



Office for Democratic Institutions and Human Rights

# KYRGYZ REPUBLIC

## EARLY PARLIAMENTARY ELECTIONS 30 NOVEMBER 2025

### ODIHR Election Observation Mission Final Report



Warsaw  
14 August 2026

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**KYRGYZ REPUBLIC**  
**EARLY PARLIAMENTARY ELECTIONS**  
**30 November 2025**

**ODIHR Election Observation Mission Final Report<sup>1</sup>**

**I. EXECUTIVE SUMMARY**

Following an invitation to observe the 30 November 2025 early parliamentary elections and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) established an Election Observation Mission (EOM) on 21 October. The mission, headed by Tamás Meszerics, consisted of a 16-member core team based in Bishkek and 30 long-term observers (LTOs) who were deployed on 29 October throughout the country. The ODIHR EOM remained in Kyrgyzstan until 12 December to follow post-election developments. For election day, the ODIHR EOM was joined by delegations from the OSCE Parliamentary Assembly (OSCE PA) and the Parliamentary Assembly of the Council of Europe (PACE) to form an International Election Observation Mission (IEOM).

In its statement of preliminary findings and conclusions issued on 1 December 2025, the IEOM concluded that the elections “were administered efficiently but the restrictive campaign environment stifled candidate and voter engagement. Fundamental freedoms of expression, association, and peaceful assembly, while constitutionally protected, are increasingly limited in practice by new restrictive legislation and its enforcement. Recent fundamental changes to the legal framework introduced a new majoritarian electoral system and new constituency delineation as well as additional restrictions on candidate eligibility, resulting in significantly diminished political party involvement. Positively, the new system provides for 30 mandates, one per district, reserved for the underrepresented gender, and 41 per cent of the candidates were women. The election administration enjoyed confidence in its technical capacity and introduced measures to enhance transparency of its decision-making, but for other key aspects of the process transparency was insufficient, in particular on the new voting technologies, campaign finances and its decisions on election-related cases. The nationwide new remote voting option provided greater opportunities for voter participation. While there were competitive campaign activities in some districts, significant financial disparities between candidates affected their ability to compete on a level playing field. Numerous allegations of vote-buying continued throughout the campaign. Media refrained from covering candidates in their news coverage or editorial programmes, citing strict interpretation of the requirements for equal coverage and liability for content, limiting voters’ ability to make an informed choice. Funding limitations and recent legal amendments impacting civil society organizations have significantly restricted participation in public life and election observation. Election day was assessed overall positively, new voting technologies functioned reliably, and voting procedures were largely followed, however, widespread issues with adherence to counting and tabulation procedures were observed.”

The electoral legal framework was fundamentally changed in the months preceding the elections. While providing a technical basis for conducting elections, the legal framework falls short of a number of international standards for democratic elections and does not address most of ODIHR and the Council of Europe’s Venice Commission previous recommendations. The 2025 legal amendments *inter alia* introduced a new majoritarian electoral system with a new gender representation quota, new electoral district delineation and further restricted candidate eligibility requirements. The condensed timeframe for the adoption of the amendments to the law limited opportunities for meaningful public consultation, raised concerns about the inclusiveness of the legislative process, hindered the implementation of certain

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<sup>1</sup> The English version of this report is the only official document. An unofficial translation is available in Kyrgyz and Russian.

provisions, and undermined the stability of the electoral law, at odds with international standards and good practice.

The 90-member parliament is elected for a five-year term under a new majoritarian single non-transferable vote system across 30 three-member districts. The new rules for delineation of electoral districts and their implementation are not in line with international good practice.

The election administration enjoyed the confidence of most stakeholders in its technical capacity to conduct the elections. The Central Commission for Elections and Referenda (CEC) managed technical preparations efficiently and within the expedited deadlines for early elections. The CEC undertook positive measures for transparency in its decision-making, although agendas, regulations and decisions were not always published on time and substantive discussions often took place in working groups. The work of lower-level election commissions was not sufficiently transparent. The District Election Commissions (DECs) were well resourced and carried out their duties professionally, often with the active involvement of the CEC. The legal status, functions and jurisdictions of Territorial Election Commissions, which were used as sub-DEC hubs to facilitate the delivery of election materials, are not provided for in the law and remained unregulated, leading to inconsistent practices. Voter information campaigns featured extensively in the traditional media but were not accessible in the languages of national minorities. Measures to enhance the participation of persons with disabilities were inconsistently implemented.

Electronic devices were used at all polling stations for voter identification and for the establishment and transmission of preliminary results. The CEC sufficiently prepared election officials for the use of the new equipment and took steps to address connectivity problems. Voters were also given the opportunity to test the equipment, and there was general trust in its use. Despite these efforts, the overall perception of the integrity of the technology was diminished by the lack of a public procurement process, an independent verification or certification, and of public information on the audit.

The final voter list, published on 23 November, included 4,294,243 voters, of whom about 52 per cent are women. Voters were given sufficient opportunity to check the lists, and there was high stakeholder confidence in the register's accuracy and inclusiveness. Despite a long-standing ODIHR and Venice Commission recommendation and contrary to international standards, those serving any prison sentence and those deprived of legal capacity by a court are disenfranchised.

The CEC conducted the candidate registration process transparently and efficiently, registering 465 candidates, of whom 189 were women (41 per cent) and 10 self-identified as belonging to national minorities (2 per cent). Most candidates were self-nominated; only one political party fielded candidates, demonstrating how the new electoral system may have impacted political parties. The legal requirements for candidate eligibility are unduly restrictive, contrary to international standards and prior ODIHR and Venice Commission recommendations. A total of 57 nominees were rejected due to not meeting eligibility requirements, not paying the new non-refundable electoral fee, or not opening a dedicated bank account, limiting political participation.

Due to the short campaign period from 10 to 29 November, candidates' opportunities to reach voters were hindered. While a high number of participants entered the official campaign, genuine competitiveness was restricted by campaign regulations and their implementation, as well as authorities' actions against dissenters. Apart from a brief momentum prior to the election day, the campaign environment was subdued; ODIHR EOM interlocutors linked this restraint to fears of retribution for critical political activity. Electoral activities were observed in various districts, including gatherings, some co-organised by the CEC and the DECs; door-to-door canvassing; and social media activity. While the legal framework provides for equal campaign opportunities for all contestants, there were significant financial disparities between candidates that affected their ability to compete on a level playing field.

Allegations of vote-buying remained wide-spread throughout the campaign. The week before the elections was marked by arrests of prominent politicians on charges of organizing mass riots.

Campaigning on social networks is not specifically regulated, and general campaign rules apply. Online campaign activities were actively monitored by authorities. Campaign-related posts generally presented the candidates' activities and were personality-focused, rarely featuring programmatic issues, including those that generated higher levels of interaction.

Women are underrepresented in political life, which ODIHR EOM interlocutors attributed to ingrained patriarchal stereotypes, financial barriers, social stigma, intolerant rhetoric and the lack of affirmative measures to promote participation. The new electoral system provides for 30 mandates, one per district, reserved for the underrepresented gender, which falls short of international recommendations for promoting gender parity, and no other affirmative measures are stipulated. Some 41 per cent of the registered candidates were women, but these candidates received only 33 per cent of free airtime. The majority of the ODIHR EOM interlocutors among women welcomed the current de facto quota as a way to secure a higher participation of women in a political life system.

A substantial discrepancy between the country's demographic composition and the representation of national minorities was observed throughout the electoral process. Only two per cent of registered candidates self-identified as belonging to a non-majority ethnic group, and only three of them won mandates, despite ethnic minorities constituting 22 per cent of the population. Recent legislative changes that removed a statutory 15 per cent quota for national minorities and new restrictions on candidate eligibility may have contributed to this underrepresentation. The newly established electoral districts did not consider the ethnic composition of localities, despite earlier recommendations from ODIHR in 2025. Candidates who self-identified as part of a minority avoided being seen as representatives of that group exclusively. Discussions on topics related to the rights and inclusion of minority groups were almost absent from public campaigning, and the availability of electoral information and campaigning in minority languages was severely limited.

As currently implemented, regulations on reporting and oversight do not provide sufficient safeguards for integrity and accountability. Prior ODIHR recommendations on the regulation of campaign finance remain unaddressed. The legal framework stipulates disproportionate sanctions, including deregistration of candidates for nominally exceeding spending limits, and does not establish a sufficient system for financial disclosure and verification, limiting its effectiveness. Financial information was consistently published by the CEC throughout the campaign and indicated that candidates mainly relied on personal assets and private donations. Interim reports remained unpublished due to technical issues, which limited transparency and voters' access to information. Not all contestants had submitted comprehensive financial reports by the legal deadline.

The Constitution provides for freedom of expression, but it also includes unduly broad and vague grounds for restricting it. The legal framework governing media falls short of international obligations, and despite prior ODIHR recommendations, it was not amended to prevent a narrow interpretation of campaign rules, which led to an absence of news and editorial coverage of contestants' campaigns.

State-funded broadcasters provided free airtime to contestants in line with the law. However, news coverage across all broadcasters and online portals focused almost entirely on procedural aspects of the elections and the authorities' activities, limiting voters' ability to make an informed choice. Likewise, despite previous ODIHR recommendations, paid candidate content also featured in news segments during the campaign, which together with the lack of analytical reporting limited voters' opportunity to make an informed choice.

The legal framework provides for judicial review and expedited deadlines for election disputes. However, recent amendments have limited political parties' ability to challenge election results, while voters remain excluded from such disputes, limiting access to effective remedy. The shortened early election timelines did not provide sufficient time for the submission and adjudication of complaints. While CEC sessions on disputes provided some transparency and the opportunity for parties to present their cases, procedural guarantees were undermined as a notable number of cases were examined *in camera*. Most election-related judgments and some CEC decisions were published with a delay, limiting transparency. The decisions available to the ODIHR EOM for assessment were mostly characterised by insufficient reasoning and substantiation of conclusions, and the CEC decisions did not specify avenues for appeals.

The legal framework provides for citizen and international election observation. Candidates may also field observers to election commissions, but due to limited resources, this opportunity was inaccessible for most candidates. The CEC accredited 788 international observers and only two citizen organizations, each appointing one observer. Funding limitations, along with recent amendments that define observation as a political activity and require civil society organizations with foreign funding to register as "foreign representatives", have substantially diminished civil society's ability to participate in public life. Some ODIHR EOM civil society interlocutors described a fear of retribution for engaging in election observation activities.

Election day was calm and orderly and procedures were largely followed. For the first time, voters had the opportunity to vote remotely at any polling station outside their electoral district. IEOM observers found the new voting technologies to be fully operational and functioning correctly in almost all observed polling stations, despite some connectivity issues. Women were well represented among polling officials. IEOM observers assessed voting positively in 96 per cent of polling stations observed, but reported procedural shortcomings, including issues related to the secrecy of the vote, as well as the frequent presence and interference of unauthorised persons. A small number of serious procedural shortcomings were observed, including group voting, multiple voting, and proxy voting. In a few cases, observers saw indications of vote-buying around polling stations. The vote count was negatively assessed in over one-third of the observed polling stations, and the tabulation process in almost half. Regrettably, almost half of the observed polling stations did not provide independent access for voters with physical disabilities. The CEC announced the preliminary turnout at 34.31 per cent and started posting the electronically-generated preliminary results, disaggregated by polling station, on its website immediately after the end of voting, contributing to transparency.

This report offers recommendations to support efforts to further enhance the integrity of elections in Kyrgyzstan and bring them closer in line with OSCE commitments and other international obligations and standards for democratic elections. Priority recommendations include conducting a review of the electoral legal framework through an inclusive and transparent process; revising candidacy requirements in line with international standards, OSCE commitments, and good practice; amending campaign rules to protect fundamental freedoms; regulating audit procedures, timelines, and publication of audit results on campaign finance; introducing appropriate special measures to ensure adequate representation of persons belonging to national minorities in the legislature; reviewing the media legal framework to ensure and uphold freedom of expression in line with international standards; amending campaign rules for media to ensure coverage of the campaign, especially in news and current affairs programmes; providing comprehensive, standardised, practical, and timely training for lower-level commissions, particularly on counting and tabulation procedures; and ensuring full adherence to all legal and procedural provisions for counting and tabulation of election results. ODIHR remains ready to assist authorities in implementing the recommendations contained in this and previous reports.

## II. INTRODUCTION AND ACKNOWLEDGMENTS

Following an invitation to observe the 30 November 2025 early parliamentary elections and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) established an Election Observation Mission (EOM) on 21 October. The mission, headed by Tamás Meszerics, consisted of a 16-member core team based in Bishkek and 30 long-term observers (LTOs) who were deployed on 29 October throughout the country. The ODIHR EOM remained in Kyrgyzstan until 12 December to follow post-election developments.

For election day, the ODIHR EOM was joined by delegations from the OSCE Parliamentary Assembly (OSCE PA) and the Parliamentary Assembly of the Council of Europe (PACE) to form an International Election Observation Mission (IEOM). Claude Haagen (MP) was appointed by the OSCE Chairperson-in-Office as Special Co-ordinator and Leader of the OSCE short-term observer mission. Monica Zajkova (MP) was the Head of the OSCE PA delegation. Georgios Stamatis (MP) led the PACE delegation. Each of the institutions involved in this IEOM has endorsed the 2005 Declaration of Principles for International Election Observation. On election day, the IEOM consisted of a total of 356 observers from 45 countries, including 223 observers deployed by ODIHR, a 72-member delegation from the OSCE PA and an 18-member delegation from the PACE.

The ODIHR EOM assessed the compliance of the electoral process with OSCE commitments, other international obligations and standards for democratic elections, as well as national legislation. This final report follows a Statement of Preliminary Findings and Conclusions, which was released at a press conference in Bishkek on 1 December.<sup>2</sup>

The mission wishes to thank the authorities of the Kyrgyz Republic for their invitation to observe the elections, and the Central Commission for Elections and Referenda (CEC) and the Ministry of Foreign Affairs for their assistance. The mission also expresses its appreciation to other state institutions, the judiciary, political parties, the media, civil society organisations, international community representatives and other interlocutors for their co-operation.

### III. BACKGROUND AND POLITICAL CONTEXT

On 30 September, President Sadyr Japarov announced early parliamentary elections to be held on 30 November, following the parliament's self-dissolution.<sup>3</sup> The parliamentary decision to self-dissolve was described by the authorities as an attempt to lessen the administrative and social pressures of consecutive parliamentary and presidential election campaigns under a new electoral system.<sup>4</sup> The elections were widely seen as a further step in consolidating presidential power.<sup>5</sup>

The outgoing parliament was elected in November 2021,<sup>6</sup> following the cancellation of the October 2020 elections in response to extensive and violent public protests. Women are underrepresented in political life, and held 20 of the 90 seats in the outgoing parliament, 1 of 23 ministerial positions, and none of the 7 governor positions. Interlocutors informed the ODIHR EOM that the underrepresentation of women in politics results from ingrained patriarchal stereotypes, financial barriers, social stigma, and intolerant

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<sup>2</sup> See the previous [ODIHR election-related reports on Kyrgyzstan](#).

<sup>3</sup> The proposal for self-dissolution was initiated by 32 members of parliament (MPs) and was adopted on 25 September with 84 votes. Under the Constitution and the Law "On the Rules of Procedure of *Jogorku Kenesh*", such a proposal can be initiated by one-third of all MPs (90) and requires the support of at least two-thirds.

<sup>4</sup> See the statements by the [President](#) and by the [Chairperson](#) of the Parliament.

<sup>5</sup> In August 2024, President Japarov emphasised that "the vertical of power must be strong and strict" and thanked the parliament for their "support [...] to] our important decisions, major projects, reforms, and legislative initiatives without delay or empty words".

<sup>6</sup> *Ata-Jurt* Kyrgyzstan won 15 seats; *Ishenim* – 12 seats; *Yntymak* – 9 seats; Alliance – 7 seats; *Butun Kyrgyzstan* – 6 seats; and *Yjman Nuru* – 5 seats. Thirty-six members of parliament were not nominated by political parties.

speech, as well as a lack of capacity-building measures to encourage greater participation, as envisaged in international standards.<sup>7</sup>

The period after the 2021 referendum reintroducing the presidential system was characterised by a shift in the balance of powers reinforcing the role of the president in political life.<sup>8</sup> A centralised governance model was established through the redistribution of functions among state institutions, including within the judiciary, anti-corruption initiatives, and national security agencies, particularly the role of the State Committee for National Security (SCNS).<sup>9</sup> The political landscape underwent major fragmentation and the influence of political parties diminished.

New legislation introduced restrictions on the constitutionally protected fundamental freedoms of expression, association, and peaceful assembly. These restrictions and the manner in which they are enforced have been criticised by international human rights organizations, along with the recent prosecutions and detentions of activists, journalists, and politicians.<sup>10</sup>

#### IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The parliamentary elections were primarily regulated by the 2021 Constitution and the 2011 Constitutional Law “On Election of the President of the Kyrgyz Republic and Deputies of the *Jogorku Kenesh* of the Kyrgyz Republic” (the Election Law, last amended in October 2025).<sup>11</sup> The Kyrgyz Republic is a party to major international and regional instruments on democratic

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<sup>7</sup> Article 4 of the 1979 [UN Convention on the Elimination of Discrimination against Women \(CEDAW\)](#) and its Committee’s 2004 General [Recommendation No. 25](#) highlight the need for temporary special measures to be supported by practical steps that facilitate equal participation in political and public life; see also CEDAW General [Recommendation No. 23](#); CEDAW General [Recommendation No. 40](#) on Equal and inclusive representation of women in decision-making systems; see also the 2024 CESCR Concluding [Observations](#) on the fourth periodic report of Kyrgyzstan and the 2021 CEDAW Concluding [Observations](#) on the fifth periodic report of Kyrgyzstan.

<sup>8</sup> Mr. Japarov was elected in the January 2021 presidential election, held simultaneously with the referendum that opted to re-introduce the presidential system. Consequently, the new Constitution adopted through the referendum in April 2021 substantially expanded the presidential powers, *i.a.* with legislative and referendum initiatives and a strong role in appointment and dismissal of the judiciary, including the presidents of the Constitutional Court and the Supreme Court, and the transfer of leadership over the executive branch from the prime minister to the president; and replaced a single six-year presidential term with the two five-year terms.

<sup>9</sup> Mr. Kamchybek Tashiev was the Head of the State Committee of National Security and the Deputy Chair of the Cabinet of Ministers since 2021, he was generally perceived as one of the most influential political figures in the country, until the February 2026 dismissal (see *Post-Election Developments*).

<sup>10</sup> See statements of the UN Office of the High Commissioner for Human Rights (OHCHR) in January 2024 and March 2025 on the [situation with the freedom of expression](#) in Kyrgyzstan, including on the [narrowing space](#) for independent media and civil society. In February 2024, the ODIHR Director and the OSCE Representative on Freedom of the Media [called](#) to repeal the “foreign representative” law, due to its expected “overwhelmingly negative impact on civil society”. See the 2022 ODIHR [Urgent Interim Opinion](#) on the earlier draft of the law. In April 2024, the OHCHR [stated](#) that the “foreign representative law” threatens the work of civil society and broadly violates “fundamental rights to freedom of expression, association, peaceful assembly and the right to take part in public affairs”. In its [Opinion](#) on the law “On non-profit organizations”, the Council of Europe’s European Commission for Democracy through Law (Venice Commission) stressed that the law is “incompatible with the right to freedom of association and the principle of non-discrimination”. See also reports by [Human Rights Watch](#), [International Partnership for Human Rights](#), [Human Rights Defender](#) and [Amnesty International](#).

<sup>11</sup> The legal framework governing parliamentary elections encompasses the 2021 Constitutional Law concerning the Central Commission for Elections and Referenda (amended in July 2025), the 2011 Law on Election Commissions (amended in 2021), supplemented by the Central Commission’s regulations. Other relevant provisions are contained in the 1999 Law on Political Parties (amended in 2025), the 2012 Law on Assemblies, the 2021 Criminal Code (amended in 2025), and the 2021 Code of Administrative Offences (amended in 2025).



elections.<sup>12</sup> While providing a technical basis for conducting elections, the legal framework falls short of a number of international standards for democratic elections. Some aspects of the electoral process lacked comprehensive and timely subsidiary regulation, undermining legal certainty, contrary to international good practice.

The Election Law was amended seven times in 2025, including in October, altering most aspects of the electoral framework shortly before the parliamentary elections and without addressing most previous ODIHR and Venice Commission recommendations, including those related to restrictions on the suffrage rights of prisoners and persons with disabilities, campaign finance oversight, legal standing in electoral disputes, and campaign regulations. The amendments introduced, *inter alia*, a majoritarian electoral system, a gender representation quota, and electoral districts delineation, and a non-refundable registration fee, further restricted candidate eligibility, changed campaign regulations, and abolished by-elections.

In its 2025 Opinion on the draft amendments to the Election Law, ODIHR noted that the Law was amended in a condensed timeframe, limiting opportunities for meaningful public consultation and raising concerns about the inclusiveness of the legislative process.<sup>13</sup> Changes of fundamental elements of the electoral system shortly before elections undermine the stability and foreseeability of electoral law.<sup>14</sup>

*The legal framework for elections should be reviewed in line with international standards for democratic elections and previous ODIHR recommendations. Such a review should be undertaken through an open, inclusive and transparent consultation process well in advance of elections. Subsidiary legislation should be adopted and published in due time prior to the respective stages of the electoral process to ensure legal certainty and allow adequate preparation for all stakeholders.*

The 90-member parliament is elected for a five-year term under a new majoritarian single non-transferable vote (SNTV) system across 30 three-member districts. Voters may vote for one candidate or against all. The three top candidates are elected, one of whom shall be of the underrepresented gender. Some ODIHR EOM interlocutors opined that the SNTV system could weaken political parties, lead to localised patronage networks, and hinder the development of a coherent national political agenda.

The 30 mandates reserved for candidates of the underrepresented gender were presented by the authorities as a “women’s quota”.<sup>15</sup> While the measures to strengthen political participation are laudable,

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<sup>12</sup> These include the [1966 International Covenant on Civil and Political Rights](#) (ICCPR), the [1975 Convention on the Elimination of All Forms of Racial Discrimination](#) (ICERD), the [1979 Convention on the Elimination of All Forms of Discrimination Against Women](#) (CEDAW) and its [Optional Protocol](#), the [2006 Convention on the Rights of Persons with Disabilities](#) (CRPD), the [2003 UN Convention Against Corruption](#) (UNCAC), and the [2002 CIS Convention on Standards of Democratic Elections, Electoral Rights and Freedoms](#). Kyrgyzstan is a member of the Council of Europe’s European Commission for Democracy through Law (Venice Commission) and has the status of Partner for Democracy with the Council of Europe Parliamentary Assembly.

<sup>13</sup> See paragraphs 19-25 of the [2025 ODIHR Legal Opinion](#) on the draft Constitutional Law “On amendments to the Constitutional Law ‘On elections of the President of the Kyrgyz Republic and Members of *Jogorku Kenesh* of the Kyrgyz Republic’”. Paragraph 5.8 of the [1990 OSCE Copenhagen Document](#) states that “legislation [shall be] adopted at the end of a public procedure [...] that being the condition for their applicability”. See also paragraph 23 of the [2024 ODIHR Guidelines on Democratic Lawmaking for Better Laws](#) and paragraph 60 of the 2025 Venice Commission Updated [Rule of Law Checklist](#).

<sup>14</sup> Paragraph II.2.b of the [2002 Venice Commission Code of Good Practice in Electoral Matters](#) states that “[t]he fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendment less than one year before an election”; the [2024 Venice Commission Revised Interpretative Declaration on the Stability of Electoral Law](#) emphasizes that election-related legal reforms must occur early enough to ensure that the management and understanding of the process are not compromised by late legislative changes.

<sup>15</sup> If there are no elected candidates of the required gender, the mandate of the third placed candidate is reserved for the candidate of the opposite gender with the most votes in that district.

many ODIHR EOM interlocutors expressed concerns that the quota system does not align with the internationally recommended standard for gender parity in political participation.<sup>16</sup> The law does not provide other measures to enhance the capabilities and representation of women in politics, such as capacity building trainings or financial subsidies, contrary to international standards.<sup>17</sup>

*Legislative and capacity-building measures shall be considered to ensure gender parity in political representation. The quota for the underrepresented gender should be raised and complemented with additional legal and policy measures, such as training, mentoring and financial support, in line with CEDAW recommendations on achieving substantive equality in political participation.*

The new electoral districts delineation rules and their implementation are not in line with international good practice with respect to the composition of the institution in charge of the delineation and related procedures,<sup>18</sup> the compliance with administrative boundaries,<sup>19</sup> the permissible deviation from the average number of voters,<sup>20</sup> and lack of legal requirements to consider national minority interests.<sup>21</sup> The number of voters in the new electoral districts varied significantly, affecting the equality of the vote.<sup>22</sup>

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<sup>16</sup> The [2024 CEDAW General Recommendation No. 40](#) frames equal and inclusive representation as a core obligation, prescribes States parties to “amend the Constitution and legislative frameworks to institutionalize 50:50 parity between women and men in all spheres of decision-making and calls for effective temporary special measures to reach balanced representation in decision-making. The [2025 ODIHR Gender Parity Roadmap: Seven steps towards the equal and meaningful representation of women and men in politics](#) further frames gender parity as a governance principle, stating that parity should be both a core principle of governance and a driver of transformative change, with women having an equal say in decision-making systems on par with men.

<sup>17</sup> [CEDAW](#) Article 4 and its [2004 General Recommendation No. 25](#) highlight the need for temporary special measures, including electoral quotas, to be supported by practical steps that facilitate equal participation in political and public life. See also the [1997 CEDAW General Recommendation No. 23](#) and [2024 General Recommendation No. 40](#).

<sup>18</sup> The law prescribes that the CEC delineates electoral districts prior to each parliamentary election. Paragraph I.2.2.vii. of the [2002 Venice Commission Code of Good Practice](#) states that the process must be conducted “impartially, and [...] taking account of the opinion of a committee, the majority of whose members are independent, [and] should preferably include a geographer, a sociologist and a balanced representation of the parties and, if necessary, representatives of national minorities”. The CEC delineated the 30 new electoral districts on 1 October 2025 within the legal deadline.

<sup>19</sup> The law recommends compliance with administrative boundaries, which was not ensured for the 2025 election campaign. The CEC delineation combined administrative units across existing boundaries, including Electoral District No. 3, which comprised territorial units from Batken Oblast and Osh Oblast, and Electoral District No. 4, which comprised Nookat District together with a number of territorial units from Aravan District.

<sup>20</sup> The law prescribes that electoral districts should have an approximately equal number of voters, with a permissible deviation of up to 20 per cent from the national average. Paragraph 7.3 of the [1990 OSCE Copenhagen Document](#), stipulates that the participating States will “guarantee universal and equal suffrage to adult citizens”. Paragraph I.2.2.iv of the [2002 Venice Commission Code of Good Practice](#) provides that deviations should not exceed 10 per cent and certainly not more than 15 per cent, except in special circumstances”.

<sup>21</sup> The law does not require consideration of the ethnic composition of electoral districts and its implementation created an artificial division of geographically concentrated communities, which impacted the ability of candidates representing national minorities to mobilise their community’s electorate. The issue pertains to the division of Uzgen between electoral districts No. 9 and No. 11, the districts Nos. 5,7,8 in Osh and the division of Suzak between districts No. 11 and No. 12, affecting the Uzbek communities, while the delineation of districts No. 7 and No. 9 have likely affected the Tajik community. Recommendation 10 of the [1999 OSCE HCNM Lund Recommendations on the Effective Participation of National Minorities in Public Life](#) states that “[t]he geographic boundaries of electoral districts should facilitate the equitable representation of national minorities”. Paragraph I.2.2.vii of the [2002 Venice Commission Code of Good Practice](#) states that “when constituency boundaries are redefined [...] it must be done without detriment to national minorities”. Article 25 in conjunction with Article 2 of the [1966 UN ICCPR](#) protect against discrimination in realisation of electoral rights.

<sup>22</sup> The [CEC Resolution No. 88](#) of 1 October 2025 determined the 30 districts with an average of 142,900 voters. Eight districts (26.7 per cent of the total) exceed the internationally recommended 10 per cent threshold: districts No. 9 (-14.10 per cent), No. 15 (+12.11 per cent), No. 28 (+12.09 per cent), No. 13 (+11.9 per cent), No. 27 (+10.37 per cent), No. 20 (-10.6 per cent), and No. 4 (-10.24 per cent). Furthermore, district No. 5 exceeds the 15 per cent threshold. Paragraph 21 of the [1996 UN CCPR General Comment No. 25](#) states “[t]he drawing of electoral boundaries and the method of allocating votes should not distort the distribution of votes”.

*To ensure the equality of the vote, the permissible deviation from the average number of voters per district should be reduced to meet international good practice. Constituency delimitation should be conducted in consultation with an independent and impartial body, as well as all relevant stakeholders, including national minorities.*

## V. ELECTION ADMINISTRATION

The parliamentary elections were administered by a three-tier system of election commissions, with the CEC, 30 District Election Commissions (DECs), and some 2,500 Precinct Election Commissions (PECs).<sup>23</sup> The CEC is a permanent body appointed by the parliament on the basis of parliamentary and presidential nominations, while DECs are temporarily formed by the CEC based on the membership of Territorial Election Commissions (TECs) and dissolve upon the official publication of the election results.<sup>24</sup> There are no legal criteria for selecting DEC members, apart from the requirement to consider election-related experience when selecting the chairperson and secretary, which leaves broad discretion to the CEC. For these elections, there were some 30 changes in the composition of DECs since their formation on 3 October 2025, most of them due to self-resignation for personal reasons. Registered candidates are entitled to appoint representatives to the election commissions at all levels. The election administration enjoyed the confidence of most stakeholders in its technical capacity to conduct the elections.

PECs are composed of nominees from political parties and local self-government bodies in equal numbers, with the total membership depending on the respective number of registered voters.<sup>25</sup> Several ODIHR EOM interlocutors noted that political parties did not nominate members to PECs, reducing political pluralism in the commissions. The ODIHR EOM observed that PECs were primarily composed of local public employees.

Women were well represented in DECs and PECs, at 57 and 70.5 per cent respectively, whereas the CEC includes only 2 women among 11 members.<sup>26</sup> Contrary to a prior ODIHR recommendation, national minority groups do not benefit from any legally guaranteed quota in the election administration, and according to the CEC, no initiatives or quotas exist for the representation of persons with disabilities.<sup>27</sup>

*Consideration should be given to introducing measures to promote the participation of persons with disabilities and national minorities in the work of the election administration, the latter in particular in the areas where they constitute a considerable part of the population.*

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<sup>23</sup> For these elections, the CEC established 100 polling stations in 34 countries, including 40 in the Russian Federation, 8 in Türkiye, 7 in Kazakhstan, 6 each in the United States of America and Canada, and 4 in the Republic of Korea for out-of-country voting. The CEC established 27 polling stations exclusively for remote voting, which are regulated by CEC resolutions on remote voting and are not tied to any specific electoral district.

<sup>24</sup> The parliament appoints half of the 12-member CEC upon nomination of the president and half upon its own proposal for a five-year term. Both the president and the parliament can also propose the dismissal of their nominees. The TECs are permanent election administration bodies. By law, they do not operate for parliamentary elections.

<sup>25</sup> PECs shall comprise no fewer than 7 members for up to 500 registered voters, no fewer than 9 members and no fewer than 11 members for 501–1,200 and more than 1,200 registered voters, respectively. One polling station can be established for up to 3,000 voters.

<sup>26</sup> On 12 September 2025, the parliament terminated the mandates of two of the four women CEC members nominated by the president, due to their voluntary resignation, substituting them with two men. Article 2 of the Election Law requires that “[...] no more than seventy per cent of the (CEC) members [shall be] of the same gender”.

<sup>27</sup> See Paragraph 31 of the [1990 OSCE Copenhagen Document](#) that prohibits discrimination and obliges States Parties to adopt measures ensuring equal enjoyment of rights, and Paragraph 35 ensuring effective participation in public affairs; see also paragraph 41.2 of the [1991 OSCE Moscow Document](#). See also paragraph II.3.1.d.iv of the [2002 Venice Commission Code of Good Practice](#) and paragraph 76 of its Explanatory Report, which state that “the electoral commission may include... representatives of national minorities”.

The CEC carried out technical preparations efficiently and within the expedited deadlines for early elections. The CEC improved transparency by holding regular sessions open for candidates' representatives and international observers, and by streaming and publishing the recorded sessions online. Candidates' representatives at the CEC were notified when matters concerning their candidates were to be considered and, as a rule, attended sessions and were able to express their views. However, the CEC's session agendas, regulations, and decisions were not always published on time. Moreover, substantive discussions often took place in working groups that were not consistently accessible, which further reduced the transparency of decision-making.

The DEC's were sufficiently resourced and carried out their duties professionally, often with the active involvement of CEC representatives in their administrative duties.<sup>28</sup> Some DEC's convened on an *ad hoc* basis, often at short notice, and agendas and minutes of the sessions were frequently not published, limiting transparency and the opportunity for observation.<sup>29</sup> The work of some DEC's was affected by the vast size of their electoral districts and by communication problems.<sup>30</sup>

*To ensure full transparency in decision-making, election administration bodies at all levels should hold public sessions and publish draft agendas and minutes in a timely and consistent manner.*

By law, DEC's are responsible for receiving election documentation from PEC's and compiling district-level results. On the eve of election day, the CEC informed the ODIHR EOM that DEC's would serve as sub-DEC hubs to facilitate the delivery of election materials. The legal status, responsibilities and territorial jurisdiction of these sub-DEC's are not prescribed in the law and remained unregulated, leading to inconsistent practices, including the involvement of some sub-DEC's in tabulating results and processing PEC materials. Although the sub-DEC hubs offered an operational solution to reduce travel time and expedite the materials transfer, their engagement in sensitive electoral procedures without a clear legal basis limited procedural consistency across districts, reduced transparency, and raised concerns regarding the legality and integrity of the process.

*To ensure legality, integrity and public trust, the processing of election results and election materials should be conducted only by the institutions empowered to do so by the law. Any operational solution should have a clear legal basis and its uniform implementation should be ensured.*

The CEC adopted regulations on election-day procedures, including on remote voting, some two weeks before election day, leaving insufficient time for trainers to fully understand the process and effectively communicate the information to DEC and PEC members.<sup>31</sup>

*To ensure consistent implementation of election day procedures, consideration should be given to adopting and publishing relevant regulations sufficiently in advance of election day and disseminating clear, detailed guidelines to DEC's and PEC's in a timely manner.*

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<sup>28</sup> CEC special representatives are permanent staff of the CEC apparatus assigned to the regions to provide coordination as well as organisational and methodological support to election commissions.

<sup>29</sup> Such practices were observed in Balykchy, Kara Kuldja, Kerben, Kochkor, Kyzyl-Kyya, Massy, Nookat, Tokmok, Toktogul, and Uzgen; unpublished decisions reported in Bishkek, Manas and Suzak.

<sup>30</sup> Based on observations in Aravan, Bishkek, Balykchy, Cholpon-Ata, Kara-Suu, Kent, Kyzyl-Suu, Kyzyl-Kyya, Manas, Nookat, Osh, Suzak, Talas and Tokmok.

<sup>31</sup> On 21 November, the CEC published the two regulations they adopted a week earlier: on voter identification and on the procedure for organizing, conducting and summarising the results of remote voting, which allowed to vote at a polling station outside one's electoral district.

The quality of the PEC trainings observed by ODIHR EOM long-term observers varied, ranging from structured and practical sessions supported by quality presentations, to lectures with no supplementary materials. Some PEC trainings were cancelled, and some were conducted on short notice.

*To enhance the professional capacity of the election administration, the CEC should provide comprehensive, standardised, practical and timely training for lower-level commissions, with particular emphasis on counting and tabulation procedures.*

Extensive voter information was provided through televised spots and social media platforms, and, to a lesser extent, through public gatherings, while outdoor campaign signage was scarce. Voter information covered various topics, including the new electoral system, candidate eligibility, and voter registration, and was conducted in Kyrgyz and Russian, but not in minority languages or in accessible formats for persons with sensory or intellectual disabilities.<sup>32</sup> Civil society was largely absent from voter education activities, with many interlocutors noting that CSOs avoid election-related activities due to legislative and financial constraints.

*To promote informed participation and encourage voter engagement, consideration should be given to expanding voter education and information activities, tailoring them to different voter groups, including national minorities and persons with various types of disability.*

The legal framework stipulates measures to enhance the participation of persons with disabilities.<sup>33</sup> The implementation of some of these measures remained inconsistent. While ODIHR observers reported that the mapping of polling stations ahead of election day was conducted systematically, the capacity to address shortcomings identified in the mapping was not always effective. Moreover, the accessibility of voting procedures, including the newly introduced voting technologies, was limited by the absence of assistive technologies. In addition, interlocutors highlighted the persisting social and cultural barriers affecting the inclusion of persons with disabilities, compounded by limited voter information and awareness-raising efforts.

*The Central Election Commission should continue efforts to improve the accessibility of the electoral process for voters with various types of disabilities, including by ensuring physically accessible polling stations, with appropriate layouts and consistently available assistive tools to facilitate independent and secret voting, in consultation with disabled persons' organisations.*

## VI. THE USE OF TECHNOLOGY IN THE ELECTION

The elections were conducted using new voting equipment that integrated most polling procedures into a single system and enabled the electronic tabulation of preliminary results. The Voter Identification Device with Ballot Printing (VID-BP) combined ID verification, biometric authentication through fingerprint and facial scanning, and the printing of both the voter identification slips and ballot papers. The device also enables the regular transmission of turnout data to the CEC during voting.

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<sup>32</sup> The Constitution provides that Kyrgyz is the state language and Russian is the official language, and guarantees conditions for ethnic groups to preserve and develop their native languages. Paragraph I.3.1.b of the [2002 Venice Commission Code of Good Practice](#) states that “[t]he public authorities have a number of positive obligations; *inter alia*, they must ii. enable voters to know the lists and candidates standing for election [...]. iii. The above information must also be available in the languages of the national minorities.”

<sup>33</sup> These including mapping of accessible polling stations, accessibility standards, large-print/Braille materials, adequate lighting of the voting premises, and assisted and mobile voting. The latter could be requested by voters who could not reach their polling station due to health reasons or disability and took place the day before election day.



Ballots are completed manually by voters and inserted into the ballot scanner while upholding the secrecy of the vote. After the polls close, the scanner is connected to the internet to immediately transmit the preliminary results and subsequently forward the scanned paper protocols. The electronically generated results are to serve as preliminary, while manual counting remains mandatory, and only manually counted results are legally valid.

CEC trainings sufficiently prepared election officials to use the new equipment, and they were reinforced with ample practice exercises. The authorities undertook measures to address the instability of electricity and Internet connections, which were the most commonly identified challenges; however, a few delays in the delivery of the additional equipment were noted in remote areas.<sup>34</sup>

Most ODIHR EOM interlocutors from the election administration assessed the introduction of the new equipment positively, underlining its overall user-friendliness and the facilitation of election day procedures, and expressed trust in its technical aspects. However, contrary to international good practice, the contract to supply the electronic voting systems and on support services was awarded without an open public tender process, which does not ensure transparency and accountability, and, along with the lack of access to scrutinise the technology, affected the broader perception of its integrity.<sup>35</sup>

The ballot paper issued by the VID-BP incorporates a unique Quick Response (QR) code used for time and location attribution of ballots and to substitute spoiled ballots. The simultaneous processing of the identified voter's data and the generation of a QR code linked to the corresponding ballot creates a significant potential vulnerability that may compromise the secrecy of the vote. The absence of publicly available source code and comprehensive technical documentation prevents assessment regarding the potential link or assignment between QR codes and individual voters.

*To ensure the secrecy of the vote, ballots should remain untraceable and unattributable to individual voters. The use of unique identifiers, such as individualized QR codes on ballot papers, should be discontinued to eliminate the risk of compromising voter anonymity. Alternative safeguards for the issuance and accounting of spoiled ballots should be established to maintain integrity without jeopardizing the privacy of the vote.*

The law does not provide for the independent verification and certification of electronic technologies, limiting public scrutiny of the systems. According to the CEC, the last system audit was carried out in 2020 by the State Enterprise “Infocom”, but the findings remain unpublished, limiting transparency and public accountability. The CEC did not demonstrate if and how the utilised electronic equipment complies with all established legislative requirements.<sup>36</sup> Furthermore, technical documentation for the equipment was not publicly available, and even key stakeholders, such as political parties and observers, were not granted access to relevant documentation and equipment set-up procedures, at odds with international good practice.<sup>37</sup> Some ODIHR EOM interlocutors expressed concerns about the integrity of the use of the equipment.<sup>38</sup>

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<sup>34</sup> ODIHR observers reported that trained technicians were assigned to each DEC, while power and connectivity vulnerabilities were addressed with cable networks and mobile internet, as well as spare generators. Issues with the delivery of power generators were observed in Aravan, and there were reports that no technical specialist was assigned for the Batken region.

<sup>35</sup> In 2024, the contract was awarded by orders of the President and Cabinet of Ministers to a foreign company without a public tender.

<sup>36</sup> Among other concerns, questions were raised regarding the existence of safeguards to prevent duplicate entries for the same voters across multiple voter lists, and uploaded to multiple identification devices.

<sup>37</sup> The [2002 Venice Commission Code of Good Practice](#), paragraph I.3.2.iv and paragraph 3.2.2.3 of the Explanatory Report calls for transparency of e-voting systems, and their compliance to the vote secrecy requirements.

<sup>38</sup> According to observations by ODIHR EOM, ballot scanners were connected to a network in over 30 per cent of cases on election day, which presents a potential risk of the premature transmission of preliminary election results.

*To strengthen confidence in the use of election technologies, the law should explicitly provide for independent third-party verification and certification of voter identification and vote-counting devices. Relevant stakeholders should be granted meaningful opportunities to scrutinise all aspects of the implementation process, including access to technical documentation, source code review, device configuration, and auditing procedures.*

Remote voting, in which voters could cast a ballot at any polling station outside their electoral district of registration, was implemented nationwide for the first time in these elections and accounted for 12 per cent of the total votes cast.<sup>39</sup> If voting remotely, the voter is identified using centrally stored personal data and receives a ballot paper listing the candidates from the voter's original electoral district. To prevent multiple voting, upon their successful identification in the centralized register, the voter is recorded by the register as having voted and the identification process for that voter cannot be repeated at another polling station. The CEC organized several mock exercises and three nationwide tests of remote voting to ensure voters' familiarity with the process and to improve public trust. The testing sessions did not attract broad participation, but allowed the election administration to identify operational risks related to connectivity and data transfer. The lack of clear procedures on the tabulation of remotely cast votes and on the verification of their results undermined legal certainty.<sup>40</sup>

## VII. VOTER REGISTRATION

Citizens of at least 18 years of age on election day are eligible to vote, except those serving a prison sentence, regardless of the gravity of the crime committed, and those declared legally incompetent by a court, which is contrary to international standards, OSCE commitments, and prior ODIHR recommendations.<sup>41</sup>

*Blanket deprivation of voting rights of prisoners should be reconsidered to account for the gravity of the crime; suffrage limitations based on disabilities should be repealed.*

Voter registration is passive, based on permanent civil registration and biometric data.<sup>42</sup> Voter lists are updated daily during electoral periods. ODIHR EOM observers reported that the lists were publicly displayed and voters had sufficient opportunities to request corrections. The final voter list, published on 23 November, included 4,294,243 voters, of whom 51.5 per cent are women. The ODIHR EOM interlocutors did not raise concerns about the accuracy of the voter register, or the voter list scrutiny and verification process. However, the legal requirement for PECs to display lists of voters who have voted at polling stations and to publish these lists on the CEC website undermines the secrecy of the vote.<sup>43</sup>

<sup>39</sup> Remote voting was implemented several times in the 2024 local and parliamentary by-elections. According to the Election Law, the decision to conduct remote voting shall be adopted when the elections are scheduled. For the 2025 early parliamentary elections, conducting of remote voting was determined in the 30 September presidential decree.

<sup>40</sup> The provisions of Articles 36<sup>1</sup> and 37 paragraph 5 of the Election Law on tabulating, counting and invalidating of remotely cast votes lack clarity, which was not addressed in the respective regulation of 14 November.

<sup>41</sup> Article 25(b) of the [1966 ICCPR](#) in conjunction with Article 2 guarantees the right to vote "without unreasonable restrictions" and discrimination. See also the [1996 UN CCPR General Comment No. 25](#) paragraph 4. See Articles 12 and 29 of the [2006 UN CRPD](#) and paragraph 48 of the [General Comment No. 1](#) that state that "a person's decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising [...] the right to vote [and] the right to stand for election". See also paragraphs 7.3 and 24 of the [1990 OSCE Copenhagen Document](#).

<sup>42</sup> Voter lists are generated from the Unified State Population Register administered by the State Registration Agency (SRA) "Kyzmat" based on voter addresses and eligibility criteria.

<sup>43</sup> Article 25 of the [1966 ICCPR](#) and paragraph 5.1 of the [1990 OSCE Copenhagen Document](#) provide for the secrecy of the vote. Paragraph I.4.54 of the Explanatory Report to the [2002 Venice Commission Code of Good Practice](#) states that "since abstention may indicate a political choice, lists of persons voting should not be published. See also the 2016 Venice Commission [Interpretative Declaration](#) to the Code of Good Practice in Electoral Matters on the Publication of Lists of Voters Having Participated in Elections.

*To safeguard the secrecy of the vote, the legal framework should be amended to prohibit the publication of the names of voters who have voted.*

Biometric registration is mandatory for all citizens above the age of 16. According to the CEC, only some 8,000 citizens still have not undergone biometric registration, which demonstrates significant progress and mostly addresses prior ODIHR recommendations related to comprehensive efforts to encourage and facilitate biometric registration of all eligible voters.<sup>44</sup> According to ODIHR EOM interlocutors, a planned voter registration database audit, which examines the security of biometric data processing, was postponed until after the elections

## VIII. CANDIDATE REGISTRATION

Voters who are at least 25 years old by election day, have a higher education, and have resided permanently in the country for at least five years prior to the elections may stand as candidates. Restrictions on candidate eligibility on the basis of education or residence are contrary to international standards and OSCE commitments.<sup>45</sup> The Constitution continues to prohibit holders of dual citizenship from holding public or civil service positions, despite recommendations by ODIHR and the Venice Commission.<sup>46</sup> The law requires certain categories of state and municipal officials to resign before registering as a candidate.<sup>47</sup>

Recent legal amendments introduced further restrictions on candidate eligibility by requiring proficiency in the Kyrgyz language<sup>48</sup> and by broadening grounds for ineligibility based on criminal record, including

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<sup>44</sup> ODIHR Election Observation Mission [Final Report on Parliamentary Elections](#), 28 November 2021, reported that “[a]ccording to the CEC, some 290,000 citizens, mostly residing abroad, do not have biometric registration and thus remained disenfranchised.” (p. 10), a 36 per cent decrease, compared to January 2021, when 450,000 were reported disenfranchised (see p. 9 of the Limited Election Observation Mission’s [Final Report on Early Presidential Election and Referendum](#), 10 January 2021).

<sup>45</sup> Article 25(b) of the [1966 ICCPR](#) in conjunction with Article 2 guarantees the right to be elected “without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. Paragraph 15 of the 1996 UN HRC 1996 UN CCPR [General Comment No. 25](#) to the ICCPR states that “[p]ersons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent, or by reason of political affiliation.” See also Paragraph 7.3 of the [1990 OSCE Copenhagen Document](#). Paragraph I.1.1.d of the Venice Commission [Code of Good Practice](#) provides that a length of residence requirement for nationals is permissible only for local or regional elections. Article 24(1) of the Constitution of the Kyrgyz Republic prohibits discrimination, including based on education.

<sup>46</sup> The 2020 ODIHR and Venice Commission [Joint Opinion](#) on Amendments to Some Legislative Acts Related to Sanctions for Violations of Electoral Legislation recommended “to give due consideration to minimizing and eventually abolishing limitations on holding public offices for citizens with dual nationalities” (paragraph 32).

<sup>47</sup> Political officials (except for MPs) as well as heads of state and municipal enterprises and their affiliated entities should resign from the moment they are nominated as candidates.

<sup>48</sup> Due to the lack of the secondary legislation regulating the Kyrgyz language requirement attributable to the late adoption of the amendments, it was not implemented for the 2025 early parliamentary elections, which was [announced](#) by the First Deputy Head of the Council of Ministers in September 2025. Under its [Resolution No. 211](#) the Cabinet of Ministers also postponed the implementation of requirement for the proficiency in the Kyrgyz language for representatives of ethnic minorities until 2028.



expunged convictions and some terminated criminal proceedings.<sup>49</sup> A lifetime blanket ban imposed for any conviction, especially if expunged, or for a terminated criminal prosecution, raises concerns about proportionality and the right to rehabilitation. Furthermore, individuals included in preventive administrative registers for links to criminal or armed groups are ineligible, in the absence of a court decision and prior information to the affected individuals about the deprivation of the right to be elected,<sup>50</sup> which undermines the presumption of innocence and legal certainty.<sup>51</sup> There is also a limited-time ban on participation by former clergy.<sup>52</sup> These restrictions unduly limit the right to stand, contrary to international standards.<sup>53</sup>

*Eligibility to stand for elections should be brought in line with the international standards, and all undue, disproportionate restrictions and limitations on the right to stand for elections should be eliminated. Current restrictions based on disability, education, and criminal record should be repealed. The residency requirement should be removed or substantially reduced.*

Candidates could be nominated by registered political parties and by self-nomination until 30 October. One individual may compete in only one election district. Political parties may nominate one candidate for each electoral district; the candidate list nominated by political parties may include up to 70 per cent of candidates of the same gender. The 2025 amendments to the Election Law removed previous quotas related to the participation of persons with disabilities, youth, and national minorities, weakening opportunities for inclusive representation.<sup>54</sup>

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<sup>49</sup> Article 25 of the [1966 ICCPR](#) guarantees the right to stand for election without unreasonable restrictions. Paragraphs 150-155 of the [2015 Venice Commission Report on Exclusion of Offenders from Parliament](#) state that “[...] the principle of proportionality has always to be respected: the severity of the offence, its nature and/or the length of the sentence have to be taken into account. [...] For restrictions of passive electoral rights after the serving of the sentence, proportionality requires that the length of disenfranchisement depend on the nature of the offence. (154) Once the statutory disenfranchisement has expired, offenders may again run for elections: [...] lifetime restrictions are provided only in very extreme cases. [...] The Venice Commission considers that long-time sanctions should be limited to very serious crimes such as crimes against humanity ... or crimes that go against the democratic nature of elections”.

<sup>50</sup> The court cases reviewed by the ODIHR EOM confirmed that some individuals only learned of their inclusion on preventive-operative lists upon receiving the CEC’s decision denying their registration as candidates. As courts maintained that they had no jurisdiction to review or annul such listings, their examination was limited to the CEC’s procedural compliance with the law. As a result, those concerned were left without an effective remedy to contest the basis of their disqualification, contrary to OSCE Commitments and international standards. Article 2.3 of the [ICCPR](#) on effective remedy. See also paragraph 5.10 of the [1990 OSCE Copenhagen Document](#).

<sup>51</sup> The 2025 Law on Combating Organized Crime provides the basis for the operative preventive register, which is maintained by the security services without judicial review or supervision over the inclusion of individuals into the list. Article 57(1) of the Constitution guarantees the presumption of innocence. Paragraphs 5.12 and 5.13 of the [1990 OSCE Copenhagen Document](#) provide that restrictions on the rights must meet standards of legality, foreseeability, and non-arbitrariness.

<sup>52</sup> See Article 25 in conjunction with Article 2 of the [1966 ICCPR](#). Paragraph 3 of the 1996 [UN CCPR General Comment No. 25](#) prohibits any distinction in political rights on the grounds of religion.

<sup>53</sup> Paragraph 15 of the 1996 UN CCPR [General Comment No. 25](#) to the ICCPR states that “[p]ersons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent, or by reason of political affiliation.”

<sup>54</sup> The 2025 ODIHR [Legal Opinion](#) on the amendments to the Election Law recommended affirmative measures to ensure pluralistic participation of various groups that “could include, but should not be limited to, the introduction of an explicit requirement that the borders of electoral districts shall be determined taking into consideration the settlements of national minorities; further, to ensure representation of various groups, meaningful candidate nomination quotas, reserved parliamentary mandates, decreased electoral deposits for representatives of such groups could also be considered”. Paragraph 7.5 of the [1990 OSCE Copenhagen Document](#) commits the participating States to respect “the right of citizens to seek political or public office [...] without discrimination”. Paragraphs 41.2 and 41.3 of the [1991 OSCE Moscow Document](#) affirmed the commitment to take steps to ensure the equal opportunity of persons with disabilities to participate fully in social life, and to promote their appropriate participation in decision-making in the spheres affecting them. See also Article 29 of the 2006 [UN CRPD](#).

*To promote political pluralism and the inclusion of underrepresented groups, consideration should be given to developing affirmative measures that would facilitate the electoral participation of members of such communities. Such measures could include, but should not be limited to, meaningful candidate nomination quotas, reserved seats, and decreased electoral deposits for representatives of such groups.*

Each nominated candidate was required to pay a non-refundable electoral fee of KGS 300,000.<sup>55</sup> A decreased electoral fee is provided for prospective candidates with disabilities. Still, the ODIHR EOM observed that the electoral fee constituted a potential undue barrier for participation, particularly given the limited time for fundraising in the case of early elections and the prohibition on fundraising prior to the official start of the election campaign.<sup>56</sup>

*The electoral fee for candidate registration should be reduced to eliminate financial barriers to standing for election, and made refundable based on the election results. The amount of the electoral fee should be determined based on an inclusive public discussion.*

The registration process was overall transparent, but its inclusiveness was affected by the stringent eligibility requirements and the high non-refundable registration fee. The CEC efficiently conducted compliance checks through an inter-agency data exchange and verified submissions on a rolling basis, registering candidates or issuing motivated rejections. The rules on challenging denials of registration render appeals ineffective, in case of registration denial close to the registration deadline. By the legal deadline, the CEC registered 465 candidates, of whom 189 were women (41 per cent) and 10 self-identified as belonging to national minorities (2 per cent); 67 candidates had withdrawn,<sup>57</sup> and 57 had been denied registration.<sup>58</sup> The number of registered candidates varied significantly across districts.<sup>59</sup> Nearly all candidates were self-nominated (98 per cent); only one political party fielded nine candidates, suggesting that the new electoral system may have affected political parties' participation.<sup>60</sup> Of the 90 members of the outgoing parliament, 79 MPs competed.

## IX. ELECTORAL CAMPAIGN

The election campaign was short, from 10 to 29 November, which, according to many candidates, effectively hindered their voter outreach. While a high number of participants entered the official campaign, genuine competitiveness was restricted by campaign regulations and their implementation, as

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<sup>55</sup> EUR 1 equals approximately KGS 100. The fee is 3,000 calculation units (c.u.), 1 c.u. equals to KGS 100, thus the electoral fee amounts to EUR 3,000. The legally provides registration fee reductions for candidates with disabilities are graded according to the degree of disability. Paragraph 194 of the 2020 ODIHR and Venice Commission [Joint Guidelines](#) for Political Party Regulation (second edition) provides that “States may require parties to meet certain obligations in order to be placed on a ballot in elections. [...] Such requirements usually include [...] payment of a monetary deposit (refundable if a party receives a predetermined percentage of votes or a seat in parliament)”.

<sup>56</sup> Article 25 of the 1966 [ICCPR](#) guarantees the right to stand for election without unreasonable restrictions. Paragraph 4 of 1996 [UN CCPR General Comment No. 25](#) underlines that any conditions imposed on candidacy must rely on objective and reasonable criteria and must not create disproportionate barriers to participation, while paragraph 16 of the clarifies that nomination requirements, including dates, fees, or deposits, must be reasonable, non-discriminatory, and must not unduly limit participation in public life. Paragraph I.1.3.iv of the 2002 [Venice Commission Code of Good Practice](#) states that “[i]f a deposit is required, it must be refundable should the candidate or party exceed a certain score; the sum and the score requested should not be excessive”.

<sup>57</sup> By law for early elections parties and candidates could withdraw no later than 7 days before election day.

<sup>58</sup> Of those denied registration, 14 failed to pay the electoral fee, 20 failed to open a campaign bank account and 23 were rejected for other ineligibility reasons, including two due to criminal records.

<sup>59</sup> There were 29 districts with at least 10 candidates, including 5 with more than 20 candidates. The lowest number of candidates (5) were registered in district No. 11, and the highest number (25) in district No. 19.

<sup>60</sup> For an assessment of the potential impact of the new electoral system on political participation and representation, see section 3 of the [2025 ODIHR Legal Opinion](#).

well as authorities' actions against dissenters.<sup>61</sup> Apart from a brief campaign momentum shortly prior to the election day, the campaign unfolded in a subdued atmosphere, with largely low-key activities. ODIHR EOM observers and their interlocutors noted a degree of caution in campaign messaging and engagement. Several interlocutors described an apparent acceptance by voters and candidates alike of a certain degree of control over the campaign environment, accompanied by a fear of repercussions for any activities or statements that could be considered as criticism. These concerns were reinforced by preventive and warning activities reportedly undertaken by the state security services.<sup>62</sup> ODIHR EOM interlocutors further noted a high level of voter apathy, which they attributed to a lack of trust and disillusionment in the political process.

*To foster an environment in which campaign activities and meaningful voter and candidate engagement are not hindered, the involvement of law enforcement and national security bodies in enforcing campaign regulations should be confined to what is clearly prescribed by their mandate and should be considered from the human rights compliance perspective.*

The legal framework provides for equal campaign opportunities for all contestants and grants citizens the right to participate in campaigning. However, the regulations include strict definitions of permissible and prohibited speech during campaigns,<sup>63</sup> and prescribe specific forms of campaigning,<sup>64</sup> which, combined with the election administration's formalistic interpretation of the rules and extensive sanctions, unduly limited the candidates' opportunities and hampered free public political discourse.<sup>65</sup> In some regions, the judiciary has restricted the right to assemble.<sup>66</sup>

The law prohibits the misuse of administrative resources and public office, vote-buying, preferential media access, dissemination of false information and criticism of other contestants during free time on state media.<sup>67</sup> Public authorities, including the President, repeatedly addressed voters to discourage

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<sup>61</sup> There were 460 candidates at the end of the campaign, as a result of 2 withdrawals and 3 cases of criminal investigation of vote buying. Article 46 of the Election Law stipulates that the CEC may deregister a candidate at any time before election day and an elected candidate if they have lost their eligibility or, pursuant to a final court decision, are found to have committed a serious violation, including voter bribery, misuse of administrative resources, and breaches of campaign finance rules.

<sup>62</sup> In 71 per cent of the observed campaign events (75 out of 106 events) there were no negative or critical remarks or comments by the candidate or other speakers. Numerous ODIHR EOM interlocutors from civil society informed about frequent informal outreaches by the State Committee of National Security, discouraging from critical statements or activities. In paragraph 7.7 of the [1990 OSCE Copenhagen Document](#) participating States committed to ensure "[...] political campaigning to be conducted in a fair and free atmosphere in which neither administrative action, violence nor intimidation bars the parties and the candidates from freely presenting their views and qualifications, or prevents the voters from learning and discussing them or from casting their vote free of fear of retribution".

<sup>63</sup> The 2021 Law on Inaccurate (False) Information, as well as the Election Law in Article 28(5) prohibits publications based on knowingly false information and damaging honour, dignity, or business reputation of candidates or political parties. At the same time, the latter in its Article 28(6) prohibits dissemination in free airtime of "calls to vote against the candidate (candidates)", "of information about any candidate (any candidates), the political party that nominated the registered candidate, with negative comments" and "dissemination of information that contributes to the creation of a negative attitude of voters towards the candidate or the political party that nominated the registered candidate".

<sup>64</sup> The Election Law in Article 22(10) prescribes four forms of election campaigning – (1) calls to vote for certain candidates or against them; (2) expression of preference in relation to individual candidates; (3) a description of the possible consequences of the election or non-election of candidates; (4) dissemination of information about the activities of candidates that are not related to their professional activities or the performance of their official duties.

<sup>65</sup> The Election Law in Article 1 defines campaigning as "activities of citizens [...], candidates, authorized representatives and trustees of candidates, political parties in the preparation and dissemination of information during the election campaign, aimed at encouraging voters to vote for certain candidates (list of candidates) or against them". However, the CEC adopted a wide interpretation that any explicit expression of the citizens' political stance or commentary constitutes campaigning and as such should be allowed only on a contractual basis with a candidate.

<sup>66</sup> Since 2024, temporary judicial measures requested by local administrations render central areas in Bishkek and Osh as areas where public assemblies are prohibited.

<sup>67</sup> Campaign violations of administrative nature may lead to warnings, fines, and deregistration of candidates, while campaign-related criminal offences entail fines, correction labour, or imprisonment of up to eight years.

unlawful practices.<sup>68</sup> The President announced his intention to personally oversee the election campaign to ensure its fair conduct.<sup>69</sup> A number of ODIHR EOM interlocutors alleged that a new rule allowing contestants to employ up to 1,000 campaigners legitimised the practice of vote-buying and could be abused by affluent contestants; only candidate representatives, proxies and observers can be volunteers. Contestants signed a memorandum pledging not to misuse administrative resources or engage in vote-buying.<sup>70</sup> However, ODIHR EOM observers received credible allegations of vote-buying that remained widespread across most districts throughout the campaign.<sup>71</sup> The law mandates the CEC to screen allegations of vote-buying cases to determine which merit referral for investigation, granting the CEC broad discretion in deciding whether potentially criminal conduct is examined by law enforcement authorities.<sup>72</sup>

*To promote confidence in the electoral process robust efforts are needed to address the persistent issue of vote-buying, both through a civic awareness campaign, including beyond the electoral period, and through effective prosecutions. The role of the CEC in pre-screening vote-buying cases prior to investigation should be reconsidered to ensure effective separation of functions and consistent investigations.*

The law mandates the CEC to ensure compliance with campaign requirements. The CEC's Working Group on Campaigning reviewed over 220 cases, most of which concerned materials posted or mentioned on social networks or in closed messaging groups, both before and during the official campaign.<sup>73</sup> The Working Group did not consistently demonstrate that its decisions were necessary and proportionate, in order to balance campaign regulations with the protection of fundamental freedoms.<sup>74</sup> The Group's approach often demonstrated a formalistic interpretation whereby any explicit expression of a citizen's political stance or commentary constitutes campaigning and as such should be allowed only on a contractual basis with a candidate.<sup>75</sup> The strict legal framework, combined with this restrictive interpretation, led to numerous sanctions, including fines or agreements requiring the online content to be deleted to prevent further punitive action. As a result, free political debate was curtailed and candidates' opportunities were unduly limited.

*The campaign rules should be amended with an aim to protect the exercise of fundamental freedoms. A social and political expression of a citizen, if not presented on a contractual basis, should not be*

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<sup>68</sup> On 30 September, President Japarov, in his [address](#) to the nation, specifically urged employees of local administrations, civil servants, teachers, and doctors not to interfere in the election process, warning that any interference will result in dismissal and strict accountability. The President stated that "these elections must become the most transparent and fair in our history". The [CEC chairperson](#) called on candidates to abstain from vote-buying and the [Ministry of Education](#) called on education professionals to abstain from campaigning.

<sup>69</sup> The President [undertook](#) to "personally monitor these elections [...] as an arbiter. If unfair actions are recorded in any district, I myself will take part in the CEC proceedings or set up a commission and send my trusted people there."

<sup>70</sup> The candidates signed the [memoranda](#) on 8 November in each respective DEC (for Bishkek-based districts - at the CEC), after the lottery on ballot order and the allocation of free airtime in the state media were conducted.

<sup>71</sup> ODIHR EOM received credible allegations in the following districts: Batken, all four districts within Bishkek, Gulczo, Kadamjai, Kant, Kara-Suu, Kerben, Kyzyl-Suu, Lebedinovka, Massy, Naryn, Nookat, Talas, Tokmok, and Toktogul.

<sup>72</sup> The CEC does not have investigative functions and the law does not prescribe the criteria the CEC has to account for while selecting the cases meriting an investigation (see Election Dispute Resolution section for information about the investigations of vote-buying cases).

<sup>73</sup> The Working Group has reportedly held 18 sessions, including 16 working ones. See *Election Dispute Resolution* section for the information on complaints that reached the CEC level.

<sup>74</sup> The [2011 UN CCPR General Comment No. 34](#) to Article 19 (Freedoms of opinion and expression) of the ICCPR in its paragraph 9 states that "[...] article 19 requires protection of the right to hold opinions without interference. This is a right to which the Covenant permits no exception or restriction. Freedom of opinion extends to the right to change an opinion whenever and for whatever reason a person so freely chooses. No person may be subject to the impairment of any rights under the Covenant on the basis of his or her actual, perceived or supposed opinions. All forms of opinion are protected, including opinions of a political, scientific, historic, moral or religious nature [...]"

<sup>75</sup> See *Election Dispute Resolution* section for examples.

*interpreted in a formalistic and overly restrictive manner as campaigning, and should be allowed.*

Many ODIHR interlocutors indicated that personal political connections played an increased role in the electoral chances of some affluent candidates, while the importance of party allegiances was further weakened with the introduction of the new electoral system. Many candidates sought to conceal their party affiliations to avoid potential negative repercussions. The week prior to the elections was marked by arrests of prominent political figures on suspicion of organizing mass riots.<sup>76</sup>

Despite such a campaign environment, ODIHR EOM observers noted campaign activities in various districts, including gatherings, some co-organised by the CEC and the DEC, door-to-door canvassing, and extensive use of social media.<sup>77</sup> Most campaigns were personality-driven, based on local connections and family networks rather than political programmes. Nevertheless, candidates addressed a range of primary local issues, such as rising living costs, social development including education and healthcare, support to small enterprises, local infrastructure, family, youth and women's rights. ODIHR EOM observers observed a low participation of youth in in-person campaign activities.<sup>78</sup>

Campaigning on social networks is not specifically regulated, and general campaign rules apply. The authorities actively monitored the internet space during the elections, including social networks.<sup>79</sup> Most candidates relied largely on social networking platforms such as *Instagram*, *Facebook*, and messaging apps as one of their main campaign tools.<sup>80</sup> The campaign-related posts generally presented the candidates' activities and were personality-focused, rarely featuring programmatic issues, including those that generated higher levels of interaction. The social media accounts monitored by the ODIHR EOM did not contain posts that discredited or derogated other candidates or authorities.

Women candidates informed ODIHR EOM that they often faced challenges such as limited resources and entrenched patriarchal attitudes.<sup>81</sup> The majority of women candidates met by the ODIHR EOM welcomed the current legislative quota as a way to secure a higher participation of women in political life.

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<sup>76</sup> On 22 November, a number of politicians and journalists, including representatives of two opposition parties and two former MPs, were detained for questioning, and ten of them, including the leader of Social Democrats party were further detained until 17 January 2026 on suspicion of organizing mass riots (under Article 278 of the Criminal Code, that provides a sanction of up to a 10-year imprisonment). Multiple searches and interrogations were conducted, including within the family members of the detained individuals.

<sup>77</sup> ODIHR EOM observed 106 campaign events in all districts, most in districts No. 15 (Kerben), No. 26 (Tokmok) and No. 29 (Kochkor). In some 40 per cent (42 events) up to 100 people participated and in 22 per cent up to 50 participants (23 events). Some 17 per cent attracted a larger audience of up to 500 participants (18 events) and in 3 events the audience reached up to 1,000 participants.

<sup>78</sup> In at least 89 per cent of observed campaign events, youth participation was assessed as low or not visible.

<sup>79</sup> The ODIHR EOM observed online campaign activities of 237 candidates and some of their representatives, and 21 accounts of state institutions and public officials, as well as some politicians and bloggers, both on *Instagram* and *Facebook*. Out of the monitored state authorities', the official account of the CEC posted most regularly since the beginning of the campaign, 88 posts on *Facebook* (80 posts during the campaign period and 8 posts during election day); and 81 posts on *Instagram* (65 posts during the campaign period and 16 posts during election day). The CEC posts were highly technical and procedural and triggered somewhat higher active public engagement only on *Instagram* – the most popular post in Instagram triggered 2,889 interactions (there were additional 26 posts that gained over 100 interactions). The most popular post on *Facebook* gained only 288 interactions, being the only CEC post that gained over 100 interactions.

<sup>80</sup> The ODIHR EOM observed online campaign activities of 237 candidates and some of their representatives, and 21 accounts of state institutions, public officials, and political bloggers, both on *Instagram* and *Facebook*.

<sup>81</sup> There were 80 campaign rallies observed by the ODIHR EOM in which women participated as speakers (75 per cent of the 106 observed rallies) – in 40 of those rallies it was a candidate woman (38 per cent), in 30 rallies it was a candidate and at least one woman-speaker in another status (28 per cent), and in 10 rallies speakers were in another status (9 per cent). Participation of women at the observed rallies was rather limited (LTO teams reported a higher participation of women in 18 per cent of observed rallies vs 47 per cent of lower participation).



The ODIHR EOM observed that the visibility of persons with disabilities in campaign media coverage and events was generally low.<sup>82</sup> While some candidates' campaign materials featured topics addressing issues related to the needs of voters with disabilities, these often reflected local situations rather than national strategies for political and socioeconomic empowerment. The candidates were not observed to adjust their outreach strategies or campaign materials to be accessible for persons with sensory or intellectual disabilities.

*In order to enhance the inclusiveness and accessibility of election campaigns, political parties should adjust their campaign outreach strategies, materials, activities and information to meet diverse requirements of persons with various types of disabilities. Genuine inclusion strategies should be elaborated in cooperation with organizations representing persons with disabilities.*

## **X. CAMPAIGN FINANCE**

Campaign finance is primarily regulated by the Election Law, supplemented by CEC resolutions and regulations.<sup>83</sup> Recent amendments, *inter alia*, introduced social network advertising as a permitted campaign expense, prohibited donations through unidentifiable payment systems, allowed candidates nominated by political parties to manage campaign finances independently from the nominating parties while retaining access to party resources, and extended the grounds for deregistration of candidates in case of overspending by their nominating political party. The legal framework for campaign finance stipulates some disproportionate sanctions, including deregistration of candidates for nominally exceeding spending limits, and does not establish a sufficient system for financial disclosure and verification, which limits its effectiveness. Prior ODIHR campaign-finance related recommendations remain unaddressed. Overall, as currently implemented, the legal framework for campaign finance reporting and oversight does not provide sufficient safeguards for integrity and accountability.

Campaigns may be financed from the candidate's or political party's own resources and voluntary donations from citizens and legal entities, subject to limitations on amounts and sources.<sup>84</sup> These are complemented certain resources for candidates that are financed from municipal and state budgets, including allocated meeting venues, advertisement spaces and airtime. In-kind donations, including discounts, remain prohibited, despite prior ODIHR and Venice Commission recommendations.<sup>85</sup> Third-

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<sup>82</sup> A notable exception was the campaign by Dastan Bekeshev, a candidate in electoral district 22, who was one of the most active candidates, in particular in social networks.

<sup>83</sup> This includes the CEC Regulations and Resolutions No. 56 of 15 August 2025 and No. 65 of 29 August 2025.

<sup>84</sup> Campaigns can be financed via personal funds of up to approximately KGS 10 million (EUR 100,000), party contributions of up to KGS 1 million (EUR 10,000), and donations from individuals and legal entities capped at about KGS 500,000 (EUR 5,000). Political party campaign funds may include candidate contributions of up to KGS 15 million (EUR 150,000), party resources of up to KGS 100 million (EUR 1 million), individual donations of up to KGS 200,000 (EUR 2,000), and legal-entity donations of up to KGS 3 million (EUR 30,000). Donations from anonymous and foreign sources, clergy, judiciary, military, public and civil servants and those with debts to the state are prohibited.

<sup>85</sup> Paragraph 170 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that "...all individuals should have the right to freely express their support of a political party of their choice through financial and in-kind contributions" within reasonable limits. See Article 41 para 10 of the Election Law.



party financing is prohibited, contrary to international good practice.<sup>86</sup> The 2025 amendments provided for the possibility to contractually recruit up to 1,000 campaign activists.<sup>87</sup>

*The legal framework should be reviewed to permit in-kind donations and regulate third party financing, prescribing clear market valuation and reporting rules.*

The law requires all campaign services be paid via bank transfer and finalised within 5 days after the elections. As required by law, all contestants opened a dedicated campaign account at one of two authorised state-owned banks. Some ODIHR EOM interlocutors regretted the lack of simplified online donation tools, such as QR codes or e-wallets, which discouraged small contributions. Others expressed concern about the exclusive use of state-owned banks, reported delays in transaction processing, and limited access to branches in rural areas. The CEC explained that the databases of both banks are linked to its system to enable real-time data exchange, and that the two state banks developed more user-friendly digital interfaces for campaign accounts.

The total campaign fund for each candidate is capped at KGS 20,000,000 (approximately EUR 200,000). According to publicly available financial data provided by the banks, the primary sources of campaign funding were the candidates' personal assets, followed by individual donations.<sup>88</sup> Financial disparities affected the ability of candidates to campaign on a level playing field, which the high campaign expenditure ceiling did not alleviate.<sup>89</sup> As announced on the eve of the elections, total income of all candidates constituted about KGS 1.76 billion and expenditures about KGS 1.55 billion.<sup>90</sup>

*The legal limits on campaign income and expenditures could be revised in line with international good practice aimed at promoting a level playing field for all contestants.*

The law requires submission of interim and final campaign finance reports on 22 November and 7 December 2025, respectively, which should detail the sources and amounts of funding and all expenditures. The law does not provide for any public financial disclosure immediately prior to the election day, but obliges the CEC to publish contestants' bank statements weekly throughout the campaign. While this practice contributes to transparency, it provides only limited accountability in the

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<sup>86</sup> Paragraph 256 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that “[t]hird parties should be free to fundraise and express views on political issues as a means of free expression, and their activity should not be unconditionally prohibited. However, it is important that some forms of regulation, with comparable obligations and restrictions as apply to parties and party candidates, be extended to third parties that are involved in the campaign, to ensure transparency and accountability”.

<sup>87</sup> Paragraph 217 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that “a distinction might be drawn between services for which a volunteer would not be paid in the regular course of his or her business and those for which the volunteer would be paid if the service were provided to other clients. Services provided gratis or at a sub-market price by individuals or legal persons for which the donor would expect to be paid by other clients should be counted as donations at their normal market value. Services voluntarily provided by those who would not normally expect to be paid might be regarded as individual political activity rather than as political contributions”.

<sup>88</sup> Candidates' personal assets constituted approximately 75 per cent of total aggregated campaign funds at the time of registration, and individual donations amounted to 24 per cent. Funding from legal entities and political parties constituted less than 0.1 per cent.

<sup>89</sup> Election fund amounts among registered candidates varied significantly, with Ulan Bakasov recording the highest total at KGS 19,983,780 (EUR 199,838, registered in DEC No. 30) and Erulan Kokulov the lowest total at KGS 452,003 (EUR 4,520, registered in DEC No. 28). A minimum single contribution of KGS 50.0 (EUR 0.5) was reported for Satybaldiev Busurman, a candidate with a disability registered in DEC No. 18. Paragraph 19 of the [1996 UN CCPR General Comment No. 25](#) states that “reasonable limitations on campaign expenditure may be justified where this is necessary to ensure that the free choice of voters is not undermined or the democratic process distorted by the disproportionate expenditure on behalf of any candidate or party”.

<sup>90</sup> As of 29 November, the CEC [published](#) consolidated bank data, disaggregated by source, expenditure and district.

absence of controls of the actual spending and verification of the reports.<sup>91</sup> Despite long-standing ODIHR recommendations, the obligatory financial audit of the campaign finance reports is not regulated.

In the absence of an online campaign finance report submission system, the interim reports were submitted in hard copies, and were not published due to the lack of technical capacity, compromising transparency and accountability.<sup>92</sup> Donor identities were not consistently disclosed throughout the campaign, at odds with international standards.<sup>93</sup> The CEC's working group on audits informed the ODIHR EOM that not all contestants had submitted final campaign finance reports by the deadline, and not all those submitted were comprehensive, which was largely left without legal consequence.<sup>94</sup> The CEC expressed its concern that electronic payment applications or cash could be used to bypass the requirements for electoral funds. Several ODIHR EOM interlocutors referred to possible unreported volunteer labour and operational expenses that could fall under prohibited in-kind contributions and noted the limited verification capacity at the district level, together indicating gaps in oversight system.

The CEC oversees compliance with campaign finance rules, acts on violations, verifies financial transactions, reports on campaign finances during the campaign, and conducts inspections and audits. The CEC could not account for the exact number of the received reports, as some of them were submitted to the DEC. The CEC explained to the ODIHR EOM that due to limited human resources and the short timeframe, the verification of the reports was limited, and that it primarily relied on the banks servicing the campaign accounts to have rejected unlawful or excessive donations.<sup>95</sup>

*Consideration shall be given to an introduction of an online submission platform for all campaign finance reports. This system should be integrated with state databases to allow for the immediate, automated publication of all financial information, and ensure accessibility of financial data via a user-friendly interface and machine-readable and searchable format of published documents.*

The law requires an *ex-post* audit, but it does not regulate the audit methodology or require publication of its findings. The lack of institutional capacity to ensure comprehensive verification of campaign finance reports, combined with the absence of procedures and methodologies for financial audits and the limited public disclosure, diminishes the effectiveness of campaign finance oversight.<sup>96</sup>

*To facilitate meaningful oversight and transparency, the legal framework should be amended to clearly regulate audit procedures, timelines, and the publication of audit findings. The institutional capacity of the CEC should be strengthened for conducting thorough, comprehensive and timely analysis, verification and audits of campaign finance reports.*

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<sup>91</sup> The control is limited to the nominal comparison of the reported income and expenditures to the bank statements.

<sup>92</sup> See paragraphs 258 and 259 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#), that recommend submission of financial reports in “digitalized, easily searchable and reusable form [...] to facilitate oversight”, to be filed to the “proper authorities [...] in a timely manner”; “[t]he law should define the format and contents of the reports to ensure that parties and candidates disclose essential information. This also helps make sure that information received from the different parties is easily searchable and can be compared. In an effort to support transparency and provide civil society and other interested stakeholders with the possibility of reviewing parties’ campaign finances, it is good practice for such financial reports to be made available on publicly available resources in a coherent, comprehensive and timely manner over an extended period of time”.

<sup>93</sup> Article 7.3 of the [2003 UNCAC](#) and the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) call for publication of the origin and allocation of campaign funds.

<sup>94</sup> According to the CEC, of 452 final reports due, 427 were submitted.

<sup>95</sup> The CEC only verifies the consistency of the data in the reports with the bank statements, without any attempt to identify the use of unreported funds or other malpractices.

<sup>96</sup> Paragraph 278 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that “[...] legislation should clearly outline the different steps of the audit process”. See also Section 6 of the 2015 [ODIHR Handbook for the Observation on Campaign Finance](#).

Sanctions for violations of campaign finance rules are predominantly criminal. Administrative measures remain limited and unclear and do not provide a proportionate, graduated system to address omissions during the campaign.<sup>97</sup> This framework leaves moderate violations either subject to potentially severe consequences or unpursued, limiting proportionate and predictable enforcement, which is inconsistent with international good practice and prior ODIHR and Venice Commission recommendations.<sup>98</sup> In particular, the provision for the de-registration of candidates for exceeding spending limits by 0.5 per cent is disproportionate.<sup>99</sup>

*The legal framework should be revised to establish a system of effective, proportionate, and dissuasive administrative sanctions for campaign finance violations, ensuring that penalties are appropriate to the gravity of the offence.*

## XI. MEDIA

### A. MEDIA ENVIRONMENT

The media landscape has changed significantly since 2021, and, although some plurality remains, it has narrowed significantly. Numerous ODIHR EOM media interlocutors pointed to a sharp decline in freedom of expression within the country.<sup>100</sup> The prosecution of media workers, the closure of independent media outlets, and an overly restrictive legal framework (see below *Legal Framework*) have collectively produced a pronounced chilling effect on media freedom, resulting in widespread self-censorship and a substantial curtailment of independent journalism.<sup>101</sup>

Social networks have become the primary source of political information, followed by television.<sup>102</sup> The state-owned television channels have the widest reach and dominate the traditional media

<sup>97</sup> The Code on Administrative Offences does not establish specific administrative sanctions for routine campaign finance irregularities, instead relying on broad or indirect provisions. While Article 62 addresses the submission of false information, there are no explicit administrative penalties for late reporting, minor accounting discrepancies or technical non-compliance with banking procedures. In practice, oversight bodies must rely on Article 61 on failure to provide information or Article 65 on campaigning rule violations to address finance-related issues. As these provisions do not expressly refer to campaign funds, their application to financial violations remains legally uncertain and unforeseeable for the stakeholders. Article 46(2) of the Election Law provides for deregistration of candidates when resources additional to campaign funds are used or for excessive spending. Serious offences fall under Articles 197 and 198 of the Criminal Code, which foresee penalties up to a five-year imprisonment.

<sup>98</sup> Paragraph 281 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that “while criminal sanctions are reserved for serious violations that undermine public integrity or may threaten national security (e.g. in the case of foreign funding), there should be a range of administrative sanctions available not only for the improper acquisition or use of funds by parties [...] but also for individual wrongdoing.

<sup>99</sup> As per the current expenditure limit, de-registration can potentially be initiated for a KGS 50,000 overspent.

<sup>100</sup> Since 2022, Kyrgyzstan dropped from place 72 to 144 in 2025 Reporters Without Borders [Media Freedom Index](#).

<sup>101</sup> The UN Office of the High Commissioner for Human Rights [expressed concerns over imprisonment verdicts for Kyrgyz journalists](#) for charges of “calling for mass disorder,” and criticizing the prosecutions as “marred by due process and fair trial concerns.” On 27 October 2025, three media outlets (*Kloop kg*, *Temirov Live*, and *Ait Ait Dese*) were recognised as extremist and their activities in Kyrgyzstan were [banned](#) by the court. In July 2025, *Apral TV* was [shut down](#) for “destructive” and “negative” coverage of the government. Earlier in 2022, Mr. Temirov, journalist and founder of *Temirov Live*, was [stripped of Kyrgyz citizenship](#). In January 2024, eleven *Temirov Live* journalists were [arrested](#), including Makhabat Tajibek, Temirov’s wife and founder of *Aik Aik Dese* media. Several ODIHR EOM interlocutors reported on direct censorship of sensitive topics as well.

<sup>102</sup> See the 2023 [MVector Media Consumption in Kyrgyzstan report](#). According to the [Digital 2025: Kyrgyzstan report](#), internet penetration in 2025 stood at 88.5 per cent.

market.<sup>103</sup> In 2022, the public broadcaster was nationalised, contrary to international good practice, and rebranded as the National Television and Radio Broadcasting Corporation of Kyrgyzstan (*NTRK*), with its Director General appointed and dismissed by the president.<sup>104</sup> Other developments in the media sphere included a change of format of some TV stations, limitations on broadcasting or delicensing of the media associated with the opposition or dissent, and the launch of a new Kyrgyz-Russian TV station.<sup>105</sup>

*The National Television and Radio Broadcasting Corporation should be transformed into a public service media, with independent appointment of management, a clearly defined public mandate, and a financing model that ensures financial independence.*

A few remaining independent outlets reported difficulties accessing information from various public institutions, indicating to the ODIHR EOM that state-owned media receive preferential treatment in gaining access to public institutions press events, whereas independent media are at times not invited. Some ODIHR EOM interlocutors linked the limited investigative journalism and critical reporting to activities of the SCNS, which has established the practice of inviting media professionals and other individuals involved in public discourse for informal questioning.<sup>106</sup> These interlocutors stated that the media were instructed to avoid negative news about the country's development and to refrain from covering specific controversial issues, including in newscasts.<sup>107</sup>

*Media freedoms should be strictly upheld. Undue limitations on access to information, including by granting preferential access to information to certain media, interference in the work of journalists, and intimidation of media professionals, should be addressed in law and practice to ensure a conducive environment for freedom of expression.*

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<sup>103</sup> Broadcast media available via terrestrial transmission to all households free of charge are included in the so-called 'social package'. While its composition varies by region (between 11 and 15 channels), it always includes all nationally broadcast channels of the National Television and Radio Broadcasting Corporation of Kyrgyzstan (*NTRK*) and its regional branch, the state-owned *ElTR* and *Ilim Bilim*, along with the Russian *First Channel* and *Russia RTR*, which have been part of the social package since 2020. Although the names of the owners of private *Channel 7* and *Region TV* are publicly accessible, these outlets are allegedly connected to the authorities.

<sup>104</sup> The 2022 Law on the National TV and Radio Broadcasting Corporation transformed the former Public Broadcasting Corporation (*OTRK*) to the state-owned *NTRK*. The most recent dismissal and appointment was in October 2025. Paragraph 16 of the 2011 UN CCPR [General Comment No. 34 to the ICCPR](#) provides for the independent public broadcasting services and stipulates the criteria pertinent for their independence: "States parties should ensure that public broadcasting services operate in an independent manner. In this regard, States parties should guarantee their independence and editorial freedom. They should provide funding in a manner that does not undermine their independence." In [2023 Joint Declaration](#), International Mandate-Holders on Freedom of Expression emphasized that "All government or State media should be transformed into public service media without further delay."

<sup>105</sup> For example, *NTS* ceased broadcasting news in 2022, shifting to entertainment content. *Next TV*, which operates from exile, is connected to opposition politician Jeenbekov and has reportedly reduced its coverage to Bishkek only due to limited resources. On 23 November, a new TV channel, *Nomad TV*, a joint Kyrgyz-Russian initiative, was [launched](#) to feature inter alia "the joint historical and cultural ties of Russia and Kyrgyzstan, their development and shared role on the international arena" the channel will re-broadcast programmes of the Russian *NTV*.

<sup>106</sup> In 2023, a *24.kg* journalist [was summoned](#) to the SCNC following a complaint by a Russian citizen over a video interview. In 2024 several media outlets faced criminal charges after their offices [were raided](#) by the SCNS. In November, a blogger [was invited](#) by the SCNS for a discussion following her post criticizing restrictions in relation to energy saving measures. On 4 December, an [event](#) related to 1916 *Urkun* uprising was cancelled after the organizer had been summoned by the SCNS.

<sup>107</sup> These instructions were reinforced by occasional but widespread "prophylactic phone calls" from authorities to journalists and editors to ensure compliance with unwritten directives, including during the campaign.



## B. LEGAL FRAMEWORK

Overall, the legal framework for the media falls short of meeting international obligations.<sup>108</sup> The Constitution provides for freedom of expression and prohibits censorship, but it also includes unduly broad and vague grounds for restricting it, contrary to prior ODIHR and Venice Commission recommendations.<sup>109</sup> Furthermore, the Criminal Code provides a broad basis for prosecution on vague grounds, and journalists are increasingly being prosecuted under these provisions.<sup>110</sup>

*The media legal framework should be reviewed and brought in line with international standards on freedom of expression. The Constitution and Criminal Code should be amended to remove overly broad and vague provisions that could be misused to restrict freedom of expression. Any restrictions must strictly adhere to the principles of legality, necessity, and proportionality, and should be subject to judicial oversight.*

At odds with the international good practice, there is no independent media regulator in Kyrgyzstan, and the Ministry of Culture, Information, Sports and Youth Policy (the MCISY) is mandated to license and delicense broadcasters.<sup>111</sup>

*Consideration should be given to establishing an independent media regulatory body, which would be effective and fully independent both in law and in practice.*

A new Law on Mass Media, adopted in 2025, requires registration for all media, including online media, and limits foreign ownership to 35 per cent. The new law fails to address some key recommendations from the OSCE Representative on Freedom of the Media and ODIHR, including those on creating a genuine public media service, simplifying media registration with a notification procedure designed to promote pluralism, opting for self-regulation of the media as opposed to the current mandate provided to the media regulator, and explicitly limiting the regulatory regime to the professional media only.<sup>112</sup> While the re-registration of media outlets required under the new Media Law is pending the adoption of subsidiary legislation by the Ministry of Justice, many ODIHR EOM interlocutors expressed concerns of being denied re-registration.

*The Law on Media should be revised to align with international standards on freedom of expression, including by introducing a notification procedure to replace the current registration requirements, fostering a self-regulatory mechanism, and explicitly distinguishing that requirements are applicable to professional media outlets as opposed to wider non-professional publications. Restrictions on media ownership for foreign and dual citizens should be reviewed.*

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<sup>108</sup> [OSCE Ministerial Council Decision No 3, Safety of Journalists](#) calls on States to bring their laws, policies and practices, pertaining to media freedom, fully in compliance with their international obligations and commitments.

<sup>109</sup> See the 2021 ODIHR and Venice Commission [Joint Opinion](#) on the Draft Constitution of the Kyrgyz Republic.

<sup>110</sup> The UN CERD in its [July 2025 Concluding Observations](#) expressed concerns about “overly broad and vague provisions of the Criminal Code” and recommended to “[r]eview the Criminal Code, particularly articles 278(3), 330, 326 and 327 to prevent arbitrary interpretations and disproportionate restrictions imposed on the right to freedom of opinion and expression” and “to ensure that the legislative framework is not used to intimidate, harass, arrest or prosecute journalists”. According to the [Media Policy Institute](#), in 2024 there were 13 criminal charges against journalists on the basis of articles 330 (Incitement to racial, ethnic, religious and other forms of hostility), 278 (Calls for mass unrest) and 327 (Calls for violent seizure of power). In 2025, Kanyshai Mamyrkulova was [sentenced](#) for four years of probation charged on Article 278 and 330; Aleksandr Aleksandrov and Joormart Duulatov (*Kloop*) were both [sentenced](#) to five years of imprisonment on the basis of Article 278 of Criminal code, and on 25 November, the sentence was [reviewed](#) to a three-year probation.

<sup>111</sup> Paragraph 39 of the 2011 UN CCPR [General Comment No. 34 to the ICCPR](#) recommends the necessary criteria for an independent media regulatory body.

<sup>112</sup> See the ODIHR and the OSCE Representative for the Freedom of the Media [Interim Joint Opinion](#) on the Draft Media Law.

New fines introduced in 2025 to the Code of Administrative Offences for libel, defamation and distribution of false information are disproportionately high.<sup>113</sup> Contrary to international standards, the Law on Protection of Inaccurate (False) Information allows the MCISY to remove content or block websites without a prior court decision.<sup>114</sup> Most notably, recently the MCISY blocked the websites of four popular independent media outlets: *Azattyq*, *Kloop.kg*, *24.kg* and *Respublika.kg*.<sup>115</sup>

*The regulations related to restricting online content or suspending websites should be reviewed to ensure that such decisions are solely within the jurisdiction of the judiciary. Such decisions should follow public hearings with due process guarantees and must be published, including the full list of the affected content or websites. Any restrictions should pertain to specific content and applied narrowly, and bans on entire websites should be avoided.*

The Election Law prescribes that campaign-related news must be presented in a separate block, without commentary. The media bears liability for the publication of information that disgraces or discredits the honour, dignity, or reputation of candidates and political parties, which is prohibited. Several media representatives informed the ODIHR EOM that they chose to refrain from critical content to avoid the risk of such content being considered a campaign violation.<sup>116</sup> Contrary to international good practice, the law does not stipulate a requirement for the state-funded broadcasters to provide for balanced, impartial and objective coverage of contestants in news and current affairs programmes.<sup>117</sup>

Despite a previous ODIHR recommendation, the legal framework was not amended to prevent a narrow interpretation of campaign rules, under which most election-related media content was considered campaigning, and which led, in effect, to the absence of news and editorial coverage of contestants' campaigns.<sup>118</sup> Numerous ODIHR EOM interlocutors stated that coverage of the campaign activities would be regarded as campaigning and, therefore, could only be carried out on a paid basis.<sup>119</sup> As a result,

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<sup>113</sup> The fines range from KGS 20,000 (EUR 200) for individuals to KGS 65,000 (EUR 650) for legal entities, and the [2025](#) estimated average salary is KGS 42,757 (EUR 428), and in [2024](#) was KGS 36,000 (EUR 360).

<sup>114</sup> Article 19 para 3 of the [ICCPR](#) regulates the admissible restrictions on the freedom of expression, which shall be provided by law, and be necessary (a) for respect of the rights or reputations of others, and (b) for the protection of national security or of public order (*ordre public*), or of public health or morals. Paragraph 43 of the 2011 UN CCPR [General Comment No. 34](#) states that “[a]ny restrictions on the operation of websites, blogs or any other internet-based, electronic or other such information dissemination system” are only permissible to the extent they do not violate Article 19 of the [1966 ICCPR](#), clearly concluding, that generic bans on the operation of websites are not in line with Article 19 paragraph 3 of the [1966 ICCPR](#). From June 2022 to September 2025, the MCISY examined 70 cases, 16 of which entailed the removal of contested content, either voluntarily by the owners or upon the MCISY’s decision.

<sup>115</sup> The cases of content restrictions of those outlets occurred in 2022 – 2024.

<sup>116</sup> Paragraph 25 of the [UN CCPR General Comment No 25](#) to the ICCPR states that “In order to ensure the full enjoyment of rights protected by Article 25, the free communication of information and ideas about public and political issues between citizens, candidates and elected representatives is essential. This implies a free press and other media able to comment on public issues without censorship or restraint and to inform public opinion.”

<sup>117</sup> See paragraph 7.8 of the [1990 OSCE Copenhagen Document](#) commits participating States to “provide that no legal or administrative obstacle stands in the way of unimpeded access to the media on a non-discriminatory basis for all political groupings and individuals wishing to participate in the electoral process”. See also paragraph 25 of the [UN CCPR General Comment No 25](#) to the ICCPR, and paragraph I.2.3.a.ii of the [2002 Venice Commission Code of Good Practice](#) and its Explanatory Report (p. 24). See also the 2012 ODIHR [Handbook](#) for Media Monitoring for Election Observation Missions (p. 15).

<sup>118</sup> Part from the calls to vote for or against certain candidates, Article 22 paragraph 10 of the Election law renders “2) expressing preferences regarding individual candidates; 3) describing the possible consequences of electing or not electing candidates; 4) disseminating information about candidates' activities unrelated to their professional activities or the performance of their official (job) duties” as election campaign activities, which is interpreted to apply to the informative content.

<sup>119</sup> *Eurasianet* when reporting on elections in Kyrgyzstan published a [note](#) stating that “the Central Electoral Commission informed *Eurasianet*’s correspondent in Bishkek that publishing the names or photos of individual parliamentary candidates during the campaign period is a violation of election laws”.



beyond covering procedural aspects and election-related violations, the campaign mainly featured paid coverage of candidates in news segments, limiting voters' ability to make an informed choice.

*To enhance voters' ability to make an informed choice and ensure independent editorial coverage of election campaigns the rules for the media coverage should be revised to clearly distinguish between journalistic and informational content and campaign activities. State-funded broadcasters should be required to provide balanced, impartial and objective coverage of contestants in news and current affairs programmes.*

The CEC oversees the legality of the campaign in the media and has the right to apply sanctions, including fines, and to revoke media accreditation for violations. The CEC did not conduct systemic monitoring of media coverage of the campaign, and initiated several proceedings on the basis of complaints, which were examined by its relevant working group.<sup>120</sup> Broadcast and print media are obligated to provide equal conditions for paid advertising to contestants; however, despite prior ODIHR recommendations, media were required to be accredited by the CEC in order to provide paid advertising during the campaign.

*Accreditation requirements for media outlets to provide paid advertising should be reconsidered in order to avoid creating unnecessary obstacles for media and potentially limiting the amount of information available to voters.*

### C. MEDIA MONITORING FINDINGS [ACCESS DETAILED INFORMATION](#)

ODIHR EOM media monitoring established that the candidates were not covered in news and current affairs programmes, except for limited coverage of campaign violations.<sup>121</sup> The monitored broadcasters extensively covered the state authorities, predominantly the President and his administration, the Cabinet of Ministers, the SCNS, as well as the activities of the CEC, in a positive or neutral tone, similar coverage was monitored on online portals.<sup>122</sup> In their primetime news and current affairs programmes, all monitored media dedicated between 33 and 54 per cent of coverage to the President. Region TV allocated 30 per cent of its time to the SCNS, while *Channel 7* dedicated 45 per cent of its coverage to the Cabinet of Ministers. Women featured in 16 per cent of monitored programmes across all broadcasters including candidates and public officials, with 33 per cent share in monitored free airtime (see *Media Monitoring* results). Voter information was extensive in broadcast media, mainly on *NTRK* and *ElTR*, amounting to 9 per cent of the total coverage.

Candidates received coverage through both free and paid airtime, including paid candidate coverage in news segments, despite previous ODIHR recommendations to prohibit paid news content. In the absence of editorial coverage and analytical reporting this limited voters opportunity to make an informed choice.

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<sup>120</sup> The CEC did not conduct a systemic monitoring of the campaign media coverage, its working group on campaigning assessed alleged violations based on notifications. Five media outlets were sanctioned: on October 22, *NTRK Talas* was fined with KGS 28,000 for violation of the rules in relation to early campaigning; on November 13, *Asia News* newspaper and *Aryba* online outlet were each fined with KGS 17,500 for publication of information that disgraces or discredits the honour, dignity, or reputation of candidates; on November 20, LLC *Jash FM (T-Media TV channel)* was fined for KGS 28,000 for violation of equal access provisions for candidates as a banner of one candidate appeared in the background of a newscast. On 29 November, *new.kg* was fined KGS 7,500 for publishing paid campaign materials of a candidate that used images of foreign political figures.

<sup>121</sup> The ODIHR EOM monitored the primetime broadcasts of the nationwide TV channels *NTRK*, *Ala Too 24*, *ElTR*, *Channel 7* and *Region TV*, as well as politics-related content of online media *akipress.kg*, *azattyk.kg*, *Kaktus.Media*, *24.kg*, *super.kg*, *kabar.kg* and *sputnik.kg*.

<sup>122</sup> The only exception observed, wherein the candidates were covered beyond procedural matters, were [three articles](#) on *Akipress* mapping candidates' ties with officials. On the last day of the campaign, *Kaktus.Media* published an article on candidates' campaign expenditures.

Paid advertising was not always clearly marked and was not easy to identify.<sup>123</sup> Coverage of candidates in paid programmes amounted to some 8 per cent, including paid news and paid interviews. Most of these paid programmes were observed on *Region TV* and were used by a small number of candidates. In online media, candidates were covered only in relation to procedural matters, including publishing the names of authorised representatives, withdrawals from candidature, violations of campaign rules, and campaign-related incidents. Paid content on websites amounted to less than 1 per cent of content.

*All paid political content should be clearly and consistently identified as such. Consideration should be given to banning the broadcasting of paid campaign material within news and current affairs programmes in order to preserve the distinction between advertising and editorial coverage.*

The state-funded broadcasters provided free airtime for registered candidates in line with the law. However, many candidates, particularly more affluent ones, opted not to utilise it, citing limited viewership and impact. Due to the high number of candidates, the airtime was shared between two state broadcasters, *NTRK* and *EITR*, and their regional branches.<sup>124</sup>

Debate programmes accounted for 23 per cent of the overall monitored programmes and were the only election-specific programmes.<sup>125</sup> Debates on *EITR* and *NTRK* and their local branches were the only platforms whereby candidates could present themselves and interact with each other. Some candidates considered the debate format ineffective, leading to a general reluctance to participate.<sup>126</sup> On *NTRK*, debates were aired late in the evening, at times in violation of the law requiring free airtime during primetime hours between 8 pm and midnight. Women candidates received 33 per cent of the free airtime. Sign language translation was not provided during the debates.

*Consideration could be given to allot free time and organize debates on all state-funded broadcasters, as required by the law. The format of the debates should facilitate actual interaction between contestants. The candidates should not be legally prevented from criticizing their opponents during the campaign.*

## **XII. ELECTION DISPUTE RESOLUTION**

Decisions, actions, or inaction by the election administration, public agencies, and candidates may be challenged by candidates, political parties, observers, and voters. Complaints against the election administration are subject to a hierarchical review and may be appealed to the Administrative Court of Bishkek, with further cassation available before the Supreme Court. Complaints and appeals must be filed and examined under expedited deadlines envisaged for early elections, and those submitted on election day must be handled immediately. These deadlines are insufficient for the submission of a

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<sup>123</sup> For example, on 25 November, *Region TV* broadcasted a 45-minute paid interview with a candidate which was not clearly indicated as such.

<sup>124</sup> On 8 November, in a joint draw for order on the ballot and free airtime distribution, election commissions distributed airtime among contestants, allocating 5 minutes for individual presentations and 25 minutes for participation in debates. The ODIHR EOM observed different approaches in free airtime distribution: in some instances, a separate draw was conducted per each candidate, as prescribed by the regulation, while in other cases differing procedures were developed (e.g. based on the candidates' order on the ballot).

<sup>125</sup> The ODIHR EOM monitored 14 debates; in these, fewer than half of registered candidates participated.

<sup>126</sup> Some candidates informed the ODIHR EOM that the format was not conducive for a meaningful exchange of opinions as the law prohibits criticism of other contestants and the candidates were advised not to ask provocative questions.

complaint and do not comply with international good practice.<sup>127</sup> While complaints to the CEC can be submitted electronically via its website, complaints to courts must be submitted in hardcopy.

*Timeframes for submitting and adjudicating election complaints, including in early elections, should be reviewed to allow for effective preparation of the complaints and reasoned decisions, ensuring an effective legal remedy.*

The 2025 amendments to the Election Law further limited access to legal remedy, as the standing of political parties to challenge election results was abolished, leaving such challenges to candidates, their representatives and observers.<sup>128</sup> Voters cannot contest results, contrary to prior ODIHR recommendations and international good practice that supports broad standing in electoral disputes.<sup>129</sup> Some CEC decisions and resolutions are exempt from judicial review, and the law does not establish explicit conditions for such exemptions, hampering legal certainty and clarity.<sup>130</sup>

*To provide for an effective legal remedy, the legal framework should be amended to allow voters and political parties to challenge election results. All CEC decisions should be subject to judicial review.*

The CEC maintained an online register of complaints and incident reports, which contributed to transparency; however, some decisions were uploaded with a delay. Of the 274 complaints registered on the CEC's online register, 219 were resolved by the CEC, others were forwarded to other competent agencies.<sup>131</sup> The CEC imposed administrative fines in 7 cases.<sup>132</sup> While the CEC sessions on disputes provided some transparency and an opportunity for the parties to present their cases, procedural

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<sup>127</sup> Under the Election Law, in early elections, the timeframes for all electoral actions are reduced by one-third, which shortens the regular 3-day deadline to submit and decide on complaints to 2 days, and the 5-day cassation deadline to 3 days. Paragraph II.3.3.g of the [2002 Venice Commission Code of Good Practice](#) and its Explanatory Report recommend that “[t]ime limits must [...] be long enough to make an appeal possible, to guarantee the exercise of rights of defence and a reflected decision. A time limit of three to five days at first instance (both for lodging appeals and making rulings) seems reasonable for decisions to be taken before the elections”.

<sup>128</sup> Paragraph 5.10 of the [1990 OSCE Copenhagen Document](#) states that “everyone will have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity”.

<sup>129</sup> Article 25 of the [1966 ICCPR](#) and paragraph 5.10 of the 1990 [OSCE Copenhagen Document](#) guarantee the right to an effective remedy for violations of political rights. Paragraph II.3.3f of the [2002 Venice Commission Code of Good Practice](#) recommends that “[a]ll candidates and voters registered in the constituency concerned must be entitled to appeal. A reasonable quorum may be imposed for appeals by voters on the results of elections”.

<sup>130</sup> Article 45 para 12 of the Election Law exempts CEC decisions and resolutions on election results from review. See section B of the 2025 Venice Commission [Updated Rule of Law Checklist](#).

<sup>131</sup> The CEC's [online register](#) lists 202 pre-election submissions, 65 incidents on election day, and 7 post-election cases that originated largely from the CEC's hotline, law enforcement agencies, social media monitoring, and candidates, and concerned a wide range of issues, including violations of campaign rules (122), dissemination of false or defamatory information against candidates (37), possible voter bribery (55), abuse of administrative resources (8) and other violations (52).

<sup>132</sup> According to the information provided by the CEC to the ODIHR EOM, a total of 83 administrative fines were imposed in 74 cases, including 55 fines against candidates and citizens for violations of campaigning conditions, 15 fines for disseminating knowingly false information that damaged a candidate's reputation, 2 fines for conducting campaign in religious facilities, fines in 4 media-related cases (2 for violations of campaigning conditions and 2 for discrediting the honour, dignity, or business reputation of candidates, as well as an individual fine to the director of *News.kg* for a violation committed through the outlet's social media page), 2 fines for violating campaign finance rules and 1 fine for failure to comply with a CEC decision. The CEC also issued 6 warnings. Seven post-election complaints, mostly alleging vote buying and violations of vote secrecy, were referred to law enforcement and ultimately dismissed without initiating criminal proceedings, with the CEC dismissing the related electoral claims accordingly.

guarantees were diminished, as a high number of cases was examined *in camera*, in particular those not resulting in sanctions.<sup>133</sup>

The CEC's interpretation of campaign rules in decisions on complaints was not uniform<sup>134</sup> and, in some instances, narrow, restrictive and formalistic, particularly in cases concerning the freedom of expression on election-related matters, including in private correspondence.<sup>135</sup> The CEC's decisions mainly relied on the recommendations of its relevant working group and offered limited factual and legal reasoning, failing to substantiate the relevance of the cited legal provisions to the merits of the case and thereby undermining legal clarity and the possibility of an effective appeal.<sup>136</sup> No decisions on referenced the avenues for appeals, and the ODIHR EOM could not identify any such appeals.<sup>137</sup> Overall, the CEC applied campaign rules in a manner that expanded the scope of prohibited conduct and did not consistently reflect the need to balance campaign regulation with the protection of fundamental freedoms, contrary to international standards.<sup>138</sup>

*To strengthen transparency and accountability in election dispute resolution, the Central Election Commission should consider all alleged violations in open sessions. The decisions should be reasoned and well-substantiated, and should indicate available appeal avenues and deadlines. While working groups may support fact-finding, all final decisions should remain with the Commission to ensure institutional responsibility and allow for judicial reviews.*

During the pre-election period, the Administrative Court received 12 appeals regarding candidate registration, of which it dismissed 9 on the merits and deemed 2 inadmissible.<sup>139</sup> Eight challenged judgments were upheld by the Supreme Court. Hearing schedules were often not updated, the election-related decisions of the Administrative Court were not published in a timely manner, and decisions of the Supreme Court remained unpublished, limiting transparency. The decisions available to the ODIHR

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<sup>133</sup> The CEC established internal working Groups on complaints, audit and campaign to prepare advisory opinions on complaints and violations for consideration at plenary session. The schedule of the working groups' meetings was not announced or published. The CEC coordinated a Rapid Response Coordination Group with law enforcement agencies at central and district level.

<sup>134</sup> While the CEC in its Decision No. 1404 issued a warning for disseminating information related to a candidate's official duties or professional activities, in other decisions for similar violations the CEC imposed administrative fines, without providing clear justification for the differential treatment.

<sup>135</sup> These concerned instances where private online communication was treated as campaigning, despite the absence of an explicit link to electoral promotion. In numerous instances, the CEC interpreted social media posts on personal Facebook or Instagram accounts as supporting a candidate and classified these as unlawful campaigning and issued removal orders or fines. In another example, the CEC fined an individual for unlawful campaigning who had forwarded an audio message in local *WhatsApp* groups about a candidate's meeting, despite having denied an intention to campaign and having deleted the message.

<sup>136</sup> For example, in criminal-immunity matters concerning alleged vote-buying, the CEC authorised prosecution of three candidates without presenting the grounds for its decision, whereas its denial of a similar request only briefly referenced the available evidence.

<sup>137</sup> Paragraph 5.11 of the [1990 OSCE Copenhagen Document](#) states that "administrative decisions against a person must be fully justifiable and must as a rule indicate the usual remedies available". Article 2.3 of the [ICCPR](#) requires each State to ensure that "any person whose rights or freedoms ... are violated shall have an effective remedy" and that "the competent authorities shall enforce such remedies when granted".

<sup>138</sup> Article 19 of the [ICCPR](#), the 1996 CCPR [General Comment No. 25](#) and the 2011 CCPR [General Comment No. 34](#) requires States to guarantee freedom of expression and to ensure that any restrictions are lawful, legitimate and proportionate. The free exchange of information and ideas on public and political matters between voters, candidates and elected representatives must be respected.

<sup>139</sup> One application was partially admitted on procedural grounds but ultimately rejected on the merits without affecting the substantive outcome.

EOM were structured and provided legal references, but assessed the facts formalistically, abstaining from analysing the legality and proportionality of the contested administrative measures.<sup>140</sup>

The Criminal Code outlines five election-related criminal offences that fall within the Prosecutor General's jurisdiction.<sup>141</sup> Law enforcement agencies have initiated 15 criminal procedures regarding alleged vote-buying.<sup>142</sup>

### XIII. PARTICIPATION OF NATIONAL MINORITIES

There was a substantial discrepancy between the country's demographic composition and the representation of national minorities throughout the electoral process.<sup>143</sup> Only two per cent of the registered candidates self-identified as belonging to a non-majority ethnic group, of which only three won a mandate, despite the twenty-two per cent share of ethnic minorities in the population.<sup>144</sup> Uzbek communities faced particular under-representation, with only one registered candidate.<sup>145</sup> Such under-representation does not comply with the international standards for effective participation of persons belonging to national minorities in political life.<sup>146</sup>

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<sup>140</sup> Article 2.3 of the [ICCPR](#) requires each State to ensure that "any person whose rights or freedoms ... are violated shall have an effective remedy" and that "the competent authorities shall enforce such remedies when granted", while Article 14(1) prescribes, *inter alia*, that "[...] any judgement rendered in a criminal case or in a suit at law shall be made public [...]". Paragraph 5.10 of the [1990 OSCE Copenhagen Document](#) states that "everyone will have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity".

<sup>141</sup> The five election-related criminal offences outlined in the Criminal Code are: obstruction of the exercise of electoral rights (Article 195), bribery of voters (Article 196), violation of the procedure for financing an election campaign (Article 197), illegal use of funds during elections or referenda (Article 198), and falsification of election documents (Article 199).

<sup>142</sup> By law, registered candidates enjoy procedural immunity and may not be subjected to criminal liability, detention, arrest, or court-imposed penalties during the electoral period without the CEC's prior authorisation, except when apprehended at the scene of an offence. The CEC received four petitions from law enforcement seeking consent to prosecute registered candidates and nominees, granting three and cancelling their registration for alleged vote-buying while rejecting one request; in a separate instance, a criminal case was initiated against an individual before their formal registration as a nominee.

<sup>143</sup> See National Statistical Committee of the Kyrgyz Republic, [2022 Population and Housing Census](#) of the Kyrgyz Republic. The Uzbek minority is the largest minority group at approximately 14 per cent, the Russian minority constitutes 4 per cent, other larger ethnic minority communities include Dungans (1 per cent), Uyghur (0.9 per cent) and Tajiks (0.3 per cent).

<sup>144</sup> National Statistical Committee of the Kyrgyz Republic, '[Population and Housing Census](#) of the Kyrgyz Republic 2022: Book II (Part One) in Tables: Population of Kyrgyzstan'.

<sup>145</sup> This constitutes 0.2 per cent of candidates, while Uzbek communities make up 14 per cent of the country's population. One candidate self-identifying as Uzbek was denied registration by the CEC, citing grounds related to non-rehabilitating criminal proceedings. Another candidate withdrew her candidacy prior to the elections within the context of initiated criminal proceedings in relation to alleged vote-buying.

<sup>146</sup> Article 5 of the of the International [Convention](#) on the Elimination of All Forms of Racial Discrimination establishes that State parties are to ensure without distinction as to ethnic origin "[p]olitical rights, in particular the right to participate in elections – to vote and to stand for election – on the basis of universal and equal suffrage, to take part in the Government as well as in the conduct of public affairs at any level and to have equal access to public service". Paragraph 35 of the [1990 OSCE Copenhagen Document](#) states that "[t]he participating States will respect the right of persons belonging to national minorities to effective participation in public affairs, including participation in the affairs relating to the protection and promotion of the identity of such minorities." The OSCE High Commissioner on National Minorities' Ljubljana [Guidelines](#) on Integration of Diverse Societies and Explanatory Note states that: "adequate representation ensures direct participation and is also important as a means to provide a genuine opportunity for minority voices to be heard. In order to be adequate, the representation [...] should aim to reflect the composition of society."



Recent legal changes likely contributed to the underrepresentation, in particular the abolition of the 15 per cent quota for representation of minorities in candidate lists,<sup>147</sup> as well as several new candidacy requirements that may have been disproportionately dissuasive for prospective candidates from minority communities.<sup>148</sup> Furthermore, the newly determined electoral districts did not account for their ethnic compositions, despite prior ODIHR recommendations and international good practice, which led to an artificial division of numerous communities, impeding opportunities for minority candidates to mobilise their electorate.<sup>149</sup>

*Consideration should be given to reviewing the legal framework to ensure that candidate registration provisions and principles for delineation of electoral districts are designed to facilitate electoral participation and representation of persons belonging to national minorities. The authorities could consider affirmative measures, including specific conditions facilitating participation in elections, to ensure their adequate representation in the legislature. All such measures should be designed in consultation with minority communities and implemented in a manner that promotes genuine minority political participation.*

Some candidates and prospective candidates belonging to minority communities expressed hesitancy towards participating in the elections to the ODIHR EOM. Candidates identifying as minorities avoided representing themselves as members of that group, but rather as politicians who stand for a multi-ethnic Kyrgyzstan. Discussions on minority-specific topics were almost absent from campaigning. Moreover, the availability of electoral information and campaigning in minority languages was severely limited,<sup>150</sup> contrary to international standards.<sup>151</sup> The lack of media coverage and reporting in languages other than Kyrgyz and Russian further excluded ethnic minority communities.<sup>152</sup>

*To ensure accessible and inclusive campaign environment, the authorities should guarantee and promote campaign activities, electoral materials, and political discourse in minority languages, including within the media, in line with international standards on language rights and effective political participation.*

The ODIHR EOM noted a marked disparity in minority representation across different levels of election administration. While 17.1 per cent of PEC members identified with a non-majority ethnic group and tended to reflect local demographics, only 5.2 per cent of DEC members did so. The CEC has no ethnic minority member.

*The authorities should take measures to ensure that persons belonging to national minorities are adequately represented at all levels of the election administration.*

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<sup>147</sup> See Article 40 of the Constitutional Law of the Kyrgyz Republic No. 113 “On Amendments to the Constitutional Law of the Kyrgyz Republic ‘On Elections of the President of the Kyrgyz Republic and Deputies of the *Jogorku Kenesh* of the Kyrgyz Republic’”.

<sup>148</sup> See the *Candidate Registration* section.

<sup>149</sup> See paragraph 40-41 of the 2025 [ODIHR Legal Opinion](#) on the draft Constitutional Law “On amendments to the Constitutional Law ‘On elections of the President of the Kyrgyz Republic and Members of *Jogorku Kenesh* of the Kyrgyz Republic’”. See also the *Electoral System* section.

<sup>150</sup> The 2023 State Language Law mandates campaign activities to be conducted in Kyrgyz or Russian only. Out of 106 events observed by the ODIHR EOM LTOs, 86 (81 per cent) were conducted exclusively in Kyrgyz, 15 meetings (14 per cent) in Kyrgyz and Russian, two events were held in both Kyrgyz and Uzbek, one event in more languages besides Kyrgyz, and one only in Uzbek. No campaign materials in national minority languages were observed.

<sup>151</sup> See Paragraph I.3.1.b of the [2002 Venice Commission Code of Good Practice](#), paragraph 12 of the UN CCPR [General Comment No. 25](#) as well as point 4.8 of [Language Rights of Linguistic Minorities: A Practical Guide for Implementation](#) of the UN Special Rapporteur on minority issues.

<sup>152</sup> There are no television stations consistently broadcasting in other languages than Kyrgyz or Russian, and no Kyrgyzstan-based online news outlets publishing regularly in languages other than Kyrgyz, Russian or English. According to ODIHR EOM interlocutors, there is only one remaining minority-language print media.

## XIV. ELECTION OBSERVATION

The law provides for citizen and international election observation. Civil society organizations with a statutory mandate in electoral matters or human rights may be accredited for observation. There is no deadline for accreditation for citizen observers, which is valid until the publication of the election results but can be terminated for violations of the law. Candidates and political parties are entitled to deploy their representatives; however, only candidates may appoint observers. Due to limited resources, this opportunity was inaccessible for most candidates.

Several ODIHR EOM interlocutors raised concerns about the feasibility of citizen election observation, citing funding constraints and recent legislative changes that classify domestic election observation as political activity and require CSOs with foreign funding to register as “foreign representatives”. Some interlocutors indicated that CSOs feared retribution for engaging in observation activities. As a result, citizen observation was largely absent from these elections, and civil society’s capacity to participate in public life has substantially diminished.<sup>153</sup> The CEC accredited 788 international observers and only two citizen organizations, each appointing one observer.

*The legislation should be reviewed to foster an enabling environment where civil society can engage in election observation activities without undue obstacles or fear of retribution. In particular, consideration should be given to repealing the requirement for CSOs with foreign funding conducting election observation to register as “foreign representatives”.*

## XV. ELECTION DAY

### A. OPENING AND VOTING

Election day was generally calm and orderly. The IEOM observed the opening process in 142 polling stations, voting in 1,323 polling stations, and counting in 118 polling stations. Women were well represented in the PECs observed by the IEOM and chaired in 77 per cent. Despite constitutional guarantees to equal rights, regrettably, 42 per cent of the polling stations observed did not provide independent access for voters with physical disabilities, while in 21 per cent, the layout was not suitable for such voters.<sup>154</sup> Additionally, 21 per cent of polling stations observed were not equipped with assistive tools for visually impaired voters, contrary to legal requirements.

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<sup>153</sup> Paragraph 8 of the [1990 OSCE Copenhagen Document](#) states that “participating States consider that the presence of observers, both foreign and domestic, can enhance the electoral process for States in which elections are taking place”. Paragraph 3.2.a of the [2002 Venice Commission Code of Good Practice](#) states that “both national and international observers should be given the widest possible opportunity to participate in an election observation exercise”.

<sup>154</sup> The Constitution (Article 24) stipulates that no one will be subjected to discrimination based on disability. In addition, the 2025 [Law on the rights and guarantees of persons with disabilities](#) provides equal rights for persons with disabilities, including accessible polling stations, materials and information on elections. Article 29 of the [2006 UN CRPD](#) states that the “States Parties shall guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others, and shall undertake a) To ensure that persons with disabilities can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected, *inter alia*, by i. Ensuring that voting procedures, facilities and materials are appropriate, accessible and easy to understand and use; ii. Protecting the right of persons with disabilities to vote by secret ballot in elections [...] without intimidation; iii. Guaranteeing the free expression of the will of persons with disabilities as electors and to this end, where necessary, at their request, allowing assistance in voting by a person of their own choice”.

*The authorities should ensure that polling station premises and layouts enable independent access and secret, autonomous voting for persons with disabilities. Appropriate assistive tools for voters with sensory disabilities should be consistently available.*

The opening was assessed positively in 131 of 142 polling stations observed. Delays, which occurred in more than a third of these polling stations, were attributed to difficulties in preparing the new voting equipment; in 3 cases, the delay was over half an hour. IEOM observers noted some procedural errors, including 13 instances where the ballot boxes were not shown to be empty before being sealed, 45 cases where lots were not drawn for PEC assignments, and 6 instances where the PECs did not print a zero-count protocol. Difficulties in setting up the voter identification device and the ballot scanner were reported in 16 and 37 cases, respectively, while in 13 instances, the ballot scanner was not operational at the opening of the polls.

IEOM observers assessed voting overall positively in 95 per cent of the 1,323 observations, describing the voting process as transparent. Negative assessments were largely due to issues of secrecy of the vote and procedural issues related to the use of technology. Observers or representatives nominated by contestants were present in 95 per cent of the observed polling stations. In 40 per cent of observed polling stations, unauthorised persons, mainly police and local officials, were present, and in 4 per cent, interfered with the work of PECs.

*Measures should be taken to ensure that only authorised persons are present in polling stations and that election officials conduct their work free from interference.*

Procedures were mostly followed in the majority of polling stations observed. However, IEOM observers reported that in 18 per cent of the polling stations observed, the ballot box was not sealed properly. When identification devices failed to identify a voter, in 78 per cent of these instances, PEC members did not fill in the correct form. IEOM observers reported that in 27 per cent of the polling stations observed, some voters were not allowed to vote, mainly because they were not on the voter list. Serious procedural shortcomings reported by IEOM observers included 16 cases of group voting, 13 cases of multiple voting, and 7 cases of proxy voting in the polling stations observed. IEOM observers noted indications of vote-buying in 9 cases around polling stations.

IEOM observers found voting technologies to be fully operational and functioning properly in almost all polling stations observed. However, connectivity issues were noted in 8 per cent of these polling stations, while in 2 per cent the ballot scanner was not operational. Observers found that the operators and PEC members consistently checked voter's biometric data and it was sufficient to identify voters in the vast majority of observations.

IEOM observers reported some issues related to the secrecy of the vote. In 36 per cent of observed polling stations, the design and positioning of booths compromised the secrecy of the vote, and in 5 per cent, the layout was not adequate to conduct voting. In 4 per cent, not all voters marked their ballots in secret, and overcrowding was noted in 5 per cent. The IEOM observers reported campaign materials in the vicinity of polling stations in 2 per cent of observations.

*Legal provisions on the secrecy of the vote should be implemented and enforced by the Precinct Election Commissions.*

## **B. COUNTING AND RESULTS**

The vote count was assessed negatively in 44 of the 118 polling stations observed by the IEOM, mainly due to non-compliance with established procedures and substantial procedural errors and omissions that negatively impacted the transparency of the process.

Unauthorised persons, mostly police officers and local officials, were present in 73 polling stations, and in 14 cases they were observed directing or interfering with the commission's work, with 13 cases in which they were directly participating in the count.

IEOM observers noted that key procedural safeguards before and during the manual count were often not fully implemented, and, concerning, in 30 cases the manual count was not conducted and the results were based solely on the electronically generated protocol. In 26 cases, the number of voters who voted was not determined by counting signatures on the voter list. In 13 cases, the number of voter signatures did not match the number of confirmation slips. In 23 cases, the PECs did not produce and sign an act recording the number of ballot papers issued to voters. All persons present were not shown the ballot box seals before they were opened, or were not shown control sheets, in 27 and 29 observations, respectively.

During the manual count, ballots were not counted one by one and the choice on each ballot was not announced and shown to all present in 73 polling stations observed. The protocols were not completed based on the manual count in 30 polling stations observed. The validity of ballots was not determined in a reasonable manner in 26 cases, and observers found that in 17 of these cases the PECs were also not consistent in their determination. IEOM observers reported discrepancies between the manual count and printed results slips in 21 polling stations, and in 5 cases the figures in the protocols did not reconcile. In 55 cases, the protocols were not posted for public display as required by law. In 21 cases, the official protocols were found to have been pre-signed by PEC members.

Contrary to the CEC's explanation that TEC premises would be used as sub-DECs to facilitate logistics, IEOM observers reported that in nearly half of the sub-DECs, DEC members performed a range of tabulation-related tasks in addition to receiving materials, including checking figures in the protocols and entering and aggregating data in the electronic system.

The IEOM observed the tabulation process in all 30 DEC and in 26 sub-DEC hubs. In almost half of all cases, IEOM observers negatively assessed the tabulation procedures, mainly due to procedural shortcomings and inadequate conditions, such as insufficient space and poor organisation for receiving and tabulating PEC protocols, which negatively impacted the transparency of the tabulation process. IEOM observers reported being able to follow the process without restriction in most DEC; however, in roughly half of the observations, not all those present had a clear view of the tabulation procedures.

ODIHR EOM long-term observers reported that the duration of tabulation at the district level varied and continued for several days after election day, mainly due to differences in the timing of receipt of PEC protocols, including from sub-DECs, and the deadlines for the submission of complaints. The CEC reviewed the data received from DEC on a rolling basis and approved the results for all but one DEC on 10 December.

*To safeguard the integrity and transparency of the vote count and the tabulation of election results, election officials should consistently adhere to all legal and procedural provisions, including adhering to counting and tabulation procedures specified in the law, and ensuring access of observers to all stages of the process.*

The CEC announced the preliminary turnout at 34.31 per cent and started posting the electronically-generated preliminary results, disaggregated by polling station, on its website immediately after the end of voting, contributing to transparency.

During the tabulation process, a number of DEC annulled the results from various PECs due to alleged irregularities, but there was no assessment as to whether repeat voting was required at the affected polling

stations, contrary to international good practice and despite relevant requirements in the Election Law.<sup>155</sup> The annulled PEC results were excluded from the aggregation, ultimately altering the election outcome and disenfranchising voters in the affected precincts.<sup>156</sup>

*The legally prescribed provisions for annulling the results of Precinct Election Commission should be enforced on District Election Commissions, and including the evaluation of whether the annulments qualified for a repeated voting.*

## XVI. POST-ELECTION DAY DEVELOPMENTS

On 3 December, the CEC considered complaints, alleging violations in electoral district No. 13 based on materials posted on social media. According to the reports, in 35 out of 94 polling stations, candidate representatives and observers had installed cameras and recorded voters.<sup>157</sup> The CEC assessed that such violations were widespread and systematic, undermined the secrecy of the vote, significantly affected the free expression of voters' will, and impacted the work of the PECs. Consequently, the CEC unanimously voted to annul the election results in district No. 13.<sup>158</sup> The CEC indiscriminately barred all 14 candidates who had contested the race in that district from standing in the repeat elections, without an individual assessment of responsibility, raising concerns about compliance with international standards and good practice, particularly the principles of proportionality and legal certainty.<sup>159</sup> The courts subsequently upheld the CEC decision without conducting a substantive review of individual liability.<sup>160</sup> The elections in electoral district No.13 were scheduled for 1 March 2026, with 25 candidates registered by the deadline.<sup>161</sup>

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<sup>155</sup> Five DEC annulled results in 14 PECs: DEC No. 9 annulled results in 7 PECs; DEC No. 26 in 3 PECs; DEC No. 8 in 2 PECs; and DEC No. 13 and No. 25 in 1 PEC each (DEC No. 25 annulled only mobile voting results). Article 37 of the Election Law requires that "[...] If the results of voting at one or more polling stations are declared invalid and this affects the election results, a revote shall be held at these polling stations [...]". Paragraph II.3.3.e of the Explanatory Report of the [2002 Venice Commission Code of Good Practice](#) states: "The appeal body must have authority to annul elections where irregularities may have affected the outcome. It must be possible to annul the entire election or merely the results for one constituency or one polling station. In the event of annulment, a new election must be called in the area concerned".

<sup>156</sup> Ms Zhyldyzkan Zholdosheva in DEC No. 8 and Ms Yrgal Kadyraliyeva in DEC No. 9, who had received the highest number of votes among women candidates in their districts, were replaced by Ms Nurzhamal Torobekova and Ms Zhyldyz Egenberdieva, respectively.

<sup>157</sup> Article 9 of the Election Law states that "An observer has the right to [...] take photographs, make video recordings or audio recordings without violating the secrecy of the vote or interfering with the voting process or the counting of votes".

<sup>158</sup> Article 37 of the Election Law requires that results must be annulled if the invalidated votes exceed one-third of all votes cast. According to the CEC, 30,260 voters cast ballots in the 35 affected PECs in district No. 13, representing 39.44 per cent of all voters in the district. The CEC replaced the chairpersons of all these 35 PECs.

<sup>159</sup> Article 38 of the Election Law states: "In the event of repeat elections, candidates whose actions served as the basis for declaring the elections invalid may not be nominated again for elected office". Paragraph 4 of the 1996 UN CCPR [General Comment No. 25](#) states that "Any conditions which apply to the exercise of the rights protected by Article 25 should be based on objective and reasonable criteria... The exercise of these rights by citizens may not be suspended or excluded except on grounds which are established by law and which are objective and reasonable...". Paragraph 4 of the 1996 UN CCPR [General Comment No. 25](#) states that "[a]ny restrictions on the rights protected by Article 25 should be based on objective and reasonable criteria." Paragraph II.3.3. of the 2002 [Venice Commission Code of Good Practice](#) states that "[s]anctions must be proportionate and, in principle, applied to the individual responsible", while paragraph I.1.1.d states that "any deprivation of the right to vote and to be elected must be provided for by law, observe the principle of proportionality and be imposed by express decision of a court of law".

<sup>160</sup> The Administrative Court of Bishkek received 13 appeals regarding DEC No. 13, of which six were dismissed on the merits, and seven were declared inadmissible. Two of these decisions were appealed to the Supreme Court, which upheld the CEC decision in both cases.

<sup>161</sup> Of these, 15 men and 10 women were registered for the repeat elections.



*To safeguard the right to stand for election, the legal framework and implementation should be reviewed to ensure that any disqualification of candidates for repeat elections is based on clear legal grounds and individualised findings of responsibility.*

Following the approval of the election results on 10 December, the CEC registered the elected MPs in 29 out of 30 districts on 12 December. The newly elected parliament convened for its first session on 17 December. On 9 February, the President and the Speaker of Parliament received a petition from 75 prominent individuals calling for an early presidential election due to an alleged legal uncertainty as to the length of mandate of the incumbent originating from the change of the Constitution after his election. The call was pronounced by several public institutions as an incitement to unrest and entailed detentions of some of the initiators.<sup>162</sup> The President requested the Constitutional Court to clarify the regulation on the presidential mandate and to determine the date for the next presidential election. On 17 February, the Constitutional Court decided that there were no grounds for an early election, and the next presidential election should be held in line with the law in force, on 24 January 2027.<sup>163</sup>

Following the early election petition, the President dismissed General Tashiev and several of his deputies, imposing a life-long ban on public office, as well as several of his deputies.<sup>164</sup> Those dismissals were followed by a large-scale restructuring of the state security apparatus and vast dismissals and arrests among top-ranking state and local officials, local governors, and state security personnel. Several MPs stepped down, including the Speaker of the Parliament, and some former MPs were soon arrested on corruption charges.<sup>165</sup> Following the 2025 amendments to the Election Law, there are no by-elections to fill vacant parliamentary seats, and the mandates are being re-distributed in line with the 2025 parliamentary elections results. Simultaneously, the CEC invalidated its previous decision to cancel the parliamentary elections results and to repeat elections at district 13, asserting that this reversal was based on the results of the investigation into the alleged infringement of vote secrecy. The CEC registered the elected MPs based on the initial 2025 results, except for one candidate who was found guilty for the violation.<sup>166</sup>

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<sup>162</sup> A criminal case under Article 278 of the Criminal Code was initiated in this respect, and all 75 petitioners were brought to interrogation following home searches. Several were subsequently detained as initiators.

<sup>163</sup> See the Constitutional Court's [decision](#) of 17 February 2026. The election will be scheduled by the parliament by 24 September 2026.

<sup>164</sup> The dismissal from both posts - the head of the State Committee for National Security and the deputy chairman of the Cabinet of Ministers - was [announced](#) on the President's website on 10 February.

<sup>165</sup> As of 27 March, nine MPs were substituted, and as of 1 April 2026, one mandate, from DEC No. 21, remained vacant. According to the [CEC](#), the vacancy is due to ongoing [verification](#) by the Ministry of Interior of the respective candidate, Chyngyz Aidarbekov. Mr. Aidarbekov has [claimed](#) that he has been subjected to pressure in connection with the mandate. On 1 April, it was announced that the former MP Tashiev, brother of General Tashiev, was [detained](#) on corruption charges.

<sup>166</sup> The CEC [decided](#) to revoke its decision of 3 December 2025 invalidating the elections results in DEC No. 13 upon a request from several candidates from the district due to newly established circumstances. The CEC determined that the violations of the secrecy of the vote had not prevented the determination of the election results, and that its investigations attributed the violations to one candidate, who was eventually disqualified and whose votes were invalidated, despite no judicial decision to establish the candidate's guilt. The CEC also [invalidated](#) its decision on repeat elections in electoral district 13.

## XVII. RECOMMENDATIONS

These recommendations, as contained throughout the text, are offered with a view to further enhancing the conduct of elections in the Kyrgyz Republic and to supporting 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 Kyrgyzstan in further improving the electoral process and addressing the recommendations contained in this and previous reports.<sup>167</sup>

### A. PRIORITY RECOMMENDATIONS

1. The legal framework for elections should be reviewed in line with international standards for democratic elections and previous ODIHR recommendations. Such a review should be undertaken through an open, inclusive and transparent consultation process well in advance of elections. Subsidiary legislation should be adopted and published in due time prior to the respective stages of the electoral process to ensure legal certainty and allow adequate preparation for all stakeholders..
2. Blanket deprivation of voting rights of prisoners should be reconsidered to account for the gravity of the crime; suffrage limitations based on disabilities should be repealed.
3. To strengthen confidence in the use of election technologies, the law should explicitly provide for independent third-party verification and certification of voter identification and vote-counting devices. Relevant stakeholders should be granted meaningful opportunities to scrutinise all aspects of the implementation process, including access to technical documentation, source code review, device configuration, and auditing procedures.
4. Eligibility to stand for elections should be brought in line with the international standards, and all undue, disproportionate restrictions and limitations on the right to stand for elections should be eliminated. Current restrictions based on disability, education, and criminal record should be repealed. The residency requirement should be removed or substantially reduced.
5. The campaign rules should be amended with an aim to protect the exercise of fundamental freedoms. A social and political expression of a citizen, if not presented on a contractual basis, should not be interpreted in a formalistic and overly restrictive manner as campaigning, and should be allowed.
6. To facilitate meaningful oversight and transparency, the legal framework should be amended to clearly regulate audit procedures, timelines, and the publication of audit findings. The institutional

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<sup>167</sup> 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”. The follow-up of prior recommendations is assessed by the ODIHR EOM as follows: none of the recommendations included in the [final report on the 2017 presidential election](#), the [final report on the 2020 parliamentary elections](#), the [final report on the 2021 parliamentary elections](#), and in the [final report on the 2021 presidential election and referendum](#) have been fully implemented. Recommendations 3, 10, 14 from the final report on the 2017 presidential election, 4, and 12 from the final report on the 2020 parliamentary elections, 14 from the final report on the 2021 parliamentary elections, and 11, 12 and 20 from the final report on the 2021 presidential election and referendum are mostly implemented. Recommendations 1, 2, 4, 5, 7, 12, 13, 17, 18, 23 and 24 from the final report on the 2017 presidential election, 1, 5, 6, 10, 16, 19, 23 and 25 from the final report on the 2020 parliamentary elections, 6, 10, 15 and 21 on the 2021 parliamentary elections and 3, 14, 19, 22, 23, 24 and 25 from the final report on 2021 presidential election and referendum are partially implemented. See also the ODIHR [electoral recommendations database](#).

capacity of the CEC should be strengthened for conducting thorough, comprehensive and timely analysis, verification and audits of campaign finance reports.

7. The media legal framework should be reviewed and brought in line with international standards on freedom of expression. The Constitution and Criminal Code should be amended to remove overly broad and vague provisions that could be misused to restrict freedom of expression. Any restrictions must strictly adhere to the principles of legality, necessity, and proportionality, and should be subject to judicial oversight.
8. To enhance voters' ability to make an informed choice and ensure independent editorial coverage of election campaigns the rules for the media coverage should be revised to clearly distinguish between journalistic and informational content and campaign activities. State-funded broadcasters should be required to provide balanced, impartial and objective coverage of contestants in news and current affairs programmes.
9. To provide for an effective legal remedy, the legal framework should be amended to allow voters and political parties to challenge election results. All CEC decisions should be subject to judicial review.
10. Consideration should be given to reviewing the legal framework to ensure that candidate registration provisions and principles for delineation of electoral districts are designed to facilitate electoral participation and representation of persons belonging to national minorities. The authorities could consider affirmative measures, including specific conditions facilitating participation in elections, to ensure their adequate representation in the legislature. All such measures should be designed in consultation with minority communities and implemented in a manner that promotes genuine minority political participation.
11. To enhance the professional capacity of the election administration, the CEC should provide comprehensive, standardised, practical and timely training for lower-level commissions, with particular emphasis on counting and tabulation procedures.
12. To safeguard the integrity and transparency of the vote count and the tabulation of election results, election officials should consistently adhere to all legal and procedural provisions, including adhering to counting and tabulation procedures specified in the law, and ensuring access of observers to all stages of the process.
13. To ensure legality, integrity and public trust, the processing of election results and election materials should be conducted only by the institutions empowered to do so by the law. Any operational solution should have a clear legal basis and its uniform implementation should be ensured.

## **B. OTHER RECOMMENDATIONS**

### **Legal Framework and Electoral System**

14. Legislative and capacity-building measures shall be considered to ensure gender parity in political representation. The quota for the underrepresented gender should be raised and complemented with additional legal and policy measures, such as training, mentoring and financial support, in line with CEDAW recommendations on achieving substantive equality in political participation.
15. To ensure the equality of the vote, the permissible deviation from the average number of voters per district should be reduced to meet international good practice. Constituency delimitation

should be conducted in consultation with an independent and impartial body, as well as all relevant stakeholders, including national minorities.

### **Election Administration**

16. Consideration should be given to introducing measures to promote the participation of persons with disabilities and national minorities in the work of the election administration, the latter in particular in the areas where they constitute a considerable part of the population.
17. To ensure full transparency in decision-making, election administration bodies at all levels should hold public sessions and publish draft agendas and minutes in a timely and consistent manner.
18. To ensure consistent implementation of election day procedures, consideration should be given to adopting and publishing relevant regulations sufficiently in advance of election day and disseminating clear, detailed guidelines to DEC and PEC in a timely manner.
19. To promote informed participation and encourage voter engagement, consideration should be given to expanding voter education and information activities, tailoring them to different voter groups, including national minorities and persons with various types of disability.
20. The Central Election Commission should continue efforts to improve the accessibility of the electoral process for voters with various types of disabilities, including by ensuring physically accessible polling stations, with appropriate layouts and consistently available assistive tools to facilitate independent and secret voting, in consultation with disabled persons' organisations.

### **The Use of Technology in Elections**

21. To ensure the secrecy of the vote, ballots should remain untraceable and unattributable to individual voters. The use of unique identifiers, such as individualized QR codes on ballot papers, should be discontinued to eliminate the risk of compromising voter anonymity. Alternative safeguards for the issuance and accounting of spoiled ballots should be established to maintain integrity without jeopardizing the privacy of the vote.

### **Voter Registration**

22. To safeguard the secrecy of the vote, the legal framework should be amended to prohibit the publication of the names of voters who have voted.

### **Candidate Registration**

23. To promote political pluralism and the inclusion of underrepresented groups, consideration should be given to developing affirmative measures that would facilitate the electoral participation of members of such communities. Such measures could include, but should not be limited to, meaningful candidate nomination quotas, reserved seats, and decreased electoral deposits for representatives of such groups.
24. The electoral fee for candidate registration should be reduced to eliminate financial barriers to standing for election, and made refundable based on the election results. The amount of the electoral fee should be determined based on an inclusive public discussion.

## **Electoral Campaign**

25. To foster an environment in which campaign activities and meaningful voter and candidate engagement are not hindered, the involvement of law enforcement and national security bodies in enforcing campaign regulations should be confined to what is clearly prescribed by their mandate and should be considered from the human rights compliance perspective.
26. To promote confidence in the electoral process robust efforts are needed to address the persistent issue of vote-buying, both through a civic awareness campaign, including beyond the electoral period, and through effective prosecutions. The role of the CEC in pre-screening vote-buying cases prior to investigation should be reconsidered to ensure effective separation of functions and consistent investigations.
27. In order to enhance the inclusiveness and accessibility of election campaigns, political parties should adjust their campaign outreach strategies, materials, activities and information to meet diverse requirements of persons with various types of disabilities. Genuine inclusion strategies should be elaborated in cooperation with organizations representing persons with disabilities.

## **Campaign Finance**

28. The legal framework should be reviewed to permit in-kind donations and regulate third party financing, prescribing clear market valuation and reporting rules.
29. The legal limits on campaign income and expenditures could be revised in line with international good practice aimed at promoting a level playing field for all contestants.
30. Consideration shall be given to an introduction of an online submission platform for all campaign finance reports. This system should be integrated with state databases to allow for the immediate, automated publication of all financial information, and ensure accessibility of financial data via a user-friendly interface and machine-readable and searchable format of published documents.
31. The legal framework should be revised to establish a system of effective, proportionate, and dissuasive administrative sanctions for campaign finance violations, ensuring that penalties are appropriate to the gravity of the offence.

## **Media**

32. Consideration should be given to establishing an independent media regulatory body, which would be effective and fully independent both in law and in practice.
33. The National Television and Radio Broadcasting Corporation should be transformed into a public service media, with independent appointment of management, a clearly defined public mandate, and a financing model that ensures financial independence.
34. Media freedoms should be strictly upheld. Undue limitations on access to information, including by granting preferential access to information to certain media, interference in the work of journalists, and intimidation of media professionals, should be addressed in law and practice to ensure a conducive environment for freedom of expression.
35. The Law on Media should be revised to align with international standards on freedom of expression, including by introducing a notification procedure to replace the current registration requirements, fostering a self-regulatory mechanism, and explicitly distinguishing that



requirements are applicable to professional media outlets as opposed to wider non-professional publications. Restrictions on media ownership for foreign and dual citizens should be reviewed.

36. The regulations related to restricting online content or suspending websites should be reviewed to ensure that such decisions are solely within the jurisdiction of the judiciary. Such decisions should follow public hearings with due process guarantees and must be published, including the full list of the affected content or websites. Any restrictions should pertain to specific content and applied narrowly, and bans on entire websites should be avoided.
37. Accreditation requirements for media outlets to provide paid advertising should be reconsidered in order to avoid creating unnecessary obstacles for media and potentially limiting the amount of information available to voters.
38. All paid political content should be clearly and consistently identified as such. Consideration should be given to banning the broadcasting of paid campaign material within news and current affairs programmes in order to preserve the distinction between advertising and editorial coverage.
39. Consideration could be given to allot free time and organize debates on all state-funded broadcasters, as required by the law. The format of the debates should facilitate actual interaction between contestants. The candidates should not be legally prevented from criticizing their opponents during the campaign.

### **Election Dispute Resolution**

40. Timeframes for submitting and adjudicating election complaints, including in early elections, should be reviewed to allow for effective preparation of the complaints and reasoned decisions, ensuring an effective legal remedy.
41. To strengthen transparency and accountability in election dispute resolution, the Central Election Commission should consider all alleged violations in open sessions. The decisions should be reasoned and well-substantiated, and should indicate available appeal avenues and deadlines. While working groups may support fact-finding, all final decisions should remain with the Commission to ensure institutional responsibility and allow for judicial reviews.

### **Participation of National Minorities**

42. To ensure accessible and inclusive campaign environment, the authorities should guarantee and promote campaign activities, electoral materials, and political discourse in minority languages, including within the media, in line with international standards on language rights and effective political participation.
43. The authorities should take measures to ensure that persons belonging to national minorities are adequately represented at all levels of the election administration.

### **Election Observation**

44. The legislation should be reviewed to foster an enabling environment where civil society can engage in election observation activities without undue obstacles or fear of retribution. In particular, consideration should be given to repealing the requirement for CSOs with foreign funding conducting election observation to register as “foreign representatives”.

## **Election Day**

45. The authorities should ensure that polling station premises and layouts enable independent access and secret, autonomous voting for persons with disabilities. Appropriate assistive tools for voters with sensory disabilities should be consistently available.
46. Measures should be taken to ensure that only authorised persons are present in polling stations and that election officials conduct their work free from interference.
47. Legal provisions on the secrecy of the vote should be implemented and enforced by the Precinct Election Commissions.
48. The legally prescribed provisions for annulling the results of Precinct Election Commission should be enforced on District Election Commissions, and including the evaluation of whether the annulments qualified for a repeated voting.

## **Post-Election Day Developments**

49. To safeguard the right to stand for election, the legal framework and implementation should be reviewed to ensure that any disqualification of candidates for repeat elections is based on clear legal grounds and individualised findings of responsibility.

## ANNEX I: FINAL ELECTION RESULTS<sup>168</sup>

| Electoral Subject                           | Votes received – Ballot Scanner | Votes received – Manual Counting | Valid ballots (ED total) | Invalid ballots (ED total) | Total ballots cast (ED total) | ED |
|---------------------------------------------|---------------------------------|----------------------------------|--------------------------|----------------------------|-------------------------------|----|
| Azhibayev Chyngyz Ilyaskozhoevich           | 9222                            | 10467                            | 57626                    | 690                        | 58316                         | 1  |
| Zhoroev Ismanali Egemberdievich             | 7696                            | 8715                             |                          |                            |                               |    |
| Talieva Kamila Abdyrazakovna                | 4879                            | 5377                             |                          |                            |                               |    |
| Atazhanov Yrysbe Yslamovich                 | 12746                           | 13794                            | 58465                    | 707                        | 59172                         | 2  |
| Kalpaev Baktyyar Alievich                   | 6345                            | 6981                             |                          |                            |                               |    |
| Amanova Burun Kushbekovna                   | 4753                            | 5078                             |                          |                            |                               |    |
| Rysbaev Ravshanbek Rysbaevich               | 9933                            | 10440                            | 54184                    | 628                        | 54812                         | 3  |
| Amatov Zhanybek Zhenishbekovich             | 5544                            | 5850                             |                          |                            |                               |    |
| Mavlyanova Mahabat Ergeshovna               | 3651                            | 3953                             |                          |                            |                               |    |
| Rustambek uulu Sovetbek                     | 11130                           | 11899                            | 58483                    | 710                        | 59193                         | 4  |
| Zhaanbaev Ulanbek Korgonbaevich             | 9185                            | 9996                             |                          |                            |                               |    |
| Alimzhanova Nilufar Yakubzhanovna           | 3744                            | 4264                             |                          |                            |                               |    |
| Eldar Nurlanovich Sulaimanov <sup>169</sup> | 18298                           | 18789                            | 51222                    | 920                        | 52172                         | 5  |
| Isirailov Azamat Almazbekovich              | 8582                            | 9248                             |                          |                            |                               |    |

<sup>168</sup> Preliminary Results from the CEC website.

<sup>169</sup> Following the resignation of MP Eldar Sulaimanov, on 18 February 2026 the CEC registered Abdullaev Azizbek as his replacement.

|                                                      |       |       |       |     |       |    |
|------------------------------------------------------|-------|-------|-------|-----|-------|----|
| Akhmedova Aigul<br>Abdilkhaevna                      | 4952  | 5225  |       |     |       |    |
| Kudaiberdiev Altynbek<br>Musazhanovich               | 12744 | 13826 |       |     |       |    |
| Ergeshov Bekmurzu<br>Askarbaevich                    | 8655  | 9022  | 51619 | 804 | 52423 | 6  |
| Amanova Santalat<br>Abdyldaevna                      | 2897  | 3478  |       |     |       |    |
| Kozuev Alisher<br>Abibillaevich                      | 19643 | 20672 |       |     |       |    |
| Kubanychbekov Ilimbek<br>Kubanychbekovich            | 7109  | 7711  | 49875 | 810 | 50685 | 7  |
| Mashrapova Gulay<br>Egemnazarovna                    | 3238  | 3478  |       |     |       |    |
| Akayev Zhanarbek<br>Kubanychovich <sup>170</sup>     | 11266 | 13856 |       |     |       |    |
| Primov Ulan<br>Berdibaevich                          | 9776  | 11009 | 56952 | 820 | 59862 | 8  |
| Torobekova Nurzhamal<br>Tursunaliyevna               | 2857  | 3145  |       |     |       |    |
| Dzhalilov Azamzhan<br>Abdullazhanovich               | 5358  | 5461  |       |     |       |    |
| Tolonov Daniyar<br>Ermekeovich                       | 4941  | 5088  | 40081 | 643 | 40724 | 9  |
| Egenberdieva Zhyldyz<br>Abdyldaevna                  | 1056  | 1127  |       |     |       |    |
| Zulushev Kurmankul<br>Toktoraliyevich <sup>171</sup> | 12901 | 14688 |       |     |       |    |
| Omurzakov Suyunbek<br>Abdyldaevich                   | 6327  | 7637  | 51716 | 521 | 52237 | 10 |
| Baatyrova Gulnara<br>Marishovna                      | 2809  | 3506  |       |     |       |    |

<sup>170</sup> On 19 February 2026, the CEC terminated the parliamentary mandate of Zhanar Akaev, following a presidential decree, and registered Taalaibek Sarybashev as his replacement on the same day.

<sup>171</sup> Following the resignation of MP Zulushev Kurmankul, on 18 March 2026 the CEC registered Ormonov Ulugbek as his replacement.

|                                                     |        |       |        |      |        |    |
|-----------------------------------------------------|--------|-------|--------|------|--------|----|
| Tashiev Shairbek<br>Kydyrshaevich <sup>172</sup>    | 22387  | 24302 | 43517  | 589  | 44106  | 11 |
| Kylychbaev Altynbek<br>Tairovich                    | 6703   | 7447  |        |      |        |    |
| Salyamova Venera<br>Khamzaevna                      | 4442   | 4839  |        |      |        |    |
| Cholponbai uulu<br>Bekmyrzu                         | 15208  | 16335 | 59524  | 1099 | 60623  | 12 |
| Masabirov Talaibek<br>Aitmatovich                   | 8925   | 9945  |        |      |        |    |
| Kurmanalieva Zhyldyz<br>Kochkoralievna              | 2299   | 2517  |        |      |        |    |
| Mamytov Talant<br>Turдумаматович                    | 12 108 | N/A   | 68 937 | 942  | 69 879 | 13 |
| Altynbekov Aibek                                    | 13 509 | N/A   |        |      |        |    |
| Karabekova Aigul<br>Asanovna                        | 8 861  | N/A   |        |      |        |    |
| Borbiev Bolotbek<br>Ibraimovich                     | 11822  | 13445 | 53948  | 588  | 54536  | 14 |
| Sulaimanov Kunduzbek<br>Koshalievich <sup>173</sup> | 10993  | 12064 |        |      |        |    |
| Kultaeva Gulsharkan<br>Okonovna                     | 5896   | 6415  |        |      |        |    |
| Turgunbek uulu<br>Nurlanbek <sup>174</sup>          | 14990  | 17125 | 67487  | 741  | 68228  | 15 |
| Tursunbaev Azizbek<br>Atakozuevich                  | 9902   | 10713 |        |      |        |    |
| Abdibaeva Aisarakan<br>Nyshanovna                   | 3356   | 3988  |        |      |        |    |
| Dzhumabekov<br>Dastanbek<br>Artisbekovich           | 11142  | 12928 | 56285  | 746  | 57031  | 16 |

<sup>172</sup> Following the resignation of MP Tashiev Shaiyrbek, on 18 March 2026 the CEC registered Kalberdieva Mavluida as his replacement.

<sup>173</sup> Following the resignation of MP Sulaimanov Kunduzbek, on 24 February 2026 the CEC registered Duishenbiev Raiymberdy as his replacement.

<sup>174</sup> Following the resignation of MP Turgunbek uulu Nurlanbek, on 24 February 2026 the CEC registered Nyshanov Jayloobai as his replacement.

|                                                      |       |       |       |     |       |    |
|------------------------------------------------------|-------|-------|-------|-----|-------|----|
| Chotonov Meder Oskonbekovich                         | 9057  | 10164 |       |     |       |    |
| Kairylbekova Medina Kairylbekovna                    | 8179  | 8951  |       |     |       |    |
| Azygaliev Nurlanbek Asanbekovich <sup>175</sup>      | 11198 | 12020 |       |     |       |    |
| Uzakbaev Ulukbek Kamchibekovich                      | 9838  | 10766 | 48640 | 723 | 49363 | 17 |
| Esenamanova Cholpon Zamirbekovna                     | 4358  | 4714  |       |     |       |    |
| Handzheza Karim Lemzarovich                          | 7617  | 7893  |       |     |       |    |
| Chomoev Bakyt Muratbekovich                          | 6442  | 6906  | 48348 | 704 | 49052 | 18 |
| Satieva Gulzhan Erkinbekovna                         | 4851  | 5142  |       |     |       |    |
| Aliyev Mederbek Kubanychevich                        | 4594  | 5 532 |       |     |       |    |
| Egemberdiev Abdylidabek Zholdoshalievich             | 5038  | 5316  | 42250 | 595 | 42845 | 19 |
| Taigaraeva Edita Kanybekovna                         | 1281  | 1397  |       |     |       |    |
| Aitiev Temirlan Tynychbekovich                       | 8580  | 9021  |       |     |       |    |
| Atambaev Seidbek Almazbekovich                       | 2873  | 3825  | 31062 | 540 | 31602 | 20 |
| Ashymbayeva Toktobubu Abasovna                       | 1130  | 1249  |       |     |       |    |
| Kongantiev Kuvanychbek Kambaralyevich <sup>176</sup> | 12118 | 13379 |       |     |       |    |
| Abirov Zhanybek Bolotbekovich                        | 8128  | 8914  | 39860 | 533 | 40393 | 21 |
| Sadyrbaeva Zhyldyz Esenbekovna                       | 1795  | 2079  |       |     |       |    |

<sup>175</sup> Following the resignation of MP Azygaliev Nurlanbek, on 18 March 2026 the CEC registered Choibekov Baktybek as his replacement.

<sup>176</sup> Following the resignation of MP Kongantiev Kuvanychbek, on 10 March 2026 the CEC terminated his mandate; as of 28 March, the seat had not yet been reassigned.



|                                     |       |        |       |     |       |    |
|-------------------------------------|-------|--------|-------|-----|-------|----|
|                                     |       |        |       |     |       |    |
| Bekeshev Dastan Dalabaevich         | 15106 | 17378  | 40339 | 419 | 40758 | 22 |
| Ibragimov Bolota Adylbekovich       | 6717  | 8128   |       |     |       |    |
| Kozhokulova Gulya Akmatkulovna      | 994   | 1214   |       |     |       |    |
| Surabaldieva Elvira Zhyrgalbekovna  | 8919  | 11278  | 40776 | 542 | 41318 | 23 |
| Mamataliev Marlen Abdyrakhmanovich  | 6360  | 6932   |       |     |       |    |
| Kydyraliev Umbetaly Toktoralievich  | 6013  | 6448   |       |     |       |    |
| Salymbekov Zhumabek Mamytbaevich    | 6771  | 7481   | 33755 | 554 | 34309 | 24 |
| Karybek uulu Ulukbek                | 4839  | 6038   |       |     |       |    |
| Akimbaeva Gulnara Orozbekovna       | 3002  | 3505   |       |     |       |    |
| Shabazov Bakhrudin Valievich        | 9816  | 10 062 | 45719 | 750 | 46632 | 25 |
| Tentishev Bakyt Erkinovich          | 6673  | 7108   |       |     |       |    |
| Seitkazieva Erkeaiym Alymovna       | 2997  | 3225   |       |     |       |    |
| Sakkarayev Mederbek Dzhamankulovich | 11808 | 11 978 | 52766 | 878 | 53647 | 26 |
| Isenaliyev Erkinbek Askevich        | 11097 | 11265  |       |     |       |    |
| Isaeva Jamilya Kubanychbekovna      | 6636  | 5944   |       |     |       |    |
| Tumonbaev Akylbek Toguzbaevich      | 12190 | 13 445 | 60766 | 699 | 61465 | 27 |
| Muratbekov Tabyldy Muratbekovich    | 4947  | 5992   |       |     |       |    |

|                                                      |       |        |       |     |       |    |
|------------------------------------------------------|-------|--------|-------|-----|-------|----|
| Moldobekova Gulkan Sakinovna                         | 4851  | 5156   |       |     |       |    |
| Kokulov Erulan Kalchoroevich                         | 8772  | 11 619 |       |     |       |    |
| Sagynaev Bolot Turusbekovich                         | 7888  | 9254   | 57082 | 595 | 57677 | 28 |
| Zhunushbaeva Rakhat Myrzabekovna                     | 5948  | 6724   |       |     |       |    |
| Sydygaliev Nurbek Omurbekovich                       | 10451 | 13 067 |       |     |       |    |
| Belekov Adilet Cholponbekovich                       | 8240  | 9535   | 55734 | 573 | 56307 | 29 |
| Zhunushalieva Gulsunkan Ishengazievna <sup>177</sup> | 5814  | 6688   |       |     |       |    |
| Samakov Kubanychbek Karganbekovich                   | 10870 | 13 333 |       |     |       |    |
| Bakasov Ulan Bolotbekovich                           | 9168  | 11411  | 61667 | 539 | 62206 | 30 |
| Taalaibek kzy Zhyldyz                                | 5945  | 7243   |       |     |       |    |

<sup>177</sup> Following the resignation of MP Zhunushalieva Gulsunkan, on 18 March 2026 the CEC registered Murzakimova Altynkul as her replacement.

|                                            | <b>In-country<br/>(ballot<br/>scanner &amp;<br/>remote)</b> | <b>OCV<br/>(ballot scanner<br/>&amp; remote)</b> | <b>Total (ballot<br/>scanner &amp;<br/>remote)</b> | <b>Total<br/>(manual<br/>counting<br/>&amp;<br/>remote)</b> |
|--------------------------------------------|-------------------------------------------------------------|--------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------|
| Total number of voters on voter list       |                                                             |                                                  |                                                    | 4 294<br>243                                                |
| Total number of women voters on voter list |                                                             |                                                  |                                                    | 2 212<br>729                                                |
| Total number of voters who voted           | 1 558 384<br>(Total – OCV)                                  | 26 062                                           | 1 584 446                                          | 1 578<br>397                                                |
| Total number of remote votes               | 163 968<br>(Total – OCV)                                    | 26 062                                           | 190 030                                            | 190 030                                                     |
| Number of invalid votes                    | 20 857 (Total<br>– OCV)                                     | 282                                              | 21 139                                             | 20 806                                                      |
| Number of valid votes                      | 1 537 527<br>(Total – OCV)                                  | 25780                                            | 1 563 307                                          | 1 557<br>427                                                |

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

### ODIHR EOM Short Term Observers

|                        |            |
|------------------------|------------|
| Selcan Fabiankovits    | Austria    |
| Anja Fiedler           | Austria    |
| Hermann Hagspiel       | Austria    |
| Philipp Hermann        | Austria    |
| Eva Pumpernig          | Austria    |
| Bernhard Zimburg       | Austria    |
| Gunay Asadli           | Azerbaijan |
| Jana Gašparíková       | Czechia    |
| Terezie Hiclová        | Czechia    |
| Vaclav Hrabak          | Czechia    |
| Pavel Hrnčíř           | Czechia    |
| Jan Schroth            | Czechia    |
| Tereza Staňková        | Czechia    |
| Viktor Velek           | Czechia    |
| Karin Bergquist        | Denmark    |
| Helene Ellemann-Jensen | Denmark    |
| Gert Holtze            | Denmark    |
| Martin Larsen          | Denmark    |
| Poul Lauritsen         | Denmark    |
| Kirsten Mogensen       | Denmark    |
| Finn Nielsen           | Denmark    |
| Birthe Solevad         | Denmark    |
| Bo Weber               | Denmark    |
| Kalvi Noormägi         | Estonia    |
| Maija Dahlgren         | Finland    |
| Juho Kääriäinen        | Finland    |
| Katri Linna            | Finland    |
| Arttu Malkamäki        | Finland    |
| Pompeo Coppola         | France     |
| Florence Ganoux        | France     |
| Elise Montois          | France     |
| Jacques Pellet         | France     |
| Maxence Peniguet       | France     |
| Lena Sabadel           | France     |
| Khalil Zerargui        | France     |
| Gunda Amat Amoros      | Germany    |
| Yvonne Bach            | Germany    |
| Julia Baumann          | Germany    |
| Jana Bollinger         | Germany    |
| Zaza Bzishvili         | Germany    |

|                          |         |
|--------------------------|---------|
| Ingeborg Chyla           | Germany |
| Kerstin Dokter           | Germany |
| Clara Duske              | Germany |
| Dominika Eichstaedt      | Germany |
| Thomas Erling            | Germany |
| Joachim Freund           | Germany |
| Marcel Geissler          | Germany |
| Kim Grundbacher          | Germany |
| Jakob Hoffmann           | Germany |
| Henning Horstmeyer       | Germany |
| Joachim Kaetzler         | Germany |
| Hanns-Christian Klasing  | Germany |
| Alexander Kloß           | Germany |
| Edeltraud Lier           | Germany |
| Maxim Menschenin         | Germany |
| Marion Mienert           | Germany |
| Lorena Mosharof          | Germany |
| Kirsten Müller           | Germany |
| Caroline Müller-Hofstede | Germany |
| Ulrike Neundorf          | Germany |
| Martin Nölle             | Germany |
| Anne Rennschmid          | Germany |
| Kerstin Roeske           | Germany |
| Hildegard Rogler-Mochel  | Germany |
| Matthias Rumpf           | Germany |
| Volker Schiller          | Germany |
| Heinrich Schneider       | Germany |
| Jens Schuering           | Germany |
| Ursula Schulze-Aboubacar | Germany |
| Paula Schumann           | Germany |
| Arnim Stauth             | Germany |
| Marlies Temme            | Germany |
| Anne Uhlig               | Germany |
| Markus Vogel             | Germany |
| Peter Vogl               | Germany |
| Matthias Vollert         | Germany |
| Marie Luise von Halem    | Germany |
| Michael Wahlen           | Germany |
| Michael Wiersing         | Germany |
| Therese Caherty          | Ireland |
| Kathleen Cass            | Ireland |
| Finbar Hefferon          | Ireland |
| Marianne Kiernan         | Ireland |
| Pippa Matthews           | Ireland |
| Arthur O'Malley          | Ireland |

|                     |                    |
|---------------------|--------------------|
| David O'Shea        | Ireland            |
| Chiara D'Alessandro | Italy              |
| Paolo Foradori      | Italy              |
| Simone Ginzburg     | Italy              |
| Federico Orsi       | Italy              |
| Alessia Pappalardo  | Italy              |
| Alessia Riva        | Italy              |
| Alens Rupeiks       | Latvia             |
| Alinda Aalpoel      | Netherlands        |
| Gijsbert Bakker     | Netherlands        |
| Marije Breedveld    | Netherlands        |
| Anette Froyland     | Norway             |
| Sunniva Kasin       | Norway             |
| Joseph Mardelli     | Norway             |
| Else Muri           | Norway             |
| Reidun Samuelsen    | Norway             |
| Mateusz Debowicz    | Poland             |
| Elzbieta Hryciuk    | Poland             |
| Mariusz Marszewski  | Poland             |
| Maciej Mielnik      | Poland             |
| Jakub Pieńkowski    | Poland             |
| Marcin Popławski    | Poland             |
| Marzena Ryszkowska  | Poland             |
| Adam Sauer          | Poland             |
| Elzbieta Swidrowska | Poland             |
| Hanna Zobel         | Poland             |
| Francisco Viana     | Portugal           |
| Natalia Dragan      | Romania            |
| Alin Stoenescu      | Romania            |
| Diana Ainetdinova   | Russian Federation |
| Andrei Alekseev     | Russian Federation |
| Alina Artamonova    | Russian Federation |
| Andrei Avdeev       | Russian Federation |
| Mariia Bashkirova   | Russian Federation |
| Aleksei Budarev     | Russian Federation |
| Anna Chirkova       | Russian Federation |
| Egor Detinov        | Russian Federation |
| Dmitry Dryuchin     | Russian Federation |
| Andrei Ermolenko    | Russian Federation |
| Aleksandr Fediakov  | Russian Federation |
| Aleksandr Fedorinov | Russian Federation |
| Arif Gadzhiev       | Russian Federation |
| Damir Galiulin      | Russian Federation |
| Marsel Gibadullin   | Russian Federation |
| Iuliia Golubkina    | Russian Federation |



|                            |                    |
|----------------------------|--------------------|
| Elena Gorshkova            | Russian Federation |
| Aleksandr Kapishnikov      | Russian Federation |
| Asiia Khalitova            | Russian Federation |
| Vasilii Khlebushkin        | Russian Federation |
| Daria Kim                  | Russian Federation |
| Olga Kolosova              | Russian Federation |
| Oleg Komarov               | Russian Federation |
| Evgeny Kozhokin            | Russian Federation |
| Irina Krestova             | Russian Federation |
| Irina Kulbanova            | Russian Federation |
| Anton Kurakov              | Russian Federation |
| Pavel Kurochkin            | Russian Federation |
| Semen Liapichev            | Russian Federation |
| Mariia Molodtsova          | Russian Federation |
| Dmitrii Mukhrin            | Russian Federation |
| Tamerlan Munchaev          | Russian Federation |
| Nikita Nazarov             | Russian Federation |
| Daria Pakhomova            | Russian Federation |
| Anton Perov                | Russian Federation |
| Stanislav Pritchkin        | Russian Federation |
| Ilia Samarin               | Russian Federation |
| Stefaniia Sitner           | Russian Federation |
| Inna Tarysheva             | Russian Federation |
| Andrey Telushkin           | Russian Federation |
| Aleksei Topolskii          | Russian Federation |
| Ksenia Verkholtantseva     | Russian Federation |
| Alexey Zenkov              | Russian Federation |
| Sergei Zhdanov             | Russian Federation |
| Natasa Adlesic Barba       | Slovenia           |
| Hana Hadžiahmetović        | Slovenia           |
| Mar Aguilera Vaqués        | Spain              |
| Raquel Cabello Arribas     | Spain              |
| José Luis Del Riego Santos | Spain              |
| Alvaro Garlaschi Rodriguez | Spain              |
| Estefania Guallar Arino    | Spain              |
| Javier Pose Rodriguez      | Spain              |
| Maja Aase                  | Sweden             |
| Marcus Ahlqvist            | Sweden             |
| May Ann Aigrot Ramsay      | Sweden             |
| Andreas Berglöv            | Sweden             |
| Emma Bradley               | Sweden             |
| Sofia Busch                | Sweden             |
| Yvonne Carlberg Bengtsson  | Sweden             |
| Sanna Eliasson             | Sweden             |
| Victoria Enstroem Lindskog | Sweden             |

|                           |                |
|---------------------------|----------------|
| Karin Fält                | Sweden         |
| Latifa Gharbi             | Sweden         |
| Nina Gunneberg            | Sweden         |
| Victor Gupta              | Sweden         |
| Jenny Gustafsson          | Sweden         |
| Madeleine Hägg-Liljeström | Sweden         |
| Lennart Haggren           | Sweden         |
| Ami Hedenborg             | Sweden         |
| Lena Ingelstam            | Sweden         |
| Catherine Jonsson         | Sweden         |
| Tommy Karlsson            | Sweden         |
| Stina Larserud            | Sweden         |
| Ulrich Larsson            | Sweden         |
| Anders Liden              | Sweden         |
| Sara Mejia Lagergren      | Sweden         |
| Torbjörn Messing          | Sweden         |
| Tilda Nilsson Gige        | Sweden         |
| Erik Norbergh             | Sweden         |
| Kajsa Norman              | Sweden         |
| Jonathan Oesterlund       | Sweden         |
| Karin Olofsson            | Sweden         |
| Anna Stenvall             | Sweden         |
| Lisa Westholm             | Sweden         |
| Christina Winroth         | Sweden         |
| Michel Bosshard           | Switzerland    |
| Diane Crittin             | Switzerland    |
| Marianne Gerber           | Switzerland    |
| Kristina Hoffet           | Switzerland    |
| Roman Magri               | Switzerland    |
| Sandro Marcotullio        | Switzerland    |
| Martin Minder             | Switzerland    |
| Raya Schifferle           | Switzerland    |
| Tina Stauffer             | Switzerland    |
| Jeanne Vu Van             | Switzerland    |
| Olgan Bekar               | Türkiye        |
| Yaşar Sari                | Türkiye        |
| Andrew Houlton            | United Kingdom |
| Sohibjon Olimjonov        | Uzbekistan     |
| Iroda Ubaydullaeva        | Uzbekistan     |

**ODIHR EOM Long Term Observers**

|                 |            |
|-----------------|------------|
| Lilit Antonyan  | Armenia    |
| Cornelia Perle  | Austria    |
| Martin Rossmann | Austria    |
| Vafa Fati-zada  | Azerbaijan |

|                                |                    |
|--------------------------------|--------------------|
| Julia Hawlanová                | Czechia            |
| Miroslav Krcmar                | Czechia            |
| Stig Skovbo                    | Denmark            |
| Janne Ahola                    | Finland            |
| Tatiana Khrol-Lappalainen      | Finland            |
| Nadia Yakhlaif-Lallemand       | France             |
| Rodolphe Oberle                | France             |
| Thomas Froehlich               | Germany            |
| Sophie Haring                  | Germany            |
| Rebecca Wagner                 | Germany            |
| Sara Formisano                 | Italy              |
| Francesca Calvi Giancristofaro | Italy              |
| Gandolgor Sainkhoo             | Mongolia           |
| Nicolay Paus                   | Norway             |
| Narve Rio                      | Norway             |
| Arsen Aisin                    | Russian Federation |
| Vadim Mitrofanov               | Russian Federation |
| Nadezhda Obukhova              | Russian Federation |
| Nikolay Vorobiev               | Russian Federation |
| Dejan Dejanovic                | Serbia             |
| Anna Pernilla Berlin           | Sweden             |
| Robert Hall                    | Sweden             |
| Anna Lidstrom                  | Sweden             |
| Laura Merz                     | Switzerland        |
| Simon Schorno                  | Switzerland        |
| Alona Sheshenia                | Ukraine            |

#### ODIHR EOM Core Team

|                          |                 |                        |
|--------------------------|-----------------|------------------------|
| Tamás Meszerics          | Head of Mission | Hungary                |
| Peter Naderer            |                 | Austria                |
| Aliaksandr Chaliadzinski |                 | Belarus                |
| Yelena Kovalyova         |                 | Belarus                |
| Davor Čorluka            |                 | Bosnia and Herzegovina |
| Tarvi Martens            |                 | Estonia                |
| Dimitra Ioannou          |                 | Greece                 |
| Rocco Giovanni Dibiase   |                 | Italy                  |
| Jacopo Leone             |                 | Italy                  |
| Max Bader                |                 | Netherlands            |
| Robert Lech              |                 | Poland                 |
| Ružica Jovanović         |                 | Serbia                 |
| Ivan Godársky            |                 | Slovakia               |
| Andreas Roth             |                 | Sweden                 |
| Farrukh Juraqulov        |                 | Tajikistan             |
| Zeliha Aydin             |                 | Türkiye                |
| Katya Andrusz            |                 | United Kingdom         |

Chris Taylor  
Kyle Bowers  
Meaghan Fitzgerald

United Kingdom  
United States of America  
United States of America

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Monika Zajkova                    Head of Delegation  
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Sebastian Schwaighofer  
Tural Ganjaliev  
Allessia Claes  
Albin Muslic  
Teo Rogic  
Deyan Dechev  
Sandra Krpan  
Nikola Mazar  
Olgica Tolic  
Kyriakos Hadjiyianni  
Jaroslav Chalupsky  
Radek Merkl  
Linhart Zbynek  
Henrik Rejnholt Andersen  
Kim Aas Christensen  
Mati Raidma  
Lassi Vilhelm Junnila  
Valerie Boyer  
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Nikoloz Samkharadze  
Malte Kaufmann  
Stefan Keuter  
Tobias Alexander Winkler  
Eleni Maria Apostolaki  
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Emanuele Loperfido

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Austria  
Austria  
Austria  
Azerbaijan  
Belgium  
Bosnia and Herzegovina  
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Croatia  
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Croatia  
Cyprus  
Czechia  
Czechia  
Czechia  
Denmark  
Denmark  
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Finland  
France  
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|                         |                          |
|-------------------------|--------------------------|
| Federica Onori          | Italy                    |
| Catia Polidori          | Italy                    |
| Giuseppe Trezza         | Italy                    |
| Eugenio Zoffili         | Italy                    |
| Alibek Nautiyev         | Kazakhstan               |
| Claude Gaspard          | Luxembourg               |
| Monique Christiaanse    | Netherlands              |
| Farah Karimi            | Netherlands              |
| Robert Van Gasteren     | Netherlands              |
| Lidija Karakamcheva     | North Macedonia          |
| Mimoza Musa             | North Macedonia          |
| Marius Arion Nilsen     | Norway                   |
| Barbara Bartus          | Poland                   |
| Radosław Fogiel         | Poland                   |
| Kazimierz Kleina        | Poland                   |
| Marcin Mykietynski      | Poland                   |
| Katarzyna Ueberhan      | Poland                   |
| Daria Boyarskaya        | Russian Federation       |
| Anzhelika Ivanischeva   | Russian Federation       |
| Milan Radin             | Serbia                   |
| Artemi Vicent Rallo     | Spain                    |
| Ricardo Tarno           | Spain                    |
| Peder Bjork             | Sweden                   |
| Ulrik Nilsson           | Sweden                   |
| Jessica Roden           | Sweden                   |
| Markus Wahlund Wiechel  | Sweden                   |
| Manuchekhr Salokhudinov | Tajikistan               |
| Selami Altinok          | Türkiye                  |
| Murat Baybatur          | Türkiye                  |
| Halis Dalkilic          | Türkiye                  |
| Ecem Danik Gokce        | Türkiye                  |
| Ozgul Saki              | Türkiye                  |
| Murat Uysal             | Türkiye                  |
| Artem Dubnov            | Ukraine                  |
| Pavlo Frolov            | Ukraine                  |
| Sharon Hodgson          | United Kingdom           |
| Rachel Bauman           | United States of America |
| Janice Helwig           | United States of America |

**Council of Europe Parliamentary Assembly**

|                   |                    |                        |
|-------------------|--------------------|------------------------|
| Georgios Stamatis | Head of Delegation | Greece                 |
| Khagani Guliyev   |                    | Azerbaijan             |
| Manu Diericx      |                    | Belgium                |
| Amila Berkovic    |                    | Bosnia and Herzegovina |
| Ivan Racan        |                    | Croatia                |

|                       |             |
|-----------------------|-------------|
| Eugen Schoenfeld      | Czechia     |
| Carine Roller Kaufman | France      |
| Garret Ahearn         | Ireland     |
| Aurora Floridia       | Italy       |
| Elisabetta Gardini    | Italy       |
| Fabio Pietrella       | Italy       |
| Paul Galles           | Luxembourg  |
| Srdjan Darmanovic     | Montenegro  |
| Wanda Nowicka         | Poland      |
| Bogdan Torcatoriu     | Romania     |
| Gerardo Giovagnoli    | San Marino  |
| Pierre Garrone        | Switzerland |
| Mehmet Akalin         | Türkiye     |

## 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](http://www.osce.org/odihr)).