



Office for Democratic Institutions and Human Rights

ICELAND

REFERENDUM

29 August 2026

ODIHR NEEDS ASSESSMENT MISSION REPORT

14 – 17 July 2026



Warsaw
31 July 2026

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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

Following an invitation to observe the 29 August 2026 referendum in Iceland, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 14 to 17 July. The NAM was composed of Lusine Badalyan, ODIHR Senior Election Adviser, and Ranko Vukčević, ODIHR Election Adviser.

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

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

II. EXECUTIVE SUMMARY

On 29 August 2026, Iceland will hold a nationwide referendum on whether to reopen accession negotiations with the European Union. Iceland applied for European Union (EU) membership in 2009 and opened accession negotiations in 2010, but the process was suspended in 2013. The referendum follows a commitment contained in the government coalition agreement and was brought forward from the original deadline of the end of 2027. The issue remains politically divisive, with differing positions within both the governing coalition and the opposition.

The referendum is primarily regulated by the Constitution, the Elections Act, and the parliamentary resolution calling the referendum. It is consultative, and its result is not legally binding, although the government has committed itself politically to following the outcome. The legal framework contains limited referendum-specific provisions, particularly concerning campaigning, campaign finance, and media coverage, and does not comprehensively regulate non-party campaign organizations. The 2021 changes to the electoral legislation addressed a number of ODIHR recommendations, although several remain unaddressed, particularly in the areas of campaign finance and media regulation.

The administration of the referendum is performed jointly by a number of institutions, including the National Election Commission (NEC), several subordinate tiers of election commissions, district commissioners, municipal authorities, and the Ministry for Foreign Affairs (MFA). All interlocutors expressed a high level of confidence in the capacity of the administration to conduct the referendum. The NEC noted the short timeframe for referendum preparations that coincided with the summer holiday period, but stated that all the deadlines had been met so far. The NEC launched a voter information campaign by establishing a dedicated referendum website. The Elections Act provides for early voting, voting abroad, and in-person voting on referendum day, as well as voting in hospitals, health-care institutions, prisons, and private homes. The ODIHR NAM was informed about measures to facilitate

the participation of voters with disabilities, including information in accessible formats, the possibility of assistive voting, and tactile ballot templates.

Voter registration is passive, and Icelandic citizens who are 18 years of age or older on referendum day and have a legal residence in Iceland are eligible to vote. Citizens residing abroad retain voting rights for 16 years after transferring their legal residence from Iceland and may thereafter apply for inclusion in the voter register for renewable four-year periods. The centralized electronic voter register introduced by the 2021 Elections Act has been fully implemented since the 2024 elections. Voter lists are available for public inspection and individual verification online. None of the ODIHR NAM interlocutors expressed specific concerns regarding the accuracy of the voter lists.

No interlocutor raised concerns about the ability to campaign freely. Referendum campaigning is subject to only limited specific regulation, and there is no official campaign period or formal registration of campaign organizations. Political parties, civil society organizations (CSOs), informal initiatives, and individual citizens may campaign, while several prominent CSOs are expected to lead the campaign. Most campaign actors met by the ODIHR NAM expected to campaign primarily on social media. The issue of EU accession was widely described as highly polarizing, with fisheries, the future of the national currency, and the changed international security environment expected to feature prominently in the campaign.

Political parties may use their own resources to campaign for either referendum outcome, with related income and expenditure covered by their ordinary financial reporting obligations. However, the political finance law does not apply to CSOs, informal initiatives, or other non-party actors campaigning in the referendum, which are therefore not subject to campaign-specific rules on donations, expenditure, disclosure, or oversight. The National Audit Office (NAO) oversees political party finances, but there is no interim reporting before referendum day, and it does not have the authority to impose sanctions or fines. The NAO's oversight mandate does not extend to CSOs or informal campaign initiatives. A number of interlocutors identified the absence of regulation for non-party campaign actors as a principal shortcoming, noting that it undermines financial transparency and accountability in referendum campaign financing. Most previous ODIHR recommendations related to campaign finance remain unaddressed, including those concerning interim financial reporting, the capacity of the oversight body, and its authority to impose effective and proportionate sanctions.

Freedom of expression and of the media is guaranteed by the Constitution, but defamation and insult remain criminal offences. Several interlocutors noted that private media outlets display identifiable editorial leanings and may be closely aligned with particular economic or interest groups. Concerns were also raised about the shrinking media market potentially impacting the diversity of sources of information for voters. The legislation does not contain detailed provisions governing media coverage of referendum campaigns, including requirements on the balanced coverage of the opposing positions. The National Broadcasting Service (RÚV) plans dedicated referendum programming and has decided to provide free airtime to four campaign organizations. The Media Commission oversees compliance with the Media Law and may act on complaints or on its own initiative and impose sanctions. Several ODIHR NAM interlocutors raised concerns about artificial amplification, disinformation, and limited oversight of online campaigning.

The MFA co-ordinates inter-institutional efforts concerning hybrid threats and foreign information manipulation and interference through a dedicated unit that facilitates information-sharing among relevant ministries and state institutions, and supports a co-ordinated assessment of potential threats affecting the referendum. The national cybersecurity incident response team is monitoring the emergence of new referendum-related websites, while the Media Commission, through the Icelandic Centre for Social Cybersecurity and Media Literacy, conducts public education and awareness-raising

on online safety, media and information literacy and related digital risks. As the EU Digital Services Act is not yet applicable in Iceland, communication with major social media platforms relies on existing contacts and voluntary co-operation.

All ODIHR NAM interlocutors expressed confidence in the efficiency and transparency of the dispute-resolution system. The Election Appeal Committee adjudicates referendum-related complaints, including appeals against voter registration decisions by Registers Iceland, and its decisions may be challenged before the courts under expedited procedures.

All ODIHR NAM interlocutors expressed a high degree of confidence in the impartiality and technical capacity of the administration to organize the referendum professionally and transparently and recognized Iceland's longstanding democratic tradition. At the same time, many raised concerns about certain gaps in the legal framework, campaign finance regulation and oversight, and media regulatory framework. Most ODIHR NAM interlocutors welcomed a potential ODIHR referendum observation activity and acknowledged that an external assessment could contribute to the transparency of the referendum process and inform possible improvements.

The ODIHR NAM sees benefit in undertaking a closer examination of certain electoral domains, including the campaign environment and online campaigning, campaign financing and its oversight, and the media environment and its regulation. Based on the findings of this report, the ODIHR NAM recommends the deployment of a Referendum Expert Team (RET) for the 29 August 2026 referendum. ODIHR also encourages the authorities to consider previous recommendations that remain unaddressed.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

The early parliamentary elections held on 30 November 2024 changed the composition of the parliament and government. The Social Democratic Alliance emerged as the largest party, winning 15 of the 63 seats in the unicameral parliament (*Althingi*) and overtaking the long-dominant Independence Party. The Liberal Reform Party, the People's Party, and the Centre Party increased their representation, while the Left-Green Movement and the Pirate Party lost their parliamentary representation.¹ The election resulted in the formation of a coalition government comprising the Social Democratic Alliance, the Liberal Reform Party, and the People's Party. The coalition agreement included a commitment to hold a referendum on whether to reopen accession negotiations with the European Union (EU) by the end of 2027. In March 2026, the government proposed bringing the referendum forward to 29 August 2026.

Iceland applied for EU membership in July 2009, in the aftermath of the financial and banking crisis. The EU granted Iceland candidate status in June 2010, with accession negotiations opening the following month. The views on the accession process differed, particularly regarding the implications for national decision-making, fisheries, and eventual participation in the euro (EUR) area. Following the 2013 parliamentary elections, the government formed by the Independence Party and the Progressive Party suspended the accession process. In March 2015, the government informed the EU about its intention to cease accession negotiations, although the formal status of the application continued to be disputed in

¹ The Social Democratic Alliance received 20.8 per cent of the vote (15 seats); the Independence Party 19.4 per cent (14 seats); the Liberal Reform Party 15.8 per cent (11 seats); the People's Party 13.8 per cent (10 seats); the Centre Party 12.1 per cent (8 seats); and the Progressive Party 7.8 per cent (5 seats). Voter turnout was 80.18 per cent.

Icelandic public debate.² Despite the suspension of negotiations, Iceland remains closely integrated with the EU through the European Economic Area (EEA) Agreement, which extends the EU internal market to Iceland, the European Free Trade Association, and through its participation in the Schengen area. Iceland also maintains extensive foreign policy, security, and sectoral co-operation with the EU.³

The referendum takes place in a politically divided and highly polarized environment. Within the government, the Social Democratic Alliance and the Liberal Reform Party support reopening accession negotiations and eventual EU membership. The People's Party, which opposes EU membership, supported holding the referendum in accordance with the coalition agreement. In the opposition, the Independence Party, the Centre Party, and the Progressive Party oppose EU membership, although their positions on reopening accession negotiations and on the referendum itself are not identical.

Women are well represented in political life. They currently hold 29 of the 63 seats in the parliament (some 46 per cent) and occupy 6 of the 11 ministerial positions, including the office of Prime Minister.⁴ The legal framework provides for gender equality, including through the 2020 Act on Equal Status and Equal Rights Irrespective of Gender, last amended in 2026.⁵

ODIHR has previously observed three elections in Iceland.⁶ Most recently, ODIHR deployed an Election Expert Team for the 28 October 2017 early parliamentary elections.⁷ The final report, issued in March 2018, contains 15 recommendations, including 6 priority ones, for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.

B. LEGAL FRAMEWORK

The referendum is primarily regulated by the 1944 Constitution, the 2021 Elections Act, last substantively amended in 2023, and the 2026 parliamentary resolution calling the referendum. Other applicable legislation includes the 2006 Law on the Finances of Political Organizations and Candidates and their Information Disclosure, last amended in 2018, the 2011 Media Law, last amended in 2013, and the 2013 Law on the Icelandic National Broadcasting Service. Iceland is a party to major international and regional instruments related to the conduct of democratic elections.⁸

² The government requested that the EU no longer regard Iceland as a candidate country, without obtaining parliamentary approval for the formal withdrawal of the application. The Council of the EU noted the request, although the application was not formally withdrawn through a parliamentary decision, giving rise to differing interpretations of its continuing legal status.

³ This includes regular foreign-policy dialogue and frequent alignment with EU foreign-policy positions, co-operation on sanctions, security, defence, cyber threats and resilience, and participation in EU programmes in areas such as research, education, culture and mobility.

⁴ Iceland leads the World Economic Forum's [Global Gender Gap Index](#) for 16 consecutive years, "and remains the only economy to have closed more than 90% of its gender gap since 2022".

⁵ In June 2026, parliament adopted legislation obliging employers to comply with equal-pay requirements. The [Directorate of Equality](#) will be responsible for monitoring compliance, maintaining public registers of entities subject to the reporting requirements, and publishing a list of employers that have fulfilled their legal obligations.

⁶ See all previous [ODIHR election-related reports on Iceland](#).

⁷ ODIHR was invited to observe the 2020 and the 2024 presidential elections, as well as the 2021 and 2024 parliamentary elections; however, respective ODIHR NAMs did not recommend election-related activities.

⁸ Including the [1950 European Convention on Human Rights \(ECHR\)](#), [1966 International Covenant on Civil and Political Rights \(ICCPR\)](#), [1965 International Convention on the Elimination of All Forms of Racial Discrimination \(ICERD\)](#), [1979 Convention on the Elimination of All Forms of Discrimination against Women \(CEDAW\)](#), [2003 UN Convention against Corruption](#), and the [2006 Convention on the Rights of Persons with Disabilities \(CRPD\)](#). Iceland is also a member of the Council of Europe's Venice Commission and the Group of States against Corruption (GRECO). As of the time of reporting, Iceland signed the [1995 Council of Europe Framework Convention for the Protection of National Minorities](#), but has not ratified it.

The main legal issues specific to the referendum concern the legal effect and public understanding of the referendum question, the neutrality and sufficiency of official voter information, and the applicability of campaign, campaign finance, and media rules to political parties and non-party campaign actors. Under the Elections Act, a referendum on a specific issue or legislative bill is consultative rather than legally binding. Accordingly, the referendum on resuming EU accession negotiations is consultative, although the government has committed itself politically to following the outcome. The Act further requires such a referendum to be held no earlier than three months and no later than one year after the adoption of the relevant parliamentary resolution.⁹

The 2021 Elections Act introduced substantial reforms to Iceland's electoral legal framework, including the consolidation of previously separate election laws into a single act, the establishment of the National Election Commission (NEC), the introduction of an electronic voter register, revised arrangements for election dispute resolution, and provision for citizen and international election observation.¹⁰ These changes addressed a number of ODIHR recommendations, although several remain unaddressed, particularly in the areas of campaign finance and media regulation.

The upcoming referendum does not concern EU membership itself, but whether Iceland should reopen accession negotiations. The question initially proposed asked whether accession negotiations should be "continued", a formulation extensively debated in parliament, with critics arguing that the term could be misleading given the prolonged suspension of the accession process initiated in 2009. At the request of the parliament, the Council of Europe's European Commission for Democracy through Law (Venice Commission) issued an urgent opinion finding that the proposed question could comply with European standards provided that voters receive clear and balanced information on the object of the referendum and the legal and practical consequences of resuming negotiations.¹¹ The formulation was subsequently revised, and the question asks: "Should Iceland reopen accession negotiations with the European Union?", with "Yes" and "No" as the two possible answers.

C. REFERENDUM ADMINISTRATION

The referendum administration comprises the NEC, six Senior Election Commissions (SECs), Municipal Electoral Commissions (MECs), and Local Electoral Commissions (LECs). District Commissioners and municipal authorities also perform administrative and logistical functions in support of the process. The NEC is an independent permanent administrative body composed of five members and an equal number of alternates, appointed for staggered five-year terms.¹² Three members, including the chairperson, are elected by the parliament, while two are nominated by the Icelandic Association of Local Authorities. SECs comprise five members and an equal number of alternates elected by the parliament following each parliamentary election. Parliamentary parties not represented on a SEC may appoint one observer each, with the same rights as commission members, except the right to vote. MECs and LECs are elected by the respective municipal councils and co-ordinate referendum preparations within municipalities.

The NEC is responsible for the overall co-ordination and oversight of the referendum, including announcing the referendum, issuing guidance to lower-level election commissions, preparing

⁹ The resolution calling the referendum was adopted by the parliament on 28 May 2026, with 34 members voting in favour, 8 against, and 14 abstaining; 7 members were absent. With the referendum scheduled for 29 August 2026, the shortest timeframe permitted by law was effectively applied.

¹⁰ Amendments to the Elections Act adopted in 2024 and 2026 were temporary or election-specific and do not alter the framework applicable to the forthcoming referendum.

¹¹ See the [2026 Venice Commission Opinion](#) on the Compatibility with International Standards of the Referendum Question About EU Accession Negotiations.

¹² The NEC was established on 1 January 2022. The three members were elected by the parliament on 28 December 2021; subsequent changes to the composition included appointments in December 2022 and November 2024.

referendum materials, providing official voter information, and publishing the final results.¹³ It also provides an opinion on the wording and presentation of the referendum question. The NEC's meetings are not public, although its decisions and meeting minutes are published on its website. SECs supervise the conduct of the referendum at the constituency level, while LECs administer voting at polling stations on referendum day. The Ministry of Foreign Affairs (MFA) co-ordinates voting abroad and serves as the liaison between the NEC and election officials overseas, while District Commissioners and municipal authorities perform a range of administrative and logistical functions. The NEC prepares training manuals, while SECs conduct online training for polling staff closer to referendum day. The NEC noted the short timeframe for referendum preparations that coincided with the summer holiday period, but stated that all statutory deadlines had been met so far. All ODIHR NAM interlocutors expressed a high level of confidence in the capacity of the election administration to conduct the referendum.

The NEC informed the ODIHR NAM that it had established a dedicated referendum website providing official information on the referendum, practical voting information, and explanatory materials.¹⁴ The NEC stated that voter information was available, or was expected to become available, in several accessible formats, including easy-to-read materials, audio recordings for voters with visual impairments, and videos with Icelandic Sign Language interpretation.¹⁵ The NEC emphasized that its role is limited to providing neutral, clear, complete, and accessible voter information, particularly as the referendum concerns an intermediate procedural step rather than a final decision on EU membership, and does not extend to encouraging voter participation.

Voting may take place either during the early voting period, starting on 27 July, or in person on referendum day. Early voting is available both within Iceland and abroad. Within Iceland, it is administered by District Commissioners and may take place at their offices, municipal service centres and other designated locations, including hospitals, health-care institutions, prisons, and private homes for voters unable to travel. Voting abroad is organized through Iceland's diplomatic missions and ends one day before the referendum day. Voters may cast more than one early vote or vote both early and on referendum day, but only the last vote cast is counted.¹⁶ Under the Elections Act, early voting may begin only after the referendum has been formally announced and the relevant procedural requirements have been completed, addressing a previous ODIHR recommendation on the sequencing of key electoral deadlines.

The legal framework provides several measures to facilitate the participation of voters with disabilities and other voters requiring assistance. On referendum day, any voter may receive assistance in casting their ballot without having to provide a reason. Assistance may be provided either by a person of the voter's choice or by election officials, subject to safeguards intended to protect the secrecy and integrity of the vote. All polling stations are reportedly equipped to provide independent access for voters with physical disabilities, while tactile ballot templates are available to facilitate independent voting by voters with visual impairments.

¹³ Following each election or referendum, the NEC submits a report to the Ministry of Justice (MoJ) identifying possible improvements to electoral administration and proposing amendments to the legal framework. The MoJ informed the ODIHR NAM that it considers the NEC's findings and, where appropriate, reports to parliament on proposed improvements.

¹⁴ See the [NEC website](#). Accessibility features had not yet been fully implemented at the time of the ODIHR NAM visit, but work was ongoing to introduce them.

¹⁵ Icelandic Sign Language was officially recognized by law in 2011, and central and local authorities are required to ensure access to sign-language services for those who need them.

¹⁶ According to the NEC, only a small number of voters cast more than one ballot. Each early vote is time-stamped, enabling officials to identify and count only the voter's latest ballot.

Voting is conducted exclusively using paper ballots, and votes are counted manually at the constituency level.¹⁷ The NEC noted that centralized counting at this level can complicate the timely transport and handling of referendum materials, particularly given the considerable distances involved and Iceland's sometimes severe and unpredictable weather conditions.

D. VOTER REGISTRATION

Voter registration is passive for all Icelandic citizens who are 18 years of age or older on referendum day and have a legal residence in Iceland. Icelandic citizens residing abroad retain their voting rights for 16 years after transferring their legal residence from Iceland.¹⁸ Thereafter, they may apply to Registers Iceland for inclusion in the voter register for a renewable four-year period. Such applications take effect from 1 December following their submission. Registers Iceland informed the ODIHR NAM that, as a result, a small number of citizens residing abroad who applied after 30 November 2025 may not be eligible to vote in the referendum, as their applications would take effect only after referendum day.¹⁹ The legal framework guarantees voting rights for persons deprived of legal capacity or serving prison sentences, consistent with international standards.

The 2021 Elections Act introduced an electronic voter register, which has been fully implemented since the 2024 presidential and parliamentary elections. Registers Iceland maintains the central voter register on the basis of the National Population Register. The register is used throughout the voting process, including during early voting and on referendum day, replacing the previous paper-based system except in exceptional circumstances provided for by law.

Registers Iceland compiles the voter lists before each election and referendum and transmits them electronically to municipal authorities. The register is compiled according to voters' place of residence 38 days before referendum day. For the forthcoming referendum, the reference date was 22 July 2026, and the voter lists were published on 24 July 2026, enabling voters to verify their registration before referendum day.²⁰ Voters who change their place of residence after the reference date remain registered at their previous one for the purposes of the referendum. The register must be made available for public inspection at municipal offices or another suitable location no later than 21 days before referendum day, while voters may verify their individual registration online.²¹

Registers Iceland informed the ODIHR NAM that a civil society organization (CSO) campaigning against reopening accession negotiations had requested access to the register; at the time of the NAM, no formal response had been issued, given the absence of explicit legal provisions governing such requests.²² None of the ODIHR NAM interlocutors expressed specific concerns regarding the accuracy of voter lists.

¹⁷ The introduction of an electronic voter register did not alter the paper-based method of voting or counting.

¹⁸ Unlike in municipal elections, non-citizens residing in Iceland are not entitled to vote in referendums.

¹⁹ A similar issue arose ahead of the 30 November 2024 parliamentary elections and reportedly affected some 500 to 600 citizens residing abroad. The [Parliament adopted a temporary provision](#) allowing affected citizens to apply for inclusion in the voter register for those elections. Registers Iceland informed the ODIHR NAM that it records rejected applications and would be able to update the register should parliament adopt a similar temporary provision for the referendum.

²⁰ According to Registers Iceland, the final voter register included 272,690 voters.

²¹ Electronic access granted under the Elections Act may not be used to publish or disseminate the register or information contained in it, and recipients must comply with data-protection legislation.

²² The Elections Act grants political contestants electronic access to the voter register in presidential elections.

E. CAMPAIGN ENVIRONMENT

The legal framework does not establish an official referendum campaign period, and campaign activities are subject to only limited specific regulation. There is no campaign silence period, and campaigning may continue up to and including referendum day, subject to general restrictions on campaigning inside polling stations and on activities that obstruct or otherwise interfere with voting. No ODIHR NAM interlocutor raised concerns about the ability to campaign freely.

The legal framework does not regulate who may campaign in a referendum, including online, and does not provide for the registration or formal designation of referendum campaign organizations. In practice, political parties, CSOs, informal campaign initiatives, and individual citizens may campaign, subject to the general legal framework. Some ODIHR NAM interlocutors raised concerns about the distinction between ministers campaigning in their political capacity and the use of public office to advocate a particular referendum outcome. In addition, several interlocutors considered the referendum timing unfavourable to a sufficiently broad and informed public debate. Some political parties stated that holding the referendum campaign during parliament's summer recess may limit opportunities for parliamentary debate on the referendum topic.

The referendum campaign is expected to be led primarily by several CSOs established around the question of EU accession. Two of the most prominent are the European Movement in Iceland (*Evrópuhreyfingin*), a CSO established in 2022 that advocates the resumption of Iceland's EU accession negotiations and eventual EU membership, and *Heimssýn*, Iceland's "No to EU" movement, a CSO established in 2002.²³ Most parliamentary political party representatives met by the ODIHR NAM indicated that they do not intend to conduct centralized campaigns, while individual members of parliament would remain free to decide whether and how to campaign, linking this approach to the constitutional principle of the free mandate of members of parliament.²⁴ ODIHR NAM interlocutors involved in campaigning indicated that they planned to use a variety of campaign methods, with most expecting to focus primarily on social media.

Fisheries remain a central issue in Iceland's EU accession debate, particularly in relation to the EU Common Fisheries Policy.²⁵ The future of the Icelandic *króna* (ISK) and the possible adoption of the EUR are also expected to feature prominently, especially against the background of inflation, high interest rates, and cost-of-living concerns. The changing international security environment and broader uncertainty in transatlantic relations have added a further dimension to the debate on Iceland's relationship with the EU. All ODIHR NAM interlocutors described the issue of EU accession as highly polarizing in Icelandic society, expecting it to be reflected in the referendum campaign.

Independent initiatives were established to provide information on the EU and assess public claims made during the referendum campaign. Europe Portal (*Evrópuvefur*), an independent government-funded information service operated by the University of Iceland, provides answers and background information on the EU and has introduced an artificial intelligence (AI)-assisted search function. According to the service, the function draws on publicly available academic publications by Icelandic scholars that have

²³ Other initiatives include recently established Forward Iceland (*Afram Ísland*), which campaigns against reopening accession negotiations and involves former president Ólafur Ragnar Grímsson, and Yes, in Order to See (*SJÁ*), which supports a positive vote as a means of establishing the terms of EU membership before a final decision is taken.

²⁴ Article 48 of [the Constitution](#) provides that "Members of the *Althingi* are bound only by their conviction and not by any instructions from their constituents".

²⁵ The [EU Common Fisheries Policy](#) establishes common rules for the conservation and management of fish stocks, including the setting of total allowable catches and the allocation of fishing quotas among member states. It also generally provides EU fishing vessels with access to EU waters and resources, subject to specified restrictions and national quota allocations.

undergone editorial fact-checking.²⁶ Separately, *ESB Vaktin*, an independent information project, collects and analyses public claims concerning the referendum and publishes background information, assessments, and weekly summaries. Its content is generated with the assistance of Anthropic's Claude AI system and reviewed before publication by a statistician responsible for the methodology and underlying factual database.

The MFA co-ordinates inter-institutional efforts concerning hybrid threats, foreign information manipulation and interference. A dedicated unit established within the ministry in 2021 facilitates information-sharing among the relevant ministries and state institutions and supports a co-ordinated assessment of potential threats affecting the referendum. The participating authorities exchange information through existing crisis-preparedness and government co-ordination arrangements. In July 2025, amendments to the 2008 Defence Act transferred the Computer Emergency Response Team (CERT-IS), Iceland's national cybersecurity incident response team, to the MFA and incorporated it into the statutory defence and security framework. Its mandate includes identifying cyber threats and incidents, limiting their impact, protecting telecommunications and critical infrastructure, and co-ordinating responses with relevant authorities. Ahead of the referendum, CERT-IS is monitoring the emergence of new referendum-related websites as part of its situational-awareness activities.

F. CAMPAIGN FINANCE

Political and campaign finance is regulated by the 2006 Law on the Finances of Political Organizations and Candidates and their Information Disclosure, last amended in 2018.²⁷ The law defines political organizations as parties or organizations presenting candidates in elections to the parliament or municipal councils and regulates donations to political organizations and election candidates. It establishes disclosure requirements and restrictions on sources of funding, including prohibitions on anonymous and foreign donations. Political parties may use their own resources to campaign for either referendum outcome, with related income and expenditure falling within their ordinary financial reporting obligations. However, the law does not apply to CSOs, informal initiatives, or other non-party actors campaigning in a referendum. Such actors are therefore not subject to campaign-specific rules on donations, expenditure, financial disclosure, or oversight. A number of ODIHR NAM interlocutors identified the absence of regulation for non-party campaign actors as one of the principal shortcomings of the legal framework, noting that it undermines financial transparency and accountability in referendum campaign financing.

The National Audit Office (NAO) is responsible for overseeing the finances of political parties and other entities regulated by the political finance law. Political parties are required to submit annual financial reports covering their income, expenditure, assets, and liabilities, including resources used for referendum campaigning. The NAO publishes these reports and may request additional information or corrections in cases of omissions or inconsistencies. However, the law does not provide for interim reporting before referendum day. The NAO itself does not have the authority to impose sanctions or fines and may refer to enforcement bodies to do so. The NAO's oversight mandate does not extend to CSOs or informal campaign initiatives. Most previous ODIHR recommendations related to campaign

²⁶ In December 2025, the government allocated ISK 5 million (approximately EUR 34,900) to the University of Iceland's science website to update its [Europe Portal](#).

²⁷ Political parties that obtained at least one seat in the most recent parliamentary elections or received at least 2.5 per cent of the vote are entitled to annual public funding allocated in proportion to their share of the vote. Parties represented in parliament are additionally entitled to a fixed annual operating grant of ISK 12 million (approximately EUR 83,700).

finance remain unaddressed, including those concerning interim financial reporting, the capacity of the oversight body, and its authority to impose effective and proportionate sanctions.²⁸

In December 2025, the government allocated ISK 10 million (approximately EUR 69.800) each to the European Movement in Iceland and *Heimssýn* to facilitate public debate ahead of the referendum. Some ODIHR NAM interlocutors noted that public discussion of the decision focused on the appropriateness of providing public funding rather than on whether the organizations fell within the scope of campaign finance legislation.

Overall, ODIHR NAM interlocutors considered that the political finance framework would benefit from revision, particularly to regulate the finances of non-party referendum campaign actors and strengthen the transparency and oversight of campaign expenditure, including online.

G. MEDIA

Freedom of expression and of the media is guaranteed by the Constitution. Defamation and insult remain criminal offences punishable by fines or imprisonment for up to one year, while certain aggravated forms of defamation may carry imprisonment for up to two years.²⁹ The media environment is primarily regulated by the 2011 Media Law and the 2013 Law on the Icelandic National Broadcasting Service, which govern relevant aspects of referendum campaign coverage, including the role of the public broadcaster and the provision of media services.

The Icelandic media market is relatively small and comprises public and private outlets operating across broadcast, print, and online platforms. Most ODIHR NAM interlocutors described RÚV as a central source of political information, while prominent private outlets include the cross-platform media company *Sýn*, which operates *Stöð 2* television, *Bylgjan* radio, and internet portal *visir.is*, as well as *Morgunblaðið*, Iceland's only remaining printed national daily newspaper, and its online portal *mbl.is*. A few online investigative outlets also contribute to political coverage. Several ODIHR NAM interlocutors noted that private media outlets often display obvious bias towards one or the other side of the referendum debate, and also considered certain private media outlets to be closely aligned with particular economic or interest groups. Concerns were also raised about the shrinking media market potentially impacting the diversity of sources of information for voters.

The National Broadcasting Service (RÚV) is required to provide objective and impartial news and current-affairs programming. However, according to ODIHR NAM interlocutors, the legislation does not contain detailed provisions governing media coverage of referendum campaigns, including requirements concerning the balance of coverage afforded to the opposing positions. A RÚV representative informed the ODIHR NAM that it had introduced three weekly podcasts on the referendum, aimed particularly at younger audiences, and planned to begin weekly televised debates and other dedicated programming in August. RÚV decided to provide free airtime to four campaign organizations, two advocating each position, and indicated that it would consider extending this opportunity should additional organized campaigns emerge.³⁰ Referendum campaigners may purchase advertising on public and private broadcasters, with no specific legal limit on the amount of airtime that may be purchased.

²⁸ GRECO previously identified vulnerabilities concerning indirect donations and the effectiveness and proportionality of sanctions in Iceland's political finance framework. See GRECO, [2007 Third Evaluation Round: Evaluation Report on Iceland, Transparency of Party Funding](#), and [2013 Addendum to the Second Compliance Report on Iceland, Transparency of Party Funding](#).

²⁹ Aggravated forms include knowingly false defamatory allegations and defamatory allegations disseminated publicly without reasonable grounds.

³⁰ For elections, RÚV is legally required to provide candidates with equal coverage and opportunities to present their programmes. The legislation does not establish an equivalent allocation framework for referendum campaigns.

RÚV is planning voter-information programming in Icelandic, English, and Polish. It also offered to co-operate with the NEC on voter information and education, although no arrangements had been agreed at the time of the ODIHR NAM. RÚV also provides sign-language interpretation for a range of programmes, subtitles its programming, and publishes some online news in easy-to-read language. The broadcaster does not systematically monitor disinformation but follows reports and other indications of potentially false or misleading information during electoral periods and intends to do so during the referendum campaign. Instances of political pressure seeking to influence RÚV reporting were noted. Concerns were also raised that members of RÚV's board, elected by parliament, may publicly express positions on the referendum, including through social media, although the broadcaster's editorial decisions remain the responsibility of its professional editorial structures.

The Media Commission oversees compliance by media service providers with the Media Law. It monitors advertising, sponsorships, and product placement, issues broadcasting licences, and publishes information on media ownership, registered media service providers, and their rules on editorial independence. The Commission may initiate proceedings *ex officio* or act on complaints concerning alleged violations of the Media Law. It may impose sanctions, and its decisions, which are published online, may be appealed to the courts. Since 2024, the Commission has operated *Netvís*, the Icelandic Centre for Social Cybersecurity and Media Literacy, and the country's Safer Internet Centre, in co-operation with the Icelandic Red Cross and the National Police. Through *Netvís*, it conducts public education and awareness-raising on online safety, media and information literacy, and related digital risks.³¹

Social media platforms are not generally classified as media service providers under the Media Law, as they do not exercise editorial responsibility over individual user-generated content. While certain platforms may fall within the separate category of video-sharing platform services, the campaign-related obligations applicable to editorial media do not extend comprehensively to political content disseminated through social networks. Several ODIHR NAM interlocutors raised concerns about the misuse of online platforms, including through artificial amplification of content and the dissemination of disinformation. *Netvís* representatives informed the ODIHR NAM that they had detected apparent co-ordinated automated activity during the last election campaign but had been unable to determine its origin.

The EU Digital Services Act (DSA) has not yet been incorporated into the EEA Agreement and is therefore not applicable in Iceland. The authorities informed the ODIHR NAM that preparations for its eventual implementation were ongoing. Consequently, the institutional framework and formal mechanisms for co-operation with very large online platforms envisaged by the DSA are not yet operational, and communication with major social media platforms relies on existing contacts and voluntary co-operation. Several ODIHR NAM interlocutors raised concerns about the limited oversight of online campaign activities and noted that the existing framework does not comprehensively regulate the transparency and targeting of online political advertising.

H. REFERENDUM DISPUTE RESOLUTION

The 2021 Elections Act established an independent Election Appeal Committee (EAC) responsible for resolving specified electoral disputes, including those arising from referendums. The EAC is composed

³¹ On 21 July 2026, *Netvís* launched an [online portal](#) through which members of the public may report suspected disinformation and co-ordinated online activity related to the referendum.

of three members and an equal number of alternates, appointed by the MoJ for terms of up to six years.³² Complaints concerning the voter register are submitted directly to Registers Iceland, which is required to address them without delay, and its decisions may be appealed to the EAC within 24 hours. The EAC also adjudicates non-criminal complaints concerning the legality of a referendum. Such complaints must be submitted no later than seven days before the NEC meeting convened to declare the referendum results. The EAC is required to issue its decision within four weeks of receiving a complaint.³³

EAC decisions may be brought before the courts within three weeks of their publication, with such cases subject to expedited proceedings.³⁴ Violations such as breaches of ballot secrecy, deliberate obstruction of voting, or providing misleading information, are handled through the ordinary criminal justice system. EAC representatives informed the ODIHR NAM that information on available complaint and appeal mechanisms is widely accessible and that voters generally know where to submit complaints. ODIHR NAM interlocutors did not raise concerns regarding the legal framework or functioning of the dispute-resolution system and expressed confidence in its efficiency and transparency.

I. CITIZEN AND INTERNATIONAL OBSERVERS

The 2021 Elections Act introduced an explicit legal framework for citizen and international election observation, addressing a previous ODIHR recommendation. Organizations seeking to deploy observers must apply to the NEC for accreditation no later than 30 days before referendum day. Accredited observers may follow voting, counting, and tabulation, subject to the conditions and criteria established by the NEC.³⁵

The ODIHR NAM was informed that citizen election observation is not an established practice in Iceland and that no citizen observer organization was planning to observe the referendum at the time of the NAM visit. Before the NAM visit, the NEC had received one application for accreditation from an international observer organization.³⁶

IV. CONCLUSIONS AND RECOMMENDATIONS

All ODIHR NAM interlocutors expressed a high degree of confidence in the impartiality and technical capacity of the administration to organize the referendum professionally and transparently and recognized Iceland's longstanding democratic tradition. At the same time, many raised concerns about certain gaps in the legal framework, campaign finance regulation and oversight, and media regulatory framework. Most ODIHR NAM interlocutors welcomed a potential ODIHR referendum observation activity and acknowledged that an external assessment could contribute to the transparency of the referendum process and inform possible improvements.

The ODIHR NAM sees benefit in undertaking a closer examination of certain electoral domains, including the campaign environment and online campaigning, campaign financing and its oversight, and the media environment and its regulation. Based on the findings of this report, the ODIHR NAM recommends the deployment of a Referendum Expert Team (RET) for the 29 August 2026 referendum. ODIHR also encourages the authorities to consider previous recommendations that remain unaddressed.

³² All EAC members must meet statutory professional qualification requirements. The Supreme Court nominates the chairperson, while the [Icelandic Rectors' Conference](#) and the [Icelandic Association of Local Authorities](#) each nominate one member; alternates are nominated in the same manner.

³³ The deadline may be extended to six weeks where a case is particularly extensive.

³⁴ EAC decisions are published on the [government's dedicated rulings portal](#).

³⁵ See [NEC Criteria for Conducting Election Observation in Iceland](#).

³⁶ The application was submitted by Democracy Volunteers, a United Kingdom-based election observation organization.

ANNEX: LIST OF MEETINGS

Ministry for Foreign Affairs

Anna Hjartardóttir, Director General of the Directorate for International Affairs and Policy
Tómas Orri Ragnarsson, Director at the Directorate for Defence
Bryndís Bjarnadóttir, Specialist, Computer Emergency Response Team (CERT-IS)
Daniel Freyr Birkisson, Adviser

Constitutional and Supervisory Committee of the Parliament

Bryndís Haraldsdóttir, Chair, Independence Party
Jón Gnarr, 1st Deputy Chair, Liberal Reform Party
Ása Berglind Hjálmarsdóttir, Social Democratic Alliance
Eiríkur Björn Björgvinsson, Liberal Reform Party
Sigríður Á. Andersen, Centre Party

Ministry of Justice

Bryndís Helgadóttir, Director General
Þorvaldur Heiðar Þorsteinsson, Senior Legal Advisor
Anton Ástvaldsson, Legal Advisor

National Election Commission

Ástríður Jóhannesdóttir, Director General
Hjördís Stefánsdóttir, Head of Legal Affairs
Indriði Björn Ármannsson, Legal Adviser

Registers Iceland

Karen Edda B. Benediktsdóttir, Specialist
John Harmon Grant, IT Operations Lead

Election Appeal Committee

Berglind Svavarsdóttir, Chairwoman, Supreme Court Attorney
Anna Tryggvadóttir, Member

National Audit Office

Guðmundur Björgvin Helgason, Director General
Gestur Páll Reynisson, Specialist, Performance Audit Department

Political Parties³⁷

Bryndís Haraldsdóttir, Independence Party
Eiríkur Björn Björgvinsson, MP, Liberal Reform Party
Ásthildur Lóa Þórsdóttir, MP and Parliamentary Group Leader, People's Party
Lilja Alfreðsdóttir, MP and Chair, Progressive Party
Dagbjört Hákonardóttir, MP, Social Democratic Alliance

Media Commission

Elfa Ýr Gylfadóttir, Director
Guðrún Kristín, Media Literacy Specialist, Centre for Social Cyber Safety and Media Literacy (Netvís)
Stefania Ragnarsdóttir, Media Literacy Specialist, Netvís

³⁷ ODIHR offered meetings to all parliamentary political parties.

National Broadcasting Service (RÚV)

Heiðar Örn Sigurfinnsson, Director of News

Civil Society

Snærós Sindradóttir, Executive Director, European Movement in Iceland

Elvar Örn Arason, Treasurer, European Movement in Iceland

Birgir Ármannsson, Forward Iceland

Vigdís Hauksdóttir, Spokesperson, Heimssýn

Erna Bjarnadóttir, Board Member, Heimssýn

Ögmundur Jónasson, Left-Green Movement

Academia

Hafsteinn Einarsson, Associate Professor, Faculty of Industrial Engineering, Mechanical Engineering and Computer Science; Assistant, Faculty of Law

International Community³⁸

Representatives of diplomatic missions of Czechia, Denmark, Finland, Germany, Portugal, the Russian Federation, Slovakia, Switzerland, and the United States of America.

³⁸ The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in or accredited to Iceland.