

INTERNATIONAL ELECTION OBSERVATION MISSION Bosnia and Herzegovina – General Elections, 4 October 2026

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

PRELIMINARY CONCLUSIONS

In the 4 October general elections there was genuine competition and contestants were largely able to reach voters. The political landscape is deeply fragmented, characterised by conflicting narratives still rooted in wartime divisions. The first-time countrywide use of information and communication technologies (ICT) was introduced to address longstanding electoral integrity concerns, although delays and shortfalls limited transparency in the implementation stage. The election administration made considerable efforts, but persistent institutional and operational constraints, combined with its increased responsibilities, affected the efficiency and timeliness of its work. Suffrage rights continue to be subject to discriminatory restrictions based on ethnicity and residence. Some broad legal provisions unduly restricted political discourse in the pre-electoral period. Limited access to impartial information across most monitored media, combined with the lack of oversight of both traditional and social media, detracted from voters' ability to make an informed choice. In handling election disputes, the Central Election Commission (CEC) was overburdened by complaints about early campaigning, and significant cases of misuse of administrative resources remained unaddressed. Election day proceeded in an orderly manner, although technical difficulties in the use of the ICT, complex procedures in the voting and counting processes, and issues with secrecy of the vote were observed. In the polling stations observed, the manual count showed only minor discrepancies from the electronic results.

The electoral legal framework provides an overall adequate basis for holding democratic elections. Extensive legal amendments imposed by the Office of the High Representative in 2022 and 2024 strengthened safeguards and addressed some prior ODIHR recommendations. However, important ODIHR and European Commission for Democracy through Law of the Council of Europe (Venice Commission) recommendations to address issues pertaining to ethnicity- and residency-based restrictions on suffrage rights, misuse of administrative resources, election dispute resolution, campaign finance oversight and dissuasive sanctions, remain unaddressed. Further, the legislation contains several broad provisions which as currently interpreted and applied raise concerns about disproportionate restrictions on freedom of expression. The law insufficiently regulates recounts, granting the CEC broad discretionary powers, without adequate safeguards against arbitrary and selective decisions.

The election administration made considerable efforts in carrying out its responsibilities, but persistent institutional and operational constraints affected the efficiency and timeliness of its work. The technical preparations were marked by significant challenges, including notable delays in the deployment of the ICT devices, difficulties in forming polling station committees (PSCs) and recruiting technical operators, as well as late and insufficient training of election commissioners and voter education on the new voting methods and the new ballot. In general, the CEC enjoyed the confidence of some political parties and civil society organizations (CSOs), while acknowledging its limited capacities, but several stakeholders raised concerns over its independence and impartiality.

The 2024 legal amendments provide for countrywide use of electoral ICT. The ICT introduction was made in response to previous concerns of voter impersonation and fraudulent counting and with a stated aim to further protect the integrity of the elections. The law lacks sufficient provisions for effective implementation and the deployment of ICT devices was carried out hastily, with limited time for testing, voter education, and training of election officials. To enable the use of scanners, the CEC had to use broad discretionary powers to change the ballot format without a legislative amendment, replacing candidates' names with numbers. Furthermore, the law lacks clear criteria for recounts in cases of discrepancies between the manual and scanner counts, leaving such decisions to the discretion of the

CEC. While the introduction of ICT raised expectations of strengthened electoral integrity, key aspects of the process lacked transparency, as relevant information on the progress of implementation and integrity of the ICT systems was not made publicly available in a timely manner, contrary to international recommendations.

The Central Voter Register, maintained by the CEC, contains 3.4 million registered voters. Of those, 48,078 voters registered for out-of-country voting. Stakeholders generally expressed confidence in the register's inclusiveness, despite the continued presence of deceased voters and voters who maintain official residency in the country while *de facto* residing abroad. Many stakeholders expressed the expectation that the use of voter identification devices will effectively prevent the misuse of such entries. While voters had ample opportunity to review and correct their own voter list data, the CEC did not make the preliminary voter register available online as prescribed by law, limiting opportunities for effective public oversight. Contrary to international standards, individuals deprived of legal capacity by a court decision are disenfranchised.

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 and Council of Europe recommendations. Separately, the relevant rulings of the BiH Constitutional Court remain unaddressed. In an overall inclusive process, the CEC certified 75 of the 77 applicant parties and all four independent candidates, and subsequently 29 coalitions, which nominated a total of 7,028 candidates, including 2,977 women. Extensive documentation requirements, including duplicative electronic and hard-copy submissions, may have hindered prospective contestants' ability to stand for election.

Women remain underrepresented in political life, accounting for 21 per cent of members in the state parliament, and 33 per cent and 28 per cent of the Federation of Bosnia and Herzegovina and Republika Srpska legislatures, respectively. The Council of Ministers is led by a woman. However, women comprise only 20 per cent of its members and 23.5 per cent of ministers in the entity governments. Despite uniform compliance with the 40 per cent gender quota for candidate lists, women overall headed only about 14 per cent of lists for state and entity legislatures. Many ODIHR IEOM interlocutors noted that female candidates are often nominated as mere placeholders, to meet the gender quota. The 2024 amendments requiring parties to promote gender equality during campaigning did not result in a tangible increase in the visibility of women candidates in these elections.

The campaign was competitive and fundamental freedoms were respected, while contestants primarily targeted their respective ethnic communities and there were several instances of negative campaigning and divisive rhetoric. The official campaign period ran from 4 September through 3 October. Pursuant to a ban on early campaigning from the calling of elections until the start of the official campaign, fines totalling BAM 655,500 were imposed on political actors mainly for unpaid posts on social networks. In the absence of sufficient regulation of misuse of administrative resources, after the calling of elections, entity, cantonal and municipal authorities either revised their budgets or allocated previously approved funds to increase salaries and pensions, and to provide social benefits and one-time payments to unduly influence voters. Such practices undermined the level playing field by providing incumbents with an undue advantage.

Campaign regulations are also applicable online. However, institutional frameworks for addressing issues in the online campaign are insufficient and no authority is mandated with oversight of online campaigning or communication with big tech companies. While the CEC enforced campaign regulations and imposed sanctions, it did not monitor the online campaign or make use of available content-reporting mechanisms, citing the past low responsiveness of the platforms. Overall, the lack of publicly available information on the authorities' efforts and on the platforms' application of their policies undermined the transparency and effectiveness of enforcement. The ODIHR EOM social media monitoring identified a

polarized online environment, with most contestants relying on social networks. The online discourse was also shaped by anonymous media websites and social network accounts, clickbait networks and AI-generated content, which often included misleading information and inflammatory rhetoric. The absence of oversight of these activities, coupled with the lack of obligations on big tech companies to mitigate the risks they pose, undermined voters' ability to make an informed choice.

Campaign finance regulations provide for public and private funding, and limits on donations and expenditures, but the reporting requirements do not provide voters access to relevant information before election day on such fundings. All contestants submitted the required pre-election report and positively the CEC made the reports available online. While the CEC is mandated to oversee party and campaign finance, to publish financial reports and impose sanctions, it lacks the necessary resources and methodology for effective oversight. Recent amendments strengthened reporting requirements, but gaps remain, including lack of a deadline for auditing and the absence of regulation of third-party campaigning. Overall, the regulatory framework as currently implemented does not ensure transparency and effective oversight.

The media environment is pluralistic, however, divided along ethnic and political lines and media independence is undermined by political and business interests and continuous pressure on journalists, leading to self-censorship and other limitations. Since the last general elections, several restrictive legislative initiatives were adopted at the state- and entity-level, including the re-criminalization of defamation in Republika Srpska. Most media monitored by the ODIHR EOM did not adhere to the legal requirement to provide balanced and impartial election coverage. Further, all three public broadcasters did not cover the campaign in news programmes focusing instead on coverage of election preparations and extensive coverage of the respective incumbents in their official capacity. Private media offered substantial but partisan news coverage of the contestants. These factors, combined with moderate participation in debates, limited voters access to balanced information and their ability to make an informed choice. Despite a legal requirement, the Communication Regulatory Agency did not systematically monitor the media or impose sanctions for violations of election-coverage requirements.

While voters and contestants have access to legal remedies for violations of their electoral rights and a large number of cases were reviewed in the pre-electoral period, the system of election dispute resolution remains largely ineffective and under resourced. The CEC's complaint review mechanism was substantially burdened by the review of some 700 complaints and notifications received in the pre-electoral period, mainly related to alleged early campaigning. At the same time, gaps in the legal framework prevented the CEC from addressing more substantive forms of electoral misconduct, in particular the misuse of administrative resources. Despite previous ODIHR recommendations, transparency of both administrative and judicial election dispute resolution remained limited with the CEC not publishing decisions or the texts of complaints, and court hearings not being open to the public.

The law provides for election observation of all stages of the electoral process by citizen and international observers, and observers appointed by political subjects. In an inclusive process, the CEC accredited 756 international and 1,557 citizen observers. The civil society observer coalition *Pod Lupom* and Transparency International BiH conducted long-term observation activities, while the former also deployed some 900 short-term observers on election day.

Election day proceeded orderly but a number of technical difficulties and issues with the cumbersome voting process were observed. Opening was slightly delayed in three quarters of polling stations visited due to lengthy opening procedures and problems with the new ICT devices. Polling officials generally adequately managed the use of the devices and the process was assessed negatively in 6 per cent of the polling stations observed, which is significant. Negative observations were mainly attributed to serious shortcomings in ensuring vote secrecy and technical issues with the new devices such as unsuccessful fingerprint recognition, paper jamming or ballots not being accepted by the scanners. Further, voters,

particularly the elderly, appeared to have difficulties marking their ballots, pointing to inadequate voter education. Almost half of the polling centres did not provide for independent access for persons with reduced mobility. The conduct of counting was assessed negatively in 25 out of 121 observations, mainly due to significant procedural omissions, indicating polling officials had a limited understanding of the complex procedures and made attempts to find practical shortcuts. The manual count showed minor discrepancies from the electronic results. The tabulation process was generally assessed positively, although in several instances IEOM observers were unable to fully follow the results data entry and verify their accuracy, reducing transparency.

PRELIMINARY FINDINGS

Background

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).¹ 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”.²

The 2022 general elections led to the formation of the state-level government, comprising the Social Democratic Party (SDP), People and Justice (NiP), and Our Party (NS), collectively known as Trojka, along with the Croatian Democratic Union of BiH (HDZ BiH) and the Alliance of Independent Social Democrats (SNSD). In March 2024 BiH opened accession negotiations with the European Union (EU), which have since stalled pending the appointment of a chief negotiator and the completion of reforms.³ In January 2025, the Trojka ended its coalition with SNSD, citing unconstitutional actions and obstruction of EU-related legislation.⁴ Following an unsuccessful attempt to form a new governing majority, the government, including SNSD ministers, remained in office. The conviction of former RS President Milorad Dodik and the termination of his mandate led to an early presidential election in November 2025, partially repeated in February 2026 following the identification of irregularities, which the SNSD candidate Siniša Karan won.

The 4 October 2026 elections were held to elect representatives at the state, entity, and cantonal levels. The first countrywide use of election information and communication technologies (ICT) was generally welcomed by the public, raised expectations regarding electoral integrity and was strongly supported by the resident international community. The elections took place amidst voter disillusionment with political actors and in a polarised environment marked by divisive reactions to the death of Ratko Mladić, convicted of war crimes, crimes against humanity and genocide, prompting criminal complaints against RS politicians for his alleged glorification.⁵ The elections were widely viewed as a contest between SDP and the Party of Democratic Action (SDA) for the lead in post-election government formation, as an opportunity for the HDZ BiH to win a seat in the BiH presidency and in the RS as an effort by the SNSD-led bloc to retain power by securing the presidency and a majority in the entity parliament.

¹ In addition, Brčko District has special status as a self-governing administrative unit under direct state sovereignty.

² 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.

³ 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.

⁴ 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 SDS, Party of Democratic Progress (PDP) and For Justice and Order.

⁵ On 28 August, SDP MPs pressed charges with the BiH Prosecutor’s Office against Milorad Dodik, Staša Košarac, Nenad Stevandić, and Draško Stanivuković.

Women remain underrepresented in elected and governing bodies, making up 21 per cent of state parliament members and 33 per cent and 28 per cent of the FBiH and RS legislatures, respectively. The Council of Ministers is headed by a woman. However, women comprise 20 per cent of its members and 23.5 per cent of ministers in the entity governments.

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).⁶ Overall, the legal framework provides an adequate basis for democratic elections. Extensive legal amendments imposed by the Office of the High Representative (OHR), in 2022 and 2024, strengthened electoral integrity safeguards and addressed some prior ODIHR recommendations.⁷ The OHR cited the failure of domestic stakeholders to agree on reforms and the aim of enhancing electoral integrity as reasons for imposing the amendments.⁸ Different stakeholders welcomed the changes while several political actors noted that these were not adopted by parliament following public consultations and did not enjoy broad political consensus, contrary to OSCE commitments.⁹ Draft amendments submitted by the CEC in 2025 were stalled in the BiH House of Peoples (BiH HoP).¹⁰

Despite the recent revisions, some persistent and pressing challenges affecting the electoral process remain insufficiently addressed in the legislation and its application. In particular, the misuse of administrative resources continues to be inadequately regulated, the election dispute resolution system lacks efficiency and transparency, campaign finance oversight remains ineffective, and the application of electoral technologies requires further regulation. In addition, the law does not prescribe clear and objective criteria for all types of *ex officio* recounts, granting the CEC broad discretionary powers, which do not safeguard against arbitrary and selective implementation. More fundamental constitutional reforms, including those necessary to remove discriminatory restrictions on the exercise of suffrage rights, have remained stalled.¹¹ Separately, the relevant rulings of the BiH Constitutional Court remain unaddressed.

Some broad legal provisions, as currently interpreted and applied, raise concerns about undue restrictions on freedom of expression.¹² Namely, the prohibition of spreading disinformation has been broadly

⁶ 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.

⁷ In particular, the amended law provides the election administration with more time to consider complaints, strengthens the deterrent effect of sanctions for campaign violations, introduces safeguards to enhance the impartiality of lower-level election administration, and requires the CEC to disclose information on complaints and decisions.

⁸ The DPA also established the Office of the High Representative (OHR), an international body charged with overseeing the implementation of civilian aspects of the peace settlement including the power “to make binding decisions” and “take measures against public officials to ensure the effective functioning of state institutions”.

⁹ Paragraph 5.8 of the [1990 OSCE Copenhagen Document](#) provides that legislation is “adopted at the end of a public procedure”.

¹⁰ These aimed to allow for review of the CEC internal organization without needing approval from the Council of Ministers, to determine the ballot design and to randomly select polling stations for control recounts.

¹¹ See the European Court of Human Rights (ECtHR) judgments on [Sejdić and Finci v. Bosnia and Herzegovina](#), [Zorić v. Bosnia and Herzegovina](#) and [Pilav v. Bosnia and Herzegovina](#), [Šlaku v. Bosnia and Herzegovina](#). 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.

¹² Paragraph 34 of the [General Comment No. 34](#) on Article 19 of the ICCPR states that restrictions must not be overbroad; they must be proportionate, appropriate to their protective purpose, and the least intrusive instrument capable of achieving that purpose. Proportionality must be respected both in the law and in its application by administrative and judicial authorities. See also the 2024 Venice Commission [Report on freedom of expression, prohibition of hate speech and promotion of pluralism in the context of electoral campaigns](#).

interpreted to sanction criticism of the work of the election administration and electoral technologies;¹³ the criminal offence of psychological violence, with a punishment of up to five years of imprisonment if committed online, has been invoked by politicians to respond to allegedly insulting and defamatory speech;¹⁴ while the prohibition of early campaigning (premature campaigning) has been applied in ways that unduly restricted political discourse (See *Electoral Campaign and Election Dispute Resolution*).

Six contests took place at three levels, with all mandates allocated for four-year terms. At the state level, the electorate voted for the tripartite presidency and the House of Representatives of the Parliamentary Assembly of Bosnia and Herzegovina (BiH HoR).¹⁵ At the entity level, voters in the FBiH voted for the House of Representatives (FBiH HoR) and ten cantonal assemblies. Voters in RS voted for the Republika Srpska National Assembly (RS NA), and the president and two vice-presidents of RS.¹⁶ Most members of the BiH HoR, FBiH HoR and RS NA are elected through a preferential voting system in multi-member constituencies (MMCs). Additional compensatory seats are allocated to candidates from closed party lists, to ensure the proportional representation of parties and coalitions.¹⁷ After the direct contests, four indirect elections will be held.¹⁸

Despite longstanding ODIHR recommendations as well as existing legal requirements, constituency delimitation remains stalled as it is closely intertwined with the representation of the three constituent peoples, thus leaving significant deviations in the number of voters per mandate and concerns about the equality of the vote unaddressed.¹⁹

Election Administration

The election administration consists of the CEC, 143 municipal or city election commissions (MECs), as well as some 5,204 polling station committees (PSCs) and 385 mobile teams.²⁰ While women were well-represented in middle-level election commissions, accounting for 47 per cent of MEC members,

¹³ For example, the CEC several times sanctioned SNSD over statements concerning credibility of the newly introduced electoral technologies which they deemed as disinformation.

¹⁴ In July 2026, the Sarajevo Municipal Court sentenced blogger Amir Pašić Fačo to two years and eight months' imprisonment for psychological violence committed through social networks in connection with repeated verbal abuse of public figures and journalists in 2025; in September, he was again arrested following a complaint by municipal mayor and election candidate, Benjamina Karić, concerning allegedly abusive online statements. [General Comment No. 34](#) on Article 19 of the ICCPR notes that "[t]he principle of proportionality must also take account of the form of expression at issue as well as the means of its dissemination. For instance, the value placed by the Covenant upon uninhibited expression is particularly high in the circumstances of public debate in a democratic society concerning figures in the public and political domain."

¹⁵ The tripartite presidency is elected by simple majority, with voters from the FBiH electing a Bosniak and a Croat candidate and those from RS a Serb candidate. The three members rotate in the presidency every eight months.

¹⁶ The candidate who receives the most votes is elected president, and the top candidates from the two other constituent peoples are elected vice-presidents.

¹⁷ 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.

¹⁸ 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.

¹⁹ 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. The Constitutional Court (2010) noted that the constituency arrangement could affect the extent to which the election results translated into representation of particular constituent peoples.

²⁰ The CEC is a permanent seven-member body appointed for a seven-year term by parliament and comprises two Bosniaks, two Croats, two Serbs and one representing "Others". MECs are appointed by municipal and city authorities for seven-year terms, following an open selection process, subject to CEC approval. PSCs are temporary, composed of CEC-appointed non-partisan chairpersons and members nominated by contestants represented in the state and entity parliaments. Including 20 PSCs for out-of-country voting in 13 countries.

including 37 per cent of MEC chairpersons, only two of the seven CEC members are women, falling short of the gender quota.²¹ In general, the CEC enjoyed the confidence of some political parties and civil society organizations (CSOs), while acknowledging its limited capacities, but several stakeholders raised concerns over its independence and impartiality.

The CEC issued or updated several regulations, including on the ballot format, the use of ICT, appointment of PSCs and technical operators, voter and candidate registration, and campaign finance. However, some aspects of the process were addressed late or remained insufficiently elaborated, including on the implementation of ICT and the verification and determination of election results.²² Despite legal requirements, not all regulations and instructions were published in a consistent and timely manner. The CEC held regular public, live-streamed sessions, with recordings available online. However, most sessions were convened at short notice, not enabling in-person observer participation, and substantive discussions were held during closed meetings. These practices reduced its transparency and public accountability.

The CEC lacked sufficient human resources to fulfil its current increased responsibilities, impacting its operational capacity.²³ Despite considerable efforts of the election administration, persistent challenges, including the large workload and insufficient financial and human resources on all levels, undermined the efficiency of the preparations. While the election administration met most deadlines, it experienced notable delays in certain technical and administrative areas. The formation of PSCs was significantly delayed in most municipalities, primarily due to insufficient nominations by political parties, reflecting limited support bases and ethnic representation in certain areas, as well as the withdrawal of applicants and the limited number of candidates in the pool maintained by the CEC and MECs. These difficulties were attributed to the increased responsibilities related to the use of ICT, shortage of qualified personnel, low remuneration and general lack of interest. For the same reasons, challenges arose in securing sufficient numbers of technical operators. On 2 October, the CEC replaced 1,563 PSC chairpersons and deputy chairperson in 112 municipalities, while MECs reported similar withdrawals among other PSC members.

Most MECs published their decisions on the establishment of polling stations and PSC formation, albeit inconsistently, on municipal websites or local noticeboards. MECs held *ad hoc* sessions, mainly on operational issues, which were rarely attended by party representatives or observers. Several MECs complained that CEC instructions were issued late while the guidance was limited and insufficiently clear, resulting in uncertainty over some procedures.²⁴ ODIHR EOM Long-Term Observers (LTOs) assessed the MECs as generally efficient and committed.

The delays in recruitment of PSC staff and delivery of ICT devices resulted in the postponement of trainings in most affected locations. With support from the vendor of the ICT devices and international actors, the CEC delivered a training programme for MECs, trainers, and PSCs. Most training sessions observed by ODIHR EOM LTOs did not comprehensively address all essential aspects, including the operation of ICT devices, protection of vote secrecy, ballot validity, completion of protocols and reconciliation of results. The training format provided limited opportunities to practice using the new

²¹ By law, all state bodies must meet a 40 per cent gender quota and reflect the ethnic composition of the respective municipality. In line with established practice, MECs collectively complied with the gender requirement, while 27 MECs have failed to do so.

²² Primarily in relation to voting and counting procedures with the use of ICT, appointment of PSCs and ICT operators, voter and candidate registration, and campaign finance.

²³ The CEC has some 60 professional and administrative support staff, based on the 2014 internal staffing and organisational structure. In its 2023 proposed rulebook on internal organization, the CEC foresaw to double the professional staff, with potential additional expert personnel for the introduction of ICT; the BiH Council of Ministers did not approve this rulebook.

²⁴ These related, for example, to the appointment of PSC members, the conduct of the 'mock' elections, training activities, deployment and responsibilities of operators, election ICT transportation, and election-day operations.

devices, while manuals lacked sufficient clarity on some election-day procedures and the operation of ICT.

The introduction of ICT, together with the new ballot design, called for enhanced voter education. The CEC campaign, launched some two months prior to election day, was confined largely to materials on broadcast media and social networks.²⁵ These materials covered voting procedures for using the new devices, the right to a free and secret ballot, the participation of women and first-time voters, and “hate speech” during the campaign. Several international actors supported the CEC’s field-based voter education on the use of election ICT and changes to voting procedures, while CSOs and political parties also undertook voter information activities. However, the scope and outreach remained limited, with activities focused primarily on urban areas, potentially leaving older and rural populations without sufficient information.²⁶ While the involvement of multiple actors broadened voter education efforts, it also carried the risk of providing voters with inconsistent or conflicting information.²⁷

While the law requires the accessibility needs of voters with disabilities to be taken into account when designating polling stations, ODIHR EOM interlocutors from organizations representing persons with disabilities pointed to long-standing barriers to their participation in the electoral process. These included physical barriers at many polling premises, as well as societal barriers and limited awareness among election officials of the specific needs of such voters. Although audio-visual voter education materials included sign-language interpretation and subtitles, most voter education and election materials, including ballot papers and election ICT devices, were not adapted to the needs of voters with visual or cognitive impairments, limiting their ability to vote independently and in secrecy, at odds with international standards and good practice.²⁸

Electoral Information and Communication Technologies

The election legislation was amended in 2024 to provide for the countrywide use of ICT devices for biometric voter identification and authentication and optical ballot scanning with the stated aim of preventing voter impersonation and fraudulent counting.²⁹ The introduction of ICT generally enjoyed public support;³⁰ however, the legal basis and funding for its use were established through OHR-imposed amendments without parliamentary procedure and broad political consensus, contrary to OSCE commitments.³¹

The countrywide use of ICT builds on 2024 pilot projects, although these involved different technologies. In line with international recommendations, the CEC prepared a Feasibility Study, following the pilots, which contained a number of prerequisites for ICT implementation, most of which were not met in a

²⁵ The 2017 [Council of Europe Recommendation on standards for e-voting](#) requires that “the public, in particular voters, to be informed, well in advance of the start of voting in clear and simple language about steps that they need to take to vote, correct use and functioning of the system.”

²⁶ The CEC Facebook page received about 720,550 views during the month prior to election, covering the top 27 posts. Separately, on Instagram, the CEC page reached approximately 242,200 and, on YouTube, some 321,200 views during this period. The most-viewed post being the public call for polling-station operators published on 10 September.

²⁷ For instance, some stakeholders advised voters against the use of the preferential votes.

²⁸ See Article 29 of the of the 2006 [Convention on the Rights of Persons with Disabilities](#) (CRPD). Paragraph 18 of the 2026 [General comment No. 11](#) to the CRPD reiterates that the States shall “ensure that voting procedures, facilities and materials are appropriate, accessible and easy to understand and use for persons with disabilities on an equal basis with others, making accessibility a prerequisite for the meaningful exercise of political rights...”

²⁹ In addition, a significant part of the ICT introduction involves a completely new CEC system for the centralized management of the electoral process. The system integrates support applications and data from the ICT devices, as well as multiple software tools for the aggregation and publication of election results.

³⁰ Many ODIHR EOM interlocutors expressed hopes that the introduction of the electoral ICT would enhance the integrity of the process. See also *Pod Lupom* [survey](#) in which majority of respondents support the introduction.

³¹ The funding was provided by the BiH Central Bank profits. See paragraph 5.8 of the [1990 OSCE Copenhagen Document](#).

timely manner.³² Following the significantly delayed allocation of funds, in September 2025, the CEC launched a public procurement process, which was marred by public controversy and litigation, and only concluded on 18 May 2026, after the elections were called.³³ This significantly reduced the time available for the proper introduction of ICT, including for voter education and training of the election administration, and casted doubts on the timely configuration, testing and deployment before election day, contrary to international recommendations.³⁴

The election law requires the CEC to adopt a decision to determine whether the necessary technical requirements were fulfilled for the use of ICT during the elections. The decision, adopted on 2 October, which confirmed that the technical conditions were satisfied, was also based on the feedback from test ('mock') elections held on 11 and 18 September.³⁵ During both tests, ODIHR EOM LTOs observed that the biometric identification devices functioned well overall; however, a number of challenges were noted, in particular with the delivery of election materials, functioning of equipment, preparedness of election staff and voters' understanding of the new procedures, including how to respect the secrecy of the vote, particularly among older voters.³⁶

While the legislation provides for the use of ICT in general, it has substantial gaps, leaving significant decision-making authority to the CEC. The law does not set out the requirements for transparency, accountability, reliability and security of the ICT or provide details on the technical conditions to be fulfilled, type of consultations to be held with other institutions, and deadlines for adopting the decision on the use in specific elections, thereby undermining the stability of the legal framework and the planning process. The law also does not prescribe clear criteria for mandatory recounts in case of discrepancies between the electronic and the manual count, leaving such decisions to the discretion of the CEC.³⁷ To enable the use of scanners, the CEC, changed the ballot format, replacing candidates' names with numbers, without a legislative amendment.³⁸

The process of ICT introduction was rushed and not conducted transparently, contrary to international recommendations. A few days before the election day, some CEC members and the public had still not been informed on the progress of ICT implementation, on identified and addressed shortcomings, and on

³² These [included](#): i. timely allocation of funds, ii. inclusive participation of political parties and relevant state institutions, iii. enhanced CEC staffing and institutional capacities, iv. strengthened electoral infrastructure, v. continuous voter education and vi. training of the election administration.

³³ Smartmatic was the selected vendor with contract award BAM 74.5 million (approximately EUR 38.1 million; BAM 1 equals EUR 0.51). One CEC member [noted](#) in a dissenting opinion that the procurement evaluation report was altered multiple times and under pressure, unfairly disqualifying an alternative offer, although cheaper by BAM 17 million. Several complaints were lodged during the bidding period which additionally delayed the procurement process. One appeal, submitted on 28 May, is still pending before the BiH Court.

³⁴ Most of the equipment was imported and configured in the last 10 days before the election day including the CEC system for centralized election management, also developed by Smartmatic. The system, including software for the manual and electronic (scanner) counting and transmission of results, was deployed four days before the election day, leaving limited time for testing. The 2017 [Council of Europe Recommendation on standards for e-voting](#) requires that ICT be introduced in a gradual and progressive manner and that [any implementation of e-voting pilots should start well ahead of elections](#). See also [OSCE ODIHR Final Report on the 6 October 2024 Local Elections](#), recommendation 11.

³⁵ The adopted decision followed the CEC's internal assessment of the fulfillment of technical conditions and receipt of a positive feedback from the Agency for Identification Documents, Registers and Data Exchange (IDDEEA) and the Agency for Personal Data Protection, as required by law.

³⁶ After the 11 September 'mock' elections, 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. Prior to election day, the CEC did not publish information on the second 'mock' elections or the concluding report from both 'mock' elections. The [1990 OSCE Copenhagen Document](#) requires participating States to "guarantee universal and equal suffrage to adult citizens".

³⁷ Discrepancies flagged by the centralized management system will be used by the CEC to decide on the recounts in the Main Counting Center.

³⁸ Previously submitted [draft amendments](#) on this issue did not pass in the parliament.

the number of devices delivered, configured and tested.³⁹ Most technical documentation was not published, further limiting transparency.⁴⁰ At odds with international recommendations, the law does not provide for independent audit and certification of the election technology. Nevertheless, the CEC contracted a private vendor for auditing the ICT devices although the audit was conducted only on 16 September, limiting the opportunity for meaningful public scrutiny and the publication of the findings before election day.⁴¹

In an effort, to ensure effective implementation, the CEC established a dedicated ICT unit, and coordination and project teams involving several state institutions. However, the overall institutional support was uneven and, according to the CEC, some institutions actively obstructed the introduction of ICT. Moreover, the cybersecurity governance remains a challenge as the country lacks sufficient institutional structures, including an operational national Computer Emergency Response Team.⁴² Due to a shortage of staff and limited capacities and time, the CEC is fully dependent on the private vendor for the development, deployment, operationalization and implementation of the new ICT system and devices, contrary to international recommendations and good practice.⁴³

Voter Registration

Citizens aged 18 or older have the right to vote, except those serving prison sentences for, or indicted for serious crimes, as well as those deprived of legal capacity by a court decision, including on the grounds of intellectual or psychosocial disabilities; the latter restriction is contrary to international standards and previous ODIHR recommendations.⁴⁴ 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 FBiH may vote only for a Bosniak or Croat candidate. By law, citizens residing in Brčko District vote for the FBiH or RS institutions, depending on their entity citizenship. Among these, 9,687 eligible voters (representing

³⁹ Tests organized by Smartmatic were attended only by CEC representatives, without presence of international, domestic and party observers. The 2022 [Council of Europe Committee of Ministers Guidelines on the ICT use](#) requires ensuring transparency in all aspects of the ICT solutions.

⁴⁰ Citing system secrecy and data privacy concerns, the CEC did not publish the instructions for handling and processing, storage and destruction of voters' data, various reports provided by Smartmatic on the progress of the ICT implementation, printing of ballots, transport and equipment maintenance, hardware and software configuration, as well as the findings from the cybersecurity test conducted during the 'mock' elections. Source code information and the measures taken and guarantees for reliability and security of the ICT system were not publicly disclosed.

⁴¹ Pro V&V was awarded a contract for auditing the ICT configuration for BAM 661,050 but the reports were not publicly available before election day. The 2017 [Council of Europe Recommendation on standards for e-voting](#) recommends that "the components of the e-voting system shall be disclosed for verification and certification purposes" and that "before an e-voting system is introduced [...] an independent and competent body shall evaluate the compliance of the e-voting system and of any ICT component with the technical requirements." The 2022 [Council of Europe Committee of Ministers Guidelines on the ICT use](#) recommends that "the evaluation of the ICT solutions used in the election process by independent experts prior to implementation".

⁴² While the CEC informed the ODIHR EOM that the cybersecurity tests conducted during the 'mock' elections were satisfactory, the scope of the test and its findings were not published. The 'mock' elections and the cybersecurity test were conducted before the new system for transmission of data and election results was finalized. Inter-agency arrangements for cyber-incident management on election day are not defined. In November 2025, the Ministry of Security [informed](#) the CEC that the newly established unit has no staff and cannot support the CEC.

⁴³ Despite limited capacities, the CEC undertook efforts to oversee Smartmatic's implementation of the project. The 2017 [Council of Europe Recommendation on standards for e-voting](#) recommends that the "legislation shall regulate the responsibilities for the functioning of e-voting systems and ensure that the electoral management body has control over them". The 2022 [Council of Europe Committee of Ministers Guidelines on the ICT use](#) recommends that "Member States should build and retain the necessary capacity to assess, introduce and manage the use of ICT solutions in the electoral process" and "be ultimately responsible, also when private stakeholders are involved".

⁴⁴ See Articles 12 and 29 of the 2006 CRPD. Paragraph 48 of the 2014 [General Comment No. 1 to the CRPD](#) states that "a person's decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising their political rights, including the right to vote [and] the right to stand for election".

11 per cent) did not opt for either entity citizenship and were, thus, not included in the voter register, and could not exercise the right to vote.⁴⁵

The CEC maintains the permanent central voter register (CVR) through a system of passive and continuous voter registration, with data drawn from relevant public databases.⁴⁶ Persistent shortcomings in the civil and residence registration impact the accuracy of information provided to the CEC.⁴⁷ While the CVR is generally inclusive, some ODIHR IEOM interlocutors acknowledged the continued presence of deceased voters or voters who maintain official residence in the country while *de facto* residing abroad.⁴⁸ In this regard, most interlocutors expressed expectations that the introduction of biometric voter identification would significantly reduce the potential for voting on behalf of deceased persons or diaspora voters.⁴⁹

Throughout the year, voters had ample opportunities to verify their data in the CVR via the CEC website or at municipal registration centres and request corrections. From 6 June to 6 July, the preliminary voter lists were available for public scrutiny in printed form at municipal voter registration centres and selected locations. However, contrary to the BiH Election Law, the CEC did not make the preliminary voter list available online, citing concerns over the compatibility of online publication with the legal provisions for personal data protection, thereby limiting opportunities for meaningful scrutiny. Upon request and as provided by law, an electronic copy of the register for the contested constituencies was shared with 18 electoral contestants for verification. The final voter register, closed on 20 August, contains 3,408,517 voters.⁵⁰ Of those, 48,078 voters registered for out-of-country voting and 16,159 for voting with a mobile ballot box.⁵¹

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.⁵² The law disqualifies persons convicted of or indicted before an international or domestic court for genocide, crimes against humanity

⁴⁵ Article 25(b) of the [ICCPR](#) states that “every citizen shall have the right and the opportunity [...] to vote and to be elected [...]”. Paragraph 11 of the 1996 [UN Human Rights Committee, General Comment 25](#) requires states to take “effective measures to ensure that all persons entitled to vote are able to exercise that right. Where registration of voters is required, it should be facilitated and obstacles to such registration should not be imposed”.

⁴⁶ BiH does not maintain a single population register, but has a system of interconnected central administrative registers maintained by the IDDEEA, including the registers of personal identification numbers, identification documents, and permanent and temporary residence. Civil status records, including deaths, are maintained by competent authorities at municipal level and the relevant data is transmitted to the central registers.

⁴⁷ The responsibility to report a death to the municipality lies with the deceased person’s family, who are required to present a death certificate, or with a healthcare institution. Under the Law on Permanent and Temporary Residence of Citizens of BiH, citizens are responsible for registering and deregistering their permanent residence.

⁴⁸ By law, citizens who permanently settle abroad or reside abroad for more than three months are required to deregister their permanent residence in BiH, unless they do not intend to settle permanently in the foreign country and maintain an effective link with BiH.

⁴⁹ According to the CEC, 827 voters were marked as deceased on the voter register. In absence of a centralized population register and a recent population census, the Agency for Statistics published that the estimated population in 2024 was 3,412,000, based on the last census in 2013, vital statistics and internal migration data. As of September 2026, IDDEEA indicates that 4,015,809 citizens have permanent residence and 21,695 have temporary residence in the country. It also records 3,067,805 valid ID cards, 2,552,117 valid passports and 1,464,932 valid driving licences issued to citizens, all of which are valid voter identification documents.

⁵⁰ Of the total number, 2,143,439 voters are registered to vote for FBiH institutions and 1,265,078 for RS institutions.

⁵¹ Of those registered, 45,457 voters opted to vote by post and 2,621 at diplomatic representations. 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.

⁵² Only citizens self-declared as Bosniaks, Croats or Serbs may be elected to the state and entity presidencies and the BiH HoP, provided they reside in the relevant entity. Persons self-declaring as “Others” are ineligible to stand for these offices.

or war crimes, as well as public officials who are removed from office for defying OHR's decisions.⁵³ Candidates may be nominated by political parties, coalitions or run as independent.

In a generally inclusive process, the CEC registered 560 lists submitted by 82 political subjects comprising 7,028 candidates, including 2,977 women, for the six direct elections. 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.⁵⁴ Contrary to a previous ODIHR recommendation and international good practice, voters could sign in support of only one party or independent candidate per contest.⁵⁵ The extensive documentation required for certification, including the burdensome obligation to submit documents electronically and subsequently in hard copy, may have hindered prospective contestants' ability to stand for election.⁵⁶

Two parties were denied registration across the country for insufficient support signatures, while five others qualified only for lower-level elections.⁵⁷ Further, three candidate lists were not registered. The CEC did not publish the respective decisions related to candidate registration, including findings on identified deficiencies, detracting from transparency. The CEC referred 24 political parties to the Prosecutor's Office on suspicion of forged signatures, while proceeding with their registration where all requirements were met, including the required number of valid signatures. Appeals of five CEC certification decisions were filed, some of which challenged the registration process and the CEC's competence to verify the authenticity of voters' signatures; all five CEC decisions were upheld by the BiH Court.

All registered contestants met the 40 per cent legally required gender quota, with a progressive placement requirement.⁵⁸ 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. Many ODIHR IEOM interlocutors noted that women candidates were often nominated as mere placeholders, to meet the gender quota requirements.

Electoral Campaign

The campaign was competitive, and freedoms of association and assembly were largely respected. The official campaign period ran from 4 September through the day before election day. The 2024 amendments prohibited campaigning from the announcement of elections until the start of the official

⁵³ 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.

⁵⁴ Political parties and prospective independent candidates must first apply to the CEC to be certified for eligibility by submitting the legally required documents, voters' support signatures, and by paying a certification fee. The CEC certified 75 of the 77 applicant parties, all 4 independent candidates, and subsequently 29 coalitions.

⁵⁵ Paragraph 196 of the 2020 [ODIHR and Venice Commission Guidelines on Political Party Regulation](#) recommends that "a requirement that a citizen be allowed to sign in support of only one party should be avoided, as such a regulation would affect his/her right to freedom of association and could easily disqualify parties".

⁵⁶ Three candidate 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, namely to provide certified candidates' statements on acceptance of the candidacy.

⁵⁷ Movement *MOST* 21 and *Posavska stranka* (PS) were fully rejected while Bosnian-Herzegovinian Patriotic Party – Sefer Halilović (BPS), Life Party (SŽ), Movement for a Modern and Active Krajina (PoMAK), Party of Democratic Progress of Republika Srpska (PDP RS), and Strength of the People – Ramo Isak (SN) were certified only for certain levels of elections where they met the signature threshold. PS, PoMAK and SN appealed the CEC decisions to the BiH Court, which upheld them. The Constitutional Court upheld the CEC and court of BiH decisions declining PoMAK's and SN's registration, due to insufficient number of valid signatures.

⁵⁸ 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.

campaign, including non-paid posts on social networks.⁵⁹ Such broad legal provisions raise concerns about undue restrictions on the political discourse (see *Legal Framework*). In response to some 470 complaints about early campaigning, the CEC imposed fines totalling BAM 655,500.⁶⁰

Parliamentary parties both from the FBiH and RS were visible throughout the campaign period. They largely targeted their respective ethnic constituencies, combining identity-based appeals with entity-focused policy messages. SDA and NiP emphasised stronger state institutions, while SDP and NS focused on unity, institutional effectiveness, and the rule of law. HDZ BiH and the Croatian Five bloc highlighted Croat political representation in the state presidency. In the RS, SNSD and its coalition partners stressed the protection and stability of the entity, whereas the opposition parties SDS, PSS and ZPR focused on political change. Parties also differed on social protection and economic policy, anti-corruption, governance and investment. EU and NATO integration featured mainly in the campaigns of FBiH-based parties while a number of contestants criticised the role of international actors in the country.

Campaigning was conducted through rallies, community meetings, billboards and posters as well as through media appearances and activity on social networks but was generally measured. The campaign environment remained polarised, and the campaign tone was largely negative, with one physical attack and several instances of divisive and inflammatory rhetoric being used by candidates and party representatives.⁶¹

The law prohibits the misuse of public resources for campaign purposes, including the engagement of public employees, the use of publicly funded events, as well as one-time payments not envisaged in regular budgets. However, these restrictions do not prevent the misuse of budgetary resources to induce voters after the calling of the elections.⁶² Following the announcement of elections, entity, cantonal and municipal authorities either revised their budgets or allocated previously approved funds to increase salaries and pensions, and provide social benefits and one-time payments during the campaign period.⁶³ A member of the BiH presidency and several high-ranking officials received significant visibility through their dual roles as candidates and public officials, including through their official participation in the inauguration of publicly funded projects.⁶⁴ Such practices undermined the level playing field by

⁵⁹ For instance, an SDS 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.

⁶⁰ Fines totalling BAM 483,500 were imposed on political parties and coalitions, and BAM 172,000 on candidates. Of those fines, BAM 483,500 were imposed for non-paid social network posts. The highest fines included BAM 177,000 for SNSD, BAM 91,500 for the Coalition PSS/PDP, BAM 47,500 for SDP, BAM 26,500 for SDA, BAM 10,500 for NiP and BAM 10,000 for independent candidate Zdenko Lučić. BAM 1 equals EUR 0.51.

⁶¹ On 13 September, the Croatian Republican Party candidate was attacked in Ravno. 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." BiH Minister of Defence, in his [Facebook post](#), called on the international community to "withdraw its signature from the creation of this genocidal entity." On 17 September, SNSD president Milorad Dodik [portrayed](#) Muslims in BiH as pursuing territorial expansion into the RS.

⁶² The CEC received 88 complaints regarding misuse of public resources and imposed only 6 sanctions, citing that it cannot sanction collective bodies which use budgetary resources for payments and subsidy allocation.

⁶³ For instance, on 17 June, the RSNA [adopted](#) a BAM 1.1 billion budget amendment providing for a 5 per cent salary increase for 56,000 public employees, one-time payments of BAM 80–120 to pensioners, BAM 100–150 to students and a monthly childcare subsidy of BAM 200, with disbursements that began in September. On 28 July, 7 August and 25 August, [Central Bosnia Canton](#), [Canton 10](#) and [Zenica-Doboj Canton](#) increased their budgets by BAM 25.598 million, BAM 7.888 million and BAM 21.142 million, respectively, including for public-sector salary increases. On 20 July, [Banja-Luka city](#) allocated a total of BAM 189,800 (BAM 100 to each child entering first grade).

⁶⁴ On 5 September, the HDZ BiH presidential candidate opened a high school in Travnik. On 16 September, the RS Prime Minister and the Serb member of the BiH Presidency from SNSD visited a reconstructed hospital in Foča. On 23 September, the FBiH Minister of Displaced Persons and Refugees from SDP opened the newly built elderly house.

providing incumbents with an undue advantage, contrary to OSCE commitments and international good practice.⁶⁵

The ODIHR EOM also received numerous allegations of vote-buying and systematic pressure on voters through patronage networks, including allegations that public-sector employment and contracting opportunities were linked to political support.⁶⁶ The ODIHR EOM was not aware of any criminal cases initiated in connection with these allegations before election day. Nevertheless, these allegations raised concerns about voters' ability to vote free of fear of retribution.⁶⁷

Several women candidates featured prominently, either contesting the BiH presidency or heading party lists for the legislatures, including Željka Cvijanović of SNSD, Darijana Filipović of HDZ BiH, Jelena Trivić of the National Front (NF), Sabina Ćudić of NS and Benjamina Karić of SDP. However, despite a legal requirement, most parties did not promote candidates of both genders equally in campaign activities. At the 84 rallies observed by ODIHR EOM LTOs, women accounted for 34 per cent of attendees and only 21 per cent of candidate speakers. Women accounted for only 20 per cent of participants in televised debates, and represented parties in 19 per cent of their free addresses aired by the state and entity public media.

Campaign regulations are also applicable online, including those pertaining to restrictions on political content and rules on campaign finance. However, institutional frameworks for addressing issues in the online campaign are insufficient. While the CEC enforced campaign regulations, including reviewing complaints and imposing numerous sanctions on contestants for posts in breach of the law (see *Election Dispute Resolution*), no institution is specifically mandated to monitor campaigning on social networks. Further, BiH does not have a state digital framework to safeguard information integrity and no institution is specifically tasked with addressing hybrid threats such as AI-manipulated content and cyber-attacks, including during election campaigns.⁶⁸ This also increases vulnerability to foreign interference and manipulation. Civil society organisations undertook some fact-checking initiatives.⁶⁹

The terms and conditions of big tech companies on political content provide for removal or geo-blocking of content, and reporting of co-ordinated influence operations⁷⁰ However, no state authority is mandated to communicate with these companies.⁷¹ Some platforms undertook measures to safeguard election

⁶⁵ See Paragraph II. B. 1.1 of the 2016 ODIHR and Venice Commission's [Joint Guidelines](#) for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes, which states that the "legal framework should provide effective mechanisms for prohibiting public authorities from taking unfair advantage of their positions by ... the use of specific funds (state or local budget) as well as institutional resources".

⁶⁶ For instance, on 28 August, the Hospital in Zenica opened a call for 203 positions. From 3 to 9 September, the Indirect Taxation Authority launched a competition for 131 positions. On 22 September, the Sarajevo Canton Government approved subsidised employment of 250 young people, providing BAM 24,000 per hire (BAM 2,000 per month for 12 months) for salaries.

⁶⁷ Paragraph 7.7 of the 1990 [OSCE Copenhagen Document](#) requires that campaigning be conducted in a fair and free atmosphere and that voters be able to cast their vote "free of fear of retribution".

⁶⁸ Paragraph 14 of the 2024 [Venice Commission's Interpretative Declaration on the Code of Good Practice in Electoral Matters as concerns digital technologies and artificial intelligence](#), notes "State authorities should address the challenge posed by organised information disorder campaigns, which have the potential to undermine the integrity of electoral processes."

⁶⁹ Fact-checking platform *Istinomjer* had a live blog section on its website dedicated to the elections, and *Raskrinkavanje* posted constant analysis regarding click-bait news and information manipulation.

⁷⁰ Content removal and Geoblocking is implemented either following take-down orders by authorities or on the initiative of big tech companies, mainly for illegal content, misinformation and disinformation. Authorities' requests are usually based on protocols with big tech companies.

⁷¹ Paragraph 19 of the 2024 [Venice Commission's Interpretative Declaration on the Code of Good Practice in Electoral Matters as concerns digital technologies and artificial intelligence](#), states: "Provisions should be established to ensure the cooperation of internet intermediaries and other private actors with governments, among themselves, and with academia and civil society."

information integrity and support voter education;⁷² among others, TikTok and Meta provided the CEC with ‘escalation channels’ to report content for review, but the CEC informed the ODIHR EOM that they did not make use of this mechanism, citing the past limited responsiveness of the platforms. Meta informed the ODIHR EOM that its community guidelines for designated dangerous individuals and organisations applied to content glorifying Mladić.⁷³ Overall, the lack of publicly available information on the authorities’ efforts to monitor and report harmful content and on the platforms’ application of their policies undermined the transparency and effectiveness of enforcement.⁷⁴

Most contestants relied on social networks as a primary channel for campaigning, with Facebook remaining the dominant platform.⁷⁵ They used both non-paid content and paid advertising.⁷⁶ The online campaign remained divided among ethnic lines, with the most prominent narrative drawing on conflicting interpretations of the wartime past and BiH’s relationship with Serbia, generating some 17.2 million views.⁷⁷ In the second half of the campaign, messaging about economic development, such as promoting the need for higher wages and pensions, lowering burdens on self-employment and the need for increased investments increased by 32.5 per cent. In FBiH, NiP, SDP and NS also focused on accountability, targeting mainly SDA, while calling for a united BiH. SDA promoted the need for experienced politicians, and criticised incumbent parties for failing to protect Bosniak interests. Croat political actors focused on the demand for equal political rights. In the RS, SNSD mainly promoted their strength in defending Serb interests while the opposition parties focused on restoring justice.⁷⁸

Anonymous media websites and social network accounts also posted politically relevant content. These were distinct networks operating along ethnic lines, with some appearing to amplify partisan messaging. Inflammatory rhetoric was often used, with polarising narratives based on the wartime past getting some 3.1 million views and religious messaging being instrumentalised to reinforce identity-based rhetoric.⁷⁹ Co-ordinated Inauthentic Behaviour (CIB) and click-bait networks also posted political content, including misleading and inflammatory posts about NATO and EU statements.⁸⁰ Fact-checking

⁷² TikTok deployed an in-app election center redirecting to the CEC website while Meta operated a voter information unit one week prior to the election day. In contrast, Google did not inform of any country-specific measures.

⁷³ According to [Meta’s Dangerous Organizations and Individuals policy](#), Meta removes content that glorifies, supports or represents designated actors engaged “in serious offline harms, including organizing or advocating for violence against civilians, repeatedly dehumanizing or advocating for harm against people based on protected characteristics.”

⁷⁴ The ECtHR judgment on [Bradshaw and Others v. the United Kingdom \(2025\)](#) noted that “while the circulation of disinformation or misinformation could potentially interfere with the right to receive information (...), any measure would need to be calibrated carefully to ensure that they do not interfere disproportionately.”

⁷⁵ 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.

⁷⁶ Based on data from WhoTargetsMe, spending on political advertisements during the campaign period amounted to approximately BAM 514,186. SDP official pages recorded the highest overall spending at BAM 76,257, followed by NS with BAM 59,027, SDA with BAM 45,932, PSS with BAM 44,953, US with BAM 37,770, and SNSD with BAM 32,107. The largest candidates’ pages were Draško Stanivuković (BAM 21,334) and Jelena Trivić (BAM 19,727). Accounts classified as unofficial party or group pages spent a total of approximately BAM 4,308, with most being spent by sources promoting SNSD-affiliated accounts (BAM 1,684), followed by SDA (BAM 666).

⁷⁷ Sources generating the most engagement were NiP, Elmedin Konaković, Jelena Trivić and Draško Stanivuković.

⁷⁸ Narratives were identified using BERTopic modelling, based on multilingual sentence embeddings and clustering of the monitored posts. *Restoring justice in Republika Srpska* reached 5.8 million views during the campaign period promoted mainly by Branko Blanuša, Jelena Trivić and Draško Stanivuković. *The need for equal political rights* was led by Zdenko Lučić and Darijana Filipović and reached 3 million views.

⁷⁹ Monitored official political pages of candidates and parties reached a total of 231.4 million views, while alternative media pages monitored reached 106.6 million views. In the period 5-10 September, 169 posts on anonymous media disseminated posts about the desecration of the Gazanfer-bey Mosque in Banja Luka with the message “Ratko Hero” as a deliberate provocation that proves Muslim vulnerability and the need for defense.

⁸⁰ For instance, “NATO on its feet; four powers send urgent warning; grabbing of territory underway”. The ODIHR EOM monitored 400 coordinated clickbait pages on Facebook. The politically relevant content grew from 7 percent before the start of the campaign to over 20 percent during the campaign.

organisations reported isolated instances of AI generated content.⁸¹ No authority monitored anonymous media websites and social media accounts as well as CIB operations and big tech companies have no obligation under domestic law to mitigate the risks posed by these actors.⁸² This left voters without adequate safeguards from online information manipulation campaigns, undermining their ability to reach informed opinions.⁸³

Campaign Finance

Campaign finance is primarily regulated by the Law on Financing of Political Parties and the Election Law.⁸⁴ Pursuant to the 2024 amendments, contestants are required to open dedicated bank accounts, submit interim reports, report their cash donations and payments as well as online expenditures, while sanctions for exceeding the expenditure limits were increased.⁸⁵ While recent amendments strengthened reporting requirements, several long-standing ODIHR and GRECO recommendations remain unaddressed, including related to strengthening the CEC's capacity to monitor and investigate campaign finance, requiring the timely audit of financial reports, and improving the transparency and oversight of political party financing. Overall, the current implementation of the campaign finance regulatory framework does not ensure transparency and effective oversight.

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.⁸⁶ 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. Campaign expenditures are capped at BAM 0.30 per registered voter per election contest.⁸⁷ Third-party campaigning is not regulated, detracting from transparency and accountability.

Some ODIHR EOM interlocutors raised concerns about contestants receiving donations from holders of public tenders, contrary to the law. While the law requires that all campaign incomes and expenditures are made centrally, through dedicated bank accounts, some contestants informed the ODIHR EOM that they use their own resources or receive in-kind support for campaign activities, such as private vehicles and donated billboard space. ODIHR EOM interlocutors reported limited grassroots fundraising and noted

⁸¹ Fact checking organization *Raskrinkavanje* exposed the dissemination of an AI generated image of a convoy in the [Hague showing farewell to Ratko Mladić](#). Another one claimed [Draško Stanivuković travels in a Mercedes](#), instead of the announced camper van.

⁸² The 2024 [Venice Commission's Interpretative Declaration on the Code of Good Practice in Electoral Matters as concerns digital technologies and artificial intelligence](#) paragraph 48, states: "The fight against information disorders, including disinformation explicitly aimed at questioning or misleading about the basic aspects of electoral procedures, calls for regulation by the state and an independent body with adequate resources and powers to enforce such regulation."

⁸³ Paragraph 60 of the [Venice Commission's 2024 Report on Freedom of Expression, Prohibition of Hate Speech and Promotion of Pluralism in the Context of Electoral Campaigns](#) states that "The importance of the role of (...) social media – in elections is increased by the fact that free and informed voting presupposes not only the possibility for candidates to express their ideas, but also the possibility for voters to receive a plurality of unbiased information, free from disinformation, manipulation and unlawful interference."

⁸⁴ Laws on political parties of RS and the Brčko District and relevant CEC regulations are also applicable.

⁸⁵ Between BAM 3,000 and 30,000 (around EUR 1,534 to 15,337).

⁸⁶ 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. On 7 July, the RS Election Commission issued a decision to disburse the public funding based on parliamentary representation, electoral participation and mandates won in these elections; the first part was due no later than the start of the campaign while the remaining would be allocated after the elections. Some parties in the RS informed the ODIHR EOM that they had not received the funds prior to the election.

⁸⁷ 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.

that often candidates were required to donate to the party's campaign in exchange for being placed in the top positions of the candidate lists.

In line with the law, all contestants submitted interim reports three days before election day. Positively, despite the absence of a legal requirement, the CEC published them before election day, contributing to transparency. Final financial reports are due within 30 days of the publication of final election results. The CEC is mandated to oversee campaign finance, including reviewing and auditing contestants' financial reports, and it may impose sanctions.⁸⁸ However, the effectiveness and timeliness of oversight are constrained by the CEC's limited institutional capacity. The CEC's Audit Department has six staff, lacks a methodology for monitoring online expenditure, and there is no statutory deadline for completing audits of final financial reports.⁸⁹

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 and leading to self-censorship and other limitations. Freedom of expression is guaranteed in State and entity constitutions. However, since the last general elections, several restrictive legislative initiatives were adopted at the state- and entity-level, including, most notably, the re-criminalization of defamation in RS.⁹⁰ Many ODIHR IEOM interlocutors as well as various reports expressed concerns about the continued number of physical attacks, verbal threats and lawsuits targeting media professionals, affecting their operating environment and leading to self-censorship and other limitations.⁹¹

The public broadcasting service, provided by two entity-based public broadcasters and the Radio and Television of Bosnia and Herzegovina (BHRT) at the state level, continues to be affected by a structural crisis.⁹² The system of financing through broadcast fees, as currently implemented, has left the BHRT significantly underfunded and triggered mutual long-standing financial disputes resulting in litigation.⁹³

⁸⁸ The CEC powers include reviewing and auditing financial reports, investigating suspected violations, monitoring compliance with campaign-finance rules and spending limits, and imposing administrative sanctions. Depending on the violation, it may impose fines, remove candidates from candidate lists or decertify political subjects, while certain financial-reporting violations may result in a political party being barred from participating in subsequent elections. The CEC is also required to refer suspected criminal financial offences to law-enforcement authorities.

⁸⁹ The CEC informed the ODIHR EOM that it is currently auditing the 2023 financial reports.

⁹⁰ Defamation is punishable with fines of up to BAM 6,000. Paragraph 47 of the [General Comment No. 34 to the ICCPR](#) calls States to "consider the decriminalization of defamation". In RS, this restriction 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. In 2025, article 181b was added to the BiH Criminal code (psychological violence), a vague wording of which allows for the possibility of undue restrictions on the freedom of expression. See also the [Media Centar report](#) for more details on restrictive legal initiatives.

⁹¹ According to the journalist association *BH Novinari*, there are 31 active civil and 6 criminal lawsuits against media and journalists. Regional 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.

⁹² The public broadcasting system consists of the BHRT at the national level and two entity-based broadcasters: the Radio Television of the Federation of Bosnia and Herzegovina (RTVFBiH) and the Radio Television of Republika Srpska (RTRS).

⁹³ Public broadcasters are funded through a broadcast tax collected by the entity-based broadcasters. RTVFBiH has long faced difficulties in collecting the RTV tax in several cantons, RTRS fully discontinued transferring its share to BHRT in 2017. The 2025 decision by the [BiH Constitutional Court](#) confirming BHRT's legal entitlement to a share of the RTV tax collected in RS remains unfulfilled. BHRT informed the ODIHR EOM that it operated in the election period despite having its bank account frozen as a result of a temporary decision in one of multiple lawsuits, forcing it to suspend two programmes during the campaign.

This raises concerns about the effectiveness of the current financial arrangement, at odds with previous ODIHR recommendations.

The ODIHR EOM media monitoring found that, overall, public broadcasters did not cover the activities of the contestants in their news coverage, focusing instead on electoral preparations by the CEC and the activities of the ruling state and entity authorities.⁹⁴ Public state channel BHT-1 and FBiH-based FTV provided extensive coverage to the incumbents. Combined the incumbents received some 68 per cent of news coverage on BHT-1 predominantly in a neutral tone, while 54 per cent of the news coverage on FBiH-based FTV was dedicated to state and FBiH incumbents and coverage of RS authorities was marginal and with a noticeable negative tone.⁹⁵ RTRS displayed clear bias in favour of the RS-ruling SNSD, allotting 43 per cent of news coverage to entity authorities and another 30 per cent to SNSD, with an almost exclusively positive or neutral tone. Further, the entity public broadcasters had dedicated election programmes that provided additional coverage of the candidates, although these were not always aired during primetime, potentially limiting their viewership. The state BHT-1 did not provide election-related coverage beyond the required formats, including free airtime and debates. The broadcasters opted for this approach due to the high number of contestants, combined with strict legal requirements on equal access.

In line with the law, all three public broadcasters provided eligible contestants with the opportunity to utilize three minutes of free airtime. However, only about half of the registered contestants took advantage of this opportunity. Only 12 registered contestants purchased paid advertisement across monitored media. Public broadcasters and some private ones offered contestants a platform to present their views through debates. However, while these featured a moderate number of contestants for entity legislatures, participation was particularly low in the debates for candidates for the state presidency.⁹⁶

Private channels *ATV*, *BN* and *N1* covered the campaign within their news programmes, focusing mostly on larger parties, while *Hayat* provided only nominal coverage of the election campaign. While *N1* presented more balanced coverage towards various contestants, including the ruling Trojka, HDZ and SDA, *ATV* and *BN* mostly covered RS-based parties, with *ATV* news coverage dominated by SNSD and *BN* focusing on opposition parties.

The Communication Regulatory Agency (CRA) did not conduct systematic media monitoring of the campaign, despite legal requirements and long-standing ODIHR recommendations, and performed its oversight function exclusively based on complaints. The CRA received one election-related complaint from a contestant who had been denied free airtime by a radio station, which it upheld resulting in the provision of the requested coverage. However, in the absence of complaints related to the electoral coverage by RTRS, the CRA did not take measures to enforce compliance with the legal requirements concerning equal and fair coverage and address the political bias in the broadcaster's programs. The CRA

⁹⁴ Since 31 August, the EOM monitored three public TV channels, *BHT-1* (state), *FTV* (FBiH) and *RTRS* (RS), and four private ones (*ATV*, *BN*, *Hayat*, and *N1*). Also, the websites *Avaz.ba*, *Klix.ba*, *Nezavisne.com*, *Oslobodjenje.ba* and *Radiosarajevo.ba*, as well as the daily newspapers *Glas Srpske*, and *Večernji List* were monitored. TV channels were analyzed for their prime-time programmes, while politics-related sections of online and print media were monitored.

⁹⁵ BHT-1 devoted 31 per cent to state authorities, 17 per cent to FBiH authorities and 14 per cent to RS authorities, while FTV 37 per cent to state authorities, 17 per cent to FBiH authorities and 7 per cent to the RS authorities.

⁹⁶ A total of 76 out of 109 invited participants attended but only three out of 24 debates featured all invited participants. At the same time, there were two debates with a single participant while one debate (organised for Croat candidates) in a *BHT-1* series of debates for the state presidency had to be cancelled due to a lack of participants.

received numerous complaints concerning coverage of the funeral of Ratko Mladić by a few broadcasters; these were not adjudicated before election day.⁹⁷

Print and online media monitored by the ODIHR EOM provided a more diverse and quite extensive coverage of the campaign; however, they also displayed partisan editorial policies. Preferential coverage was particularly visible in the popular online outlet *Avaz* (in favor of the SBB party led by Fahrudin Radončić, the owner of *Avaz*), *Glas Srpske* for SNSD and *Večernji List* for HDZ. At the same time, the most popular online outlet *Klix*, as well as *Nezavisne*, *Olsobodjenje* and *Radio Sarajevo* presented more balanced coverage of the campaign. The Press and Online Media Council is mandated to oversee the print and online media. While the Election Law empowers the self-regulatory body with broad responsibilities, it does not provide any institutional guarantee to its operation, leaving it dependent on own limited resources. The Council received five election-related complaints, of which three were resolved through mediation prior election day.⁹⁸

Election Dispute Resolution

Voters and electoral contestants whose rights are violated may file election-related complaints with the election administration. The CEC is entitled to initiate *ex-officio* proceedings, including upon receiving information from citizen observers. The CEC handles in the first instance certain campaign violations, including those related to “hate speech” and misuse of administrative resources, as well as appeals against MEC decisions.⁹⁹ The Appellate Division of the Court of BiH reviews appeals against CEC decisions, except those on the appointment of PSC chairpersons and their deputies and the content of the ballot, which are exempt from judicial review, contrary to OSCE commitments.¹⁰⁰

Despite the large number of complaints received, reviewed and sanctioned, the system of election dispute resolution remains largely ineffective and lacks transparency. Since the calling of the elections, the CEC has received some 700 complaints and notifications, the overwhelming majority originating from citizens and CSOs as well as anonymous submissions.¹⁰¹ Most complaints related to alleged early campaigning, predominantly through social media, resulting in 70 contestants being sanctioned with fines totalling BAM 655,500. The high number of complaints placed a substantial burden on the CEC's complaint-review mechanism and being under resourced despite an extended review period, the CEC could not adjudicate all complaints before election day. At the same time, the lack of clear criteria for distinguishing ordinary political speech from electoral campaigning as well as false information from legitimate criticism of the electoral process raises concerns as to the legitimacy and proportionality of the sanctions imposed.¹⁰² At the same time, gaps in the legal framework prevented the CEC from addressing more substantive forms of electoral misconduct, such as revising public budgets or allocating previously approved funds to increase salaries and pensions, and provide social benefits and one-time payments or advancing infrastructure projects after the calling of the elections.

⁹⁷ On 7 September, the state-owned cable provider *BH Telekom* and the private *Telemach* stopped broadcasting RTRS as well as the private channels ATV and BN in FBiH during their live coverage of the funeral. According to the CRA, the coverage prompted some 20 complaints. These included the complaint of the Association of Genocide Victims and Witnesses and the "Movement of Mothers of the Srebrenica and Žepa Enclaves" who alleged that RTRS systematically omitted his final genocide conviction, used affirmative terminology and aired statements relativizing the Srebrenica genocide without editorial distancing.

⁹⁸ 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.

⁹⁹ MECs are in charge of complaints related to voter registration and most campaign other violations.

¹⁰⁰ The Court held that the CEC decision establishing the ballot form could not be appealed, as it constituted a general administrative act. See paragraph 18 of the [1991 OSCE Moscow Document](#).

¹⁰¹ While political parties submitted 10 per cent of these complaints, CSOs accounted for around 40 per cent. The remaining were submitted by individuals, anonymously or through other channels such as email.

¹⁰² This broad approach effectively brought a wide range of ordinary political communication within the scope of sanctionable early campaigning. Similarly, the CEC did not apply a sufficiently clear methodology to establish disinformation violations, including for criticism of newly introduced electoral technologies.

The Appellate Division of the Court of BiH reviewed some 90 appeals against CEC decisions, upholding the majority of them, and did not overturn the CEC's broad interpretation of early campaigning and disinformation.¹⁰³ On 24-25 September, the Constitutional Court upheld the CEC and Court of BiH decisions rejecting two political parties' applications to participate in the general elections due to insufficient or irregular signatures of support of their registration. In both cases, it found no violation of the right to free elections.

Despite previous ODIHR recommendations, transparency of both administrative and judicial election dispute resolution remained limited. While the CEC reviewed most complaints in public sessions, the CEC database does not include decisions or the texts of complaints, and the reasoning for sanctions and fines was not always clear. Contrary to previous ODIHR recommendations, court hearings were not open to the public, and many judicial decisions were not publicly available.

Citizen and International Observers

The legislation provides for observation by CSOs and international organizations, as well as by observers appointed by contestants, both in the country and abroad. Contributing to transparency, the law affords observers broad access to the electoral process and establishes a range of rights, including the right to request information and documents, attend election commission sessions at all levels, access electoral premises, and report irregularities to election commissions.

In an inclusive manner, the CEC accredited 1,557 observers nominated by CSOs, 119 by contestants and 756 international observers. MECs accredited some 25,000 observers of contestants. Some CSOs, including the Coalition for Free and Fair Elections *Pod Lupom* and Transparency International BiH, conducted long-term observation activities, issued pre-electoral reports on their findings, and filed many notifications with the CEC calling for investigations into campaign irregularities, mainly for early campaigning. In addition, *Pod Lupom* conducted a field-based voter education campaign to raise awareness about the electoral ICT and changes to the voting process.

Election Day

Election day was generally calm and orderly but complex procedures combined with difficulties in handling ICT devices resulted in significant delays and waiting times for voters. The CEC shared regular but not comprehensive updates about the voting process and voter turnout throughout election day. Preliminary election results started being posted on its website on election night from 20:00, despite the voting time being extended in an unspecified number of polling stations due to accumulated delays, which could potentially unduly influence voters still casting their votes. Almost half of the polling centres did not provide for independent access for persons with reduced mobility and 20 per cent had unsuitable interior layouts. Women made up half of polling staff, including of chairpersons.

The IEOM observed the opening in 139 polling stations and assessed it positively in 129 observations. While the vast majority of polling staff and election materials were present, around three quarters of the observed polling stations opened with slight delays, due to organisational issues, time required to complete the prescribed procedures, or technical problems with the ICT devices. In seven cases, opening was delayed for up to or over one hour. While PSC members were largely familiar with the procedures, some important procedural safeguards were omitted, including counting and recording the number of ballot papers received (28 cases) and recording the numbers of security seals in a consistent manner (47 cases). PSC members encountered difficulties in operating the ICT devices in ten cases.

¹⁰³ Paragraph 5.10 of the [1990 OSCE Copenhagen Document](#) states that everyone shall have “effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity”.

In the IEOM's 1,501 observations of 1,454 polling stations, the conduct of the voting process was assessed negatively in 6 per cent, which is significant. Negative observations were mainly attributed to problems with the ICT devices and serious shortcomings in ensuring the secrecy of the vote, including due to the layout. Voting procedures were generally respected, but several procedural errors during the day indicated insufficient polling staff training. In 19 per cent of polling stations observed, despite a legal requirement, PSCs did not consistently inform voters about the voting procedures and measures to ensure the secrecy of the vote. Further, voters, particularly the elderly, appeared to have difficulties in marking their ballots (36 per cent of observations), indicating inadequate voter education. In around 16 per cent of polling stations, IEOM observers noted that voting procedures were time-consuming, slowing down the process.

In 30 per cent of polling stations observed, not all voters marked their ballots in secrecy. IEOM observers noted that vote secrecy was potentially compromised by how polling booths were positioned, and by the layout of polling stations in 20 and 9 per cent of observations, respectively. Further, in 32 per cent, PSC members and operators standing near the ballot scanner did not ensure that voters cast their ballots in secrecy, while in 14 per cent voters failed to use the secrecy cover properly or held their ballots with the front side visible before casting them. In 4 per cent of observations, individuals providing assistance to voters were observed directing their choices. In 3 per cent of observed polling stations, persons other than the designated PSC member kept track of who had voted, or interfered in the process, primarily partisan observers.

Generally, the PSCs managed the use of the ICT devices adequately. However, technical issues with the voter identification and authentication device (VIAD) were reported in 13 per cent of polling stations. In 29 per cent of observations, fingerprint recognition did not successfully identify all voters on the voter list, while in around 4 per cent of polling stations, the VIAD had difficulty reading identification documents. In addition, PSCs reported that some voters had been denied the opportunity to vote, primarily because their newly issued ID cards were not included in the voter register, thus not recognised by the VIAD. In 9 per cent of observations, technical problems with the ballot scanners were observed, including occasional paper jams and cases where ballots had to be inserted more than once (3 and 4 per cent of observations, respectively). Observers reported 69 instances (4 per cent) where the voting process was suspended due to device malfunctioning. Partisan observers were present in 82 per cent of the polling stations observed, representing a wide spectrum of contestants. Citizen observers were reported in 19 per cent, contributing to transparency.

Closing and counting was observed in 121 polling stations and, due to procedural errors and organisational issues, was assessed negatively in 25 polling stations. Over half of the observed polling stations did not complete the prescribed closing procedures and integrity checks before the start of the count, such as counting of signed VIAD receipts (33 cases), reconciliation of the number of voters and ballots found in ballot boxes (35 cases) or counting and packing of unused and spoiled ballots (27 and 50 cases, respectively). Interference in the process by partisan observers, technical operators or citizen observers was observed in 24 instances.

While preliminary results were generated by ballot scanners and automatically transmitted online to the CEC, the official results will be determined on the basis of the mandatory manual count. In half of observed counts, PSC members did not follow the prescribed sequence or performed the procedures concurrently. IEOM observers attributed these omissions to the PSC members having a limited understanding of the complex procedures and attempting to find practical shortcuts. The determination of ballot validity was generally reasonable and consistent, reflecting voters' intent. The manual count showed minor discrepancies from the electronic results, mostly of up to ten votes, in 55 polling stations. Issues with the reconciliation of results data established by the manual count were observed in 25 instances. In 21 cases, PSCs did not carry out the prescribed cross-checks intended to identify possible arithmetical errors. In 33 instances, PSC members had difficulties filling in the results protocols, while

in 15 cases, the protocols were pre-signed by PSC members before being fully completed. PSCs did not publicly display copies of the results protocols and the preliminary results report generated by the ballot scanner in 47 and 53 polling stations, respectively, reducing transparency.

The IEOM observed the initial phase of the results tabulation at 46 MECs. The process was generally assessed positively, and characterized as efficient and well-organized while most results integrity checks were carried out as prescribed. Procedural omissions, including inadequate verification of submitted election materials, were noted in 4 observations, problems with the integrity of the delivered election materials in 10 observations, while the MEC premises were considered inadequate for tabulation in 4 cases. In 15 instances, IEOM observers were unable to fully follow the results data entry and verify their accuracy, reducing transparency. A few MECs informed the observers that they would start the tabulation process the following day, due to technical issues with the new results management system.

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

MISSION INFORMATION & ACKNOWLEDGEMENTS

Sarajevo, 5 October 2026 – This Statement of Preliminary Findings and Conclusions is the result of a common endeavour involving the OSCE Office for Democratic Institutions and Human Rights (ODIHR), the OSCE Parliamentary Assembly (OSCE PA), the Parliamentary Assembly of the Council of Europe (PACE), the NATO Parliamentary Assembly (NATO PA) and the European Parliament (EP). The assessment was made to determine whether the elections complied with OSCE commitments and other international obligations and standards for democratic elections and with national legislation.

Mr. Luis Graça was appointed by the OSCE Chairperson-in-Office as Special Co-ordinator and Leader of the OSCE short-term observer mission. Ms. Allesia Claes headed the OSCE PA delegation, Mr. Jone Blikra headed the PACE delegation, Mr. Sverre Myrli headed the NATO PA delegation and Mr. Davor Ivo Stier headed the EP delegation. Ms. Tana de Zulueta is the Head of the ODIHR EOM, deployed from 20 August.

This Statement of Preliminary Findings and Conclusions is delivered prior to the completion of the electoral process. The final assessment of the elections will depend, in part, on the conduct of the remaining stages of the electoral process, including the count, tabulation and announcement of results, and the handling of possible post-election day complaints or appeals. ODIHR will issue a comprehensive final report, including recommendations for potential improvements, some eight weeks after the completion of the electoral process. The OSCE PA will present its report at its next meeting. The PACE will present its report at its Standing Committee session in Budva on 27 November 2026. The NATO PA will present the report at its incoming meeting. The EP will present the report at an incoming meeting of its Committee on Foreign Affairs.

The ODIHR EOM includes 20 experts in the capital and 26 long-term observers deployed throughout the country. On election day, 408 observers from 41 countries were deployed, including 272 short-term observers deployed by ODIHR, as well as a 66-member delegation from the OSCE PA, a 24-member delegation from the PACE and from NATO PA, respectively, and 22-member delegation from the European Parliament. There were 45 per cent of women among the observers. Opening was observed in 139 polling stations and voting was observed in 1,454 polling stations across the country. Counting was observed in 121 polling stations, and the tabulation in 46 MECs.

The IEOM wishes to thank the authorities for their invitation to observe the elections, and the Central Electoral Commission and the Ministry of Foreign Affairs of Bosnia and Herzegovina for their assistance. The IEOM also expresses its appreciation to other state institutions, political parties and civil society organizations and the international community representatives for their co-operation.

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