



Office for Democratic Institutions and Human Rights

BULGARIA

PRESIDENTIAL ELECTION

25 October 2026

ODIHR NEEDS ASSESSMENT MISSION REPORT

1 – 4 September 2026



Warsaw
19 October 2026

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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

Following an invitation to observe the 25 October 2026 presidential election, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 1 to 4 September 2026. The NAM was composed of Ranko Vukčević, ODIHR Election Adviser, and Kakha Inaishvili, ODIHR Election Adviser.

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

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

II. EXECUTIVE SUMMARY

Early parliamentary elections in April 2026 gave Progressive Bulgaria (PB) an absolute majority, leading to the formation of a government headed by former president Rumen Radev, who had resigned from the presidency in January to enter parliamentary politics and was succeeded by Vice-President Iliana Iotova. The presidential election is scheduled for 25 October, with a possible second round on 1 November. ODIHR NAM interlocutors generally considered the election as less politically significant than parliamentary and local elections, given the comparatively limited role of the presidency in day-to-day governance and policymaking. Some interlocutors expressed concerns regarding a possible further concentration of political power, particularly in light of PB's parliamentary majority and its support for incumbent President Iotova.

The electoral legal framework was amended in July 2026, with changes affecting machine voting and results transmission, out-of-country voting, Central Election Commission (CEC) procedures, complaints and appeals, accessibility, and campaign regulation. Several ODIHR NAM interlocutors viewed the amendments as either restoring previous arrangements or introducing limited procedural changes rather than addressing broader structural issues. Most interlocutors nevertheless considered the legal framework broadly adequate for conducting elections, while noting remaining gaps and inconsistencies and the absence of a comprehensive review. Several longstanding ODIHR recommendations remain unaddressed, and some political-party representatives expect broader electoral reform discussions to resume after the presidential election.

The CEC informed the ODIHR NAM that all statutory deadlines due by the time of the mission had been met and expressed confidence in its capacity to administer the election, including implementation of the revised machine-voting and results-processing procedures and the expanded training framework. ODIHR NAM interlocutors nevertheless expressed differing levels of confidence in the technical capacity and impartiality of the election administration. Most civil society and political-party representatives noted frequent last-minute replacements of lower-level commissioners without the required training. Several interlocutors also noted that the recent change to the CEC decision-making threshold reduces the degree of cross-party agreement previously required for the adoption of decisions.

Amendments adopted in July 2026 substantially changed the use of voting technologies, making machine voting the sole regular voting method in polling stations with at least 300 voters and reintroducing electronic recording and transmission of machine-voting results, alongside a full control count of paper receipts. The amendments also expanded access to source code and related technical documentation. Several ODIHR NAM interlocutors nevertheless noted issues pertaining to the preparedness of members of Precinct Election Commissions to apply the revised procedures and the continued reliance on the same private provider for technical and logistical services.

Some 6.5 million voters are registered for the forthcoming election. The legislation retains restrictions on suffrage rights for prisoners serving a prison sentence and for persons deprived of legal capacity by a final court decision. Most ODIHR NAM interlocutors expressed general confidence in the overall accuracy of voter lists; several nevertheless noted some longstanding issues related to the address-registration system, including instances of numerous voters being registered at the same address and citizens residing abroad remaining at their permanent address in Bulgaria, potentially contributing to discrepancies between registered voters and the resident population and affecting turnout figures.

Candidates for president and vice-president stand jointly on a single ticket and may be nominated by a political party or coalition, or independently through an initiative committee. All contestants must submit at least 2,500 supporting signatures, while presidential candidates must be Bulgarian citizens by birth, at least 40 years of age, hold no other citizenship, and have resided in Bulgaria during the five years preceding the election. Political parties and other ODIHR NAM interlocutors did not raise concerns regarding the candidate nomination and registration process.

Women remain underrepresented in public and political life. In the current National Assembly, 63 of 240 members (26.3 per cent) are women, while 5 of 21 members (23.8 per cent) of the current Council of Ministers are women. By contrast, women hold 6 of 12 seats (50 per cent) on the Constitutional Court and 9 of 15 positions (60 per cent) on the Central Election Commission.

Most parties met by the ODIHR NAM stated that they expect to campaign without undue hindrance. Interlocutors anticipated a polarized campaign focused on Bulgaria's geopolitical orientation, the cost-of-living and inflation, the concentration of political power, and the use of voting machines. Some also referred to longstanding allegations of "controlled" voting and clientelistic practices, particularly in economically and socially vulnerable communities and at the local level.

Campaigning online remains largely unregulated, and social networks generally fall outside the Election Code's framework for media services. Several ODIHR NAM interlocutors raised concerns about artificial amplification of social media narratives, disinformation, and insufficient oversight of digital campaigning, while noting that responsibilities for cyber and information-related risks remain dispersed across several institutions. Bulgaria has designated the Communications Regulation Commission (CRC) as Digital Services Co-ordinator under the EU Digital Services Act; however, the CRC's role regarding major platforms remains limited, despite ongoing engagement with Meta, X, TikTok, and Google.

Campaigns may be financed from contestants' own funds and donations from natural persons, subject to statutory restrictions and expenditure limits, while eligible contestants may also receive state-funded media packages. The National Audit Office provides guidance to contestants and publishes campaign-finance information through its Unified Public Register, which is updated during the campaign. Most ODIHR NAM interlocutors did not raise major concerns regarding the legal framework, while noting that more comprehensive regulation and oversight of online campaign-related spending would be beneficial to enhance transparency.

The Election Code requires objective and equitable coverage of contestants by the public service broadcasters, while private broadcast media remain subject to more limited election-specific requirements. The media environment is diverse but highly concentrated, and parts of the private media sector are perceived as politically aligned. Defamation remains criminalized. The EU Anti-SLAPP Directive was recently transposed into national legislation, while the national institutional and enforcement framework for the EU Artificial Intelligence Act remain incomplete. The Council for Electronic Media monitors election-related broadcast content and refers potential breaches to the CEC. Recent amendments extended certain campaign-silence and opinion-poll restrictions to social-media profiles of media outlets, and are dealt with by the CEC.

The law provides expedited procedures for election-related complaints. Any citizen may submit alerts regarding alleged violations, while decisions of lower-level election commissions may be appealed to higher commissions and, where applicable, to the administrative courts. Following the July 2026 amendments, complainants may also appeal District Election Commission decisions finding that no violation occurred. The legality of the presidential election may be challenged only before the Constitutional Court by a limited number of constitutionally authorized actors, and contestants do not have direct standing. ODIHR NAM interlocutors did not raise major concerns regarding the functioning of the election dispute resolution system.

The Election Code provides for citizen and international observation of all stages of the electoral process. Several civil society organizations met by the ODIHR NAM intend to follow specific aspects of the process, including campaign activities, political advertising, and related media and online content, and to deploy observers to a limited number of polling stations. A Civil Society Council operates as a consultative body to the CEC.

Most ODIHR NAM interlocutors welcomed an ODIHR election observation presence, while generally expressing overall confidence in the conduct of the forthcoming presidential election and considering a full-scale election observation mission for the presidential election unnecessary. ODIHR has observed elections in Bulgaria regularly, including the April 2026 early parliamentary elections, and has extensively assessed various aspects of the electoral process, including election administration, voting technologies, campaign conditions and longstanding challenges related to electoral integrity. While some interlocutors identified issues warranting continued attention, including the implementation of recent legislative amendments and the reintroduction of machine voting, the NAM found that these could be more effectively addressed through follow-up to previous ODIHR recommendations. In light of these findings, the ODIHR NAM does not recommend deploying an election observation activity for the 25 October presidential election. Instead, ODIHR encourages the authorities to engage in a comprehensive follow-up process, including through co-operation with ODIHR, to address recommendations contained in the forthcoming Final Report on the April 2026 early parliamentary elections, once published, as well as those from previous ODIHR election observation reports. Such engagement could contribute to addressing remaining shortcomings and strengthening the electoral framework and practices ahead of future elections.

A. BACKGROUND AND POLITICAL CONTEXT

Early parliamentary elections were held on 19 April 2026, following the resignation of Prime Minister Rosen Zhelyazkov's government on 11 December 2025 amid widespread anti-corruption protests. The established parliamentary parties suffered significant losses, while Progressive Bulgaria (PB) secured an absolute majority in the National Assembly and formed a government headed by Prime Minister Rumen Radev, the former president.¹ The parliamentary opposition comprises Citizens for European

¹ With 44.59 per cent of the vote, PB won 131 of 240 seats in the National Assembly, on a turnout of 51.11 per cent.

Development of Bulgaria – Union of Democratic Forces (GERB–SDS), We Continue the Change–Democratic Bulgaria (PP–DB), the Movement for Rights and Freedoms (DPS), and Revival.

The most recent presidential election was held in November 2021, concurrently with early parliamentary elections. Incumbent President Rumen Radev was re-elected in the second round with 66.7 per cent of the vote. He began his second five-year term in January 2022 but resigned in January 2026 to enter parliamentary politics and was succeeded by Vice-President Iotova.

On 31 July 2026, the National Assembly scheduled the presidential election for 25 October, with a possible second round on 1 November.

ODIHR NAM interlocutors generally viewed the forthcoming presidential election as less politically significant than recent parliamentary elections and the upcoming local elections, given the comparatively limited role of the presidency in day-to-day governance and policymaking. Several interlocutors anticipate lower voter turnout, pointing to voter fatigue after seven early parliamentary elections since April 2021 amid prolonged political instability.² Some stakeholders expressed concerns about a possible further concentration of political power, particularly in light of PB's parliamentary majority and its support for incumbent President Iliana Iotova.

Women remain underrepresented in public and political life. In the current National Assembly, 63 of 240 members (26.3 per cent) are women. In the current Council of Ministers, 5 of 21 members (23.8 per cent) are women. By contrast, women hold 6 of 12 seats (50 per cent) on the Constitutional Court, and 9 of 15 members (60 per cent) of the Central Election Commission (CEC) are women.

ODIHR has previously observed 16 elections in Bulgaria.³ Most recently, ODIHR deployed an Election Observation Mission (EOM) for the 19 April 2026 early parliamentary elections. The mission's Statement of Preliminary Findings and Conclusions was published on 20 April 2026, while the final report is pending. The last final report, issued in September 2024, contains 15 recommendations for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.⁴

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The presidential election is regulated primarily by the 1991 Constitution and the 2014 Election Code, with relevant provisions of the Political Parties Act, the Code of Administrative Procedure, and the Criminal Code also applicable.⁵ Bulgaria is a party to major international and regional instruments related to the conduct of democratic elections.⁶

² Since 2021, Bulgaria has experienced a prolonged period of political instability marked by difficulties in forming durable governing coalitions, recourse to caretaker governments appointed by the president, and repeated early parliamentary elections.

³ See all previous [ODIHR election-related reports on Bulgaria](#).

⁴ In paragraph 25 of the 1999 OSCE Istanbul Document, OSCE participating States committed themselves “to follow up promptly the ODIHR’s election assessment and recommendations”.

⁵ Other relevant legislation includes the 1999 Civil Registration Act and the 1998 Radio and Television Act, as well as the Territorial Administration Act, and the Local Self-Government and Local Administration Act, which regulate administrative-territorial structures and local authorities’ competences.

⁶ Including the [1950 European Convention on Human Rights \(ECHR\)](#), [1966 International Covenant on Civil and Political Rights](#), [1965 International Convention on the Elimination of All Forms of Racial Discrimination](#), [1979 Convention on the Elimination of All Forms of Discrimination against Women \(CEDAW\)](#), [1995 Council of Europe Framework Convention for the Protection of National Minorities](#), [2003 UN Convention against Corruption](#), and the [2006 Convention on the Rights of Persons with Disabilities \(CRPD\)](#). Bulgaria is also a member of the Council of Europe’s Venice Commission and the Group of States against Corruption (GRECO). As of the time of reporting, Bulgaria has signed but not ratified the [2011 Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence](#).

The election code was amended in July 2026, less than three months before the presidential election.⁷ The amendments re-introduced mandatory machine voting in most polling stations with at least 300 voters and revised procedures for determining and transmitting results. They also removed the limit on polling stations in non-EU countries and the previously envisaged constituency for voters abroad, changed the CEC decision-making threshold and training framework, expanded avenues for complaints and appeals, introduced new accessibility measures, and amended provisions concerning campaign silence and opinion polls on social media.⁸ Several ODIHR NAM interlocutors characterized many of the amendments as either restoring arrangements that had applied previously or introducing limited procedural changes rather than addressing broader structural issues.

Most ODIHR NAM interlocutors viewed the legal framework as providing an adequate basis for the conduct of elections, while noting remaining gaps and inconsistencies, and the absence of a comprehensive review of the Election Code. Several longstanding ODIHR recommendations remain unaddressed, including on voting and candidacy rights, the participation of women and persons belonging to minorities, misuse of state resources, and effective electoral dispute resolution. Several political-party representatives indicated that they expect discussions on broader electoral reform to resume after the presidential election.

The president and vice-president are elected jointly by popular vote for a five-year term under a two-round majority system.⁹ A candidate pair is elected in the first round only if it receives more than half of the valid votes cast, and more than half of all eligible voters participate in the election. If no candidate pair meets both requirements, a second round is held within seven days between the two candidate pairs that received the highest number of votes in the first round. No turnout requirement applies in the second round, in which the pair receiving the higher number of votes is elected.

C. ELECTION ADMINISTRATION

The election administration is composed of the CEC, 31 District Election Commissions (DECs), and some 12,000 Precinct Election Commissions (PECs). The CEC is a permanent body composed of 15 members appointed for a 5-year term. The current composition of the CEC took office on 23 June 2026 following consultations with the parliamentary parties and coalitions. It broadly reflects the current parliamentary representation; however, the methodology used to allocate seats among parliamentary groups has been challenged before the Constitutional Court by a group of members of parliament (MPs).¹⁰

The recent amendments also lowered the CEC's decision-making threshold from two-thirds of members present to more than half of all CEC members, while retaining the quorum of more than half of the Commission. Several ODIHR NAM interlocutors considered that the change reduces the degree of cross-party agreement previously required for the adoption of CEC decisions. ODIHR NAM interlocutors expressed differing levels of confidence in the CEC's technical capacity. Some noted that the distribution of responsibilities across several institutions may constrain the CEC's direct operational control over

⁷ See the [Law Amending and Supplementing the Election Code](#), adopted on 30 July 2026.

⁸ Several competing bills were considered by parliament in July 2026. Four were adopted at first reading and subsequently consolidated into a common bill. Other proposals, including on removing ballot numbers, expanding video surveillance, changing the appointment of lower-level election commissioners, removing residency requirements for certain elections, and changes to the language of campaigning, were not adopted.

⁹ The ballot also includes a "None of the above" option.

¹⁰ On 17 July 2026, 49 MPs challenged parts of the rules governing the appointment of the CEC, arguing, *inter alia*, that the Hare–Niemeyer method and the statutory limitation that no party or coalition may hold a majority in the CEC had been applied incorrectly, resulting in an improper allocation of seats among parliamentary forces. The Constitutional Court admitted [the case](#) for consideration on 23 July and it remains pending.

technical aspects of the process, while others raised concerns regarding perceptions of impartiality and politicization.

The CEC oversees electoral preparations and implements them jointly with the government, local authorities, and other relevant institutions.¹¹ The newly appointed CEC informed the ODIHR NAM that it is confident in its capacity to administer the election, despite the legislative changes adopted shortly before election day. The election administration has thus far met the statutory deadlines for preparations due by the time of the ODIHR NAM. Preparatory activities include the implementation of the revised machine-voting and results-processing procedures, the appointment and training of lower-level commissions, the procurement and technical preparations for voting equipment, and voter information. The CEC has adopted requirements for the computerized processing of election results, including machine-voting data, and is developing voter-information materials, including guidance and interactive tools on machine voting.

The recent amendments expanded the mandate of the CEC training unit, which had previously been tasked only with organizing and conducting training for election commissions. The unit is now tasked with developing voter-information programmes and materials, and maintaining a public electronic register of persons who have completed training.¹² Representatives of the Civil Society Council may participate in the work of the unit, and training of election officials abroad may be conducted remotely. Several ODIHR NAM interlocutors expressed doubts that the expanded training structure would be fully operational in time for the forthcoming election.

DECs consist of either 13 or 17 members, depending on the number of parliamentary mandates allocated to the respective constituency, and are appointed for each election following consultations among parliamentary parties and coalitions.¹³ PECs comprise between 5 and 9 members, depending on the number of registered voters in the precinct. The composition of lower-level commissions should reflect the proportional representation of parliamentary parties and coalitions, with each parliamentary contestant entitled to at least one member where possible. Most civil society and political-party representatives noted frequent last-minute replacements of lower-level election commissioners, including instances where replacements occur without the required training.

The 2026 amendments also repealed the February 2026 limit of 20 polling stations outside diplomatic and consular premises in non-EU countries, which had applied during the April early parliamentary elections.¹⁴ Polling stations abroad may again be established under the general statutory criteria, including, depending on the location, on the basis of at least 40 voter applications and a decision of the CEC. The Ministry of Foreign Affairs and the CEC informed the ODIHR NAM that they do not anticipate difficulties in organizing out-of-country voting under the revised framework.

¹¹ In line with the law, on 19 August, the government assigned the Minister of Innovation and Digital Transformation responsibility for co-ordinating the organizational and technical preparations for the election, including co-ordination with the CEC on the production, delivery, and storage of election materials. The Civil Registration and Administrative Services General Directorate (GRAO), within the Ministry of Regional Development and Public Works, maintains voter-register data, verifies supporting signatures, and checks candidate information against population registers. Information Services, a state-owned enterprise, is responsible for computerized processing and tabulation of election results and performs technical functions related to machine voting. Other technical and logistical services, including deployment and servicing of voting machines, are procured by the CEC.

¹² Between elections, it is also required to provide training on the application of the Election Code to persons nominated by parties and coalitions and to issue certificates to successful participants; nominees for chairperson and secretary positions in PECs are required to present such certificates to the respective higher-level commission.

¹³ Parliamentary parties have primary nomination rights, but if positions remain vacant, other registered parties or coalitions may nominate members to fill the vacancies.

¹⁴ The amendments also removed the previously envisaged parliamentary constituency for voters abroad, a change without direct effect on the presidential election.

The law requires municipalities to designate polling stations accessible to voters with visual impairments and reduced mobility within each constituency, but does not require that all polling stations be accessible. The amendments revised mobile voting arrangements, including the deadlines for submitting requests and limiting the number of voters served by a mobile PEC to 30. Previous ODIHR reports noted that accessibility of polling stations remained uneven in practice. The CEC website includes basic accessibility features, such as adjustable font size, while live and recorded CEC sessions are not provided with sign-language interpretation or closed captioning.

D. USE OF TECHNOLOGIES

Amendments adopted in July 2026 substantially changed the use of voting technologies. In polling stations with at least 300 voters, machine voting is now the sole regular voting method, except in the cases specifically provided by law.¹⁵ Unlike in the April 2026 early parliamentary elections, when voting machines effectively functioned as ballot-printing devices, and the printed records were manually counted, the machines will again record votes electronically and produce machine-generated results protocols, while control receipts will be counted for verification.¹⁶ Electronic machine-voting data will also be transferred and processed at the computing centres of the respective DEC's. The CEC informed the ODIHR NAM that comprehensive pre-election technical checks of voting machines are planned ahead of election day. Several ODIHR NAM interlocutors raised questions regarding the preparedness and training of PEC members.

The July 2026 amendments expanded the CEC's responsibilities and transparency requirements related to voting technologies. The CEC may procure voting machines through purchase or rental and, where deficiencies are identified during conformity checks, is required to instruct the supplier to remedy them. Access to the source code and related technical documentation, previously available only to persons nominated by political parties and coalitions, is now also granted to any Bulgarian citizen upon application to the CEC and is to be available throughout the year under procedures established by the Commission. Some ODIHR NAM interlocutors reiterated concerns regarding the continued reliance on the same provider for technical and logistical services over successive elections, noting possible implications for competition and the degree of institutional control exercised by the CEC.¹⁷

E. VOTER REGISTRATION

Citizens aged 18 or older have the right to vote. The legal framework continues to restrict suffrage rights for persons deprived of legal capacity by a final court decision, including persons with intellectual or psychosocial disabilities.¹⁸ The legislation also retains restrictions on suffrage rights for prisoners serving a prison sentence, irrespective of the gravity of the offence. Some 6.5 million voters are registered for the upcoming election.

¹⁵ Machine voting is not used for mobile voting or in polling stations in healthcare facilities, elderly care homes, other specialized social-service institutions or vessels flying the Bulgarian flag; or in polling stations abroad where fewer than 300 applications were submitted or fewer than 300 voters participated in the previous elections.

¹⁶ A comparable system, in which voting machines electronically recorded votes and produced machine-generated results together with control slips, was last used during the November 2021 presidential and early parliamentary elections.

¹⁷ Ciela Norma has served as Smartmatic's primary partner for the provision and technical support of voting machines.

¹⁸ In March 2025, the [Constitutional Court reiterated Article 42\(1\) of the Constitution](#) in unchanged terms, thereby confirming that the constitutional framework governing these restrictions has not been amended. According to Articles 12 and 29 of the [CRPD](#), "State Parties shall recognize that persons with disabilities enjoy legal capacity on an equal basis with others in all aspects of life" and ensure their "right and opportunity [...] to vote and be elected". Paragraph 48 of the CRPD Committee's [General Comment No. 1 to Article 12 of the CRPD](#) states that "a person's decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising [...] the right to vote [and] the right to stand for election". See the ECtHR judgements in [Kulinski and Sabev v. Bulgaria](#), [Marinov v. Bulgaria](#) and [Dimov and others v. Bulgaria](#).

Voter registration is passive and derives from the permanent and continuously updated National Population Register maintained by the Civil Registration and Administrative Services General Directorate (GRAO) within the Ministry of Regional Development and Public Works. Eligible voters with a permanent address in Bulgaria are automatically included in the voter list of their precinct. Voter lists are compiled by municipal administrations prior to each election and made available for public inspection online and at designated locations 40 days before election day. Requests for corrections may be submitted until seven days before election day, while court-ordered changes must be implemented no later than two days before election day.¹⁹

Most ODIHR NAM interlocutors expressed general confidence in the overall accuracy of voter lists. Several noted some longstanding issues related to the address-registration system, including instances of numerous voters being registered at the same address, and noted that citizens residing abroad for extended periods remain registered at their permanent address in Bulgaria. According to these interlocutors, this may contribute to a voter register considerably larger than the resident population and affect turnout figures.

F. CANDIDATE REGISTRATION

Presidential candidates must be Bulgarian citizens by birth, at least 40 years of age, hold no other citizenship, not be under guardianship or serving a prison sentence, be eligible for election to the National Assembly, and have resided in Bulgaria during the five years preceding the election.²⁰ CEC decisions refusing or invalidating candidate registration may be appealed before the Supreme Administrative Court. Presidential and vice-presidential candidate pairs are registered by the CEC no later than 32 days before election day.

Candidates for president and vice-president stand jointly on a single ticket and may be nominated by a political party or coalition, or independently through an initiative committee comprising at least 21 voters.²¹ To register, parties and coalitions must submit to the CEC supporting signatures of at least 2,500 voters, and an electoral deposit of EUR 1,278.23.²² Initiative committees nominating independent candidate pairs must also submit at least 2,500 supporting signatures and a deposit of EUR 51.13. Voters may sign in support of only one contestant.²³ Political parties and other ODIHR NAM interlocutors did not raise concerns regarding the candidate nomination and registration process.

G. ELECTION CAMPAIGN

The official campaign period starts 30 days before and ends 24 hours prior to election day. By law, campaign materials must identify the issuer and include a statement that vote-buying and selling constitute criminal offences. The Election Code requires campaigning to be conducted only in the

¹⁹ Voters not included in the voter list at their permanent address may also be added on election day upon presentation of an official document issued by the respective municipal administration. In such cases, voters are required to submit a written declaration that they have not voted and will not vote elsewhere.

²⁰ Paragraph 15 of the [UN CCPR General Comment 25](#) states that “any restrictions on the right to stand for election, such as minimum age, must be justifiable on objective and reasonable criteria. Persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent, or by reason of political affiliation”. See also paragraph 24 of the [1990 OSCE Copenhagen Document](#) and sections I.1.1.c.iii and I.1.1.iv of the [Venice Commission Code of Good Practice in Electoral Matters](#).

²¹ A total of 27 candidate pairs were [registered by the CEC](#) to participate in the presidential election.

²² Deposits are refunded to parties, coalitions and initiative committees whose candidate pair receives at least one per cent of the valid votes cast. Registration documents and supporting signatures are verified by the CEC and the GRAO. Deficiencies in registration documents may be remedied within the deadlines prescribed by the Election Code.

²³ Paragraph 196 of the ODIHR and Venice Commission [Guidelines on Political Party Regulation](#) recommend that “a requirement that a citizen be allowed to sign in support of only one party should be avoided, [...]”.

Bulgarian language, an issue addressed in a previous ODIHR recommendation and raised by several ODIHR NAM interlocutors.

Political parties met by the ODIHR NAM stated that they expect to conduct their campaigns without undue hindrance. Most ODIHR NAM interlocutors indicated that the campaign is expected to focus on Bulgaria's geopolitical orientation and foreign-policy positioning, the cost-of-living and inflation, concerns regarding the concentration of political power, judicial council reform, and the use of voting machines, on which political parties remain strongly divided. Most parties met by the ODIHR NAM were in the process of nominating presidential candidates or deciding which candidates to support. Some indicated that they intend to organize in-person campaign events, while making more extensive use of traditional media and online platforms than in previous elections.

Some ODIHR NAM interlocutors referred to longstanding allegations of so-called "controlled" voting, particularly in economically and socially vulnerable communities. A number of interlocutors also described entrenched clientelistic practices at the local level, especially in smaller municipalities, including pressure on municipal employees and voters. Some political-party representatives argued that the use of voting machines would help prevent such practices, without explaining the mechanism through which this would occur.

Online campaigning and campaigning by third parties remain largely unregulated. Social networks and personal blogs are generally not classified as media services under the Election Code, although recent amendments extended campaign-silence and opinion-poll restrictions to social-media profiles operated by regulated media providers (*see Media*). Several ODIHR NAM interlocutors raised concerns regarding the potential misuse of online platforms, including artificial amplification of content, disinformation, and artificial intelligence (AI) -generated material. Bulgaria still lacks a dedicated inter-institutional framework for the systematic exchange of information and co-ordinated responses to emerging cyber and information-related threats in the electoral context, with relevant responsibilities dispersed among different institutions.

Bulgaria has established a national framework for implementing the EU Digital Services Act (DSA), with the Communications Regulation Commission (CRC) designated as the Digital Services Co-ordinator and working alongside the Council for Electronic Media (CEM) and the Personal Data Protection Commission. The CRC informed the ODIHR NAM that, as no very large online platforms are established in Bulgaria, its role is largely limited to receiving and forwarding alerts through the DSA co-operation mechanisms. The CRC has established contacts with Meta, X, TikTok, and Google, and continues engagement with these platforms and the CEC ahead of the election. The EU Regulation on transparency and targeting of political advertising (TTPA) has been applied since October 2025, but Bulgaria has yet to complete the national measures necessary for its enforcement.²⁴ Many ODIHR NAM interlocutors considered oversight of the online campaign insufficient and identified the lack of a clear framework for online political advertising as a significant transparency gap.

H. CAMPAIGN FINANCE

The Election Code and the Political Parties Act regulate campaign finance. Parties entitled to annual public funding may use it for campaign purposes.²⁵ Campaigns may be financed from the own funds of

²⁴ [Regulation \(EU\) 2024/900](#) of the European Parliament and of the Council of 13 March 2024 on the TTPA establishes EU-wide rules to enhance transparency in political advertising, including requirements for the disclosure of sponsors, funding sources and targeting criteria, as well as restrictions on the use of personal data for political advertising, with the aim of safeguarding democratic processes and preventing manipulation.

²⁵ The state also provides media packages to eligible parties, coalitions and initiative committees under the conditions prescribed by the Election Code.

parties, parties participating in coalitions, and members of initiative committees; candidates' funds; and monetary or in-kind donations from natural persons. Contributions from legal entities, religious institutions, anonymous and foreign sources are prohibited. Donations and contributions by candidates or initiative committee members exceeding one minimum monthly wage must be accompanied by a declaration on the origin of the funds.²⁶ Contestants are required to maintain a dedicated campaign account, and transactions exceeding EUR 511.29 must be made by bank transfer. Individual donations are subject to statutory limits. The total campaign expenditure for a party, coalition, or initiative committee is capped at EUR 1,022,583.

The law does not comprehensively regulate or provide for effective oversight of expenditure by third parties or campaign spending on social networks. ODIHR NAM interlocutors did not identify the use of cryptocurrencies in campaign finance as a current concern, but acknowledged that their possible use in campaign-related activities could pose a potential oversight risk, as the legislation does not explicitly address cryptocurrencies in the context of campaign finance.²⁷

The National Audit Office (NAO) oversees campaign finance and provides guidance to election contestants on campaign-finance reporting requirements. Contestants are required to disclose information on campaign income, donations, and contracts with media, advertising, polling, and public-relations agencies during the campaign through the NAO's Unified Public Register. However, they are not required to report campaign expenditure prior to election day.²⁸ Within 30 working days after election day, contestants must submit final reports on campaign income, expenditure, and outstanding payment obligations, which the NAO publishes and subsequently audits.²⁹

Contestants must submit prescribed information on campaign funding, donors, and contracted sociological, advertising, and public-relations agencies for publication in the Unified Public Register within five days of the start of the campaign, and report any newly received information within seven days. The NAO informed the ODIHR NAM that the register is updated in real time, allowing the public to follow disclosed information on campaign financing during the campaign. The legislation provides for administrative sanctions for non-compliance with campaign-finance requirements and, in certain cases, suspension of public funding.

Overall, most ODIHR NAM interlocutors did not raise major concerns regarding the legal framework for campaign finance, while noting that more comprehensive regulation and oversight of online campaign-related spending would be beneficial to enhance transparency.

²⁶ The minimum monthly wage in 2026 is EUR 620.20.

²⁷ Cryptocurrencies are legal and regulated in Bulgaria under the [EU Markets in Crypto-Assets](#) (MiCA) regime and national law.

²⁸ Paragraph 261 of the [2020 ODIHR and Venice Commission Guidelines on Political Party Regulation](#) (Guidelines on Political Party Regulation) states that “[i]t is good practice to require [...] reports providing oversight bodies and the public with preliminary information on campaign incomes and expenses of parties and candidates several days before election day”.

²⁹ Media service providers, polling, advertising, and public-relations agencies are also required to submit information on services provided to contestants, which the NAO may use for cross-checking. The NAO has a six-month deadline to complete the audit of the information provided; the audit of the 19 April 2026 early parliamentary elections therefore remains pending.

I. MEDIA

The media landscape is diverse, with television (TV) remaining a primary source of news, followed by online media. Public service broadcasters Bulgarian National Television (BNT) and Bulgarian National Radio (BNR) remain among the most trusted news sources.³⁰

The legal framework provides constitutional guarantees for freedom of expression and the right to information. Defamation remains a criminal offence punishable by fines. The EU Anti-Strategic Lawsuit Against Public Participation (SLAPP) Directive required transposition by 7 May 2026; amendments to the Civil Procedure Code implementing the Directive were adopted on 30 September 2026. Still, concerns persist regarding the professional security of journalists and editorial independence, with international assessments noting fewer physical attacks but an increase in verbal attacks, online harassment, and continued legal pressure on journalists, alongside dismissals of journalists covering politically sensitive topics.³¹

The media market continues to be characterized by a high degree of ownership concentration, with several large groups holding significant positions across the TV and telecommunications sectors.³² Several ODIHR NAM interlocutors described the media environment as polarized, noting perceived editorial alignments and links between parts of the private media sector and political or economic interests, while also raising concerns that ownership concentration may affect media pluralism and editorial independence.

By law, the public service broadcasters, BNT and BNR, are required to cover the campaign objectively and fairly, respecting the equality and significance of registered contestants, in line with rules adopted by the CEC. BNT informed the ODIHR NAM that it applies these principles in its coverage and plans extensive campaign programming, including interviews and debates. At the same time, BNT noted difficulties in reconciling the requirement to cover all registered contestants on prescribed conditions and its own editorial standards, where a contestant's statements conflict with the latter. BNT also informed the ODIHR NAM that it distinguishes coverage of President Iotova's official activities from her campaign, including limits on incumbency-related coverage in news programming during the campaign. The broadcaster further plans to develop programming for voters abroad, citing comparatively low participation among diaspora communities. BNT provides sign-language interpretation and subtitling across election-related and other programming.

CEM conducts specialized monitoring of election-related coverage by licensed and registered media service providers, with the scope and parameters agreed with the CEC. Its role is supportive: where the CEM identifies a possible breach of the Election Code, it refers the case to the CEC, including information on the provider and relevant recordings, while the CEC establishes violations and imposes sanctions. For the forthcoming election, the CEM plans to monitor public and private TV and radio services, registered non-linear media services, and the Bulgarian video-sharing platform. The CEM does not monitor print media, online news outlets, or social networks.

³⁰ A [national survey commissioned by CEM](#) and conducted by the Myara agency found that 59.1 per cent of respondents expressed greater trust in public than private media and 62 per cent in traditional radio and TV compared with online media. BNT was identified by 36.4 per cent of respondents as providing the most objective TV information, while BNR received the highest assessment for radio, at around 35 per cent.

³¹ In June 2026, the [Committee to Protect Journalists](#) and several international media-freedom organizations called on the authorities to investigate alleged plans for a violent attack against BIRD investigative journalist Dimitar Stoyanov. See also the [2026 European Commission Rule of Law Report for Bulgaria](#).

³² The [2026 European Commission Rule of Law Report for Bulgaria](#) notes continued indications of political and economic influence over the media and concerns regarding media concentration and editorial independence.

Following the 2026 amendments, the Election Code extended the campaign-silence and opinion-poll restrictions to social-media profiles operated by licensed and registered media providers.³³ Such profiles fall outside the scope of CEM's specialized monitoring, which covers media services within its statutory remit, while cases concerning these profiles are dealt with by the CEC. The CEM monitoring will cover, *inter alia*, paid political content, use of intolerant speech, adherence to campaign-silence requirements, publication of opinion polls, use of languages other than Bulgarian in campaigning, and compliance by BNT and BNR with campaign requirements approved by the CEC. The CEM also informed the ODIHR NAM that it has been observing the growth of AI-generated media content. The EU Artificial Intelligence Act became generally applicable on 2 August 2026; however, Bulgaria has not yet completed the national institutional and enforcement framework required for its implementation.³⁴

National measures related to the implementation of the European Media Freedom Act remain incomplete, although the CEM has initiated consultations and public discussions on editorial independence and safeguards against external influence.

J. ELECTION DISPUTE RESOLUTION

Election disputes are handled by election commissions and the administrative courts, with standing to file complaints generally limited to persons with a legitimate legal interest under the Administrative Procedure Code.³⁵ Any citizen may also submit an alert concerning election-related violations to the election administration. The Election Code provides expedited procedures, with deadlines ranging from three days to as little as one hour on election day. Following the 2026 amendments, a person who has submitted an alert may challenge a decision of a District Election Commission finding that no violation of election legislation occurred. Decisions of the CEC may be appealed before the competent administrative court or, in certain cases, directly to the Supreme Administrative Court.

The legality of the election of the president and vice-president may be challenged before the Constitutional Court. Contestants do not have direct standing to petition the Court and must rely on one of the constitutionally authorized bodies to initiate proceedings, a limitation previously noted by ODIHR in relation to access to an effective remedy in election result disputes.³⁶ ODIHR NAM interlocutors did not raise major concerns regarding the current system for resolving election disputes, however several referred to the stalled judicial reform.³⁷

K. CITIZEN AND INTERNATIONAL OBSERVERS

The Election Code provides for observation of all stages of the electoral process by citizen and international observers. Organizations must apply to the CEC for accreditation no later than seven days before election day. Registered contestants may appoint representatives to follow the work of election commissions at all levels and proxies to observe proceedings at PECs during voting and counting.³⁸

³³ The July 2026 amendments also increased the sanctions for violations of the rules on publication of election-related opinion polls; fines were raised from BGN 2,000–5,000 (EUR 1,022.61 – 2,556.45) to EUR 5,000–10,000.

³⁴ [Regulation \(EU\) 2024/1689](#) (Artificial Intelligence Act) requires Member States to designate national competent authorities and a single point of contact. Bulgaria has taken only preparatory steps towards establishing the national institutional framework.

³⁵ Decisions of lower-level election commissions are appealed to the respective higher-level election commission.

³⁶ Article 2.3 of the [ICCPR](#) states that “[a]ll persons whose rights or freedoms are violated shall have an effective remedy [...]”; see also paragraph 5.10 of the [1990 OSCE Copenhagen Document](#). Standing to file such a petition is limited to at least one-fifth of the Members of Parliament, the President of the Republic, the Council of Ministers, the Supreme Court of Cassation, the Supreme Administrative Court, or the Prosecutor General.

³⁷ The [2026 European Commission Rule of Law Report for Bulgaria](#) notes that perceived judicial independence remains low and identifies continued concerns regarding judicial governance, including the expired mandates of key judicial bodies and insufficient safeguards against political influence.

³⁸ Only one proxy per contestant may be present at a polling station at a time.

Several civil society organizations met by the ODIHR NAM nevertheless intend to follow specific aspects of the electoral process, including campaign activities, political advertising, and related media and online content, and to deploy observers to a limited number of polling stations. In addition, a Civil Society Council operates as a consultative body to the CEC, providing a platform for dialogue between the election administration and civil society organizations.³⁹

IV. CONCLUSIONS AND RECOMMENDATIONS

Most ODIHR NAM interlocutors welcomed an ODIHR election observation presence, while generally expressing overall confidence in the conduct of the forthcoming presidential election and considering a full-scale election observation mission for the presidential election unnecessary. ODIHR has observed elections in Bulgaria regularly, including the April 2026 early parliamentary elections, and has extensively assessed various aspects of the electoral process, including election administration, voting technologies, campaign conditions and longstanding challenges related to electoral integrity. While some interlocutors identified issues warranting continued attention, including the implementation of recent legislative amendments and the reintroduction of machine voting, the NAM found that these could be more effectively addressed through follow-up to previous ODIHR recommendations. In light of these findings, the ODIHR NAM does not recommend deploying an election observation activity for the 25 October presidential election. Instead, ODIHR encourages the authorities to engage in a comprehensive follow-up process, including through co-operation with ODIHR, to address recommendations contained in the forthcoming Final Report on the April 2026 early parliamentary elections, once published, as well as those from previous ODIHR election observation reports. Such engagement could contribute to addressing remaining shortcomings and strengthening the electoral framework and practices ahead of future elections.

³⁹ The [2026 European Commission Rule of Law Report for Bulgaria](#) notes that civil society organizations remain active in public policy consultation and oversight, while continuing to face challenges related to financial sustainability and the predictability of public funding.

ANNEX: LIST OF MEETINGS

Ministry of Foreign Affairs

Radi Naydenov, Permanent Secretary

Hristiana Grozdanova, Director of Human Rights

Milena Ivanova, Head of International Humanitarian Organization Department and Focal Point for Election Observation Missions

Committee on Legal Affairs, National Assembly

Milen Trifonov, Member, Parliamentary Group Progressive Bulgaria

Central Election Commission

Georgi Horozov, Chairperson

Ismail Osman, Vice-chairperson

Margarita Makhaeva, Vice-chairperson

Yordanka Gancheva, Secretary

Stoyanka Balova-Tsvetkova, Member, Spokesperson

Alina Dobрева, Member

Anna Aleksandrova, Member

Vyara Todeva, Member

Georgi Bahanov, Member

Desislava Abrasheva, Member

Zinaida Zlatanova, Member

Ivan Karchev, Member

Yordan Vasilev, Member

Lazarina Boneva-Haralampieva, Member

Tsvetan Enchev, Member

Information Services

Ivaylo Filipov, Chief Executive Officer

Alexander Stanev, Director of System Integration and Innovations

Penka Borisova, Head of Legal Department

Ministry of Regional Development and Public Works

Desislava Stoycheva, Acting Director General, Civil Registration and Administrative Services General Directorate

National Audit Office

Margarita Nikolova, Vice President

Ekaterina Percheva, Director of the Specific Audits Directorate

Denitsa Bozheva, International Relations

Council for Electronic Media

Gabriela Naplatanova, Chairperson

Galina Georgieva, Member

Kadrinka Kadrinova, Member

Prolet Valkova-Velkova, Member

Simona Veleva, Member

Zornitsa Gyurova, Director of the Monitoring and Analysis Directorate

Communications Regulation Commission

Martina Martinova, Chief Expert, International Activity and Digital Services Department, International Activity, Digital Services and Co-ordination Directorate

Miglena Peychinova-Zaharinoва, State Expert, International Activity and Digital Services Department, International Activity, Digital Services and Co-ordination Directorate

Irena Simeonova, Acting Head, International Activity and Digital Services Department, International Activity, Digital Services and Co-ordination Directorate

Public Broadcaster – Bulgarian National Television

Georgi Slanchev, Board Member

Alexander Kumanov, Head of International Communications Department

Boyko Vasilev, Producer and Presenter, Political Survey “Panorama”

Political Parties⁴⁰

Yordanka Fandakova, Member of the Parliamentary Group, Citizens for European Development of Bulgaria – Union of Democratic Forces

Georg Georgiev, Member of the Parliamentary Group, Citizens for European Development of Bulgaria – Union of Democratic Forces

Pavel Popov, Member of the Parliamentary Group, Democratic Bulgaria

Aleksandra Sterkova, Member of the Parliamentary Group, Democratic Bulgaria

Stanislav Anastassov, Member of the Parliamentary Group, Movement for Rights and Freedoms

Atidzhe Alieva-Veli, Member of the Parliamentary Group, Movement for Rights and Freedoms, Chairperson of the Parliamentary Committee on Human Rights, Religion and Citizens’ Complaints

Hamid Hamid, Deputy Chairperson of the Parliamentary Group, Movement for Rights and Freedoms,

Asen Babachev, Secretary of the Parliamentary Group, Progressive Bulgaria

Nikolay Denkov, Chairperson of the Parliamentary Group, We Continue the Change

Stoyu Stoev, Member of the Parliamentary Group, We Continue the Change

Civil Society

Vasil Dolapchiev, President, Union of the Blind in Bulgaria

Nadezhda Gologanova, Civil Initiative for Free and Democratic Elections; Member of the Civil Society Council to the CEC

Tsvetelina Peneva, Democracy and the Rule of Law Association; Member of the Civil Society Council to the CEC

Stoil Tzitzelkov, Coalition for Fair Election; Member of the Civil Society Council to the CEC

Iassen Lazarov, Expert, Institute for Public Environment Development

International Community⁴¹

Representatives of diplomatic missions of Greece, Ireland, the Russian Federation, and Switzerland.

⁴⁰ ODIHR offered meetings to all parliamentary political parties.

⁴¹ The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in Bulgaria.