did not ensure clarity on the procedures for filling out PSC documents and protocols. The training format often lacked interactivity and practical exercises for facilitating the understanding of key procedures. The CEC did not launch a voter education campaign for this election, citing a lack of allocated financial resources. The limited outreach efforts to inform voters relied on visual materials on the CEC website and social media platforms, focusing on general information on elections, registration for out-of-country voting, and CEC activities.

VI. VOTER REGISTRATION

Citizens aged 18 or older have the right to vote. Contrary to international standards and previous ODIHR recommendations, the law retains restrictions on suffrage rights for those declared legally incapacitated by a court decision, including on grounds of intellectual and psychosocial disabilities.²⁶ Individuals serving an active sentence or under indictment for serious crimes, including war crimes and crimes against humanity, are also disenfranchised. Only citizens with registered permanent residence in Republika Srpska and the Brčko District or those who opted for voting for the RS entity institutions were entitled to vote in this election.²⁷

The Central Voter Register (CVR) is permanent and centralised. It is maintained by the CEC, based on passive and continuous voter registration. Eligible voters residing in the country are automatically included in the voter register, based on their permanent address. Citizens temporarily residing abroad may actively register to vote by post or at diplomatic representations prior to each election; otherwise,

²⁶ See Articles 12 and 29 of the 2006 [Convention on the Rights of Persons with Disabilities](#) (CRPD). Paragraph 48 of the 2014 [General Comment No. 1](#) to the CRPD states that “a person’s decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising their political rights, including the right to vote, the right to stand for election and the right to serve as a member of a jury”.

²⁷ Residents of Brčko District must be citizens of Republika Srpska in order to be eligible voters in the entity elections. Persons with dual citizenship can vote only if Bosnia and Herzegovina is their registered country of residence.

they may vote in the country according to their last place of residence. Pursuant to a CEC regulation, voters registered to vote abroad in the 2024 local elections were automatically registered for out-of-country voting, while new voters could also apply until 14 October. Voters registered for out-of-country voting who returned after the application deadline were permitted to cast a tendered ballot at the PSC in their designated electoral unit.²⁸ Special voter lists were also compiled for voters who requested voting by a mobile ballot box.²⁹ The final voter register, closed on 3 November, included 1,264,364 voters, including 20,531 registered for out-of-country voting.³⁰

The Election Law vests the exclusive responsibility for accuracy, correctness and integrity of the CVR in the CEC. However, since the voters' data are extracted from the civil register and other pertinent public databases, the accuracy of the CVR effectively depends on the efforts of other institutions responsible for updating the civil register. While the inclusiveness of the CVR was not questioned, concerns about a significant number of deceased people and citizens who maintain official residence in the country despite living abroad remaining on the list persisted.³¹

In a co-ordinated effort and according to clearly defined responsibilities, the state authorities should enhance the process of updating all pertinent registers and databases to provide an accurate basis for the voter register. To this end, consideration should be given to revising the mechanism of reporting and registration of deaths to ensure timely data exchange and correction of citizens' records.

Throughout the year, voters have ample opportunities to verify their data on the voter lists and request corrections, either online or at municipal registration centres. Prior to elections, the CEC provides access to the preliminary voter lists for public scrutiny in electronic version and in hard copies at municipal voter registration centres and other specified places. At odds with the BiH Election Law, the CEC did not make available the aggregated preliminary voter list online, foreseen to be also published twice a year in non-election years. The CEC considers that this format does not safeguard personal data and is inconsistent with the provisions of the Law on Protection of Personal Data, although the perceived incongruence does not arise in the publication of physical copies or in electronic on-site access.³² The Election Law does not specify the scope of voters' data that shall be included in the excerpts posted online, which could guide the CEC in the process to comply with the personal data principles of data minimisation and integrity.³³

As prescribed by law, candidates were entitled to receive an electronic copy of the aggregated voter list before election day upon their request, whereas citizen observers and voters could only inspect voter lists at the municipal level.³⁴ The current limitations on access to aggregated voter register data preclude possibilities for meaningful independent verification, challenging the transparency of the voter registration process.

²⁸ A tendered ballot is a ballot of identical design and contents as a regular ballot which is placed in a special envelope after voting and is only counted once the voting rights of the person casting the ballot have been verified.

²⁹ This option is available for homebound voters, including due to disability, and those in in-patient care, retirement or detention facilities. For these elections, a total of 4,767 voters were registered to vote with a mobile ballot box. The CEC rejected 82 applications for out-of-country voting due to incomplete or incorrect documentation.

³⁰ The CEC rejected 82 applications for out-of-country voting due to incomplete or incorrect documentation.

³¹ Entries in the civil registries may be updated upon official request of relatives of deceased persons, including those living abroad, or upon deregistration of the permanent residence in the country.

³² The CEC's standpoint is based on a prior notice sent by the Personal Data Protection Agency on the online publication of the voter list for out-of-country voting; however, this notice had been issued before the BiH Election Law amendments stipulating the public nature of the CVR and requiring the publication of the preliminary voter lists entered into effect.

³³ By contrast, the law details data to be included in the copies of voter register shared with the electoral contestants, specifically first and last name, date of birth, name of one parent, name of the constituency of registration, and name and number of the polling station in which each voter is registered.

³⁴ The CEC shared an electronic copy of the register with two political parties upon their request.

To ensure meaningful access to and transparency of the voter register, the Central Election Commission should publish preliminary voter lists for public scrutiny online, disaggregated by polling station, periodically and before each election as legally prescribed. In line with personal data protection principles, the legislation should detail the scope of personal data of voters made publicly available.

VII. CANDIDATE REGISTRATION

The right to stand as a candidate for RS president is granted to citizens who are registered voters belonging to any of the three constituent peoples, on the grounds of the candidate's self-declaration of affiliation.³⁵ Such discriminatory eligibility requirements towards citizens not self-declaring as belonging to any of the three constituent peoples are contrary to OSCE commitments and international standards, including European Court of Human Rights case law.³⁶ Prospective candidates are also required to permanently reside in the territory of the entity. The law disqualifies persons convicted or under indictment by an international or domestic court for the crime of genocide, crimes against humanity, or war crimes. Some categories of state officials and civil servants, including members of the police, armed forces and diplomatic staff, may only stand as candidates if they resign or step down temporarily.

As previously recommended, the discriminatory ethnicity- and residency-based candidate eligibility requirements should be reviewed in line with international standards and commitments.

Presidential candidates could be nominated by political parties and coalitions, or they could run as independent candidates. From 25 until 29 September, prior to candidate nomination, political parties and those who wanted to run independently had to apply to be certified by the CEC to contest the election. Applicants were required to pay a certification fee³⁷ and submit at least 3,000 signatures of voters registered to vote for the RS elections.³⁸ However, in line with the law and CEC regulation, all that applied for this election were exempted from these requirements given that they had been certified for the previous entity-level elections. Contrary to international good practice, voters were allowed to sign in support of only one contestant.³⁹ The limited five-day certification period, coupled

³⁵ The [CEC Decision](#) refers to the “election of the RS President from among the Serb people”. Provided that the two RS vice-presidents in office are from the Bosniak and Croat constituent peoples, the RS president is elected from among the non-represented constituent people, i.e., the Serbs.

³⁶ Paragraph 7.3 of the 1990 [OSCE Copenhagen Document](#) states that the participating States will “guarantee universal and equal suffrage to adult citizens”. Paragraph 7.5 obliges the participating States to “respect the right of citizens to seek political or public office [...] without discrimination”. See also Article 21.3 of the United Nations (UN) [Universal Declaration of Human Rights](#) and Articles 2 and 25 of the [International Covenant on Civil and Political Rights](#) (ICCPR). See, among others, European Court of Human Rights judgements in [Sejdić and Finci v. Bosnia and Herzegovina](#), [Zornić v. Bosnia and Herzegovina](#), [Pilav v. Bosnia and Herzegovina](#), [Šlaku v. Bosnia and Herzegovina](#) and [Kovačević v. Bosnia and Herzegovina](#).

³⁷ The certification fee was set at BAM 9,000 for independent candidates and BAM 18,000 for political parties (EUR 4,590 and EUR 9,180 respectively based on the exchange rate applicable in September, BAM 1 = EUR 0.51). It was refundable to the political subjects whose candidate either wins the mandate or secures one-third of the votes received by the elected candidate.

³⁸ The supporting signatures must be physically collected on a prescribed form by applicants and submitted via the CEC electronic application which allows for verification of the voters' data against the CVR upon their manual entry.

³⁹ Paragraph 196 of the 2020 [ODIHR and Venice Commission Guidelines on Political Party Regulation](#) recommends that “a requirement that a citizen be allowed to sign in support of only one party should be avoided, as such a regulation would affect his/her right to freedom of association and could easily disqualify parties”.

with the right of voters to sign in support of only one candidate, posed unnecessary burdens for new entrants to the contest.⁴⁰

The candidate registration process was inclusive. All seven applicants were certified, and six of them nominated candidates to contest this election, including four party-nominated ones and two independents.⁴¹ No woman ran for the office. The SNSD certification was disputed in court, with the appellant arguing that the application was signed by an unauthorized person due to Mr. Dodik's conviction.⁴²

VIII. ELECTORAL CAMPAIGN

Following the CEC decision, the shortened 15-day campaign period for an early election started on 8 November and finished on 22 November, a day before polling. Overall, the campaign was competitive, and contestants were able to campaign freely, with fundamental freedoms of expression and assembly respected. SNSD and the SDS campaigned online before the official campaign period and on the election silence day, prompting several complaints and subsequent fines from the CEC.⁴³

While regular political activities should not be prohibited before the official campaign period, expenditure incurred on campaign activities from the call of elections could count towards the campaign spending limit and be included in the campaign finance reports in order to enhance transparency and prevent circumvention of such limits.

The election campaign was marked by a general reluctance across the political spectrum to engage. Some parties viewed the process as imposed by the BiH authorities and the OHR, while others saw it as a significant financial strain ahead of the 2026 elections. The frontrunners, Siniša Karan of SNSD and Branko Blanuša of SDS, opted for a restrained campaign, while the other four contestants remained inactive and less visible. The campaign was concentrated on issues related to national identity and the entity within the state structure, with only limited reference to broader social and economic matters. Both front-running candidates drew support from their respective coalition partners from the RSNA and employed polarising rhetoric.⁴⁴ The SNSD candidate's campaign emphasized the protection of the RS statehood against state-level institutions and interference of the

⁴⁰ According to the CEC, ten prospective applicants requested access to the online application platform while three of them (a political party and two independents) did not proceed to the certification process; the ODIHR SEAM did not succeed to establish contacts with them to obtain their statement regarding the reasons for non-participation.

⁴¹ Of the five certified political parties, four subsequently nominated candidates; Branko Blanuša – SDS, Dragan Đokanović – Alliance for New Politics (SNP), Igor Gašević – independent, Siniša Karan – SNSD, Slavko Dragičević – independent, Nikola Lazarević – Ecological Party of Republika Srpska (EP).

⁴² The party For Justice and Order (ZPR) filed a complaint to the Court of BiH against the CEC certification of SNSD, alleging that Mr. Dodik was not authorized to apply for certification due to his conviction. The Court rejected the complaint, noting that at the time of certification Mr. Dodik was registered as the party's authorized representative. In a letter, the Court also instructed the CEC to record and enforce the legal consequences of the conviction, preventing Mr. Dodik from performing official duties, including serving as party chair. On 19 November, the BiH Constitutional Court dismissed an appeal against the Court of BiH decision as inadmissible, citing that the appellant failed to demonstrate that the CEC's certification of SNSD for the 2025 RS early presidential election affected its constitutionally protected rights.

⁴³ The CEC received 23 complaints and information notices on early campaigning: 15 against SDS, 5 against SNSD, and 1 against the Socialist Party (SP), ZPR and United Srpska each. It imposed 5 sanctions, including EUR 8,500 fine on SDS, EUR 1,500 on Mr. Blanuša, and EUR 3,250 on SNSD. For breaching the silence period, the CEC fined SDS with EUR 7,500 and SNSD with EUR 5,400.

⁴⁴ The ruling coalition consists of SNSD, SP, Democratic National Alliance, the Democratic People's Alliance, the Socialist Party of Srpska, United Srpska, and the People's Party of Srpska. The opposition faction includes: SDS, the Party of Democratic Progress, People's Front, ZPR, the Social Democratic Party, the Party of Democratic Action, and BiH Greens.

international community and the OHR. It also showcased strong support for the former RS president and SNSD leader, Mr. Dodik, who featured prominently in the campaign materials and events as the main figure. Other campaign messages underlined the RS government's achievements and promised economic development and infrastructure projects. In contrast, the SDS candidate centred his campaign on accusations of corruption and abuse of power by the ruling party, promoting equality, justice, restoration of dignity, anti-corruption measures, and the equitable management of state resources for all citizens of the entity.

Candidates conveyed their campaign messages and sought voter support through social networks, as well as by organising rallies and community meetings, placing billboards, and distributing leaflets and other materials from campaign tents. They also relied on their party bases and regional strongholds to mobilise the electorate. The SDS campaign was more modest than SNSD's, constrained by financial limitations stemming from the US sanctions on the party's bank accounts and the abolition of public funding for political parties (*see Campaign Finance*). In two instances, the CEC sanctioned SNSD for unlawful use of children in campaign events and activities.⁴⁵

Besides polarising narratives, the campaign was marred by inflammatory language despite the CEC urging all parties to refrain from making statements that might provoke tensions.⁴⁶ On 10 November, during a rally in East Sarajevo, Mr. Dodik made inflammatory statements about Bosniaks, alleging threats of "Islamisation of BiH" by the Muslim community.⁴⁷ The Islamic Community of BiH, the Interreligious Council of BiH, along with several high-ranking officials and politicians, condemned the statements and filed hate speech complaints with the BiH Prosecutor and the CEC (*see Election Dispute Resolution*).⁴⁸

Several RS government members, along with the RS member of the BiH Presidency, Željka Cvijanović, were actively involved in the SNSD campaign activities.⁴⁹ While the law prohibits holders of high executive office from using public resources, including transportation, communication, and equipment for campaign purposes, it does not prevent them from participating in campaign activities or publicly supporting certain candidates while in office. On a number of occasions during the campaign, SNSD officials, representatives and its presidential candidate announced new financial support programmes, funding for development projects and increases in social benefits.⁵⁰ Although such practices do not violate the law, they blurred the line between the state and the party, providing an undue electoral advantage, which is at odds with OSCE

⁴⁵ SNSD and its candidate were fined for a total of EUR 6,000 and 2,000, respectively.

⁴⁶ See [the CEC statement](#) published on 7 November.

⁴⁷ See the [article of 12 November](#) from Radio Free Europe. Videos from the rally posted on the party's and Mr. Dodik's social network accounts were later deleted.

⁴⁸ On 14 November, the Prosecutor's Office of BiH transferred the case to the District Public Prosecutor's Office in East Sarajevo. See also [the statement](#) of the Interreligious Council of BiH.

⁴⁹ For instance, on 12 November, the Minister of Finance and Treasury of BiH appeared at an SNSD rally in Čelinac. On 10 November, the Istočno Sarajevo Mayor and the Minister of Foreign Trade of BiH attended an SNSD rally in Istočno Sarajevo.

⁵⁰ On 9 November, the SNSD candidate and Mr. Dodik [promised to assist](#) the Saint Mary Magdalene organisation running a charity kindergarten with BAM 20,000. On the same day, they visited a parish house under construction in Teslić and [promised](#) BAM 250,000 by the end of the month and BAM 2 million from the RS budget next year. On 14 November, the SNSD president [reportedly pledged](#) BAM 1 million to build a residential building in Milići, while the SNSD candidate [promised](#) to increase police officers' salaries. On 20 November, at the SNSD campaign event, Mr. Dodik [promised](#) a 6.25 per cent pension increase, with payments starting before December.

commitments.⁵¹ Many ODIHR SEAM interlocutors also raised concerns over the misuse of public resources and pressure on public sector employees to influence their choices. In one instance, the SNSD candidate, accompanied by the party leader, unlawfully campaigned on the premises of an under-construction police station, resulting in sanctions by the CEC.⁵² Overall, the depleted financial resources available to the candidate supported by opposition parties, coupled with the incumbency advantage, created an uneven playing field favouring the ruling party.

To ensure a level playing field, the election law should be amended to prevent incumbents and other officials from misusing public resources and official positions, and to prohibit budgetary allocations and financial awards after the call of elections. In cases of violations, timely and dissuasive sanctions should apply to all participants and public officials.

No female candidate stood in this election, and women's participation in the campaign was limited. Only very few prominent female political figures, such as Željka Cvijanović, the RS member of the BiH Presidency, Jelena Trivić, leader of People's Front (FN), and Alexandra Pandurević of SDS, were visibly active, supporting their respective candidates at campaign events and online.

The BiH Election Law does not adequately regulate online campaigning on the internet and social networks. The two front-running candidates made use of platforms to present their campaign messages and activities. The SNSD candidate, through personal and party accounts, led the most active online campaign, posting up to 25 times daily on Facebook, Instagram, and X, mirrored by similar activity from his key supporters, Mr. Dodik and the RS member of the BiH Presidency, and other prominent party officials. Posts often depicted achievements and framed the election as a choice between the SNSD candidate and the danger of political instability. Some messages included negative rhetoric against the OHR. The SDS candidate's online campaign was less intense, consisting primarily of posts from rallies and meetings with voters that echoed their campaign messages. Overall, the online campaign maintained a neutral tone, but SNSD resorted to inflammatory language and negative messages in some instances.⁵³ Candidates ran a number of campaign advertisements on YouTube, Facebook and pop-up banners on the internet.⁵⁴ In both cases, campaign advertising and related payments were outsourced to marketing companies using private rather than party accounts, reducing the transparency of available information in social network databases about whether the ads were authorised by the contestants or sponsored by a third party.

The law should be amended to regulate online campaigning, including paid political advertising, and provide the oversight body with adequate resources to monitor the compliance of stakeholders with the regulations and impose proportionate, effective and dissuasive sanctions for violations.

⁵¹ Paragraph 5.4 of the [1990 OSCE Copenhagen Document](#) committed participating States to ensure “a clear separation between the State and political parties; in particular, political parties will not be merged with the State.” See also Congress Recommendation (CG31(2016)7) on the misuse of administrative resources during electoral processes: the role of local and regional elected representatives and public officials. See also Paragraph II. B. 1.1 of the 2016 ODIHR and Venice Commission's [Joint Guidelines](#) for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes, which states, the “legal framework should provide effective mechanisms for prohibiting public authorities from taking unfair advantage of their positions by...the use of specific funds (state or local budget) as well as institutional resources”.

⁵² The CEC imposed fines of EUR 2,500 on SNSD and EUR 2,000 on Mr. Karan for having a campaign event in an under-construction police station on 20 November in Milići.

⁵³ For instance, on 14 November, an SNSD [X account post](#) accused Bosniaks of intending to abolish the RS and adopt Sharia law.

⁵⁴ The SDS candidate had 11 paid posts on Facebook for approximately EUR 1,500 and 25 Google ads of which 2 were on YouTube. The SNSD candidate had 6 paid Facebook posts for approximately EUR 850 and ran a total of 34 paid Google ads, including 7 video ads on YouTube.

IX. CAMPAIGN FINANCE

Party and campaign finance are primarily regulated by the BiH Law on Financing of Political Parties and the BiH Election Law which are not fully harmonized.⁵⁵ The legal framework is supplemented by CEC regulations.⁵⁶ Despite the 2024 amendments, the campaign finance regulatory framework does not ensure transparency and accountability and long-standing ODIHR recommendations remain unaddressed.⁵⁷

Under the BiH Law on Financing of Political Parties, political parties are entitled to public funding from the state, entity and municipal budgets, which may also be used for campaign purposes. In April 2025, the OHR suspended all public funding of SNSD and its coalition partner, United Srpska (US), conditioning its reinstatement upon their compliance with the Dayton Agreement.⁵⁸ In response, the RSNA abolished all party funding from the entity and municipal budgets and adopted the RS Law on Financing of Political Parties in May 2025, which differed from the state-level framework, and created a parallel system, thus resulting in legal uncertainty.⁵⁹ Most ODIHR SEAM interlocutors assessed that these decisions effectively benefited SNSD, as the RS opposition parties do not receive significant private donations,⁶⁰ and their funding from the BiH budget is minimal due to their limited number of mandates in the Parliamentary Assembly of BiH.⁶¹ Further, opposition parties expressed concerns about the financing of the 2026 general elections, noting that the early election imposed an additional financial burden on them.

To ensure equal campaign conditions, consideration could be given to providing public funding to all political parties represented in the entity parliaments or reimbursing campaign expenditures of the contestants, conditioned upon receiving a minimum number of votes and presenting proof of expenditure.

Parties and independent candidates may receive private donations and use their own funds for the campaign, while donations from public entities, anonymous and most foreign sources are prohibited.⁶² There is a ban on donations from holders of public contracts, but this is limited only to

⁵⁵ For instance, the BiH Election Law allows loans as valid campaign resources while the BiH Law on Financing Political Parties prohibits loans from banks and allows only contributions through the party headquarters' accounts.

⁵⁶ For this election, the CEC applied the instructions issued for the 2024 local elections on opening and using special bank accounts; rulebooks on annual financial reports by parties and pre-election and post-election financial reporting by contestants.

⁵⁷ The 2024 amendments obliged contestants to open a special bank account for campaign incomes and expenditures, introduced interim campaign finance reporting, and required contestants to account for cash donations and transactions and expenses for distributing materials online in their final report.

⁵⁸ See the OHR [decision](#) in April 2025.

⁵⁹ In May 2025, the RSNA abolished the RS Law on Financing of Political Parties from the Budgets of the Republic, Cities, and Municipalities. The law prescribed different donation limits, did not define prohibited sources of party funding and mandated the entity-level election commission with oversight. The party For Justice and Order challenged the abolishment of public funding at the BiH Constitutional Court, citing inconsistency with the BiH law. On December 9, the BiH Constitutional Court suspended the law pending a final decision on constitutionality, noting that its immediate application, which departs from the state-level framework on public funding of political parties, risks undermining the equal political competition and may cause irreparable harm ahead of the 2026 elections. On 27 March 2026, the BiH Constitutional Court repealed the law as unconstitutional due to the absence of public funding.

⁶⁰ Article 1 of the Council of Europe, Committee of Ministers [Recommendation 2003\(4\)](#) stipulates that “[t]he state should provide support to political parties. State support should be limited to reasonable contributions. State support may be financial.” Paragraph 242 of the ODIHR [and Venice Commission 2020 Joint Guidelines on Political Party Regulation](#) states that “[a]t a minimum, some degree of public funding should be available to all parties represented in parliament.”

⁶¹ SDS, SNSD, the Party of Democratic Progress, Democratic Alliance, US, ZPR are represented at the state-level legislature.

⁶² Donations from other states, foreign parties and foreign legal entities are prohibited.

contracts with executive institutions.⁶³ For this election, the expenditure limit was approximately BAM 380,000 and exceeding it was subject to sanctions of up to BAM 30,000, which is not a dissuasive sanction.⁶⁴ At odds with international good practice, the law does not regulate third-party campaigning.⁶⁵ Some parties which did not nominate candidates informed the ODIHR SEAM that they incurred campaign expenditures in favour of either the ruling party or the SDS candidate.

In line with international good practice, third-party campaigning should be regulated in a comprehensive manner to ensure transparency of campaign finances and avoid circumvention of the spending limits.

Contestants are required to open dedicated bank accounts for campaign transactions. Interim reports and final reports are due three days before elections and within 30 days of the publication of final election results, respectively. As required by law, on 20 November, all candidates submitted their interim financial reports, which were promptly published by the CEC on 21 November, enhancing transparency.⁶⁶ However, the submitted financial reports appear not to reflect the scale of campaign expenditures, including online advertising paid by the contestants, their nominating parties or hired advertising companies.

The CEC is mandated with campaign finance oversight, review of financial reports and investigation of violations, but it has no deadline for the completion of this review. The CEC informed the ODIHR SEAM that it did not have sufficient human and financial resources to conduct effective and timely oversight, and it was not able to monitor campaign expenditures and sometimes relied on information received from citizen observers.⁶⁷ As a result, the effectiveness of the oversight mechanism and sanctions is reduced. Insufficient oversight, combined with a lack of regulation of third-party campaigning, limited the transparency, accountability and integrity of campaign finances.

To increase the effectiveness of campaign finance oversight, and as previously recommended, the Central Election Commission's capacity should be strengthened to ensure effective monitoring and investigation of campaign finance operations. The law should introduce strict deadlines for the Central Election Commission to audit all financial reports and to promptly publish the results of such audits.

X. MEDIA

The media landscape is vibrant with a significant number of media outlets registered and operating in the RS, often with a prominent readership throughout BiH and the wider region. Online media and social networks, especially Facebook, are growing in relevance, and largely shape public opinion. The vast majority of the RS media are divided in their editorial policies and content along party lines,

⁶³ For example, holders of public tenders with public enterprises and institutions are eligible donors. The CEC informed the ODIHR SEAM that it verifies whether a donor has a public procurement contract using diverse sources, including the online commercial platform Akta.ba.

⁶⁴ Spending is capped at BAM 0.30 per registered voter.

⁶⁵ Article 6 of the Council of Europe (CoE) Committee of Ministers' [Recommendation Rec\(2003\)4](#) on common rules against corruption in the funding of political parties and electoral campaigns states that "rules concerning donations to political parties, with the exception of those concerning tax deductibility referred to in Article 4, should also apply, as appropriate, to all entities which are related, directly or indirectly, to a political party or are otherwise under the control of a political party". Paragraph 256 of the ODIHR and Venice Commission Joint Guidelines on Political Party Regulation states that "third-party activities should not be unconditionally prohibited".

⁶⁶ According to contestants' reports, five contestants declared zero campaign spending while the SNSD reported BAM 190,347. SNSD also reported BAM 129,000 in donations, SDS reported BAM 20 and all others reported none. Sanctions for not-submitting the reports is up to BAM 10,000.

⁶⁷ According to the CEC, it is currently conducting a review of the 2022 election campaign finance reports.

with many promoting the ruling SNSD and others criticising it. The lack of transparency on media ownership, at odds with international good practice and previous ODIHR recommendations, enables special interests to influence reporting.⁶⁸

Both the BiH and the RS Constitutions guarantee freedom of expression. At odds with international standards, defamation and libel were re-criminalized in the RS in 2023, with prescribed fines.⁶⁹ While 41 complaints were reportedly filed against journalists and media outlets, to date no one has been indicted or convicted.⁷⁰ These legal restrictions, combined with threats to media and isolated physical attacks, negatively affect the media environment, resulting in self-censorship of media professionals.⁷¹ Moreover, high-ranking SNSD politicians often verbally attack and label journalists.⁷² In 2025, the RSNA adopted a law on transparency of non-profit organisations, applicable also to the many media outlets registered as non-profit organisations, which made many independent outlets fear for their financial sustainability and longevity.⁷³ The law was annulled by the BiH Constitutional Court in May 2025.

To safeguard freedom of expression and safety of media professionals, defamation and libel should be decriminalized. Measures should be taken to protect media professionals from abusive defamation lawsuits.

⁶⁸ *Alternativna TV* is reportedly connected to Igor Dodik, Milorad Dodik's son, which, according to several ODIHR SEAM interlocutors, influences its coverage of SNSD. According to the [Media Ownership Monitor](#), in BiH, the eight major media owners including public broadcasters have a market share of 89.29 per cent while their market share without the public broadcasters is 80.14 per cent, which represents a high risk. See article 6.d. of the [UN, OSCE, OAS and ACHPR Joint Declaration on Media Independence and Diversity in Digital Age](#) and [CoE Recommendation of the Committee of Ministers to member States on media pluralism and transparency of media ownership](#).

⁶⁹ Paragraph 47 of the [General Comment No. 34 to the ICCPR](#) calls States to “consider the decriminalization of defamation”. The 2023 [ODIHR Urgent Comments on the Draft Criminal Offences against Honour and Reputation in the Republika Srpska](#) noted that “[c]riminal convictions, given their chilling effect, inherently endanger freedom of expression; even criminal fines are disproportionate interferences and therefore contribute to or amount to a violation of the right to freedom of expression”.

⁷⁰ [Article 208a of the Criminal Code](#) prescribes fines from BAM 1,000 to 3,000. The Chief Prosecutor of the RS informed the ODIHR SEAM about 264 criminal defamation complaints from its re-criminalisation until 1 November 2025 (114 in Banja Luka, 26 in Bijeljina, 50 in Dobož, 46 in Istočno Sarajevo, 4 in Prijedor, 24 in Trebinje), including 41 against journalists and media outlets. In addition, there were 31 criminal complaints related to the defence of honour and reputation, including 6 against media professionals. Additionally, *capital.ba* and *BN TV* have been facing multiple civil defamation lawsuits filed primarily by SNSD members and Mr. Dodik's family.

⁷¹ In [October 2024](#), the editor-in-chief of *Spin Info* Sanja Vasković was questioned by the police following a defamation complaint filed by Mladen Kovačević, owner of the Mraz company based in Pale, allegedly used in a corruption scheme by the employment bureau of RS; in August 2025, an investigative journalist employed with RTRS was detained by the border police, see the [Statement of the OSCE Representative on Media Freedom And OSCE Mission to BiH on the Legal Proceedings against Nataša Miljanović Zubac](#); in [September 2025](#), the head of the Zvornik Police filed a complaint for defamation against the news portal *Drina Media*.

⁷² See [Media Freedom Rapid Response Monitor](#); [Safe Journalists Reports](#); [Statement by Media Freedom Representative Ribeiro & Head of the OSCE Mission to BiH Aggeler on Threats to Media by President of Republika Srpska Dodik](#). On [30 November 2025](#), the Basic Court in Banja Luka issued a first-instance verdict ruling that the mayor of Šipovo municipality, Milan Kovač, committed discrimination against journalists Alena Beširević and Harun Dinarević by insulting and humiliating them during a phone call.

⁷³ See the [Law on Special Registry and Transparency of the Work of Non-profit Organisations](#). Several ODIHR SEAM interlocutors noted that excessive reporting requirements as well as additional financial obligations had a chilling effect for the media and civil society in RS. See the 2023 [ODIHR-Venice Commission Joint Opinion on the Draft Law of Republika Srpska on the Special Registry and Publicity of the Work of Non-Profit Organizations](#), which concluded that “[g]iven the inherent serious deficiencies of the Draft Law, ODIHR and the Venice Commission call upon the authorities of the Republika Srpska to reconsider its adoption entirely”. See also [Statement of the CoE Commissioner for Human Rights](#) and [the Statement by the Media Freedom Rapid Response](#), which condemned the adoption of such law as being a further setback for freedom of association and freedom of expression in Republika Srpska following the re-criminalisation of defamation.

In line with the BiH Election Law and the Communication Law, both the Bosnia and Herzegovina Radio and Television (BHRT) on the state-level and the entity-level Radio and Television of Republika Srpska (RTRS) public broadcasters were required to provide equal access to free airtime and equal paid advertising conditions to all candidates.⁷⁴ The Communication Regulation Agency (CRA) Rulebook for the 2024 local elections remained applicable, foreseeing for the six candidates the same amount of free airtime as for the local election candidates.⁷⁵ Long-standing financial difficulties of BHRT clouded their working atmosphere during the campaign and ultimately resulted in a protest which gathered journalists and civil society activists on 27 November in front of BiH Parliamentary Assembly.⁷⁶

The method of funding of the public media broadcasting service on both state and entity levels should ensure their stable, consistent and predictable funding and operation.

While both BHRT and RTRS adhered to the requirement to provide candidates with free airtime during the 14-day campaign, not all contestants made use of this opportunity.⁷⁷ Only SNSD placed paid political advertisements on RTRS. Moreover, ODIHR SEAM interlocutors noted that the RTRS news coverage of the election was mostly devoted to SNSD rallies and events featuring Mr. Dodik, which negatively affected stakeholders' confidence in the impartiality of the broadcaster. This, combined with the limited number of paid political advertising aired by private media, offered limited independent information to voters. Furthermore, the RTRS did not organise any debates among contestants while no contestant accepted the invitation by BHRT to participate in debates, thus depriving voters of the chance to directly compare their positions.

As previously recommended, all public broadcasters should provide equitable and balanced coverage of electoral contestants in primetime news and editorial programmes, in addition to free airtime, to contribute to the ability of voters to make informed voting choices. The legal requirements for impartial and balanced coverage of the contestants should be also applicable to their websites and social network pages.

The CRA is the broadcast media regulator with a mandate to resolve media-related complaints and apply sanctions for violations. Its effectiveness and impartiality have been questioned by several ODIHR SEAM interlocutors.⁷⁸ At odds with international good practice and despite previous ODIHR recommendations, the CRA did not conduct media monitoring of the election-related content, citing a lack of capacity and human resources. The CRA reviews complaints related to the election campaign

⁷⁴ In line with ODIHR methodology for assessment missions, the ODIHR SEAM did not conduct media monitoring and therefore is not in a position to assess the compliance of the public broadcasters with the legal requirements.

⁷⁵ The [2024 CRA Rulebook](#) stipulates that each candidate is entitled to three minutes of free airtime on each public broadcaster and the same amount on private broadcasters operating in the RS, should they opt for offering free time, up to 15 minutes of paid political advertising time on each public broadcaster and 30 minutes on each private broadcaster per week during the campaign.

⁷⁶ The two public broadcasters have legal disputes against each other about their financial obligations, with the BHRT accusing the RTRS of not paying its RTV tax share to the joint BiH public broadcaster budget, and the RTRS accusing the BHRT of not sharing its marketing income with RTRS. BHRT has [a BAM 21 million debt](#) to the European Broadcasting Union. A new 2025 BiH budget did not include any financial support for BHRT, [which triggered the protest](#). BHRT, BH Novinari, Media Centar as well as international media organisations [appealed to BiH authorities](#) with a request to support BHRT. See the [OSCE RFoM and Mission call for immediate action to safeguard the functioning and independence of Radio and Television of Bosnia and Herzegovina](#).

⁷⁷ Thus, only Dragan Đokanović and Nikola Lazarević addressed their voters on BHRT; Branko Blanuša, Dragan Đokanović, Siniša Karan and Nikola Lazarević utilised their free airtime on RTRS.

⁷⁸ The current CRA Head is Draško Milinović, who was previously the head of RTRS and in 2006 – 2014 worked under the supervision of Mr. Dodik and his government. The 2024 [CRA annual report](#) noted only nine overall violations, six of which breached the Programme Standards and License Conditions and three the Code of Programme Content, without any details. The chapter on the 2024 local elections mentioned only the number of complaints received, not specifying their nature.

coverage by broadcast media, whereas the Press and Online Media Council reviews complaints on the electoral content published by print and online media. These bodies did not publish any information about the complaints they may have received, although the legislation safeguarding access to public information is in place. The CRA informed the ODIHR SEAM that it received two complaints; one was dismissed as it was outside its mandate, while no information was publicly available on the resolution of the second at the time of writing this report.

To ensure effective remedy and access to information of public interest, the law should prescribe clear deadlines for expeditious adjudication of media-related complaints as well as timely publication of comprehensive information on complaints received during the election period.

As previously recommended, the Communication Regulation Agency could be mandated to conduct full media monitoring of all broadcasters during the election campaign to assess their compliance with the requirements for balanced and impartial coverage.

XI. ELECTION DISPUTE RESOLUTION

The CEC reviews complaints on certain campaign violations, including hate speech and misuse of administrative resources, violations of media rules by political subjects as well as appeals against MEC decisions, while the MECs handle complaints on voter registration and other campaign matters.⁷⁹ Legal standing is limited to voters and contestants whose rights are affected, however, the CEC is obliged to start proceedings *ex officio* upon receiving information notices on violations. However, a CEC communication declining to initiate or continue *ex officio* proceedings is not appealable to the court as it does not constitute a formal decision.⁸⁰ CEC decisions may be appealed to the Appellate Division of the Court of BiH as the final instance; however, not all CEC decisions are subject to judicial review, contrary to OSCE commitments.⁸¹ The law prescribes an expedient dispute resolution, in line with international standards. However, public trust in the independence and impartiality of the judiciary/adjudicating bodies remains low.⁸²

To enhance the effectiveness of the election dispute resolution, consideration could be given to extending to citizen election observers the right to file formal complaints, including at election commissions and the courts.

The CEC reviewed complaints in an open manner and largely within the legal deadlines. Although it maintains a public database of complaints, this was not comprehensive and not regularly updated, limiting transparency. Moreover, the text of complaints and decisions were not published contrary to prior ODIHR recommendations.⁸³ Before election day, the CEC received some 35 complaints and 30 information notices, mostly submitted by civil society upon which the CEC launched *ex officio*

⁷⁹ Complaints to election commissions and appeals to the CEC must be filed within 72 hours; MECs and the CEC decide within 48 hours after the 24-hour response period, while the CEC may by law extend the deadline by up to five days in complex cases. The Court of BiH resolves appeals within three days.

⁸⁰ In its [decision](#) of 19 February 2025, the Appellate Division of the Court of BiH held that Transparency International, which had submitted information notices concerning the misuse of state resources, could not file complaints or appeals under the Election Law; the appeal was pending at the Constitutional Court after the election.

⁸¹ See paragraph 18 of the 1991 [OSCE Moscow Document](#).

⁸² According to the 2025 European Commission's [Working Document](#), further efforts are needed to build public trust and to improve the independence and impartiality of the judiciary.

⁸³ The CEC is developing an online platform for complaints and appeals, which is currently being tested. Following the decision of October 2025 of the Personal Data Protection Agency, the CEC does not publish the names of complainants when these are individuals.

procedures.⁸⁴ Most disputes pertained to campaigning before the official start of the campaign, misuse of public resources, hate speech and appointments of leadership for the PSCs. The CEC issued financial sanctions in five cases against SNSD and SDS for early campaigning.⁸⁵ It also issued sanctions against SNSD in several other cases, including one for Mr. Dodik's alleged use of hate speech, for which the CEC also opened an *ex officio* case, seven for publishing campaign materials featuring children, mostly on social media, and one for the misuse of public resources.⁸⁶ Some of these cases were decided after election day. The CEC also reviewed one appeal against a MEC decision, which was rejected as unfounded.⁸⁷ The CEC reviewed six complaints on the appointment of PSC chairpersons, dismissing five on merits and upholding one.⁸⁸

The Appellate Division of the Court of BiH reviewed 13 appeals against CEC decisions and upheld all of them, including those challenging the CEC sanctions against the SNSD for hate speech and for posting campaign materials featuring children. Contrary to previous ODIHR recommendations, court sessions on election disputes were not public, with the court citing that the high volume of cases during the election period makes public hearings impracticable. In line with the law, court decisions were published, although not in a user-friendly format and not always in a timely manner. Appeals against CEC decisions are first submitted to the CEC, which must contact the parties involved. This increases the CEC's workload and delays the process, including adherence to legal deadlines.

To increase the efficiency of the election dispute resolution, the appeals against the Central Election Commission's decisions could be directly submitted to the court.

The BiH Constitutional Court does not review election disputes but it adjudicates cases concerning violations of individuals' fundamental rights once all other remedies have been exhausted.⁸⁹ Before the election, the Court reviewed several complaints pertaining to certain matters related to the background and context of the election (*see the Background and Political Context section*). The cases reviewed by the court included an appeal against the CEC certification of the SNSD, which was dismissed as inadmissible at the extraordinary plenary session on 19 November, four days prior to election day. On 27 November, the Court annulled some provisions of the RSNA conclusions of 22 August 2025, including those rejecting the CEC and court decisions ending the former RS president's mandate and the provision instructing preparation of a self-determination resolution.⁹⁰ The Court also

⁸⁴ Most information notices were submitted by the observer Coalition 'Pod Lupom' and Transparency International. As published by the CEC, all cases were reviewed; however, when no violation was established, the CEC did not publish its findings and stated only that a response was sent to the submitter.

⁸⁵ These cases concerned early campaigning in social and traditional media. In one case, the SDS presidential candidate and the party were sanctioned for publishing a video on the party's Facebook page. In two other cases, the SNSD was sanctioned for early campaigning by its members in support of the SNSD presidential candidate. The CEC also sanctioned SDS with BAM 7,000 for campaigning on social media, acting *ex officio* upon information notices submitted by the observer Coalition 'Pod Lupom'.

⁸⁶ SNSD and its candidate were fined BAM 5,000 and BAM 4,000, respectively, for visiting an under-construction police station in Milići.

⁸⁷ In the case the CEC upheld a MEC decision rejecting a complaint on the grounds that the applicant did not have the right to vote in the RS election and therefore was not eligible to be a PSC member.

⁸⁸ The CEC upheld a complaint alleging that three appointed PSC chairpersons were affiliated with SNSD and therefore were not eligible to be PSC chairpersons.

⁸⁹ The BiH Constitutional Court informed the ODIHR SEAM that in total 13,500 complaints are pending review, while most cases are on inheritance and family matters on which the court may only offer a symbolic compensation.

⁹⁰ The Court discontinued the proceedings regarding the second sentence of provisions 6, 7 and 8 of the RSNA Conclusions, as these had in the meantime been repealed by the RSNA.

received four appeals regarding the appointment of the RS interim government, which were adjudicated after the election.⁹¹

The BiH Constitutional Court is currently not functioning at full capacity due to the refusal of RSNA to appoint judges, allegedly linked to the RS authorities' stated non-recognition of the court's decisions.⁹² As a result, the Grand Chamber, composed solely of domestic judges, is not functional; nevertheless, the court increased the number of plenary sessions and election related cases were mostly decided promptly.⁹³

XII. ELECTION OBSERVATION

The law provides for election observation both in-country and abroad by citizen and international organizations, as well as by observers appointed by contestants. Contributing to transparency, the law grants observers access to the entire electoral process and ensures their rights, including the right to request information and documents, attend sessions of election commissions at all levels, access all electoral premises, and notify election commissions of irregularities. As prescribed by law, the CEC registered all international and citizen observers that applied. Political entities could request accreditation either with the CEC to observe its work or with the MECs where the contestants intended to observe.

In an inclusive manner, the CEC accredited 529 citizen observers, 100 international observers and 25 observers nominated by contestants. MECs accredited some 4,243 observers from political entities. Among citizen observer organizations, the Coalition for Free and Fair Elections 'Pod Lupom' was the biggest group to conduct long-term observation activities across the entity, primarily focusing on the pre-electoral environment, campaign irregularities, and electoral preparations. Transparency International BiH deployed long-term observers to monitor the financing of the election campaign and track misuse of public resources. Both organizations issued public reports on their findings prior to election day, enhancing the transparency and integrity of the electoral campaign. While citizen observer organizations were generally unobstructed in their work, in some instances, their observers reported difficulties in accessing individual MECs in the pre-electoral period as well as polling stations on election day. Some ODIHR SEAM observers were also hindered in their work during election day, indicating a lack of understanding of procedures by PSC members.

Election administration bodies at all levels should ensure unimpeded access of all accredited observers to the entire election process. To this effect, the Central Election Commission should enhance training sessions to increase awareness among the polling staff of the observers' rights.

⁹¹ Delegates from the BiH House of Peoples and the House of Representatives filed appeals on the legality of the appointments of the RS PM and government. On 23 January 2026, the BiH Constitutional Court found that the appointment decisions were unconstitutional, holding that they had been adopted on the basis of acts issued by Mr. Dodik after the termination of his mandate as President of Republika Srpska.

⁹² Following a judge's retirement in November 2022 and another's resignation under pressure by RS authorities in January 2024, the RSNA did not appoint replacements. In June 2023, the Court [amended](#) its rules to allow decision-making in the absence of RS or FBiH judges. Following the 2024 Venice Commission's [Opinion](#), the court further [amended](#) its rules in May 2024 to allow judges who reach retirement age to remain in office until their successors are appointed. In October 2025, the RSNA repealed the Law on Non-Implementation of Constitutional Court Decisions.

⁹³ According to the court rules, plenary sessions are comprised of all judges, i.e., four selected by the House of Representatives of the Federation of Bosnia and Herzegovina, two by the RSNA, and three international appointed by the President of the European Court of Human Rights. Decisions in the plenary require a majority of all judges.

XIII. ELECTION DAY

In line with the methodology for election assessment missions, the ODIHR SEAM did not conduct a systematic or comprehensive assessment of election day proceedings. In the limited number of polling stations visited, the process was assessed as professional, well-organized and orderly. All PSCs visited were fully staffed, despite initial concerns about possible staff shortages. Most PSC chairpersons and members had experience from previous elections and had received training, thereby appearing to be aware of procedures, which were generally followed in the stations visited.

In line with the regulations, voting screens were placed with the open side facing the room, to safeguard against any attempts to control voters. However, in polling stations visited, often this placement of voting screens could not safeguard secrecy of the vote. In all such cases, sides of the voting screens were fairly wide open, allowing those standing close to see inside and forcing voters to cover their ballots by other means to protect the secrecy of their vote. ODIHR SEAM members noted that, in some polling stations visited, the ballot boxes were not properly sealed, with the seals often being loosely attached. Most voting premises visited were not fully accessible for persons with disabilities.

To ensure the secrecy of the vote, the layout of polling stations as well as the design and positioning of polling booths should be reviewed.

Women were well represented among the polling staff in the few polling stations observed and ODIHR SEAM members noted the presence of party observers, while citizen observers were only present in a limited number of cases. The Coalition for Free and Fair Elections 'Pod Lupom' deployed over 400 observers covering almost 20 per cent of the polling stations across the RS. It operated a call centre for reporting irregularities and published regular press releases on their findings.⁹⁴

Throughout the day, the CEC provided regular updates on the voting process and voter turnout, contributing to transparency.⁹⁵ According to these reports, opening was delayed in some polling stations due to the snowfall and power cuts while voting was rescheduled in one polling station which failed to open.⁹⁶ At the press conference at 21:00, the CEC informed about having received a total of 76 complaints related to the electoral process, including three election-day complaints (resolved without interrupting the election process).⁹⁷ The CEC published on its website the first preliminary results at 23:00, disaggregated by polling station, enabling public scrutiny. The preliminary turnout was announced at 35.78 per cent.

A. POST -ELECTION DEVELOPMENTS

Based on the preliminary results, the SNSD candidate obtained 50.39 per cent of the votes while the second frontrunner received 48.22 per cent. In his post-election statement, Mr. Dodik, together with the SNSD candidate, declared victory, thanked voters, and framed the outcome as the electorate's response to perceived efforts by the BiH authorities and the OHR to undermine the RS. The SDS leader, Jovica Radulović, along with their candidate and other opposition parties, did not recognise the results, citing alleged large-scale electoral fraud and the findings of citizen

⁹⁴ See the [Press Releases issued by Pod Lupom](#).

⁹⁵ The CEC collected data from MECs and announced turnout at regular polling stations.

⁹⁶ Voting at PSC 068B005 "Korićani" in the Kneževio municipality was rescheduled for 30 November since the polling station could not open for voting due to its inaccessibility and inability of the MEC to deliver election materials on time.

⁹⁷ These complaints were filed in polling stations in Laktaši, Bijeljina and Banja Luka.

observers.⁹⁸ SDS also announced their plans to contest the outcome and request recounts in four municipalities: Doboj, Zvornik, Laktaši, and Bratunac.

After election day, the CEC reviewed 24 cases related to violations of election silence and issued six sanctions. Two sanctions were imposed against SNSD, including for its president calling on voters during an appearance on the *Prva TV* morning show *Jutro*, while four were imposed on SDS, mostly for campaigning on social networks. In addition, seven cases were submitted to the CEC on violations of the election-day procedures at polling stations.⁹⁹ Eight cases were submitted challenging the MEC Doboj's decisions which rejected SDS complaints regarding the work of PSCs as unfounded or inadmissible.¹⁰⁰ The CEC also reviewed an appeal against the MEC Sokolac's decision imposing sanctions on SNSD for promising financial rewards during the campaign.

By 30 November, the CEC completed the counting process for tendered, absentee, mobile and out-of-country votes.¹⁰¹ Subsequently, having identified discrepancies and procedural irregularities, the CEC *ex officio* ordered a control count of the results of 26 polling stations in four municipalities to reconcile such discrepancies. Furthermore, based on indications of voters' forged signatures, the CEC submitted voter lists from 145 precincts in 19 municipalities for a graphological examination of voters' signatures.¹⁰² This procedure resulted in additional control counts of the results of 50 PSCs in 5 municipalities.¹⁰³ According to the CEC, the graphological examination detected certain irregularities in voter identification procedures, including a significant number of voters not possessing valid identification documents allowed to vote, implying possible forging of voters' signatures and manipulation of results.¹⁰⁴ While these CEC initiatives were critical in determining whether serious irregularities had occurred, the CEC did not publish the conclusion related to the examination procedure, outlining its scope and accounting for the grounds for the examination and the resulting control counts, which detracted from transparency of its decision. In addition, the CEC ordered verification of the ballots cast with mobile ballot boxes on account of a number of ballots

⁹⁸ The citizen observer organisation "Pod Lupom" analysed certain indicators and identified patterns of possible irregularities, including statistically relevant deviations in voter turnout indicating possible voter impersonation, high percentage of invalid ballots in some PSs and above-average votes for one candidate indicating possible interference with the results, further evidenced by discrepancies between preliminary PSCs results and outcomes of recounts in more than half of the PSs which were subject to recounts. See the coalition's [preliminary assessment](#) and post-election statements of [24 December](#) and [31 December](#).

⁹⁹ The CEC forwarded the complaints to the corresponding MECs.

¹⁰⁰ The CEC returned these cases to the MEC Doboj for reconsideration.

¹⁰¹ Prior to the count of ballots cast by voters registered for alternative voting options, the personnel at the Main Counting Centre conducted verification of the voter lists in order to confirm voters' right to vote with these options and detect any instances of possible multiple voting, as well as verification of other election materials to verify the correctness of election results. In total, 64 voters cast their vote with absentee ballot, 262 with tendered ballot, 4,049 with mobile ballot box, 39 in diplomatic and consular offices and 4,899 with postal ballot. In addition, 1,966 postal ballot packages sent by the CEC to registered voters were returned as undelivered. A total of 1,021 envelopes with postal ballots were rejected prior to verification for failing to comply with the legal requirements. Upon verification, in total, 8,260 ballots from all categories were confirmed and transferred to the count.

¹⁰² These polling stations were in the municipalities of Banja Luka, Bileća, Berkovići, Bratunac, Doboj, Gacko, Han Pijesak, Istočna Ilidža, Istončno Novo Sarajevo, Jezero, Kalinovik, Laktaši, Lopare, Modriča, Ribnik, Srbac, Ugljevik, Vlasenica, and Zvornik.

¹⁰³ In total, the control counts were conducted for 76 PSCs: 1 PSC in Banka Luka, 31 in Doboj, 8 PSCs in Laktaši, 1 PSC in Lopare, 1 PSC in Ugljevik, 34 PSCs in Zvornik. While initially ordering a control count for 51 PSCs in the latter case, the CEC adopted a correction to the order of the control counts, removing one PSC which had been previously recounted.

¹⁰⁴ While the CEC order of graphological examination indicates 145 PSCs, the subsequent [CEC decision](#) no. 05-1-07-1-1199/2025 on the partial annulment of the early presidential election, adopted on 24 December, states that materials from a total of 270 PSCs were subject to this examination and comparison of voters' signatures against individual signatures held in official records in the state identification documents register. According to this decision, some type of signature forgery was detected in 107 polling stations.

missing security elements, such as PSC stamp or signature, indicating serious procedural errors made by the respective mobile teams.

On 15 December, beyond the legal deadline, the CEC announced the determined election results.¹⁰⁵ At the same time, the CEC ordered *ex officio* recounts of the results for an additional 57 PSCs in 6 municipalities on the grounds of identified irregularities during the voter list graphological examination procedure.¹⁰⁶ The law prescribes that requests for recounts must be filed within 72 hours of the CEC's announcement of the determined results.¹⁰⁷ The CEC may also order a recount *ex officio*. While the law stipulates criteria for requests for recounts by stakeholders, it does not set clear and objective criteria for *ex officio* recounts or control counts ordered by the CEC, granting the commission broad discretionary powers and lacking sufficient safeguards against arbitrary decision-making. After the announcement of results, SDS submitted one request for recount of the results of 140 PSCs, which was rejected as unfounded; the appeal was also rejected as unfounded.¹⁰⁸

To ensure integrity of and consistency in the results tabulation process, the law should prescribe clear, objective and comprehensive criteria for all types of recounts or control count, including those ordered ex officio by the Central Election Commission.

On 24 December, the CEC decided to annul the election for 136 PSCs in 17 constituencies affecting over 84,000 registered voters.¹⁰⁹ The decision was based on various established irregularities that affected the outcome, including forged voters' signatures, voters voting without any valid ID, wrongful determination of ballot validity and allocation of votes per contestant, as well as a missing voter list in a polling station in Brčko District which precluded the possibility to confirm respective polling stations results.¹¹⁰ The CEC forwarded its decision to the Appellate Division of the Court of BiH, which dismissed two appeals lodged by SDS and SNSD against the annulment, thereby upholding the decision and rendering it legally binding on 30 December. Subsequently, the CEC scheduled the repeat election for 8 February 2026. Following the repeat election, the CEC announced and confirmed the final election results on 13 February 2026, with the overall voter turnout at 35.77 per cent. The SNSD candidate obtained 50.53 per cent of the votes while the second frontrunner 48.09 per cent.

¹⁰⁵ In accordance with the CEC Rulebook on Conduct of Elections in BiH, the CEC shall determine and announce the election results within 20 days of election day at the latest. The [CEC Instruction on Deadlines for Election Activities](#), adopted on 22 September, set the respective deadline of 13 December. Subsequently, as prescribed by the law, the final results must be confirmed within 30 days from election day, after expiration of the period for complaints and recounts. In exceptional cases, this deadline may be postponed by 15 days. The Appellate Court dismissed the SDS [appeal](#) challenging the CEC's decision on the election results, including alleged irregularities before and on election day at 140 polling stations, noting that SDS may seek a legal remedy through requests for a recount.

¹⁰⁶ These were: 20 PSCs in Doboј, 16 PSCs in Laktaši, 18 PSCs in Zvornik, and 1 PSC each in Bileća, Bratunac, and Gacko.

¹⁰⁷ Recounts may be requested by MECs, political parties and independent candidates for the constituencies where they stood for election. Accredited observers may request a recount at the polling station they observed, and a group of at least 50 voters may also submit such a request for the polling station where they are registered.

¹⁰⁸ Another request filed by a voter was dismissed as premature.

¹⁰⁹ These were: 13 PSCs in Bratunac, 31 PSCs in Doboј, 24 PSCs in Laktaši, 53 PSCs in Zvornik, 2 PSCs in Milići and Prijedor, and 1 PSC each in Banja Luka, Bileća, Brčko District, Gacko, Lopare, Nevesinje, Osmaci, Rudo, Stanari, Ugljevik, and Vlasenica.

¹¹⁰ According to the [CEC decision on annulment](#), 908 voters were registered as voting without any valid document at these PSCs. A total of 731 votes were found to be wrongfully evaluated and allocated to contestants, specifically 474 votes were added to the result for SNSD candidate and 257 votes were taken off the result for SDS candidate.

XIV. RECOMMENDATIONS

These recommendations as contained throughout the text are offered with a view to further enhance the conduct of elections in Bosnia and Herzegovina and to support efforts to bring them fully in line with OSCE commitments and other international obligations and standards for democratic elections. These recommendations should be read in conjunction with past ODIHR recommendations that have not yet been addressed. ODIHR stands ready to assist the authorities of Bosnia and Herzegovina to further improve the electoral process and to address the recommendations contained in this and previous reports.¹¹¹

A. PRIORITY RECOMMENDATIONS

1. A comprehensive review of the legal framework should be undertaken, as previously recommended, to address all ODIHR outstanding recommendations, and to remove existing inconsistencies. In line with OSCE commitments and international good practice, such a review should be open, inclusive, and consultative, and conducted well in advance of elections.
2. To ensure independence and operational efficiency of the election administration, the authorities should guarantee adequate and timely budget allocation and operational support, including in non-election years. The capacities of the Central Election Commission's personnel should match the responsibilities vested in the Commission under the Election Law, with essential qualified staff employed on a permanent basis.
3. To ensure meaningful access to and transparency of the voter register, the Central Election Commission should publish preliminary voter lists for public scrutiny online, disaggregated by polling station, periodically and before each election as legally prescribed. In line with personal data protection principles, the legislation should detail the scope of personal data of voters made publicly available.
4. The law should be amended to regulate online campaigning, including paid political advertising, and provide the oversight body with adequate resources to monitor the compliance of stakeholders with the regulations and impose proportionate, effective and dissuasive sanctions for violations.
5. To increase the effectiveness of campaign finance oversight, and as previously recommended, the Central Election Commission's capacity should be strengthened to ensure effective monitoring and investigation of campaign finance operations. The law should introduce strict deadlines for the Central Election Commission to audit all financial reports and to promptly publish the results of such audits.
6. As previously recommended, all public broadcasters should provide equitable and balanced coverage of electoral contestants in primetime news and editorial programmes, in addition to free airtime, to contribute to the ability of voters to make informed voting choices. The legal requirements for impartial and balanced coverage of the contestants should be also applicable to their websites and social network pages.
7. To ensure integrity of and consistency in the results tabulation process, the law should prescribe clear, objective and comprehensive criteria for all types of recounts or control count, including those ordered ex officio by the Central Election Commission.

¹¹¹ In paragraph 25 of the 1999 OSCE Istanbul Document, OSCE participating States committed themselves "to follow up promptly the ODIHR's election assessment and recommendations".

B. OTHER RECOMMENDATIONS

Election Administration

8. To enhance transparency and accountability, the Central Election Commission and Municipal Election Commissions shall publish all relevant documents related to the electoral process, including decisions, regulations, and complaints, in a timely and comprehensive manner and ensure effective access to information of public interest.

Voter Registration

9. In a co-ordinated effort and according to clearly defined responsibilities, the state authorities should enhance the process of updating all pertinent registers and databases to provide an accurate basis for the voter register. To this end, consideration should be given to revising the mechanism of reporting and registration of deaths to ensure timely data exchange and correction of citizens' records.

Candidate Registration

10. As previously recommended, the discriminatory ethnicity- and residency-based candidate eligibility requirements should be reviewed in line with international standards and commitments.

Electoral Campaign

11. To ensure a level playing field, the election law should be amended to prevent incumbents and other officials from misusing public resources and official positions, and to prohibit budgetary allocations and financial awards after the call of elections. In cases of violations, timely and dissuasive sanctions should apply to all participants and public officials.

Campaign Finance

12. While regular political activities should not be prohibited before the official campaign period, expenditure incurred on campaign activities from the call of elections could count towards the campaign spending limit and be included in the campaign finance reports in order to enhance transparency and prevent circumvention of such limits.
13. To ensure equal campaign conditions, consideration could be given to providing public funding to all political parties represented in the entity parliaments or reimbursing campaign expenditures of the contestants, conditioned upon receiving a minimum number of votes and presenting proof of expenditure.
14. In line with international good practice, third-party campaigning should be regulated in a comprehensive manner to ensure transparency of campaign finances and avoid circumvention of the spending limits.

Media

15. To safeguard freedom of expression and safety of media professionals, defamation and libel should be decriminalized. Measures should be taken to protect media professionals from abusive defamation lawsuits.

16. The method of funding of the public media broadcasting service on both state and entity levels should ensure their stable, consistent and predictable funding and operation.
17. To ensure effective remedy and access to information of public interest, the law should prescribe clear deadlines for expeditious adjudication of media-related complaints as well as timely publication of comprehensive information on complaints received during the election period.
18. As previously recommended, the Communication Regulation Agency could be mandated to conduct full media monitoring of all broadcasters during the election campaign to assess their compliance with the requirements for balanced and impartial coverage.

Election Dispute Resolution

19. To enhance the effectiveness of the election dispute resolution, consideration could be given to extending to citizen election observers the right to file formal complaints, including at election commissions and the courts.
20. To increase the efficiency of the election dispute resolution, the appeals against the Central Election Commission's decisions could be directly submitted to the court.

Election Observation

21. Election administration bodies at all levels should ensure unimpeded access of all accredited observers to the entire election process. To this effect, the Central Election Commission should enhance training sessions to increase awareness among the polling staff of the observers' rights.

Election Day

22. To ensure the secrecy of the vote, the layout of polling stations as well as the design and positioning of polling booths should be reviewed.

ANNEX I: FINAL ELECTION RESULTS

Total number of registered voters	1,264,366
<i>Number of voters registered to vote abroad (postal and in person)</i>	20,531
<i>Number of voters registered to vote with mobile ballot box</i>	4,767
Total number of votes cast (<i>turnout</i>)	452,219 (35.77 per cent)
Number of valid votes	444,014
Number of invalid votes	8,205

Candidate (in order of appearance on the ballot)	Votes	Percentage
Dragan Đokanović – Alliance for New Politics (SNP)	2,028	0.46
Branko Blanuša – Serb Democratic Party (SDS)	213,512	48.09
Igor Gašević – independent candidate	1,364	0.31
Siniša Karan – Alliance of Independent Social Democrats (SNSD)	224,382	50.53
Slavko Dragičević – independent candidate	1,068	0.24
Nikola Lazarević – Ecological Party of Republika Srpska (EP)	1,660	0.37

Source: [CEC results webpage](#).

ANNEX II: LIST OF OBSERVERS IN THE INTERNATIONAL ELECTION OBSERVATION MISSION

ODIHR SEAM Core Team

Mátyás Eörsi	Head of Mission	Hungary
Desislava Hristova		Bulgaria
Marcela Mašková		Czech Republic
Olga Švepešová Blat'áková		Czech Republic
Mariam Tabatadze		Georgia
Mariam Chubabria		Georgia
Elissavet Karagiannidou		Greece
Dimash Alzhanov		Kazakhstan
Ahmad Rasuli		Kyrgyzstan
Veronica Laputska		Poland
Michał Ostańkiewicz		Poland
Paweł Jurczak		Poland
Mišo Imamović		Serbia
Saša Pokrajac		Serbia
Branislav Solovic		Slovakia
Noah Lane		USA

Council of Europe Congress of Local and Regional Authorities

Bernd Vöhringer	Head of Delegation	Germany
Samira Huseynova	Congress	Azerbaijan
Jana Fischerová	Congress	Czech Republic
Ott Kasuri	Congress	Estonia
Dominique Lévêque	Congress	France
Mathilde Girardi	Congress Secretariat	France
Stéphanie Poirel	Congress Secretariat	France
György Illés	Congress	Hungary
James Moloney	Congress	Ireland
Giammaria Milani	Member of Delegation	Italy
Emvin Bartolo	Congress	Malta
Marcin Gołaszewski	Congress	Poland
Grațiela Dumitrescu	Congress Secretariat	Romania
Karin Thomasson	Congress	Sweden
Zana Gümüş	Congress	Türkiye
Iuliia Vusenko	Congress	Ukraine

European Parliament

Sérgio Humberto	Head of Delegation	Portugal
Blagoj Klimov	Political Adviser	Bulgaria
Tanya Bolneva Mihaylova	EP Secretariat	Bulgaria
Davor Ivo Stier	MEP	Croatia
Raffaele Luise	EP Secretariat	Italy
Ivars Ijabs	MEP	Latvia

ABOUT ODIHR

The Office for Democratic Institutions and Human Rights (ODIHR) is OSCE's principal institution to assist participating States "to ensure full respect for human rights and fundamental freedoms, to abide by the rule of law, to promote principles of democracy and (...) to build, strengthen and protect democratic institutions, as well as promote tolerance throughout society" (1992 Helsinki Summit Document). This is referred to as the OSCE human dimension.

ODIHR, based in Warsaw (Poland) was created as the Office for Free Elections at the 1990 Paris Summit and started operating in May 1991. One year later, the name of the Office was changed to reflect an expanded mandate to include human rights and democratization. Today it employs over 150 staff.

ODIHR is the lead agency in Europe in the field of **election observation**. Every year, it co-ordinates and organizes the deployment of thousands of observers to assess whether elections in the OSCE region are conducted in line with OSCE commitments, other international obligations and standards for democratic elections and with national legislation. Its unique methodology provides an in-depth insight into the electoral process in its entirety. Through assistance projects, ODIHR helps participating States to improve their electoral framework.

The Office's **democratization** activities include: rule of law, legislative support, democratic governance, migration and freedom of movement, and gender equality. ODIHR implements a number of targeted assistance programmes annually, seeking to develop democratic structures.

ODIHR also assists participating States' in fulfilling their obligations to promote and protect **human rights and fundamental freedoms** consistent with OSCE human dimension commitments. This is achieved by working with a variety of partners to foster collaboration, build capacity and provide expertise in thematic areas, including human rights in the fight against terrorism, enhancing the human rights protection of trafficked people, human rights education and training, human rights monitoring and reporting, and women's human rights and security.

Within the field of **tolerance and non-discrimination**, ODIHR provides support to the participating States in strengthening their response to hate crimes and incidents of racism, xenophobia, anti-Semitism and other forms of intolerance. ODIHR's activities related to tolerance and non-discrimination are focused on the following areas: legislation; law enforcement training; monitoring, reporting on, and following up on responses to hate-motivated crimes and incidents; as well as educational activities to promote tolerance, respect, and mutual understanding.

ODIHR provides advice to participating States on their policies on **Roma and Sinti**. It promotes capacity-building and networking among Roma and Sinti communities, and encourages the participation of Roma and Sinti representatives in policy-making bodies.

All ODIHR activities are carried out in close co-ordination and co-operation with OSCE participating States, OSCE institutions and field operations, as well as with other international organizations.

More information is available on the ODIHR website (www.osce.org/odihr).