

INTERIM REPORT
20 August–16 September 2026

18 September 2026

I. EXECUTIVE SUMMARY

- General elections will be held on 4 October at the state, entity and cantonal level. Voters will elect executive and legislative bodies through six distinct contests. The elections are taking place in a polarised political environment marked by divisive reactions to the death of the convicted war criminal Ratko Mladić, and further shaped by the first countrywide use of election information and communication technologies (ICT), raising expectations regarding electoral integrity.
- The electoral legal framework was extensively revised in 2022 and 2024 through amendments imposed by the Office of the High Representative, some of which addressed prior ODIHR recommendations. The election administration welcomed the changes while some political actors noted they lacked broad political consensus. Further amendments submitted by the Central Election Commission (CEC) in 2025 have not been adopted by parliament. Unaddressed ODIHR recommendations pertain to ethnicity- and residency-based restrictions on suffrage rights, misuse of administrative resources, election dispute resolution, campaign finance oversight and dissuasive sanctions.
- The election administration consists of the CEC, 143 Municipal and City Election Commissions (MECs), and 5,200 Polling Stations Committees (PSCs). To date, the CEC has regularly held public, live-streamed sessions, adopted regulations and met most legal deadlines. Technical preparations and the training of election commissions are ongoing, although with notable delays in the introduction of ICT. The formation of PSCs has been delayed in some municipalities, primarily due to insufficient nominations by political parties and withdrawals of applicants. The CEC is undertaking voter education activities on the use of ICT, including some with the support of international actors.
- The countrywide use of biometric voter identification and ballot scanning devices is foreseen for the first time in these elections, subject to an ongoing assessment by the CEC of the implementation of technical conditions and a ‘mock’ exercise. To enable the use of scanners, the CEC, without a legislative amendment, changed the ballot format, replacing candidates’ names with numbers. As of 16 September, a significant proportion of the ICT devices had yet to be delivered by the private vendor, Smartmatic, to the CEC. While the CEC is making considerable effort to ensure the proper introduction of ICT, the significantly compressed timeframe is affecting voter information, and the training and preparedness of the election administration to use the ICT devices.
- Citizens aged at least 18 years old are eligible to vote, except those convicted of serious crimes and those deprived of legal capacity by a court decision. The CEC maintains the Central Voter Register (CVR) and announced that it contains 3.4 million registered voters. The voter lists were available at selected locations for public scrutiny, the CVR is accessible online and electronic copies were shared with contestants upon request. Out-of-country voters could register through an online application. Most ODIHR EOM interlocutors did not raise serious concerns with regard to the inclusiveness of the voter register.
- The rights to vote and to stand for the state and entity presidencies continue to be subject to discriminatory restrictions based on ethnicity and residence, despite European Court of Human

Rights judgements and previous ODIHR recommendations. For the six directly elected institutions, the CEC registered a total of 7,028 candidates, including 2,977 women, nominated by 82 certified political subjects, while 4 candidates are standing independently. Seven parties were fully or partly denied certification for submitting an insufficient number of support signatures while 20 parties were referred by the CEC to the Prosecutor's Office on suspicion of forged signatures.

- Women remain underrepresented, accounting for 21 per cent of members in the state parliament, 33 per cent and 28 per cent in the parliament of the FBiH and RS, respectively. The Council of Ministers is led by a woman, while 23.5 per cent of ministers in the entity governments are women. The law prescribes a 40 per cent gender quota for each candidate list, with specific placement requirements, as well as for CEC and MEC membership.
- The official campaign period began on 4 September and lasts until 3 October. The 2024 amendments imposed a ban on early campaigning, including unpaid posts on social networks, resulting in a high number of complaints and fines on some political actors totalling BAM 300,000. The campaign is visible, with several instances of negative campaigning and divisive rhetoric, and contestants primarily targeting their respective ethnic communities. While the misuse of administrative resources is prohibited, entity, cantonal and municipal authorities have either revised their budgets or allocated previously approved funds to increase salaries, pensions, and provide social benefits and one-time payments during the campaign period.
- Campaign regulations are also applicable to online campaigning. While no state authority is explicitly mandated to oversee the online campaign or communication with big tech platforms, the CEC is competent for enforcing campaign regulations and imposing sanctions on contestants for violations. The ODIHR EOM social media monitoring has identified a polarized online environment with persistent political divisions along ethnic lines. The online discourse is also increasingly shaped by anonymous media websites and social network accounts, clickbait networks and AI-generated content.
- Political parties represented in the state and entity legislatures are entitled to annual public funding, which may be used to finance election campaigns. The law sets limits on donations and expenditures and prohibits certain funding sources. Contestants are required to submit an interim report three days prior to the elections as well a final report within 30 days of the publication of final election results. The CEC is mandated to oversee political party and campaign finance, audit and publish the reports and may impose sanctions for violations.
- While the media environment is formally pluralistic, media outlets are divided along ethnic and political lines. Media freedoms are undermined by political and business interests and pressure on journalists. Broadcast and online media are required by law to provide balanced and impartial election coverage. For the elections, public broadcasters are required to provide free airtime to all contestants, who may also purchase airtime on public and private media. While the Communication Regulatory Agency is mandated to monitor broadcasters' compliance with the legislation, it does not conduct systematic media monitoring and will act only upon complaints.
- The CEC reviews complaints on most campaign violations, while MECs handle those on voter registration and other campaign matters. The CEC received 534 complaints and notifications, including 438 on early campaigning, mainly on social networks, and the misuse of public resources; it reviewed 385 of them and imposed sanctions totaling BAM 438,000 on 26 parties and 20 candidates. The CEC reviewed most complaints in public sessions and published some information about them but not the full decisions. Overall, 88 appeals were filed with the Court of Bosnia and Herzegovina, which has thus far upheld almost all CEC decisions.

- The law provides for election observation of all stages of the electoral process by citizen and international observers, and observers appointed by political subjects. The civil society observer coalition *Pod Lupom* and Transparency International BiH are conducting long-term observation activities, while the former plans also to deploy some 1,000 short-term observers on election day.

II. INTRODUCTION

Following an invitation from the authorities of Bosnia and Herzegovina to observe the 4 October 2026 general elections, and based on the recommendations of a Needs Assessment Mission conducted from 5 to 7 May, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) established an Election Observation Mission (EOM) on 20 August.¹ The mission, led by Tana de Zulueta, consists of a 13-member core team based in Sarajevo and 26 long-term observers (LTOs), deployed on 27 August to 13 locations across the country. Mission members come from 23 OSCE participating States.

III. BACKGROUND AND POLITICAL CONTEXT

Under the Constitution, established by the 1995 General Framework Agreement for Peace, known as the Dayton Peace Agreement (DPA), Bosnia and Herzegovina (BiH) consists of two entities: the Federation of Bosnia and Herzegovina (FBiH) and Republika Srpska (RS).² The Constitution recognises Bosniaks, Croats and Serbs as constituent peoples, while citizens who do not identify with any of these groups may declare themselves as “Others”.³

Following the 2022 general elections, the ‘Trojka’, comprising the Social Democratic Party (SDP), People and Justice (NiP), and Our Party (NS), formed the state-level government together with the Croatian Democratic Union of BiH (HDZ BiH) and the Alliance of Independent Social Democrats (SNSD). In December 2022, the European Union (EU) granted BiH candidate status, followed by the opening of accession negotiations in March 2024; these have since stalled pending the appointment of a chief negotiator and the completion of judicial reform.⁴ In January 2025, the ‘Trojka’ ended its coalition with SNSD, citing unconstitutional actions and obstruction of the adoption of EU-related legislation.⁵ Efforts to establish a new governing majority were unsuccessful, and the Council of Ministers, including SNSD ministers, remained in office. After the conviction of the former RS President Milorad Dodik in June 2025 and the termination of his mandate, an early presidential election was held in November 2025, and partially repeated in February 2026, resulting in the election of the SNSD candidate Siniša Karan.

On 7 May, the Central Election Commission (CEC) called general elections for the 4 October at the state, entity and cantonal levels. The elections are taking place in a polarised political environment, further marked by divisive reactions to the death of Ratko Mladić, who was convicted of war crimes, crimes against humanity and genocide by the International Criminal Tribunal for the former Yugoslavia in 2017. This prompted a number of complaints against RS politicians and candidates over the alleged glorification of a convicted war criminal, which is criminalized under BiH law.⁶ The elections are also

¹ See previous [ODIHR election reports on Bosnia and Herzegovina](#).

² In addition, Brčko District has special status as a self-governing administrative unit under direct state sovereignty.

³ According to the latest Census from 2013, 50.11 per cent of the BiH population identified as Bosniaks, 30.78 per cent as Serbs, 15.43 per cent as Croats, and 3.68 per cent as others or undeclared.

⁴ See [the Conclusions of the European Council](#) on opening accession negotiations and the conditions from 21-22 March 2024 (EUCO 7/24). See also the European Commission’s [Bosnia and Herzegovina Report](#) of 4 November 2025.

⁵ See [Joint statement of Trojka](#) from 23 January 2025. SNSD deputies at the BiH PA abstained from the urgent consideration of the Law on Border Control and the Law on Personal Data, which were adopted with the votes of the Serb Democratic Party (SDS), Party of Democratic Progress (PDP) and For Justice and Order.

⁶ On 28 August, SDP MPs filed a complaint with the BiH Prosecutor’s Office against Milorad Dodik, Staša Kosarac, Nenad Stevandić, and Draško Stanivuković.

shaped by the first countrywide use of election information and communication technologies (ICT), raising expectations regarding electoral integrity.

Women remain underrepresented in elected and governing bodies, accounting for 21 per cent of members of the state parliament, and 33 and 28 per cent of the of the FBiH and RS legislatures, respectively. The Council of Ministers is led by a woman and 23.5 per cent of ministers in the entity governments are women.

IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

General elections are primarily regulated by the BiH Constitution, the 2001 Election Law (last amended in 2024) and the 2012 Law on Financing of Political Parties (last amended in 2016).⁷

The electoral legal framework has been extensively revised since the last general elections through amendments imposed by the Office of the High Representative (OHR). The OHR cited the failure of domestic stakeholders to agree on reform and the stated aim of enhancing electoral integrity.⁸ Some stakeholders, including the CEC, welcomed the changes, while several political leaders noted that these did not enjoy broad political consensus.⁹ While some prior ODIHR recommendations were addressed, several others pertaining to the misuse of administrative resources, the transparency and effectiveness of the election dispute resolution, effective oversight of campaign finance and dissuasive sanctions remain unaddressed. Moreover, the Constitution continues to impose discriminatory ethnicity- and residency-based restrictions on active and passive suffrage rights.¹⁰ In 2025, the CEC submitted additional draft amendments to review its internal organization without needing approval from the Council of Ministers, to determine the ballot design and to randomly select polling stations for control recounts; the initiative was stalled in the BiH House of Peoples (BiH HoP).

Six contests will take place at three levels, with all mandates allocated for four-year terms. At the state level, the electorate will vote for the tripartite presidency and the House of Representatives of the Parliamentary Assembly of Bosnia and Herzegovina (BiH HoR).¹¹ At the entity level, voters in the FBiH will vote for the House of Representatives (FBiH HoR) and ten cantonal assemblies. Voters in RS will vote for the Republika Srpska National Assembly (RS NA), and the president and two vice-presidents of

⁷ The Constitutions and laws of the entities and the Brčko District are also applicable in some aspects of the election process. The legal framework is supplemented by CEC regulations and decisions.

⁸ The DPA created the OHR to oversee the implementation of the civilian aspects of the peace agreement, which was subsequently empowered to ‘make binding decisions’ and ‘take measures against public officials.’ See the [OHR Decision Enacting the Law on Amendments to the Election Law of Bosnia and Herzegovina](#) and the [October 2023 - April 2024 OHR Report on the Implementation of the Peace Agreement to the UN Secretary-General](#).

⁹ The Party of Democratic Action (SDA) strongly criticized the amendments to the 2022 FBiH Constitution. Democratic Front (DF) challenged the 2022 amendments at the European Court of Human Rights (ECtHR), concerning their enactment on election day and alleging their discriminatory effects. In [Democratic Front v. Bosnia and Herzegovina](#), the ECtHR dismissed the complaint for late submission and lack of a victim’s status without examining the merits.

¹⁰ See the ECtHR judgments on [Sejdić and Finci v. Bosnia and Herzegovina](#), [Zornić v. Bosnia and Herzegovina](#) and [Pilav v. Bosnia and Herzegovina](#), [Šlaku v. Bosnia and Herzegovina](#). Only citizens self-declared as Bosniaks, Croats or Serbs may be elected to the state and entity presidencies and the BiH House of Peoples, provided that they reside in the relevant entity. Persons self-declaring as “Others” are ineligible to stand for these offices. Moreover, eligibility to vote for the state presidency is restricted by residence, as voters registered in RS may vote only for a Serb candidate, while those in the FBiH may vote only for a Bosniak or Croat candidate. The eligibility to vote of citizens registered in Brčko District depends on their entity citizenship, which determines whether they vote for FBiH or RS institutions. Pursuant to a Revised Action Plan for the Implementation of the ECtHR Judgements, in July 2025 the Council of Ministers established a 12-member working group tasked with drafting amendments to the Constitution and the election law; to date, no amendments have been adopted. As of June 2026, [the Committee of Ministers’ supervision of the execution of the ECtHR’s judgments](#) remains ongoing.

¹¹ The tripartite presidency is elected by simple majority, with voters from the FBiH electing a Bosniak and a Croat candidate and those from RS electing a Serb candidate. The three members rotate in the presidency every eight months.

RS.¹² Most members of the BiH HoR, FBiH HoR and RS NA are elected through a preferential voting system in multi-member constituencies (MMCs).¹³ After the direct contests, four indirect elections will be held. The ten cantonal assemblies elect the FBiH House of Peoples (FBiH HoP). The FBiH HoR and the RS NA elect the BiH HoP. The FBiH HoP and the FBiH HoR elect the president and vice presidents of the FBiH.

On election day in 2022, the OHR enacted amendments to the FBiH Constitution and the Election Law increasing the number of seats for each of the constituent peoples in the FBiH HoP, prescribing that “Others” also have at least one delegate from each canton and changing the decision-making procedure for the election of the FBiH president and vice presidents.¹⁴ Challenges to these amendments before the BiH Constitutional Court and the European Court of Human Rights were unsuccessful.¹⁵ The boundaries of MMCs have not been reviewed every four years, as required by law, thus maintaining significant deviations in the number of voters per mandate.¹⁶

V. ELECTION ADMINISTRATION

The election administration consists of the CEC, 143 municipal or city election commissions (MECs), as well as some 5,200 polling station committees (PSCs).¹⁷ The CEC is a permanent body composed of seven members appointed for a seven-year term by parliament.¹⁸ MECs are appointed by municipal and city authorities for a seven-year term, following an open selection process, subject to approval by the CEC.¹⁹ Election administration bodies at all levels must meet a 40 per cent gender quota and reflect the ethnic composition of the respective municipality. Two of the seven CEC members and 47 per cent of MEC members, including 37 per cent of MEC chairpersons, are women.

The CEC is mandated to oversee and regulate the electoral process and is supported by a secretariat. Many ODIHR EOM interlocutors, including MECs, opined that the election administration lacks sufficient capacity, particularly for the countrywide use of election ICT, impacting the timeliness of preparations and communication with lower-level election bodies and the electorate. MECs appoint and train PSC members, designate locations for polling stations, and manage technical preparations within their respective municipalities. PSCs, responsible for the conduct of election-day operations, are temporary bodies composed of CEC-appointed non-partisan chairpersons and two or four members

¹² The candidate who receives most votes is elected president, and the top candidates from the two other constituent peoples are elected vice-presidents.

¹³ Additional compensatory seats are allocated to candidates from closed party lists, to ensure the proportional representation of parties and coalitions. Each of the constituent peoples are guaranteed a minimum of four seats both in the FBiH HoR and the RS NA. The BiH HoR is comprised of 42 members: 21 elected from 5 MMCs in the FBiH and 9 from 3 MMCs in RS. Seven and five mandates, respectively, are assigned through a compensatory system. The FBiH HoR is composed of 98 members, with 73 elected from 12 MMCs, and 25 receiving compensatory seats. The RS NA comprises 83 members, with 63 elected from 9 MMCs, and 20 receiving compensatory seats.

¹⁴ In March 2023, the BiH Constitutional Court ruled that the changes are in line with the Constitution of BiH. Three of the six judges issued a dissenting opinion stating that the 2022 OHR intervention after polling stations had closed and before vote counting violated Article I(2) of the Constitution (democratic principles) and Article 3 of Protocol No. 1 to the European Convention of Human Rights. The majority decision was reached with the President's casting vote.

¹⁵ In January 2026, the ECtHR dismissed a complaint on the same matter, on grounds of late submission and lack of victim status without ruling on its merit.

¹⁶ For the BiH HoR, 4 of the 8 MMCs have deviations exceeding the permissible 15 per cent deviation from the average number of registered voters per mandate; for the FBiH HoR, 6 of the 12 MMCs and for the RSNA, 3 of the 9 MMCs.

¹⁷ Including 20 PSCs established for out-of-country voting in 13 countries. Mobile teams in each municipality will be established for homebound voters and those in social, healthcare and detention institutions and facilities for the elderly.

¹⁸ By law, the CEC should include two Bosniaks, two Croats, two Serbs and one representing “Others”. The chairperson is elected from among the members on a rotational basis, reflecting ethnic affiliation, for a 21-month term.

¹⁹ MECs consist of three, five or seven members, depending on the size and number of voters per municipality.

nominated by electoral contestants represented in the state and entity parliaments.²⁰ The appointment of PSC chairpersons and their deputies and the formation of PSCs have not yet been finalized in several municipalities, primarily due to insufficient nominations by political parties and withdrawals of applicants. Some applicants reportedly withdrew because of the increased responsibilities and low remuneration.²¹ This resulted in the postponement of the training programme in the affected locations.

To date, the CEC has issued or updated several regulations, and has held regular public, live-streamed sessions, with recordings available online. However, despite legal requirements, so far sessions have often been convened at short notice and not all decisions have been published in a consistent and timely manner. While the CEC has met most legal deadlines to date, the introduction of ICT necessitated adjustments to instructions, training and educational programmes, as well as election-day materials and procedures, thereby delaying technical and administrative preparations. The number of polling stations has decreased since the last elections, due to a decline in the number of registered voters in some locations and the merging of small and special polling stations with regular ones. Some polling stations were relocated to ensure connectivity of the devices.

The CEC completed the initial training of MECs, trainers and pre-vetted applicants for PSC chairpersons by mid-August and began PSC trainings as well as supplementary trainings to MECs on the use of election ICT and new procedures. As required by law, the CEC developed a voter education plan, which has not been fully implemented to date due to litigation over the procurement process for a service provider. These activities have largely been confined to digital and audiovisual materials published online and broadcast by the media. Several international donors supported the CEC in conducting a field-based voter education campaign focused on election ICT.²² Citizen observers also conducted activities to publicly display and test the ICT devices.

VI. INFORMATION AND COMMUNICATION TECHNOLOGIES

The countrywide use of biometric voter identification and ballot scanning devices is foreseen for the first time in these elections. The use of these ICT devices follows an OHR-imposed legislative amendment and is subject to an ongoing assessment of the fulfillment of technical requirements, which include a feasibility study, procurement of equipment, pilot projects, testing and other activities necessary to ensure the ICT integrity and functionality.²³ The assessment, expected to be finalized shortly before election day, includes among its final steps a ‘mock’ exercise held on 11 September to simulate voting and counting with the devices in 129 municipalities. The CEC announced that the biometric devices had functioned well and that the transmission of results was secure, while the MECs had not yet submitted the legally required reports on the exercise.²⁴ In the ‘mock’ exercises observed, the biometric identification functioned well overall; however the ODIHR EOM noted a number of challenges, in

²⁰ All PSC members have deputies who assume duties in their absence or participate in some of the work of PSCs in addition to the regular members. By law, the CEC compiles and maintains a pool of candidates for PSC chairpersons and deputies, in consultation with MECs, following a public selection procedure. MECs appoint PSC members through a lottery from among nominees of political parties and fill vacant positions from among applicants on reserve lists compiled following public calls.

²¹ For example, in municipalities of Banja Luka, Bosanski Petrovac, Bugojno, Čelić, Čelinac, Doboju Jug, Glamoč, Gradačac, Gradiška, Jajce, Kalesija, Ključ, Kozarska Dubica, Krupa na Uni, Maglaj, Novi Grad, Oštra Luka, Prnjavor, Srbac, Srebrenik, and Velika Kladuša.

²² ODIHR EOM Long Term Observers (LTOs) observed public demonstrations of voting in 31 locations and reported some instances of malfunctioning, moderate attendance, and mixed reactions, with concerns about the ballot design, particularly among older voters.

²³ The CEC decision must be taken after consultations with the Agency for Identification Documents, Registers and Data Exchange (IDDEEA) and the Agency for Personal Data Protection, but the law does not regulate the procedure, content and timeline of the consultations and for adopting the decision.

²⁴ ‘Mock’ elections were planned in all 143 municipalities, but 14 were not able to conduct them, due to lack of ballots. Only 6,854 voters participated. See the [CEC](#) announcement.

particular with the timely delivery of election materials, voters' understanding of the new procedures and the functioning of some equipment.²⁵

The countrywide use of ICT builds on pilot projects conducted in 2024, although these involved different types of ICT devices.²⁶ Following the pilots, the CEC determined that 6,000 ballot scanners and 6,000 biometric voter identification devices would be necessary for the 2026 elections, requiring a budget of BAM 112.5 million.²⁷ However, due to a lack of consensus among political parties and state institutions on their introduction, procurement funds were secured only following OHR intervention.²⁸

The CEC is fully dependent on a private vendor for the development, deployment, operationalization and implementation of the new ICT devices. Smartmatic was selected to provide the required services and equipment;²⁹ however, the contract award was marred by public controversy and litigation; which, combined with funding delays, significantly compressed the timeline for implementation.³⁰ One appeal is still pending before the BiH Court.³¹ Subsequently, three additional vendors were selected to verify and match the voter-signature databases and developing a CEC-IDDEEA data exchange module, and another company to audit the election ICT equipment and software.³² As per contract, on 3 August, Smartmatic delivered the first 150 of the 6,000 ballot scanners, as well as voter identification devices to the CEC. However, as of 16 September, a significant portion of the necessary ICT devices had not yet been delivered; the CEC informed the ODIHR EOM that this was placing a strain on their capacity to configure and test the equipment.³³

To ensure effective ICT implementation, the CEC established a dedicated Unit, and 11 project teams.³⁴ Additionally a 20-member inter-institutional Co-ordination Team was formed, although the CEC has informed the ODIHR EOM that most institutions had not participated actively or had obstructed the project, with the exception of IDDEEA.³⁵ The CEC is currently working with Smartmatic on the configuration of the ICT devices and plans to appoint one operator per polling station responsible for the

²⁵ ODIHR EOM LTOs observed testing in 26 instances across 24 MECs, reporting challenges related to delayed delivery or lack of ballots and other election materials, malfunctioning of devices, capacity of the polling staff to operate the devices, useability of the new ballot format, and vote secrecy issues.

²⁶ Four pilot projects (three funded by the international community and one by the CEC) tested several ICT components for voter identification and authentication and electronic results transmission.

²⁷ See the [Final Report and Feasibility Study](#), endorsed by the BiH HoR on 15 April 2025, which concluded, *inter alia*, that the ICT has improved the electoral process and recommended further implementation dependent on fulfillment of certain conditions, including securing funds by April 2025. BAM 1 equals EUR 0.51.

²⁸ The funds became operational only on 21 August 2025. On 22 August 2025, the CEC [reiterated](#) the need for respecting the deadline for the timely securing of financial resources.

²⁹ The four-year framework contract of BAM 74.5 million (approximately EUR 38.1 million) includes production, delivery, installation, configuration, storage and training, as well as printing and distribution of ballots for both the 2026 and 2028 elections.

³⁰ In October 2025, six complaints were lodged against the tender documentation; the CEC partially upheld them and revised the overall estimated procurement value. The bidders Planet Soft, Artco Group and Provis filed three complaints with the Procurement Review Body (PRB) against the CEC decision awarding the tender to Smartmatic. On 16 April 2026, the PRB rejected all complaints. One CEC member voted against the CEC decision and [noted](#) in a dissenting opinion that the evaluation report was altered multiple times and under pressure, unfairly disqualifying the offer by Planet Soft, although cheaper by BAM 17 million. The contract with Smartmatic was signed on 18 May, after the call of elections.

³¹ The complaint was lodged by Planet Soft on 28 May.

³² The consortium of iBusiness, Etrix and Artco Group was awarded two contracts for signature matching and the CEC-IDDEEA interface of BAM 769,200 and BAM 73,000, respectively. Pro V&V was awarded a contract for auditing the ICT configuration for BAM 661,050, which was signed on 16 September.

³³ As of 16 September, the CEC informed the ODIHR EOM that it received a total of 3,500 voter identification devices and 2,680 ballot scanners. The remaining equipment is expected to arrive by 29 September.

³⁴ The project teams were responsible for finance, ballot design, information and training, IT support, procurement, human resources, the legal framework, software, storage, transport and customs, and cooperation with IDDEEA.

³⁵ The Team was composed of representatives from several ministries and state agencies and the three telecom operators.

installation and handling of the devices. While the recruitment is ongoing, ODIHR EOM interlocutors noted there is limited interest in these positions. In addition, Smartmatic will provide over 1,000 technical support personnel to assist on election day.

To enable the use of ballot scanners, the CEC, without a legal amendment, introduced a smaller ballot format, replacing candidate names with numbers.³⁶ A booklet containing candidates' names and numbers will be available in each voting booth. Scanner-generated preliminary results will be transferred automatically to the CEC and the PSCs are also required to do a manual count of the ballots, the results of which are entered into the PCSs protocol and subsequently in the results management platform.³⁷ The law prescribes criteria for mandatory recounts in case of discrepancies between the numbers of voters and ballots but not for discrepancies between the electronic and the manual count. In such cases, recounts remain at the discretion of the CEC.³⁸

While most ODIHR EOM interlocutors welcomed the use of ICT, some others raised concerns about procurement transparency, vendor dependence, significant delays in the implementation, complexity of the ballots and the voting process, and biometric data protection. Several electoral contestants remain opposed to the introduction and use of election ICT, further contributing to some of these concerns.³⁹

VII. VOTER REGISTRATION

Citizens aged 18 or older on election day have the right to vote, except persons deprived of legal capacity by a court decision, including on the grounds of intellectual or psychosocial disabilities, and those serving prison sentences for, or indicted for, serious crimes, including war crimes and crimes against humanity.⁴⁰ Eligibility to vote for the state presidency is restricted by residence (see *Legal Framework*).

The CEC maintains the permanent central voter register (CVR) through a system of passive and continuous voter registration, with data drawn from the registers of residence and identification documents and other relevant public databases.⁴¹ Citizens temporarily residing abroad must actively register through an online application to vote by post or at diplomatic representations or they may vote in the country according to their last registered place of residence. By the 21 July deadline, the CEC had received 60,063 applications from voters abroad, out of which 48,078 complied with the legal requirements.⁴² Voters not found in the CVR who can prove valid residence may register and vote by a

³⁶ In October 2025, the CEC submitted an [initiative](#) and [draft amendments](#) to the Election Law to the BiH National Assembly (see *Legal Framework*).

³⁷ The MECs will network approximately 350 computers countrywide and appoint some 1,400 data entry clerks, who must undergo mandatory training. An additional 1,000 controllers will be appointed to ensure data accuracy.

³⁸ By law, mandatory recounts in the CEC Main Counting Center are triggered only by discrepancies higher than two per cent between the number of voters who voted and the number of ballots in the ballot box.

³⁹ Following several public statements by [SNSD](#) and [United Srpska party](#) (US) opposing the use of the ICT, the CEC issued three sanctions for spreading “false information by way of media that could compromise the integrity of the election process and misinform the voters”.

⁴⁰ See Articles 12 and 29 of the 2006 [Convention on the Rights of Persons with Disabilities](#) (CRPD). Paragraph 9.4 of the 2013 CRPD [Committee's Communication No. 4/2011](#) states that “an exclusion of the right to vote on the basis of a perceived or actual psychosocial or intellectual disability, including a restriction pursuant to an individualized assessment, constitutes discrimination on the basis of disability, within the meaning of article 2 of the Convention”.

⁴¹ Voters with internally displaced status can choose before each election whether to vote based on their registered permanent residence in accordance with the 1991 population census or their current residence. Those choosing their former permanent residence can vote at designated absentee polling stations.

⁴² The CEC rejected 5,548 applications, mostly due to incomplete or incorrect data. Upon appeal, four of these were subsequently accepted. Of those registered, 45,457 voters opted to vote by post and 2,621 at diplomatic representations. Many initial applicants did not complete their registration process.

‘tendered’ ballot. Special voter lists are compiled for voters who requested mobile ballot box or absentee voting.⁴³

Voters can verify their data in the CVR and request corrections via the CEC website or in person at municipal registration centers. From 6 June to 6 July, the preliminary voter lists were available for public scrutiny at selected locations and the law further provides for the preliminary voter register to be published online. Upon request to the CEC and as provided by law, an electronic copy of the register for the contested constituency was shared with 18 electoral contestants for verification. While most ODIHR EOM interlocutors did not raise significant concerns regarding the inclusiveness of the CVR, some noted the continued presence of deceased voters and voters *de facto* residing abroad.⁴⁴ In this regard, most interlocutors welcomed the introduction of biometric voter identification to prevent voter impersonation. The final voter register, closed on 20 August, contains 3,408,517 voters.⁴⁵

VII. CANDIDATE REGISTRATION

All eligible voters may stand as candidates, except in elections for the state and entity presidencies, for which discriminatory ethnicity- and residence-based requirements apply (see *Legal Framework*). The law disqualifies persons convicted of or indicted before an international or domestic court for genocide, crimes against humanity or war crimes, as well as public officials who are removed from office for defying OHR’s decisions.⁴⁶ Candidates may be nominated by political parties, coalitions or run as independent, and may stand in only one constituency at any level of authority and on one candidate list.⁴⁷

Candidate registration took place in several stages. From 7 to 22 May, political parties and prospective independent candidates could apply to the CEC for certification by submitting the legally required documents;⁴⁸ voters’ support signatures;⁴⁹ submitting a financial report;⁵⁰ and paying a certification fee.⁵¹ Voters may sign in support of only one party or independent candidate per contest. Applications were submitted electronically, enabling verification of support signatures and compliance with the gender quota. Applicants had two days to remedy deficiencies and omissions.⁵² The CEC certified 75 of the 77

⁴³ Voting with mobile ballot box is available for homebound voters, including due to disability, and those in in-patient, institutional care, retirement or detention facilities.

⁴⁴ According to the CEC, 827 voters known to have deceased are still on the preliminary voter register.

⁴⁵ Of the total number, 2,143,439 voters are registered to vote for FBiH institutions and 1,265,078 for RS institutions.

⁴⁶ In 2023, the OHR introduced article 203a to the Criminal Code prescribing imprisonment, removal from public office and ineligibility for candidacy for defying OHR decisions. On 26 February 2025, the former RS President Mr. Dodik was sentenced to one year of imprisonment and a six-year ban on holding public office.

⁴⁷ Some categories of state officials and civil servants, including magistrates, ombudspersons, notaries, police, military, diplomats, may only stand as candidates if they resign or step down temporarily.

⁴⁸ These include confirmations of party registration, of no unpaid fines imposed by the CEC, and that no party officials have been convicted or indicted for serious violations of international humanitarian law; statement of adherence to the DPA; financial reports for the previous three months; the campaign bank account number and statement on transactions made since its opening; and designation of an authorized representative.

⁴⁹ By law, 5,000 signatures are required for the state-level institutions; 3,000 for the entity-level institutions; and 1,000 or 500 at the cantonal level, depending on the number of registered voters in the relevant constituency. Except in presidential elections, political subjects are exempt from the signature requirement, if they hold at least one mandate at the same or higher-level elected body for which the candidacy is submitted.

⁵⁰ On 9 April, the CEC decided to bar 40 political parties from standing in the general elections due to failure to submit the 2023 annual financial report.

⁵¹ Parties were required to pay BAM 30,000 for state-level elections, BAM 20,000 for entity-level elections and BAM 15,000 for cantonal elections, while the amounts due were half for independent candidates. The fees are refundable to political subjects that receive at least 3 per cent of the vote in a parliamentary or cantonal race or who win the presidential or vice-presidential contests or receive one-third of the votes of the winning candidate.

⁵² The CEC identified deficiencies in ten applications, including insufficient support signatures, unpaid fines and certification fees. Of these ten parties, one was rejected, three were registered only partially, and six were invited to rectify deficiencies. Following the rectification, three parties were fully registered, two only for the contests whose requirements they met, and one was rejected.

applicant parties and all 4 independent candidates, and subsequently 29 coalitions.⁵³ Two parties were denied for insufficient support signatures, while five others qualified only for lower-level elections. The CEC referred 20 political parties to the Prosecutor on suspicion of forged signatures.

Certified parties and coalitions could submit their candidate lists by 6 July. For the six direct elections, the CEC registered 560 lists submitted by 82 political subjects comprising 7,028 candidates, including 2,977 women, while three lists were not registered.⁵⁴ In addition, 64 candidate lists submitted by 36 political subjects were certified for compensatory mandates, with 773 candidates drawn from the regular certified lists for the respective parliamentary elections. ODIHR EOM interlocutors did not raise concerns regarding the candidate registration process. By law, the CEC may deregister election contestants and individual candidates for any violation of the law.

The law mandates a 40 per cent gender quota with a progressive placement requirement.⁵⁵ Only two of the 11 candidates for the BiH presidency are women, nominated by SNSD and HDZ BiH, while NS is led by a woman who is a candidate for the BiH HoR. Women head only 18 of the 110 candidate lists for the BiH HoR (16.4 per cent), and comprise 17.2 per cent of candidates in winning positions on FBiH HoR lists, 9.4 per cent on RS NA lists and 19 per cent on cantonal lists.

VIII. CAMPAIGN ENVIRONMENT

The official campaign period commenced on 4 September and ends one day before election day. The 2024 legal amendments prohibited campaigning between the calling of the elections and the start of the official campaign period, including unpaid political content in the media and on social networks.⁵⁶ Citizen observers and parties filed over 430 complaints on these grounds, for which the CEC imposed fines totaling BAM 383,000.⁵⁷ Some ODIHR EOM interlocutors raised concerns about what they perceived as an undue impact of the ban on regular political activity and its inconsistent implementation.

Overall, the campaign is visible, with political parties relying on rallies and meetings, as well as printed materials, videos and programmes in the media and on social networks. Several instances of negative campaigning and the use of divisive rhetoric by candidates were noted.⁵⁸ Contestants oriented their campaigns primarily toward their respective ethnic communities, combining identity-based appeals with

⁵³ Thirteen political parties and seven independent candidates did not complete the application process.

⁵⁴ All three lists submitted by the Republicans of BiH were declined, one for failure to submit the application in hard copy alongside the electronic version, and two for failure to remedy deficiencies. Initially, the CEC identified deficiencies in 43 candidate lists submitted by 18 political subjects, mainly concerning candidates' withdrawals, failure to submit documents, or candidates appearing on multiple lists.

⁵⁵ Candidates of the less represented gender must occupy at least one out of the first two positions on the list, two out of the first five positions, and three out of the first eight positions.

⁵⁶ For instance, an SDS BiH presidential candidate was fined for a [Facebook post](#) referring to an opposition meeting and pledging change, the HDZ 1990 chairperson for a [Facebook post](#) confirming the party's participation in contesting elections and thanking supporters, *Volja Naroda Srpske* for a post about political activities ahead of the campaign, an independent candidate for the BiH presidency for a post calling for people to join a political movement.

⁵⁷ Fines totaling BAM284,500 were imposed on political parties and coalitions and BAM 98,500 on candidates. The highest fines included BAM 91,000 for SNSD, BAM 29,000 for SDP, BAM 48,000 for the Coalition PSS/PDP, BAM 14,000 for SDA and for independent candidate Zdenko Lučić, and BAM 10,000 for the Croatian Republican Party.

⁵⁸ For instance, the SDA presidential candidate's opening rally speech, posted on the party's [Facebook page](#), noted that "foreigners have experimented and humiliated Bosnia and the Bosniaks". United Srpska (US) chairperson and candidate [posted](#): "the Serbophobes have really gone on the rampage... if they don't back off, and they dare to attack us, they won't even have time to surrender because they'll get a bullet in the head." In an [interview](#), independent candidate Zdenko Lučić attacked his opponents on ethnic grounds. BiH Minister of Defence, in his [Facebook post](#), called on the international community to "withdraw its signature from the creation of this genocidal entity."

entity-focused policy messages.⁵⁹ Political parties are required to promote candidates of both genders equally in campaign activities. At the 26 rallies observed by ODIHR EOM LTOs, women candidates accounted for only 27 per cent of speakers.

During the official campaign period, the law prohibits the misuse of public resources for campaign purposes, including the use of public employees, publicly funded events, as well as one-time payments unless provided for in regular budgets. The ODIHR EOM noted that entity, cantonal and municipal authorities either introduced supplementary measures to their initial budgets after the calling of the elections or allocated previously approved budgetary funds to increase salaries, pensions and provide social benefits and one-time payments during the campaign period.⁶⁰ Some ODIHR EOM interlocutors alleged pressure on public- and private- sector employees to direct their voting choices.

Internet penetration is high in BiH, with most users accessing news and social networks.⁶¹ So far, most contestants have campaigned on social networks, including through paid advertising, with Facebook being the most widely used, followed by Instagram, and increasingly TikTok. The Election Law extends campaign regulations to activities on social networking platforms, including bans on early campaigning, “hate speech”, and spreading disinformation. However, there is no comprehensive national framework to safeguard information integrity in the digital environment, including throughout the electoral period.

While no institution is specifically mandated to monitor the online campaign, the CEC is competent to enforce campaign regulations and has imposed sanctions on contestants for some violations, including “hate speech” and early campaigning on social networks. While the terms and conditions of big tech companies are applicable in BiH, including pertaining to political content, no state authority is mandated to handle communication with platforms, including on take down orders.⁶² According to the CEC there has not been any co-operation with platforms related to these elections to date. TikTok is reportedly preparing an in-app election center and Meta will operate a voter information unit one week prior to the election day.⁶³

The online information environment is polarized, with persistent political divisions along ethnic lines.⁶⁴ To date, the most prominent narrative on the pages of political parties and candidates has revolved around

⁵⁹ SDA and NiP emphasized strengthening the BiH statehood. SDP and NS stressed a functioning state and social protection. HDZ BiH and Croatian Five emphasized improved political representation for Croats. SNSD focused on protecting the RS, while the opposition, Coalition PSS/PDP stressed patriotism and political change. Parties also differed in their approaches to social policy, anti-corruption, good governance, economic development and investment, while EU and NATO integration featured primarily in the campaigns of FBiH parties.

⁶⁰ For instance, on 17 June, [the RSNA adopted](#) a BAM 1.116 billion budget rebalance to increase 56,000 public employees’ salaries by 5 per cent, one-time payments of BAM 80-120 to all pensioners, and a monthly childcare subsidy of BAM 200. On 7 August, [Canton 10](#), on 28 July [Central Bosnia](#), and on 25 August [Zenica-Doboj](#) increased their budgets by BAM 25.598 million, BAM 20.84 million and BAM 163.2 million, respectively, to finance wage increases for public employees. On 20 July, [Banja-Luka city](#) allocated a total of BAM 189,800 (BAM 100 to each child entering first grade). Overall, the CEC received 16 complaints on misuse of public resources, with no decisions to date.

⁶¹ See [Use of Information and Communication Technologies in Bosnia and Herzegovina](#), Agency for Statistics of BiH, 2025; only 22 per cent of internet users use AI tools, with 59 per cent of non-users not knowing these tools existed.

⁶² [Meta](#) prohibits “misrepresentations about the dates, locations, times and qualifications for casting a ballot.” [YouTube](#) prohibits content that “encourage(s) others to interfere with democratic processes, including obstructing or interrupting voting procedure as well as misleading voters and other voter suppression tactics.” [TikTok](#) prohibits “content that could mislead voters or cause real-world harm, including misinformation that could prevent people from voting, interfere with elections, or encourage the unlawful disruption of results.”

⁶³ Google did not inform about any measures to safeguard information integrity or pertaining to voter education. Meta will redirect users to the CEC website through a banner at their feed.

⁶⁴ The most viewed posts on official political pages totaled 6.7 million views in the period 4–6 September, with most views coming from SDA’s messaging on the endangered status of Bosniaks, totaling 1.4 million views, and 1.3 million views on SNSD’s calls to defend and preserve the RS.

sharply conflicting interpretations of the wartime past, generating some 15 million views.⁶⁵ The online discourse is also increasingly shaped by anonymous alternative media websites and social network accounts, clickbait networks and AI-generated content.⁶⁶ The ODIHR EOM has started monitoring the online activities of political parties contesting the elections and other officials, noting in particular the tone and content of their messages.⁶⁷

IX. CAMPAIGN FINANCE

Campaign finance is primarily regulated by the Law on Financing of Political Parties and the Election Law.⁶⁸ The 2024 amendments required contestants to report their cash donations and payments as well as online expenditures, and increased sanctions for exceeding the expenditure limits.⁶⁹

Political parties represented in the state and entity parliaments are entitled to public funding from the corresponding state and entity budgets, which may also be used for campaigning.⁷⁰ The law provides for the private financing of campaigns and sets donation limits for individuals and legal entities while prohibiting donations from foreign and anonymous sources, and religious organizations. Despite legal prohibitions, several ODIHR EOM interlocutors raised concerns about the funding of parties and election campaigns from publicly funded sources, including holders of public contracts with executive institutions. Third-party campaigning and spending are not regulated. Campaign expenditures are capped at BAM 0.30 per registered voter per election contest.⁷¹ The CEC informed the ODIHR EOM that all contestants had opened dedicated bank accounts for campaign incomes and expenditures, as required by law.

The CEC is mandated to oversee campaign finance; it has investigative powers and may impose sanctions, varying from fines to the deregistration of a contestant. Notwithstanding, several ODIHR EOM interlocutors raised concerns about the effectiveness of oversight.⁷² As required by law, all contestants submitted their initial financial declarations at the time of registration but these were not published, as there is no legal requirement for publication. Contestants are also required to submit interim reports three days before election day, which the CEC plans to publish upon their receipt. Final financial reports are due within 30 days of the publication of final election results; the CEC is required to audit and publish them after sharing the audit reports with the contestants but there is no deadline for completing the audit.⁷³

⁶⁵ Narratives were identified using BERTopic modelling, based on multilingual sentence embeddings and clustering of the monitored posts. The divisive wartime narrative on political pages accounted for 31 posts, with a peak of 1.1 million views registered on 27 August.

⁶⁶ The ODIHR EOM monitored 400 co-ordinated clickbait pages on Facebook, from which 78,653 posts were analysed with a Python based pipeline using semantic clustering and linguistic analysis. Approximately 40 per cent of narratives had characteristics consistent with AI slop (high volume of AI-generated repetitive, low-quality content). Less than 7 per cent of the monitored content was political. See also the [Press and Online Media Council in BiH report](#) that identified 488 registered media web portals, of which 40 per cent offer complete information of their ownership, 43 per cent incomplete information, and 17 per cent no information at all.

⁶⁷ To date, the ODIHR EOM has been monitoring 58 candidates, 33 political parties, 24 influencers, 20 unofficial pages supporting political parties, and 61 anonymous media pages on Facebook with at least 10,000 followers. All the accounts were selected based on a representative sample of all three constituent peoples.

⁶⁸ Laws on political parties of RS and the Brčko District and relevant CEC regulations are also applicable.

⁶⁹ Between BAM 3,000 and 30,000 (around EUR 1,534 to 15,337).

⁷⁰ In 2025, the OHR suspended the public funding of SNSD and US. In response, the RS NA abolished public funding of parties from the RS budget, which was declared unconstitutional by the BiH Constitutional Court.

⁷¹ For the RS NA and the BiH HoR elected from the RS, the limit is BAM 379,523; for the FBiH HoR-BAM 703,046; for the BiH HoR elected from the FBiH and for candidates for the Presidency from the FBiH -BAM 643,031; for the member of the Presidency elected from the RS-BAM 379,523.40. EUR 1 is approximately BAM 1.95583.

⁷² The CEC Audit Department has six employees; it has informed the ODIHR EOM that it has a rulebook for auditing; it uses the Meta and Google Ad Libraries but it has no methodology for monitoring online expenditure.

⁷³ The CEC informed the ODIHR EOM that it is currently auditing the 2023 financial reports.

X. MEDIA

While the media environment is formally pluralistic, media outlets are divided along ethnic and political lines. The limited advertising market, the absence of an established audience measurement system and opaque media ownership, among other aspects, leave media vulnerable to political and business interests, undermining their ability to provide impartial coverage of political and social affairs. Since the last general elections, several restrictive legislative initiatives, combined with a reported increase in physical attacks, verbal threats and lawsuits targeting journalists, have affected the legal and operating environment for media professionals.⁷⁴

The public broadcasting service is provided by the Radio and Television of Bosnia and Herzegovina (BHRT) at the state level, as well as the Radio Television of the Federation of Bosnia and Herzegovina (RTVFBiH) and Radio Television of Republika Srpska (RTRS) at the entity level. BHRT and RTRS have long-standing legal disputes concerning mutual debts, which have resulted in the temporary freezing of the bank accounts of both broadcasters after the calling of the elections. On 7 September, the state-owned cable provider *BH Telekom* and the private *Telemach* stopped broadcasting of RTRS in FBiH as well as the private channels ATV and BN while they were airing live coverage of the funeral of Ratko Mladić in Belgrade. The signal continued uninterrupted in the cable packages of operators in the RS.⁷⁵

Election-related media coverage is regulated by the Election Law, complemented by the 2024 CEC regulation.⁷⁶ Broadcast and online media which cover the campaign are required to observe the principles of balance, equal access, fairness and impartiality, in particular in news and other political programmes. The state public broadcaster must grant at least three minutes of free airtime to each contestant in the state-level elections, while entity public broadcasters have the same obligation for contestants in the respective entity-level elections, in all cases during timeslots with the highest viewership. Contestants may also purchase a maximum of 30 and 60 minutes of paid airtime per week in the public and private media, respectively. As of 8 September, the state public TV channel BHT-1 planned to host a series of debates, five for contestants in the state parliament and three for the presidency contestants. FBiH-based FTV had started airing its eight scheduled debates and other broadcasters, including RTRS, had also announced their intention to air debates.

The Communication Regulatory Agency (CRA) is mandated to oversee the compliance of broadcasters with legal requirements, and apply sanctions. Despite previous ODIHR recommendations, the CRA is not conducting systematic media monitoring, citing insufficient resources, while it acts only upon

⁷⁴ In RS, the re-criminalization of defamation and libel in 2023 was followed by the brief implementation of a law on transparency of non-profit organizations, including media outlets, which contributed to the stigmatization of alleged “foreign influence” beyond the law’s short period of application; it was annulled by the BiH Constitutional Court in May 2025. See also the *Media Centar* [monitoring report](#) for more details on recent restrictive legal initiatives. According to the journalist association *BH Novinari*, there are 37 active lawsuits against media and journalists. Its Database *SafeJournalists Network* reported 172 media-related incidents between 2021–2025, with additional 18 in 2026. On 7 September, a number of civil society organizations called on media outlets to ensure that media freedoms and the safety of journalists are a focus of the election campaign. By 16 September there were 60 signatories.

⁷⁵ See the OSCE RFoM and OSCE Mission [statement](#) expressing concern for live transmission of a commemoration at which speakers repeatedly glorified Ratko Mladić. See also RTRS [statement](#) expressing concern over the signal cutoff for a public broadcaster fulfilling its information mandate. On 8 September, the Association of Genocide Victims and Witnesses and the “Movement of Mothers of the Srebrenica and Žepa Enclaves” filed formal complaints to the CRA, and the Prosecutor’s Office of BiH, against RTRS for its coverage of Ratko Mladić’s death, memorial, and funeral. The complaint alleges RTRS systematically omitted his final genocide conviction, used affirmative terminology about him and aired statements relativizing the Srebrenica genocide without editorial distancing.

⁷⁶ The 2024 Election Law amendments among others extend transparency obligations to reveal ownership details also to online media and give the right to broadcasters to refuse to air advertisements that are discriminatory on a broad range of grounds or that incite hatred.

complaints. Since the calling of the elections, the CRA has received 13 complaints for early campaigning, referred by the CEC, and 1 related to campaign coverage violations.⁷⁷ Complaints related to print and online media fall under the mandate of the Press and Online Media Council, a self-regulatory body that issues non-binding decisions. It received four election-related complaints before the start of the campaign.⁷⁸

On 31 August, the ODIHR EOM commenced qualitative and quantitative media monitoring of seven television channels, five online media outlets, and two newspapers.⁷⁹

XI. ELECTION DISPUTE RESOLUTION

The CEC reviews complaints on certain campaign violations, including “hate speech” and the misuse of administrative resources, violations of media rules by political subjects, as well as appeals against MEC decisions, while the MECs handle complaints on voter registration and other campaign matters. Legal standing is limited to voters and contestants whose rights are affected. However, the CEC may initiate *ex-officio* proceedings, including upon receiving information from citizen observers. In line with a prior ODIHR recommendation, the 2024 amendments extended the deadlines for filing complaints with election commissions from 48 to 72 hours. Appeals against CEC decisions are adjudicated by the Appellate Division of the BiH Court, but not all decisions are subject to judicial review.⁸⁰ Several ODIHR EOM interlocutors expressed low trust in the judiciary while they also noted that the CEC often cannot act upon the high number of notifications in a timely manner.

The CEC publishes basic information on the complaints received and sanctions imposed, but not full decisions. Since the calling of the elections, the CEC has received 534 complaints and notifications, including 438 on early campaigning. The CEC reviewed 385 of them and imposed fines totalling BAM 438,000, including for unpaid posts on social networks accounts.⁸¹ The CEC also fined three parties for disinformation for posts that were critical of the CEC and the use of election ICT.⁸² Most complaints were reviewed by the CEC in public sessions. Overall, 88 appeals were filed with the BiH Court, which has thus far upheld almost all CEC decisions on early campaigning and disinformation. Despite previous ODIHR recommendations, the BiH Court’s sessions are not open to the public, and most decisions are not publicly available.

⁷⁷ The CRA returned all 13 complaints on early campaigning citing a lack of legal basis and as falling under CEC mandate.

⁷⁸ The Council’s mandate is primarily to settle disputes through mediation between a complainant and the media outlet. The Council adopts formal decisions only in case of failure to reach an agreement.

⁷⁹ The ODIHR EOM monitors three public TV channels, *BHT-1* (state), *FTV* (FBiH) and *RTRS* (RS), and four private channels (*ATV*, *BN*, *Hayat*, and *NI*). The ODIHR EOM also monitors the websites *Avaz.ba*, *Klix.ba*, *Nezavisne.com*, *Oslobodjenje.ba* and *Radiosarajevo.ba*, as well as the daily newspapers *Glas Srpske*, and *Večernji List*. TV channels are monitored during their prime-time programming (18:00–24:00). For online media and newspapers, their daily political and election-related sections are monitored.

⁸⁰ The 2024 amendments, excluded the nomination or the MEC decisions on appointment of chairs and deputy chairs of polling stations from the judicial review.

⁸¹ Including 19 (out of 29 received) on misuse of administrative resources, 9 (out of 13) on nominations of PSC presidents and deputy presidents, and 11 (out of 14) on abuse of children in campaign. The 2024 amendments prescribed sanctions for early campaigning ranging from BAM 3,000 to 30,000.

⁸² The CEC does not have a clear methodology for distinguishing false information from legitimate criticism of the electoral process. The CEC cited the feasibility study as its basis for considering criticism of the reliability of the ICT as disinformation, without demonstrating why the statements in question were false or went beyond legitimate criticism. Judicial review did not address this or provide clearer criteria for distinguishing disinformation from legitimate criticism.

XII. ELECTION OBSERVATION

The legislation provides for observation by citizen and international organizations, as well as by observers appointed by electoral contestants, both in the country and abroad. International and citizen observers are accredited by the CEC, while electoral contestants can request accreditation either from the CEC to observe its work or from the respective MECs where they intend to observe.

Some civil society organizations, including the Coalition for Free and Fair Elections *Pod Lupom* and Transparency International BiH, have launched long-term observation activities, issued pre-electoral reports on their findings, and filed multiple initiatives with the CEC calling for investigations into campaign irregularities. *Pod Lupom* plans to deploy some 1,000 observers on election day and conduct a sample-based parallel vote tabulation.

XIII. ODIHR EOM ACTIVITIES

The ODIHR EOM opened in Sarajevo on 20 August. The ODIHR EOM has established regular contacts with the CEC, the Ministry of Foreign Affairs and other high-level state officials, candidates and other representatives of political parties and movements, the media, civil society, and members of the diplomatic and international community. The OSCE Parliamentary Assembly (OSCE PA), the Parliamentary Assembly of the Council of Europe (PACE), the European Parliament and the NATO Parliamentary Assembly have announced their intention to deploy an observer delegation and form an International Election Observation Mission (IEOM) for election day, together with the ODIHR EOM.

***The English version of this report is the only official document.
Unofficial translations are available in Bosnian, Croatian and Serbian.***