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Observation of the presidential and parliamentary elections in North Macedonia (24 April and 8 May 2024)

Election observation report
Ad hoc Committee of the Bureau
Rapporteur: Mr Alfred HEER, Switzerland, Alliance of Liberals and Democrats for Europe

1. Introduction

1. In anticipation of the observation of the presidential and the parliamentary elections to be held in North Macedonia and subject to receiving an invitation, the Bureau of the Parliamentary Assembly, at its meeting on 22 January 2024, decided to set up an ad hoc committee composed of 20 members (SOC-6; EPP/CD-6; ALDE-4; EC/DA-3; UEL-1), as well as the two co-rapporteurs of the Monitoring Committee, and to conduct a pre-electoral mission. On 26 January, the Bureau approved the list of members of the ad hoc committee to observe these elections and appointed Mr Alfred Heer (Switzerland, ALDE) as its chairperson. On 7 March the Bureau approved an updated list (Appendix 1).

2. On 14 February 2024, the President of the Assembly of the Republic of North Macedonia, Mr Jovan Mitreski, announced that the regularly scheduled presidential election would be held on 24 April, with a potential second round on 8 May, concurrently with the parliamentary elections. On 15 February 2024, he invited the Parliamentary Assembly (PACE) to observe the presidential and the parliamentary elections to be held on 24 April and 8 May.

3. PACE observed these elections while North Macedonia is engaged in a post-monitoring dialogue with the Assembly. In its Resolution 2304 (2019) "Post-monitoring dialogue with North Macedonia", the Assembly resolved to assess, in its next report, the progress made in particular in the following areas which are relevant for the elections:

– the further consolidation of the sustainability and functioning of democratic institutions;

– the independence of the judiciary, notably the strengthening of the independence and accountability of judges and prosecutors.

– the fight against corruption, in line with the recommendations issued by the GRECO, in particular with respect to high-level corruption cases and non-selective implementation of laws and policies;

– the consolidation of its electoral framework, in line with the recommendations of the Venice Commission and the Parliamentary Assembly election observation mission reports;

– the pursuance of inclusive policies aiming at securing the rights of minorities, in the spirit of the Ohrid Framework Agreement, including for the Roma community.

4. In line with the co-operation agreement signed between the Assembly and the Venice Commission on 4 October 2004, a representative of the Venice Commission was invited to join the ad hoc committee as legal adviser.

5. A pre-electoral mission took place on 26 and 27 March 2024 in Skopje. Its programme is contained in Appendix 2 and its statement in Appendix 3.

6. For the presidential election, the PACE ad hoc committee (PACE delegation) worked from 22 to 25 April 2024. It operated as part of an International Election Observation Mission (IEOM) together with the electoral observation mission of the Office for Democratic Institutions and Human Rights of the Organisation for Security and Cooperation in Europe (OSCE/ODIHR). The programme of the meetings is set out in Appendix 4.

7. The IEOM concluded that the presidential election campaign was competitive and that fundamental freedoms including media freedom were respected, but that important areas of the presidential contest, including campaign rules, access to the media, and allocation of State funding, are not regulated, undermining the key principle of legal certainty. The joint press release is set out in Appendix 5.

8. For the parliamentary elections and the second round of the presidential election, the PACE delegation worked from 6 to 9 May 2024. It operated once more as part of an IEOM, this time together with a delegation from the OSCE Parliamentary Assembly (OSCE-PA), a delegation from the European Parliament (EP) and the electoral observation mission of the ODIHR. The programme of the meetings is set out in Appendix 6.

9. The IEOM concluded that the parliamentary elections and the second round of the presidential election were competitive and that an extensive and pluralistic campaign helped voters to make an informed choice, but that the process was marred by negative rhetoric with nationalistic slogans, as well as shortcomings in the legislation and insufficient oversight of campaign finances. The joint press release is set out in Appendix 7.

2. Political context

10. The last presidential election was held on 21 April 2019 and, following a run-off on 5 May, was won by Stevo Pendarovski, endorsed by SDSM. The most recent parliamentary elections were held on 15 July 2020, before the official end of the sitting parliament's term, and resulted in the formation of a coalition government led by SDSM and the Besa Movement.

11. The political landscape is dominated by two parties, the Social Democratic Union of Macedonia (SDSM) and the Internal Macedonian Revolutionary Organization – Democratic Party for Macedonian National Unity (VMRO-DPMNE), which have led alternating governing coalitions since independence. In January 2024, in accordance with the law and the Pržino Agreement and following the coalition agreement between the SDSM and the Democratic Union for Integration (BDI/DUI), a caretaker government led by Talat Xhaferi, the country's first ethnic-Albanian prime minister, was established to organise the elections. This is the first time since 2006 that a parliament has completed its full term.

12. The pre-electoral political environment remained calm. However, entrenched political fragmentation and ethnic divisions have hindered the passage of reforms related to election legislation and of necessary reforms in public administration and the judiciary, as well as the implementation of anti-corruption efforts also required by the European Union (EU) for accession. Most IEOM interlocutors referred to a generalised atmosphere of disaffection with the political establishment, due to perceptions of political influence in institutional appointments, long-standing inefficiencies within the public administration, and high-profile corruption cases.

13. The Constitution provides for equality of men and women, and the 2006 Law on Equal Opportunities for Women and Men requires equal gender representation at all levels of public administration and public life. The outgoing parliament included 51 women (42.5%). Women hold 4 of the 20 ministerial positions (20%). Only 2 of the 80 municipal mayors (2.5%) are women. Of the 62 registered parties that participated in the parliamentary race independently or as part of coalitions, only 6 have women leaders (9.6%). This underrepresentation in various elected and appointed positions, coupled with instances of pressure and online attacks on female politicians, indicates that efforts by the authorities and political parties to address the enduring gender stereotypes impeding women's participation in politics have been insufficient. The Constitution guarantees the protection of ethnic, cultural, linguistic and religious identity of all communities. However, Roma and Turks are under-represented in some aspects of public life.

3. Electoral system and legal framework

14. The President is directly elected for a five-year term from a single nationwide constituency. If no candidate receives more than half the votes of all registered voters, a second round is held two weeks later between the two top candidates. In the second round, the candidate with the highest tally is elected, unless the turnout falls below 40%, in which case the entire election process is repeated without a legally-determined deadline for so doing. The turnout requirement in the second round could lead to cycles of repeated elections, which was previously criticised by the Venice Commission and the ODIHR.

15. The presidential election is regulated by the 1991 Constitution, the 2006 Electoral Code, the 2004 Law on Financing of Political Parties, the 2019 Law on Prevention of Corruption and Conflicts of Interest, the Criminal Code, and subsidiary acts by the State Election Commission (SEC). The legal framework for the parliamentary and presidential elections establishes the basis for holding democratic elections.

16. The Electoral Code was last amended on 7 March and 1 April 2024, after the elections had been announced, which undermines legal certainty. The changes, which resulted from negotiations between the ruling parties and the opposition, were adopted by means of an expedited process, without public debate. Although they incorporated some previous ODIHR recommendations and technical proposals from the SEC, they largely disregarded recommendations made by the inter-agency working group in November 2023, which had been driving electoral reform discussions since May of that year. Many IEOM interlocutors criticised the lack of transparency in the adoption process and its failure to address long-standing shortcomings of the election-related legislation.

17. The amendments, *inter alia*, eliminate the requirement for citizens to possess a valid ID document in order to retain their inclusion in the voter register, revise certain campaign finance regulations, enhance data protection in relation to voter registration, specify deadlines for resolving election disputes and, for these elections, permitted the use of certain expired identity documents for voter verification. However, a number of previous Venice Commission and ODIHR recommendations remain unaddressed, including that the Electoral Code be systematically revised to eliminate gaps and inconsistencies, ensure equal access to the media in election campaigns, increase the accountability and integrity of campaign financing, and enhance regulations on the misuse of administrative resources. The increase in the required number of signatures in support of independent candidacies is significant and would have required meaningful public debate and consultations with stakeholders.

18. The unicameral parliament, comprising 120 to 123 members (MPs), is directly elected for a four-year term, under a proportional representation system from closed lists. Of these, 20 MPs are elected from each of the 6 in-country districts. Up to three MPs can be elected from a single electoral district abroad. The number of seats open for election depends on a threshold calculated on the basis of the previous election results, with no correlation to voter turnout, which is not in line with the principle of equality of the vote. The Electoral Code permits that the number of voters in a given in-country district deviate from the average number of voters per district by no more than 5%. The number of registered voters in three districts exceeds this threshold but district boundaries were not adjusted ahead of the parliamentary elections, contrary to the law and international good practice.

19. Some rules on the elections fall short of international good practice, including the voting rights of persons with disabilities, the disproportionate restrictions on candidacy rights based on criminal charges, and the requirements to disclose ethnic affiliation to register as a candidate. Other aspects of parliamentary elections remain underregulated. Key aspects of the presidential election are also not regulated, including some campaign rules, access to the media and the distribution of State funding, undermining legal certainty. Certain SEC instructions adopted or reinstated for these elections interpret the law in a manner that is restrictively narrow.

20. A number of previous Venice Commission and ODIHR recommendations remain unaddressed, including on the need for systematic revision of the Electoral Code to eliminate gaps and inconsistencies to provide legal certainty. Many IEOM interlocutors, including those from State institutions and civil society organisations, criticised the lack of transparency in the adoption process and its failure to address long-standing shortcomings of the election-related legislation, and emphasised the necessity for comprehensive legal reform.

4. Election administration, voter lists and registration of candidates

21. The elections were administered by a three-level administration comprising the State Election Commission (SEC), 80 Municipal Election Commissions (MECs), and 3 391 Election Boards (EBs). Out-of-country voting was conducted in 31 diplomatic and consular offices in 22 countries. Early voting was held on 7 May for homebound voters, those in penal institutions, and institutional care facilities.

22. The SEC consists of seven members, nominated by political parties and appointed by the parliament for a five-year mandate. During the pre-electoral period, the SEC held regular sessions that were open to the public and broadcast online, but it did not consistently provide public notice of its sessions, and sometimes announced them less than an hour in advance, including the session for the official announcement of preliminary results of the first round of the presidential election and post-election complaints. Moreover, not all session minutes and decisions were published online as legally required, which limited transparency. Many

IEOM interlocutors, including some MEC members, noted that the SEC adopted some instructions and decisions late, and the guidance provided on key issues such as election-day dispute resolution, election-day instructions and voter identification was inadequate.

23. MECs are comprised of five members, appointed from State and municipal administration employees for five-year terms. EBs consist of three permanent members, appointed for four years from among State and municipal employees and public servants, as well as two temporary members nominated by political parties. While there had been a significant turnover in membership of MECs and EBs prior to the first election day of the presidential election, their composition remained largely unchanged before the parliamentary elections.

24. The election administration managed the technical preparations efficiently, met all legal deadlines and maintained public confidence in its technical capacity. However, persistent staff shortages in various SEC departments and the absence of a SEC secretary general since 2021, coupled with reduced funding, led to delays in several elements of the preparations, mainly prior to the 24 April election day. These delays affected the replacement of MEC and EB members, the provision of instructions to MECs and EBs, logistical arrangements for transporting election materials, and the launch of the voter education campaign. The composition of most MECs fulfils the legal criteria for gender (overall 49% of the MEC members are women) and ethnic representation. However, only two of the seven SEC members are women (29%), falling short of the required quota.

25. Ahead of the first round of the presidential election, the SEC developed and implemented a comprehensive training programme for lower-level election bodies and representatives from media, political parties, and civil society organisations. Training activities continued for EB chairpersons and their substitutes between the two election days, also incorporating discussion on lessons learned from the 24 April election day.

26. Due to administrative challenges in the procurement process and the delayed approval of educational materials by the commission, the SEC launched its broadcast media, leaflet, and online voter education campaign ten days before the 24 April election day, two weeks later than planned. The voter education campaign primarily featured general messages encouraging participation. After the first election day, additional video spots were introduced, and covered the parallel conduct of voting processes for the two elections, ballot validity and prohibited activities during voting. The educational materials were mainly in Macedonian, with subtitles in Albanian, and occasionally also in Romani, Serbian, Turkish, and Vlach languages.

27. Positively, the SEC made various voter information materials available in accessible formats, published polling station accessibility data online, established a dedicated helpline for voters with hearing impairments, and provided assistive tools, such as ballot templates on election day. Election-day press conferences and SEC sessions between the two election days were interpreted into sign language. However, EBs were not trained on how to use assistive tools, and key information in accessible formats, including voter registration data, remained limited. No additional efforts were made to improve accessibility of electoral premises, including polling stations, between the two election days.

28. Citizens over the age of 18 years are eligible to vote. Despite previous recommendations, persons deprived of legal capacity by a final court decision are disenfranchised.

29. The registration system for in-country voting is passive and continuous, based on data from the civil and population registers. The March 2024 legal amendments eliminated the requirement that voters possess a valid identification document to be registered as voters, thus removing an administrative obstacle that had previously limited the constitutional right of otherwise eligible voters. As IDs are still necessary to vote, for these elections, as an additional temporary measure to diminish the negative effects of the delays in issuing ID documents invalidated due to the country's name change, voters with IDs that expired within nine months prior to the elections were allowed to use them for identification at the polling station.

30. The law does not provide for the voter register to be updated between the two rounds of the presidential election. The SEC informed the IEOM that the 1 148 citizens who turned 18 between the two rounds had been added to the voter lists for the parliamentary elections, but not for the second-round of the presidential election. These citizens were only allowed to vote in the presidential run-off if they submitted formal complaints at the MECs or SEC and obtained decisions from these bodies. For the parliamentary elections, the voter register included 1 815 350 voters, including 96 010 registered abroad; for the presidential run-off, the register listed 1 814 317 voters, among them 95 116 abroad.

31. IEOM interlocutors generally did not raise concerns about the inclusiveness of the voter register. However, some pointed to the significant number of citizens residing abroad who remain on the register as they maintain an official residence in-country, which, should these voters choose not to participate in the election, may impact threshold requirements for the presidential run-off, for signature collection in support of independent candidates as well as for constituency delineation. Moreover, persistent shortcomings in the residential address registration and civil registration systems continue to diminish data accuracy. Previous recommendations to ensure data accuracy, harmonise all relevant databases and to audit the voter register remained unaddressed ahead of the elections.

32. Citizens who are registered voters and over the age of 40 by election day, with at least 10 years of residency in the country over the past 15 years, may stand for president. The residency requirement appears to be overly restrictive.

33. The nomination of a presidential candidate must be supported either by the signatures of 30 MPs or at least 10 000 voters. In line with the law, voters were permitted to sign in support of more than one candidate. Fifteen prospective presidential candidates officially notified the SEC of their intention to collect supporting signatures from voters, seven of whom received the required number of signatures.

34. Candidate nomination for the presidential election ended on 19 March. The SEC verified the registration documents against the established criteria within the legal deadline and provided contestants with a 48-hour window to address any identified omissions or shortcomings. In an inclusive process, the SEC registered seven presidential candidates, including two women. Two candidates were ethnic Albanians. Six candidates were supported by groups of voters and one by members of parliament. According to the law, candidates supported by voters are officially independent. However, in practice, all presidential candidates were endorsed by political parties, most used party symbols on the ballot and, following their registration, were subjected by the SEC and other authorities to the same regulations that apply to political parties.

35. The registered presidential candidates were Stevo Pendarovski, endorsed by SDSM-led coalition (Coalition “For a European Future”); Gordana Siljanovska Davkova endorsed by VMRO-DPMNE-led coalition (“Your Macedonia” Coalition); Stevco Jakimovski endorsed by GROM-led coalition (Coalition “Brave for Macedonia”); Bujar Osmani, endorsed by the BDI/DUI-led coalition (“European Front”); Biljana Vankovska-Cvetkovska endorsed by the Left; Arben Taravari, endorsed by VLEN/VREDI; Maksim Dimitrievski, endorsed by I KNOW – Movement for Our Macedonia (ZNAM).

36. Parliamentary candidates must be eligible voters of at least 18 years of age on election day. The law retains a blanket restriction on candidacy rights in the parliamentary elections for those sentenced to imprisonment, irrespective of the gravity of the offense, and without individualised assessment of the case.

37. Parliamentary candidates may be nominated by political parties, pre-electoral coalitions, or stand independently. Independent candidacies were to be supported by the signatures of 1 000 voters. In line with the law, voters were permitted to sign in support of more than one candidate list. The law mandates a minimum representation of 40% of each gender on every candidate list, stipulating that one candidate of the less represented gender must be included among every three consecutive candidates, with at least one additional candidate of this gender for every ten candidates. At odds with international good practice, the law requires that parliamentary candidates disclose their ethnic identity in order to register.

38. Candidate nomination for the parliamentary elections concluded on 2 April 2024. The SEC checked the candidate registration documents and provided contestants with 48 hours to address any omissions or shortcomings identified. While the SEC complied with the legal deadlines in all cases, it reported difficulties in meeting these deadlines in some instances, which it attributed to the delayed provision of personal and criminal record data by State authorities.

39. In an inclusive process, the SEC registered 1 680 parliamentary candidates nominated by 12 political parties and 5 coalitions. It rejected the registration of nine candidate lists for failing to comply with the legal requirements, such as the submission deadline, gender quota, the number of candidates, or for missing requisite documents. Three political parties appealed to the Administrative Court, which upheld the respective SEC decisions. All registered candidate lists met the gender requirements. Women comprised 43% of all parliamentary candidates. However, women only headed 21 of the 84 lists (25%), and women candidates were often placed in the lowest positions allowed by the law. Of the registered candidates, 14% fell within the age range of 18 to 29 years.

40. As far as the out-of-country voting is concerned, the PACE delegation received information on instances where individuals possessing valid documents were excluded from the voter list, necessitating convoluted administrative procedures for rectification. Furthermore, technical errors concerning residential

addresses impeded the registration of citizens who own property in North Macedonia. Insufficient clarity regarding the timing of voting at diplomatic and consular missions compounded the challenges, particularly for those facing long distances and workday constraints.

41. The voter registration process in diplomatic and consular missions globally commenced on 14 February 2024 but encountered issues due to outdated and incomplete instructions. Moreover, confusion regarding passport issuance or renewal further complicated citizen engagement. Efforts to inform the diaspora about the elections were deemed inadequate, with delayed announcements from official channels.

5. Election campaign and its financing

42. The presidential campaign commenced on 4 April 2024 and concluded on 22 April 2024. The parliamentary campaign commenced on 18 April and concluded on 6 May. Therefore the two campaigns overlapped. The law does not stipulate the official start of the campaign period for the second round of the presidential election. In practice, both presidential candidates resumed their campaigns one day after the first election day, prior to the official announcement of a run-off. For the parliamentary and presidential elections, the rules on the distribution of campaign funding, media time, and resources factor the representation of political parties in the parliament, advantaging the four main parliamentary parties, and limiting the opportunities for all candidates to campaign equally.

43. The campaign was competitive, and fundamental freedoms were respected. Political parties, as well as parliamentary and presidential candidates, held large-scale rallies, campaigned door-to-door and disseminated flyers, posters, billboards and digital content. Prominent themes of the campaign included the economy, countering corruption, EU accession, the country's foreign policy, and potential constitutional changes. Between the two election days, parties also focused on local issues, such as infrastructure and regional development. As the campaign progressed, the tone became increasingly negative, with *ad hominem* attacks and occasional threats. Instances of discriminatory rhetoric were observed throughout the campaign period, including the use of nationalistic slogans, and in some cases conflating the perceived actions of political parties with ethnic communities.

44. The campaigns featured few women political figures overall. Issues related to gender equality were largely neglected in the campaign discourse, except by the presidential candidate endorsed by the VMRO-DPMNE-led coalition. In most other events, references to women pertained to their roles within the family, reflecting long-standing gender stereotypes and discrimination against non-traditional families. Youth issues received limited attention in the campaign, primarily focusing on the emigration of young people.

45. The Electoral Code contains some regulations aimed at preventing the misuse of administrative resources prior to elections. Several IEOM interlocutors raised allegations and concerns about vote buying in vulnerable communities, including the Roma and Turks, as well as pressure on voters, mainly public sector employees. The law prohibits the launching of public development projects, extraordinary budgetary disbursements, and employment procedures using budgetary funds after the elections are called. The inauguration of public projects is prohibited starting 20 days before the campaign period. Despite these regulations aimed at preventing the misuse of administrative resources prior to elections, several local public infrastructure projects were announced or inaugurated by mayors, government officials, and MP candidates throughout the campaign period. Some IEOM interlocutors claimed that many public employment and procurement procedures had been initiated shortly prior to the respective ban taking effect.

46. Ethnic Albanian parties featured prominently in the campaign. In addition to the two presidential candidates in the first round, eight ethnic Albanian political parties participated in the parliamentary race as part of the coalitions led by BDI/DUI and VLEN/VREDI. BDI/DUI entered a coalition with other ethnic minority parties, including Bosniacs, Roma and Turks. One Albanian party, the European Citizen Movement, ran independently. One political party, AVAJA, focusing on Roma representation, registered candidate lists in four districts. Campaign messages were mostly presented in Macedonian and Albanian, with Bosnian, Romani, Serbian, Turkish, and Vlach languages used in some cases. Several ethnic minority party representatives felt that the distribution of State campaign funds according to a formula based on parties' representation in parliament hampered their ability to campaign on an equal footing.

47. Campaigning on social networks is not regulated. Most campaign messages promoted candidates and programmes in a neutral tone, with the tone becoming increasingly negative with the official start of the parliamentary campaign and remaining so between the two election days. Campaign content included videos, photographs, descriptions of meetings and speeches. Although many contestants used claims of disinformation as part of their campaign tactics, these were mainly claims of candidates misrepresenting their

accomplishments or support and did not allege disinformation targeted at critical election processes such as voter information. There were no organised State efforts to identify and address disinformation or manipulative content during the pre-electoral period.

48. Overall, deficiencies and inconsistencies in the legal framework, limited financial and human resources for the oversight bodies, the limited information exchange between these institutions, as well as the narrow interpretation of the law by the relevant institutions diminished the effectiveness of campaign finance oversight. Key election stakeholders, including from the oversight institutions, did not have full confidence in the effectiveness of campaign finance monitoring and accountability for the misuse of administrative resources in the campaign.

49. Political parties that received at least 1% of the votes in the previous parliamentary or local elections are eligible for public funding, which may also be used for parliamentary and presidential campaigns, without any legally specified limits. While there is no direct public funding allocated for election campaigns, the State directly reimburses media outlets registered with the SEC for campaign advertisements. The formula for these reimbursements favours the largest ruling and opposition coalitions in the parliament, disadvantaging small and non-parliamentary parties.

50. Parliamentary campaigns may also be financed through monetary and in-kind donations, and loans. Individual citizens can donate up to EUR 3 000, while legal entities may contribute up to EUR 30 000 per campaign. Donations can also be made even after the final results are announced, a practice that some considered as increasing the potential for clientelism. For these elections, the funding reported by parliamentary contestants as received from donations was significantly lower than the funds allocated for campaign reimbursement by the State. By law, the expenditure limit is set at MKD 110 per election and per registered voter in an electoral district. Third party campaigning and paid political advertisements on social networking platforms are not explicitly regulated.

51. Electoral contestants in both parliamentary and presidential elections are required to compile three interim campaign finance reports, two in advance of the elections and a third after the elections. Despite previous recommendations, these reports cannot be submitted electronically and are not audited. All contestant reports must also be sent to the State Audit Office (SAO), the State Commission for the Prevention of Corruption (SCPC) and the SEC, which are obliged to publish them on their websites. A final financial report must be submitted to the SAO within 60 days after the election results are announced, with an audit to be completed within a further 60 days. Some parliamentary contestants did not submit their interim reports in a timely manner or in the required format. Pursuant to the March 2024 legal amendments, interim reports are no longer required to include information on campaign expenditures, but only cover contributions. Moreover, the instructions provided by the Ministry of Finance for interim and final financial reporting excluded requirements for information important for financial oversight, leading to political parties submitting non-uniform or incomplete interim reports, and reducing transparency and accountability.

52. The SCPC can initiate investigations into alleged violations of campaign finance rules either *ex officio,* including based on unofficial reports, or upon receipt of a formal complaint, and must issue a resolution within five days. Since the announcement of the elections, the SCPC initiated 42 cases based on unofficial reports and 3 *ex officio,* applying a general deadline of 60 days, rather than the legally determined five days, which was only applied to one formal complaint. Due to financial constraints and unlike in previous elections, the SCPC did not deploy field monitors to identify the potential misuse of administrative resources and campaign spending, nor did it inspect contestants' bank accounts during the campaign, failing to cross-check reported campaign expenditures with actual spending.

6. Media environment

53. The media landscape is diverse, with 40 television and 58 radio stations, 22 print media outlets, and over 200 online portals. Although television is the main source of information, online portals have had an increasingly significant influence on the media environment, in particular during elections. While the environment is generally conducive to media freedom, the quality of journalism is negatively affected by political fragmentation and ethnic divisions, intense competition among numerous media outlets in a constrained market, and unfavourable working conditions of journalists. The November 2022 amendments to the Law on Civil Liability for Insult and Defamation, along with the February 2023 amendments to the Criminal Code, introduced additional safeguards for journalists. However, online attacks, including those against women, and isolated incidents of physical assault against journalists remain a concern.

54. Changes to the Law on Media and the Law on Audio and Audio-visual Media Services in March 2024 extended public subsidies to include print media and lifted the ban on state-funded advertisements in private media for public interest campaigns. Although the stated aim of the changes was to support media sustainability, many IEOM interlocutors criticised them as likely to increase political influence over the media. Many interlocutors highlighted the need for further reforms in the media sector to enhance the viability of outlets, regulate online media, and further align the legal framework with the EU *acquis* with respect to strengthening the independence and capacity of the media regulator and the public broadcaster.

55. The Electoral Code requires that all media outlets, including online news portals, provide fair and balanced election coverage. The public broadcaster is obliged to air free political promotion, whereas other types of media are entitled to offer paid political advertisements. Many IEOM interlocutors were critical of the fact that the State pays directly for all media coverage which they perceive as entrenching media dependence on State funds.

56. Many IEOM interlocutors asserted that a significant number of the news portals which registered for campaign advertising were created just before the elections in order to receive State funds during election campaigns and, in some cases, to channel these funds to political parties.

57. The public broadcaster National Broadcasting Service (MRT) is funded almost entirely from the State budget. Its news coverage is subject to stringent regulations during the campaign period. The obligation to adhere to strict time allocations constrains editorial freedom and provides disproportionately more time to larger parties.

58. The Agency for Audio and Audio-visual Media Services (AAVMS) is mandated with overseeing compliance with media regulations. During the campaign periods for both the presidential and parliamentary elections, it submitted periodic reports to the SEC based on its media monitoring, and also published its findings online.

59. Although online media is largely unregulated, a co-ordination body consisting of representatives of the AAVMS and civil society organisations has been created to register and publish related notifications, but this body lacks enforcement powers. The AAVMS also developed a voluntary code of conduct in the online sphere.

60. The election-related coverage in broadcast media was overall balanced and neutral in tone. The MRT covered all parliamentary contestants in line with the legal provisions establishing a framework for allocating time to political parties in elections, which privileges those already holding seats in parliament. Broadcasters focused on the major parties and coalitions, with SDSM, VMRO-DPMNE, BDI/DUI, and VLEN/VREDI receiving most prime-time coverage overall. The coalitions led by SDSM and VMRO-DPMNE dominated private broadcasters (24% and 27% of coverage each), both largely in neutral tone.

61. The media provided extensive coverage of the parliamentary and presidential campaigns. There were several televised debates featuring contestants running for the major coalitions in the parliamentary elections, as well as three debates between the two candidates in the presidential run-off, which gave voters the ability to make an informed choice.

62. Some of the legal amendments introduced in March 2024 included changes aimed at improving the accessibility of electoral news to persons with disabilities. Broadcasters were obliged to adjust one edition of their newscasts and one piece of election-related content per day to accommodate persons with sensory impairments. Positively, in line with the law, national public and private broadcasters supplemented parts of their prime-time content with subtitles or sign language throughout the electoral campaign.

7. Complaints and appeals

63. Regulations on mechanisms for election dispute resolution are in place, but some prior recommendations, including those related to limited standing and restrictive deadlines, remain unaddressed. The SEC has the mandate to decide on the majority of complaints, and its decisions can be appealed to the Administrative Court. Deadlines for filing and reviewing complaints are overly short and appear insufficient for preparing meaningful applications and issuing decisions. The regulation of election dispute resolution contains numerous ambiguities and gaps, including with respect to conflicting deadlines, and parallel avenues for submission. The legal standing of voters to file complaints remains limited to cases regarding voter lists and their individual voting rights. The right to appeal election results is limited to the representatives of those that signed in support of the candidates. Moreover, before the second election day, the SEC had still not aligned its instructions on election dispute resolution with recent changes to the Electoral Code.

64. The SEC reported that it did not receive any complaints before the first round of the presidential election. On the first election day, it reported receiving 362 complaints, all of which related to the right to vote. The SEC did not ensure effective legal remedy for complaints submitted on election day, with approximately half of the complaints submitted on the 24 April election day remaining unresolved by the close of the polls. Between the two election days, the SEC received 245 additional complaints on voter registration. Of 610 voter registration complaints received by the SEC in the period between 24 April and 8 May, less than 50% (274) were decided by the 8 May election day (168 were granted, 106 were rejected), and only 39 of these were examined in a public session.

65. The Administrative Court reviewed two appeals related to the registration of voters and four to the registration of parliamentary candidate lists by the SEC. The appeals about voter registration were granted, while those on candidate registration were denied as unfounded, as the Court considered that the applicants failed to convincingly demonstrate that the contested decisions by the SEC violated their rights or the law. The court also upheld an SCPC decision on the violation of the ban on employment ahead of the first-round election day, after two rounds of revisions. The Administrative Court generally complied with the short deadlines but in two cases its procedural approach lacked consistency. Moreover, at odds with the legal provisions, it failed to publish its decisions on voter registration on election day and did not conduct public sessions for these cases despite being required to do so by law. The Court decided on election-related disputes in panels of three judges, although the law prescribes five-judge panels for such cases.

66. The basic court in Tetovo handled two requests for party leadership registration from the two factions of the Alliance of Albanians; a decision was made after recusals of three judges, allegedly due to political pressure. The Constitutional Court received two petitions: one challenging the AAVMS guidelines on the distribution of media airtime among presidential candidates, and another questioning the constitutionality of the Electoral Code with respect to campaign conditions for candidates nominated by groups of voters, without affiliation to political parties, which the appellants claimed to be discriminatory. The Constitutional Court did not review the petitions in a timely manner; one was reviewed and rejected after the challenged provisions had already been implemented, while the second was not examined before the 8 May election day, which the Court attributed to the lack of expedited deadlines for constitutional review.

67. Many IEOM interlocutors voiced doubts about the fairness of adjudication of election-related complaints, citing the potential for political influence, possible interruptions in inter-agency co-operation, a backlog of unresolved disputes, as well as the perceived potential for corruption within the judiciary and law enforcement agencies.

8. Election observation

68. The Electoral Code allows for citizen and international observation and entitles registered contestants to appoint authorised representatives to follow the entire election process, and all levels of the election administration, contributing to transparency. The SEC accredited 2 citizen and 6 international observer groups ahead of the parliamentary elections, along with an additional 383 citizen and 241 international observers from organisations accredited before the first round of the presidential election, thus raising the total number to 1 303 citizen and 771 international observers. Although the legislation does not explicitly regulate the validity of accreditations issued before presidential election for run-offs, in practice, the SEC has interpreted that these would remain valid through the completion of the entire electoral process.

69. Citizen observer activities were generally minimal prior to the first round of the presidential election, as well as between the two election days. Most IEOM interlocutors attributed this to a lack of funding and a shift in the orientation of activities.

9. Election Days

70. On 24 April the PACE delegation split into 9 teams and on 8 May it split into 12 teams. The areas where PACE members observed the opening, voting and counting included Skopje and its surroundings and the regions of Tetovo, Shipkovo, Gostivar, Kumanovo and Ohrid.

71. Moreover, the previous day, a PACE team had observed the voting in the Idrizovo prison, which is the biggest prison in North Macedonia, holding 60% of the persons in prison in the country (1 187 sentenced persons were detained in Idrizovo in 2021). On 28 February 2024, the parliament extended the state of emergency in Idrizovo, initially introduced in June 2023, for another six months. This decision was called to address the volatile security situation. PACE observers noted that the elections were efficiently organised in Idrizovo. The delegation thanks the authorities for having facilitated access to the prison.

72. Election days were generally calm and peaceful. Campaign silence regulations were mostly upheld, including across media platforms. The law is silent on the applicability of campaign silence regulations on social networks. Several party leaders and candidates posted messages online urging citizens to cast their votes on election day, at times including campaign messages.

73. The IEOM assessed the opening of the polls positively at 70 of the 123 polling stations observed. EB members were largely familiar with the procedures and maintained transparency. However, some procedures were not consistently followed: in 24 instances, opening protocols were not completed and signed before voting began; in 10 cases, ballot boxes were not properly sealed; and in 4 cases, the serial number of security seals was not recorded in the logbook. EB members also encountered difficulties in configuring the biometric voter identification devices in 11 instances, although most polling stations opened with minimal delays of no more than 15 minutes.

74. The administration of the voting process was assessed positively by IEOM observers in 99% of the 1 340 polling stations observed. Contributing to the positive assessments was the implementation of important procedural safeguards, such as voter identification, stamping of ballot papers by EBs and signing of voter lists, at 99% of the polling stations observed. However, the legal requirement for EBs to inform voters about voting procedures, important to reduce the number of invalid ballots, was not followed in approximately 41% of the polling stations. Some PACE teams saw in some polling stations attempts to influence voters to vote only for the parliamentary elections and not for the presidential one. The biometric voter identification devices were operational in nearly all instances, but in 24% of the observations not every voter could be successfully identified by fingerprint scanning. PACE observers raised the issue of personal data protection, linked to the voters' photos appearing on the voter lists and also to the potential access of the authorities to the fingerprints data. The secrecy of the vote was generally upheld although in a few reported cases (19 observations) the polling station layout compromised vote secrecy. Group or family voting was observed in 4% of the polling stations (39 instances). While not against the law, in 4% (41 instances), persons other than EB members were observed to be tracking voters who had voted, which may be an indication of pressure on voters. In 18 instances, ballot boxes were not properly sealed. PACE observers also raised the issue of the dimensions of the ballot boxes, which sometimes proved to be too small for a large number of ballots, in particular when these were multilingual hence larger.

75. Representatives from political parties or candidates were present in 86% of the polling stations, contributing to transparency. PACE observers noticed that some of them were reluctant to tell which party they represented. Citizen or international observers were present in 7% of observations. In more than 99% of the polling stations, all authorised persons present had a clear view of the process and almost all EBs fully co-operated with IEOM observers. Women constituted 49% of the EB members and accounted for 60% of polling station chairpersons. Some 46% of the observed polling stations did not provide for independent access for persons with physical disabilities, and the layout was unsuitable for such voters in 22% of stations. Almost all polling stations had a tactile ballot guide for voters with visual impairments.

76. IEOM assessed the counting process negatively in 16 of the 106 polling stations observed due to errors and omissions in the procedures. Observers attributed this to an insufficient understanding of procedures by EB members, as well as efforts to hasten the process. Procedural errors included not following the prescribed order of procedures in 53 cases, failing to count the number of voters who signed the voter list in 24 cases, and not invalidating unused ballot papers before opening ballot boxes in 28 cases. The transparency of the process was compromised in instances where those present did not have a clear view of the procedures in 10 cases, where EB chairpersons did not consistently display ballots during the count in 35 cases or displayed them in such a way that the markings were not visible in 16 cases. IEOM observers reported from 26 counts that the EBs had difficulties in filling in the final protocols, and in 19 polling stations the EB members pre-signed the results protocols before finishing the count. Further, in 14 instances, persons other than EB members were allowed to participate in the count.

77. Results tabulation was positively evaluated by IEOM observers as efficient and smooth in 64 of the 66 MECs observed. Still, despite additional training on the filling of results protocols before election day, numerous mistakes and discrepancies, primarily arithmetical errors requiring corrections before tabulation, were observed in 49 cases. IEOM observers noted that in 24 cases, the EBs completed the results protocols at MEC premises immediately before submitting them for tabulation. In 9 instances, inadequate MEC premises, mainly due to insufficient space to accommodate all EBs waiting for their materials to be processed, led to overcrowding and hampered transparency. The SEC published partial results from polling stations online on an ongoing basis and held two press conferences on election night to announce the preliminary results for the presidential run-off and parliamentary elections.

78. On election day, the SEC received some 490 complaints related to voter registration. Of these, 283 were fully resolved by the close of the polls: 199 were granted, 68 were rejected, and 16 were considered inadmissible; 195 complaints remained unresolved. The SEC did not publish any of the decisions on the matters reviewed, impacting transparency. Overall, the handling of election-day related complaints did not ensure access to effective legal remedies.

79. The results are as follows:

Presidential election – 24 April 2024 (first round)

Total number of voters on the Voter Register: 1 814 317

Total number of voters who voted: 905 622

Total number of unused ballots: 908 720

Total number of valid ballots: 881 040

Total number of invalid ballots: 24 560

Turnout: 49.91%

Results:

1.	Gordana Siljanovska-Davkova	363 085	40.09%
2.	Stevo Pendarovski	180 499	19.93%
3.	Bujar Osmani – Democratic Union for Integration	120 811	13.34%
4.	Maksim Dimitrievski – “For Our Macedonia”	83 855	9.26%
5.	Arben Taravari – Alliance for Albanians	83 337	9.20%
6.	Biljana Vankovska – Levica	41 331	4.56%
7.	Stevčo Jakimovski – “Citizen Option for Macedonia”	8 121	0.90%

Presidential election – final results – 8 May 2024 (second round)

Total number of voters on the Voter Register: 1 814 317

Total number of voters who voted: 861 218

Total number of unused ballots: 953 121

Total number of valid ballots: 812 899

Total number of invalid ballots: 48 289

Turnout: 47.47%

Results:

1.	Gordana SiljanovskaDavkova	561 000	65.14%
2.	Stevo Pendarovski	251 899	29.25%

Parliamentary elections – 8 May 2024

Total number of voters on the Voter Register: 1 815 350

Total number of voters who voted: 1 006 436

Total number of valid ballots: 878 980

Total number of invalid ballots: 27 451

Turnout: 55.44%

Results:

VMRO Coalition “Your Macedonia” (Hristijan Mickoski)	43.36%	58 seats (436 407 votes)
“For a European Future” (Dimitar Kovačevski)	15.35%	18 seats (154 447 votes)
“European Front” (Ali Ahmeti)	13.68%	18 seats (137 690 votes)
VLEN (Bilall Kasami)	10.63%	14 seats (106 937 votes)
Levica (Dimitar Apasiev)	6.82%	6 seats (68 637 votes)
ZNAM (Maksim Dimitrievski)	5.59%	6 seats (56 232 votes)

10. Conclusions and recommendations

80. The IEOM concluded that the parliamentary and presidential elections were competitive, and fundamental freedoms were respected, although the process remains insufficiently regulated. The election legislation provides a suitable framework for holding democratic elections, but persisting inconsistencies, gaps, and ambiguities compromised legal certainty and merit revision. The extensive and pluralistic campaign coverage in the media gave voters the opportunity to make an informed choice, but negative rhetoric and nationalistic slogans marred an otherwise stable pre-election period. With the notable exception of one presidential candidate in the run-off (which eventually won the election), campaigns featured few women political figures overall. Transparency and accountability of campaign finances were weakened by the minimal finance reporting obligations and the limited capacity of the oversight bodies, including for monitoring the misuse of administrative resources. Authorities, including the State Election Commission and the Constitutional Court, did not always adequately address election-related complaints in a timely and transparent manner, limiting the effectiveness of legal remedies. The elections were organised effectively, but the frequent allegations of vote-buying in the run-up to the elections affected confidence in the process. In the polling stations observed, the voting process was orderly, transparent and assessed positively; however, in several instances, election boards did not fully adhere to the prescribed procedures during the vote count.

81. Key themes of the parliamentary and presidential run-off campaigns included the economy, anti-corruption efforts, EU accession and the constitutional reform. The tone of campaigning, including online, became progressively negative ahead of the first round of the presidential election, and remained so in both parliamentary and presidential campaigns.

82. In the run-up to the elections, most IEOM interlocutors referred to a generalised atmosphere of disaffection with the political establishment, citing a lack of will by both the government and opposition to address long-standing calls for comprehensive reforms, a perceived political influence in institutional appointments, long-standing inefficiencies within public administration, and recent high-profile corruption cases.

83. Following the presidential election Ms Gordana Siljanovska-Davkova won 65,41% of the votes (while her challenger and incumbent President Mr Stevo Pendarovski gathered 29,25% of the vote). She became the first woman holding this position in the country. The parliamentary elections enabled the opposition VMRO Coalition “Your Macedonia” (led by Hristijan Mickoski) to win 58 seats out of 120 (43.36% of the votes) while the ruling coalition “For a European Future” (led by Dimitar Kovačevski) won 18 seats (15.35%). In addition, the following parties and coalition reached the parliament: “European Front” (Ali Ahmeti) (13.68% of the votes, 18 seats); VLEN (Bilall Kasami) (10.63%, 14 seats); Levica (Dimitar Apasiev) (6.82%, 6 seats) and ZNAM (Maksim Dimitrievski) (5.59%, 6 seats).

84. The PACE delegation notes that the voters opted for a political alternation, both for the presidential and the parliamentary elections, in a peaceful and democratic manner. It also recalls that these elections were for the first time since 2006 held after the full-term completion of the parliament.

85. The legal framework for the parliamentary and presidential elections establishes the basis for holding democratic elections; however, some provisions do not comply with international standards, and persisting inconsistencies, gaps and ambiguous formulations undermine legal certainty and merit further revision. The law maintains residency criteria for presidential candidates which appear to be overly restrictive, running counter to international commitments and standards.

86. Regrettably, the Electoral Code was recently amended through expedited processes lacking transparency and public consultation. Although the changes incorporated some previous ODIHR recommendations and technical proposals from the SEC, they largely disregarded recommendations of the inter-agency working group tasked with electoral reform. A number of key recommendations from the Venice

Commission and the ODIHR remain unaddressed, including those to systematically revise the Electoral Code, to ensure equal access to the media in election campaigns and to increase accountability and integrity of campaign financing.

87. The election administration met all legal deadlines and enjoyed public confidence in its technical capacity. The training for lower-level election bodies was observed to be generally comprehensive and incorporated lessons learned from the first-round presidential election day. The outreach scope and topics covered by the SEC's voter education material remained limited.

88. As a temporary measure to mitigate delays caused by the late issuance of new ID documents, voters with documents expired up to nine months before the elections were allowed to use them for identification on election day. Persistent shortcomings in the residential address system and civil registration, which diminished data accuracy, were noted.

89. For the parliamentary race, the law mandates a minimum of 40% representation of either gender on each candidate list. While PACE delegation welcomes that all registered candidate lists met the gender requirements, women (comprising 43% of all parliamentary candidates) were often placed in the lowest positions allowed by the law, and women candidates headed only 25% of the lists. The political parties appeared to make little effort to engage women voters. Issues related to gender equality were largely absent from campaign discourse.

90. The campaigns were competitive and fundamental freedoms were respected. Regulation of access to campaign spaces, the media, and of the funding of political parties advantages the four main parliamentary political parties over other contestants. Ethnic Albanian parties featured prominently in the campaign. However, representatives of some ethnic minority parties raised concerns that the distribution of State campaign funds according to a formula based on parties' representation in parliament hampered their ability to campaign on an equal footing.

91. The formula for distribution of State funds for campaigning disadvantaged smaller and non-parliamentary parties. Only 11 of the 17 parliamentary contestants submitted interim campaign finance reports in a timely manner and in the required format. Reporting requirements for interim reports excluded detailed information on contributions and did not require reporting on expenditures, reducing transparency and accountability. The minimal campaign finance reporting requirements, deficiencies and inconsistencies in the legal framework, as well as limited resources and capacities of the oversight bodies, including for monitoring and preventing the misuse of administrative resources, significantly diminished transparency and accountability.

92. The media environment is generally free. The public broadcaster covered the major parliamentary and presidential contestants in line with the formula for allocating time to political parties in elections, which privileges the largest parliamentary parties. Private media presented adequate information on all candidates overall, with some channels favoring specific candidate lists. There were several televised debates featuring contestants running for the major coalitions in the parliamentary elections, as well as three debates between the two candidates in the presidential run-off, contributing to the ability of voters to make an informed choice. Most IEOM interlocutors emphasised the need for further reforms in the media sector to enhance the viability of outlets, regulate online media, and further align the legal framework with the EU *acquis*.

93. The legal framework does not sufficiently ensure access to legal redress; in practice, the SEC did not provide effective legal remedy for complaints submitted on the 24 April election day, leaving approximately half of these unresolved by the close of the polls. Further, the majority of its decisions on complaints did not provide the reasoning, and many decisions referenced outdated legal acts and incorrect legal remedies for appeals. The Administrative Court complied with the short deadlines for deciding on appeals. The Constitutional Court did not review in a timely manner the two election-related petitions it had received. Many IEOM interlocutors expressed minimal trust in the adjudication of election-related complaints, citing inefficiency of the judiciary and the election administration.

94. The PACE delegation noted that election days were generally calm and peaceful. While the election campaigns were unfortunately tarnished by harsh rhetoric, this did not affect the general atmosphere on election days, which remained calm and without significant incidents. IEOM observers assessed voting procedures positively in the vast majority of the 1 340 polling stations observed, with procedural safeguards such as voter identification, stamping of ballot papers by EBs and signing of voter lists conducted in line with legal provisions, at almost all polling stations.

95. However, some instances of group and family voting were observed. In some cases, while not against the law, the tracking of voters was also noted. The legal requirement for EBs to inform voters about voting procedures, which is important to reduce the number of invalid ballots, was not followed in almost half of the polling stations. The counting process was assessed as negative in 16 of the 106 polling stations observed, primarily due to procedural errors and omissions in the counting procedures and important safeguards, in some cases impacting transparency. Tabulation was generally evaluated as efficient; however, limited space and overcrowding limited transparency in some cases and three out of four observations noted mistakes or discrepancies in polling station results protocols.

96. The PACE delegation was informed that many voters who live abroad were unable to vote for MPs to represent them in parliament. The voter registration process in diplomatic and consular missions encountered issues due to outdated and incomplete instructions. Moreover, confusion regarding passport issuance or renewal further complicated citizen engagement. Efforts to inform the diaspora about the elections were deemed inadequate, with delayed announcements from official channels.

97. Based on these findings, the PACE delegation particularly encourages the authorities of North Macedonia to:

– implement all recommendations made by the Venice Commission and the ODIHR, including those to systematically revise the Electoral Code in a transparent, inclusive and timely manner, to eliminate gaps and inconsistencies, to ensure equal access to the media in election campaigns and to increase accountability and integrity of campaign financing;

– update and audit the residential address system and civil registration and deal with their persistent shortcomings, which diminish the accuracy of the voter lists:

– eliminate the 40% voter turnout requirement for the second round of presidential elections in order to avoid the risk of cycles of failed elections;

– alleviate the residency criteria for presidential candidates;

– suppress the requirement to disclose ethnic affiliation to register as a candidate for the parliamentary elections;

– strengthen the legal framework related to campaign funding and reinforce the resources and capacities of the oversight bodies in charge of monitoring and preventing the misuse of administrative resources in order to enhance transparency and accountability;

– review the formula for distribution of State funds for campaigning so that smaller and non-parliamentary parties are not disadvantaged;

– make further reforms in the media sector to enhance the viability of outlets, regulate online media, and further align the legal framework with the EU *acquis*;

– work towards the suppression of any hindrance encountered by the disabled during the voting process;

– improve the legal system of addressing complaints regarding all steps of the electoral process in order to increase general trust in the judiciary system;

– take appropriate measures to increase the role played by women in the country's political life, and in particular their representation in elected and appointed positions;

– ensure a better observation of the procedures by the members of the election boards, particularly during the vote counting, and further develop the training of the electoral administration;

– concerning the authentication of voters and the protection of their personal data, review the current practices in light of the "Guidelines on the protection of individuals with regard to the processing of personal data for the purposes of voter registration and authentication" adopted by the Consultative Committee of the Convention for the protection of individuals with regard to automatic processing of personal data (ETS No. 108).

– increase efforts for voters education in respect to all steps of the electoral process;

– take measures to improve the organisation of the out-of-country voting;

98. The Assembly recommends to the authorities of North Macedonia to show strong and genuine political will to address all shortcomings and issues noticed during this elections observation and highlighted throughout this report and particularly in its conclusions, in the spirit of the Fourth Summit where Heads of

States and Government of the Council of Europe member States adopted the Reykjavik Principles of Democracy to secure and strengthen democracy and good governance and "encourage democratic participation at national, regional and local levels through free and fair elections".

99. PACE stands ready to contribute to the accomplishment of this process within the framework of the Assembly's post-monitoring procedure and in close co-operation with the Venice Commission.

Appendix 1 – Composition of the ad hoc committee

Based on the proposals by the political groups of the Assembly, the ad hoc committee was composed as follows (* members of the pre-election delegation, ** members of the presidential election delegation, *** members of the presidential 2nd tour and parliamentary election delegation):

Chairperson: Mr Alfred HEER, Switzerland

Socialists, Democrats and Greens Group (SOC)

– Mr Jone BLIKRA, Norway **
– Mr Pierre-Alain FRIDEZ, Switzerland ** ***
– Mr Yunus EMRE, Türkiye **
– Mr Antonio GUTIERREZ-LIMONES, Spain **
– Ms Klotilda BUSHKA, Albania **
– Mr Stefan SCHENNACH, Austria* ***

Group of the European People's Party (EPP/CD)

– Mr Corneliu-Mugurel COZMANCIUC, Romania **
– Mr Cristian-Augustin NICULESCU-ȚÂGÂRLAȘ, Romania **
– Mr Chris SAID, Malta * **
– Mr Branislav BORENOVIĆ, Bosnia and Herzegovina ** ***
– Mr Christian BUCHMANN, Austria ***
– Mr Jan Filip LIBICKI, Poland ***
– Mr Georgios STAMATIS, Greece ***

Alliance of Liberals and Democrats for Europe (ALDE)

– Mr Alfred HEER, Switzerland * ** ***
– Ms Liliana TANGUY, France ** ***
– Ms Yevheniia KRAVCHUK, Ukraine **
– Mr Arminas LYDEKA, Lithuania **
– Mr Mehmet AKALIN, Türkiye ***
– Ms Denisa NEAGU, Romania ***

European Conservatives Group and Democratic Alliance (EC-DA)

– Mr Armen GEVORGYAN, Armenia ** ***
– Mr Jose Maria SANCHEZ GARCIA, Spain ** ***
– Mr Simone BILLI, Italy ***

Group of the Unified European Left (UEL)

– Ms Sevilay ÇELENK ÖZEN, Türkiye * ** ***

Co-rapporteurs AS/MON (ex officio)

– Ms Sibel ARSLAN, Switzerland (SOC) * ** ***
– Mr Joseph O'REILLY, Ireland (EPP/CD) * ***

Venice Commission

– Ms Florence GANOUX, Expert ** ***

– Mr Michael JANSSEN, Administrator, Venice Commission ** ***

Accompanying person

– Mr Turgunaliev MAKSAT, accompanying Mr Libicki ***

Secretariat

– Mr Bogdan TORCĂTORIU, Senior Elections Officer, Secretary of the ad hoc committee, Elections Division

– Ms Carine ROLLER-KAUFMAN, Assistant, Elections Division

Appendix 2 – Programme of the pre-electoral delegation of the Parliamentary Assembly

Tuesday, 26 March 2024

9:00-10:00: Delegation meeting with introductory words by:
- Mr Alfred Heer, Head of the PACE Delegation
- Mr Oleg Soldatov, Head of the Council of Europe Programme Office in Skopje
- Mr Joseph O'Reilly and Ms Sibel Arslan, co-rapporteurs of the Monitoring committee
- Presentation of the programme by the Secretariat

10:15-11:15: Meeting with members of the diplomatic corps:
- Ms Barbara Gruber, Deputy Ambassador (Austria)
- Mr Lucien Aegerter, Deputy Head of Mission (Switzerland)
- Mr Muhammed Çelikkaya, Deputy Ambassador (Türkiye)
- Ambassador David Geer, Head of the EU Delegation

11:30-12:30: Meeting with Ms Jillian Stirk, Head of the OSCE/ODIHR Election Observation Mission, Mr Marcell Nagy, Deputy Head of Mission and members of the core team:
- Ms Noemi Arcidiacono, Political Analyst
- Ms Marcela Maskova, Election Analyst
- Ms Elena Kovalyova, Legal Analyst

14:00-15:00: Meeting with representatives of the civil society:
- Human Rights Institute: Ms Kristina Doda
- NGO Civil: Ms Xhabir Derala
- Helsinki Committee: Ms Tona Kareva-Taleska
- Centre for Research and Policy Making (CRPM): Ms Marija Risteska

15:15-16:15: Meeting with representatives of the media (part 1):
- Macedonian Institute for Media (MIM): Ms Vesna Nikodinoska
- Media Development Center: Mr Dejan Georgievski
- Macedonian Association of Journalists (MAN): Ms Ivona Talevska
- Media Information Agency (MIA): Ms Elizabeta V. Najdeski

16:30-17:30: Meeting with representatives of the media (part 2):
- National Broadcasting Service (MRT): Mr Zoran Bogatinov, Editor
- Telma TV: Ms Snezana Lupevska, Editor in Chief
- MKD.MK portal: Mr Alaksandar Damovski, Editor in Chief
- AlsatTV: Ms Fatlume Dervishi, political journalist

Wednesday, 27 March 2024

09:30-10:00: Meeting with H.E. Mr Stevo Pendarovski, President of North Macedonia and candidate

10:15-10:45: Meeting with H.E. Mr Jovan Mitreski, President of the Assembly of North Macedonia
- Mr Darko Kaevski, Head of the Delegation of North Macedonia to the PACE
- Ms Cvetanka Ivanova, Secretary General of the Assembly of North Macedonia
- Mr Risto Taleski, special advisor in the Cabinet
- Ms Marija Stefanova, member of the Secretariat

10:50-11:20: Meeting with Mr Dimitar Kovachevski, president of SDSM

11:30-12:00: Meeting with Mr Hristijan Mickoski, president of VMRO-DPMNE and Ms Gordana Siljanovska-Davkova, candidate to the presidency. Also present: Mr Nikola Micevski, MP, Mr Aleksandar Nikoloski, MP

12:30-13:00: Meeting with Mr Aleksandar Dashtevski, President of the State Election Commission, and members of the Commission

14:30-15.00: Meeting with Mr Zijadin Sela, Alliance for Albanians

15:10-15:40:	Meeting with Mr Afrim Gashi, president of Alternative, Mr Bilal Kasami, President of the BESA Movement, Mr Izet Mexhiti, President of the Democratic Movement, and Mr Arben Taravari, candidate to the presidency
16:00-16:30:	Meeting with Mr Ali Ahmeti, president of DUI and Mr Bujar Osmani, Minister of Foreign Affairs, candidate to the presidency
17:15:	Delegation meeting (preparation of a statement)
19:00:	Working dinner hosted by Mr Darko Kaevski, Head of the Delegation of North Macedonia to the PACE

Appendix 3 – Statement of the pre-electoral delegation of the Parliamentary Assembly

In Skopje, PACE pre-electoral delegation hopes that the reshuffling of political scene in North Macedonia before the elections will not negatively affect the campaign

A pre-electoral delegation of the Parliamentary Assembly of the Council of Europe (PACE), concluding a visit to North Macedonia (25-28 March 2024), noted that the period ahead of the elections has been stable and elections are expected to meet democratic standards. It also understood that the political environment, already strongly polarized, is still very dynamic and shifting, and called on all stakeholders to ensure that the campaign will run smoothly until the election day.

The six-member cross-party delegation*, led by Alfred Heer (Switzerland, ALDE), conducted its assessment in Skopje and met with the Speaker of the Assembly of North Macedonia, candidates for the Presidency, party leaders and representatives, the President and members of the State Election Commission (SEC), journalists and civil society groups, members of the diplomatic corps, fellow international observers from the ODIHR, and members of the North Macedonia delegation to PACE.

The delegation noted that almost all political forces in North Macedonia are in favour of the European integration of the country and hopes that a solution will be found to the remaining obstacles.

The delegation was informed that a series of long-standing ODIHR recommendations have not been addressed, including recommendations to harmonise the Electoral Code, to stipulate clear tenure and appointment procedures for State Election Commissioners, and to provide effective remedies for electoral disputes.

The delegation was pleased to hear about the general confidence in the overall professionalism of the SEC but noted a lesser degree of trust in the lower election management bodies.

The delegation noted with satisfaction a general level of trust in the accuracy of the voter register and the methods of voter registration. However, it received information that the overall numbers of voters may be inflated due to citizens who remain in the register despite residing abroad. It also noted with concern that those citizens turning 18 between the 1st and the 2nd rounds of the presidential election would be deprived of the right to vote for the 2nd round of the presidential election.

The delegation learned that parties and candidates can campaign freely. While hate speech is not considered to be a major electoral issue, the delegation heard about cases of personal attacks and intimidation attempts against representatives of civil society, culminating with incitations to violence and even death threats. The delegation strongly condemns such practices, which are unacceptable in a European democracy, and expresses hope that the competent authorities will urgently take strong measures against the perpetrators of such threats.

The delegation noted that, while so far there have been no signs of massive misuse of state resources, concerns exist that this might still occur during the electoral campaign. It also heard about possible pressure on public employees as well as on inmates in prisons.

The formula for the distribution of political advertising in media and in public spaces is seen by some as privileging the larger and more established parties rather than providing fair access to all contestants, including smaller parties.

The delegation also took note of concerns on certain aspects of the electoral process, including the electoral legal framework (bringing last-minute amendments to the Electoral Code, while clearly necessary for better conduct of the electoral process, is contrary to the recommendations of the Venice Commission) as well as the rather weak regulation of campaign financing rules (particularly concerning a multitude of web portals seemingly created recently with the only goal of obtaining public funding for parties).

The delegation acknowledges that addressing some of these issues before election day may be challenging, but it strongly urges action on those that can still be rectified.

PACE – which represents parliamentarians from 46 European nations – is observing elections in North Macedonia within the framework of its post-monitoring dialogue with the country. A full-fledged PACE delegation of 22 members, accompanied by legal experts from the Venice Commission, will travel to the country to observe the vote on 24 April 2024 in the framework of an International Election Observation Mission together with the ODIHR, then on 8th of May when delegations from the OSCE Parliamentary Assembly and from the European Parliament should also join. PACE will debate its conclusions in due course.

* Composition of the delegation:

– Alfred Heer, Switzerland, Alliance of Liberals and Democrats for Europe (ALDE)
– Stefan Schennach, Austria, Group of Socialists, Democrats and Greens (SOC)
– Chris Said, Malta, Group of European People's Parties (EPP/CD)
– Sevilay Çelenk Özen, Turkey, Group of the United European Left (UEL)
– Sibel Arslan, Switzerland (SOC), co-rapporteur of the Monitoring Committee
– Joseph O'Reilly, Ireland (EPP/CD), co-rapporteur of the Monitoring Committee

Appendix 4 – Programme of the meetings of the International Electoral Observation Mission – presidential election (24 April 2024)

Monday, 22 April 2024

9:00-10:00: PACE delegation meeting
- Welcome by Mr Alfred Heer, Head of Delegation
- Presentation by Ms Sibel Arslan, co-rapporteur of the Monitoring Committee
- Presentation by Ms Florence Ganoux, expert of the Venice Commission
- Presentation of the programme by the Secretariat

10:15-12:30: Briefing by the ODIHR Election Observation Mission (part 1):
- Welcome and overview of the EOM's work: Ms Jillian Stirk, Head of Mission
- Political overview, the Contestants and the Election Campaign: Ms Noemi Arcidiacono, Political Analyst
- Legal Framework, Electoral System and Electoral Dispute Resolution: Ms Elena Kovalyova, Legal Analyst
- Campaign Finance: Mr Radivoje Grujić, Campaign Finance Analyst
- Election Administration, Voter and Candidate Registration: Ms Marcela Mašková, Election Analyst
- Media Landscape: Mr Laurens Teule, Media Analyst

14:00-15:00: Meeting with representatives of civil society and media associations:
- Media Development Center: Mr Dejan Georgievski, Director
- Macedonian Association of Journalists (MAN): Ms Ivona Talevska, President
- Association of Journalists of Macedonia (ZNM): Mr Milan Spirovski, Project Researcher
- Institute of Communication Studies: Mr Bojan Georgievski

15:15-16:15: Meeting with representatives of the media:
- Telma TV: Ms Snezana Lupevska, Editor in Chief
- MKD.MK portal: Mr Aleksandar Damovski, Editor in Chief
- AlsatTV: Mr Nazim Rashidi, Editor
- Kanal 5 TV: Mr Jovan Gjorgovski
- Fokus weekly: Mr Vlatko Stojanovski, Editor in Chief
- Plus info: Mr Branko Geroski, Editor in Chief

16:30-17:15: Meeting with the representative of the incumbent President and Candidate Mr Stevo Pendarovski, Mr Aleksandar Spasov

18:30-19:15: Meeting with Mr Arben Taravari, Candidate

Tuesday, 23 April 2024

9:00-9:45: Meeting with Mr Bujar Osmani, Candidate

9:45-10:30: Meeting with Ms Gordana Siljanovska-Davkova, Candidate

10:30-11:15: Meeting with Mr Maksim Acevski, Chief State Auditor, State Audit Office, Mr Zoran Bogoevski, Vice President, State Commission for the Prevention of Corruption, and Mr Servet Demiri, member, and Ms Katerina Zajkova, Head of Unit for Monitoring the Financing of Political Parties and Election Campaigns and Corruption in Public Procurement

11:15-12:00: Meeting with Mr Aleksandar Dashtevski, President of the State Election Commission, Ms Ditmire Shehu, Vice-president of the State Election Commission; Ms Radica Risteska, Mr Boban Stojanoski, Mr Boris Kondarko and Mr Abdush Demiri, members of the State Election Commission

12:00-12:50: Briefing by the ODIHR Election Observation Mission (part 2) – Election Day Procedures:
- Ms Marcela Mašková, Election Analyst
- STO Reporting and Forms: Andreas Roth, Statistical Analyst

12:50-13:10: Briefing by the ODIHR Long-Term Observers (LTO1 and LTO2)

13:10: Meeting with drivers and linguistic assistants

Wednesday, 24 April 2024 – Election Day

7:00-22:00: Observation of the opening of the polling stations, of the vote, of the closing of the polling stations and of the counting of ballots

Thursday, 25 April 2024

8:00-9:00: PACE delegation meeting (debriefing)

15:00: Joint Press Conference

Appendix 5 – Press release of the International Election Observation Mission

North Macedonia's presidential election competitive and overall well run, but marked by legal gaps and negative rhetoric, international observers say

SKOPJE, 25 April 2024 – North Macedonia's presidential election campaign was competitive and fundamental freedoms including media freedom were respected, but important areas of the presidential contest that included campaign rules, access to the media, and allocation of state funding are not regulated, undermining the key principle of legal certainty, international observers said in a statement today.

The joint observation mission from the OSCE Office for Democratic Institutions and Human Rights (ODIHR) and the Parliamentary Assembly of the Council of Europe (PACE) found that while the legal framework creates the basis for democratic elections, numerous gaps remain. At the same time, the link between political party affiliation on the one hand and campaign funds and media opportunities on the other resulted in an advantage for candidates associated with the main parties in parliament.

"This was a competitive election that took place in a peaceful and democratic atmosphere," said Jillian Stirk, who headed ODIHR's election observation mission. "However, the increasingly negative rhetoric was regrettable and reflected broader political fragmentation and ethnic division. At the same time, gaps in the election law and the hasty approval of legal changes did not address the long-standing need for legal reforms. Greater political will is needed to overcome these shortcomings."

Some 1.8 million citizens were registered to vote in yesterday's election. Despite the organization of two elections at the same time, ongoing staff shortages and a lack of funding, the election administration met all legal deadlines and generally enjoyed public trust. Observers assessed election day positively overall, and noted that voting procedures were largely respected.

As election day approached, the campaign became increasingly negative both online and offline, including personal attacks and occasional threats. Observers noted that some public infrastructure projects were announced by officials after the election date was set, potentially leading to the misuse of public resources in connection with the campaign.

"The presidential election was well organized and candidates could express themselves freely during the campaign, thus allowing voters to make an informed choice," said Alfred Heer, who headed the PACE delegation. "While the election campaign was unfortunately tarnished by harsh rhetoric, this did not affect the general atmosphere on election day, which remained calm and without significant incidents."

While the recent legal changes improved some parts of the campaign finance framework, they failed to improve systemic shortcomings that together with limited resources for oversight bodies and other deficiencies significantly limited the effectiveness of campaign finance oversight. A lack of full confidence was noted in the effectiveness of campaign finance monitoring and accountability.

While North Macedonia has a diverse media landscape and media freedom is generally respected, online news media is largely unregulated, underlining the need for further reform. The public broadcaster covered all presidential candidates in line with legal requirements, and private media presented adequate information on the presidential candidates overall. However, a significant number of online news portals appeared to be created for the sole purpose of receiving state funds during election campaigns and, in some cases, channelling these funds to political parties.

The international election observation to the first round of the presidential election in North Macedonia totalled 234 observers from 33 countries, made up of 216 ODIHR experts, long-term, and short-term observers, and 18 from PACE.

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Appendix 6 – Programme of the meetings of the International Electoral Observation Mission – presidential election (2nd round) and parliamentary elections (8 May 2024)

Monday 6 May 2024

9:00-10:00: PACE delegation meeting
- Welcome by the Head of the delegation, Mr Alfred Heer
- Intervention by the co-rapporteur: Ms Sibel Arslan and Mr Joseph O'Reilly
- Presentation by Ms Florence Ganoux, member of the Venice Commission
- Practical information from the secretariat

10:00-10:20: Welcome and introductory remarks
- Mr Nikoloz Samkharadze, Special Co-ordinator and Leader of the short-term OSCE observer mission
- Mr Alfred Heer, Head of the PACE Delegation
- Mr Leopoldo López Gil, Head of the European Parliament Delegation
- Ms Carina Ödebrink, Head of the OSCE PA Delegation

10:20-11:00: Introduction on the Country by the International Community
- Dr Susan Penksa, Deputy Head of the OSCE Mission to Skopje
- Ambassador David Geer, Head of the Delegation of the European Union to the Republic of North Macedonia

11:15-13:15: Briefing by the ODIHR Election Observation Mission
- Welcome and overview of the EOM's work – Ms Jillian Stirk, Head of Mission
- Political overview, the Contestants and the Election Campaign – Ms Noemi Arcidiacono, Political Analyst
- Legal Framework, Electoral System and Electoral Dispute Resolution – Ms Elena Kovalyova, Legal Analyst
- Campaign Finance – Mr Radivoje Grujić, Campaign Finance Analyst
- Election Administration, Voter and Candidate Registration – Ms Marcela Mašková, Election Analyst
- Media Landscape – Mr Laurens Teule, Media Analyst
- Security Overview – Mr Peter Marron, Security Expert

15:00-16:30: Elections and Political Context
- CIVIL – Center for Freedom, President, Mr Xhabir Deralla
- Roma Foundation for Democracy, Executive Director, Mr Selvije Mustafi, and Mr Arif Ademi
- Macedonian Center for International Cooperation, Ms Valentina Velichkovska, Director of Citizens Resource Center
- European Policy Institute Skopje, Director, Ms Simonida Kacarska

16:45-18:45: Parties/candidates contesting the elections
- "VLEN" coalition, Mr Bekim Sali
- "For a European Future" coalition, SDSM International Secretary, Mr Bojan Marichikj
- "European Front" coalition, DUI, Mr Arbër Ademi
- "Your Macedonia" coalition, Vice-president of VMRO-DPMNE, Mr Timcho Mucunski
- "ZNAM" party, Leader, Mr Boban Karapejovski

Tuesday, 7 May 2024

08:30-09:30: Presidential Candidates – 1st part
- Mr Aleksandar Spasov – Representative of Mr Stevo Pendarovski

09:30-11:00: Campaign and Election Coverage Panel
- National Broadcasting Service (MRT), Political Editor, Mr Zoran Bogatinov

- Telma TV, Editor in Chief, Ms Snezana Lupevska
- MKD.MK, Editor in Chief, Mr Aleksandar Damovski
- Macedonian Association of Journalists, President, Ms Ivona Talevska
- Association of Journalists of Macedonia, Project Resercher, Mr Milan Spirovski
- Agency for Audio and Audio-visual Media Services, Head of the Programme Affairs Department, Ms Emilia Janevska

11:15-12:15: Election administration

- Mr Aleksandar Dashtevski, Chairman, State Election Commission
- Mr Zoran Bogoevski, Vice-President, State Commission for the Prevention of Corruption
- Mr Servet Demiri, member of the State Commission for the Prevention of Corruption
- Mr Aleksandar Popovski, Secretary General, State Audit Office of the Republic of North Macedonia
- Ms Katerina Caloska Aleksovska, Assistant Auditor General, State Audit Office of the Republic of North Macedonia

12:15-12:45: Presidential Candidates – 2nd part

- Gordana Siljanovska-Davkova

12:45-13:30: ODIHR EOM Briefing continuation

- Election Day Procedures – Ms Marcela Mašková, Election Analyst
- STO Reporting and Forms – Mr Andreas Roth, Statistical Analyst
- Security overview – Mr Peter Marron, Security Expert
- Regional briefing for Skopje Teams by Skopje ODIHR LTOs – Mr Matti Heinonen, Ms Maja Bjelic, Mr Bernhard Zimburg, Mr Gunn Benjaminsen

14:00: Meeting with E-Day drivers and interpreters

Wednesday, 8 May 2024

All day: Election Day – Observation in polling stations

Thursday, 9 May 2024

08:00-09:00: Debriefing for PACE Delegation

15:00-16:15: Press conference

Appendix 7 – Press release of the International Election Observation Mission

North Macedonia's elections were competitive and voters well informed, although the process remains insufficiently regulated: international observers

SKOPJE, 9 May 2024 – North Macedonia's presidential run-off and parliamentary elections were competitive and an extensive and pluralistic campaign helped voters to make an informed choice, but marred by negative rhetoric with nationalistic slogans, as well as shortcomings in the legislation and insufficient oversight of campaign finances, international observers said in a statement today.

The elections took place against a background of voter dissatisfaction with the political establishment, and a general sense that both the government and opposition lacked the will to address long-standing calls for comprehensive reforms. The joint observation mission from 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), and the European Parliament (EP) found that while the legal framework creates the basis for democratic elections, many gaps and inconsistencies remain, making further reform essential.

"Election day was calm and peaceful, proceeding in a constructive atmosphere, despite the strong political polarization and fragmentation in North Macedonia," said Nikoloz Samkharadze, Special Co-ordinator and leader of the short-term observer mission. "It is my sincere hope for the people of this country that the newly elected leadership will effectively tackle the key challenges facing the nation and bring North Macedonia ever closer to its declared goal of EU membership."

The tone of campaigning, including online, became progressively negative ahead of the first round of the presidential election, and this did not improve during the presidential run-off and parliamentary campaigns. Allegations of vote buying increased before election day, involving all major political parties, which highlights the need for greater efforts to address these concerns.

The method for distributing state funds for campaigning and media time disadvantaged smaller parties and those without any representation in parliament. At the same time, the transparency and accountability of campaign finances were weakened by the minimal campaign finance reporting requirements, as well as the limited resources and capacities given to oversight bodies.

"North Macedonia has failed to implement a number of important recommendations made by the Council of Europe's Venice Commission and ODIHR," said Alfred Heer, who headed the PACE delegation. "Many voters who live abroad were unable to vote for an MP to represent them in parliament, and the 40% voter turnout requirement for the second round of presidential elections also needs urgent reform to avoid the risk of cycles of failed elections."

With the notable exception of one presidential candidate in the second round, observers noted that political parties featured few women speakers at campaign events, and parties appeared to make little effort to engage women voters. All registered candidate lists were in line with the law to have a minimum of 40% representation of women. However, they were often placed in the lowest possible positions.

"North Macedonia has made progress in advancing gender equality in political and public life, as demonstrated in these elections in which women comprised 43% of parliamentary candidates," stressed Carina Ödebrink, who headed the OSCE PA delegation. "Nonetheless, continued political engagement and reforms are imperative to increase representation of women in elected and appointed positions, and to address the concerns and needs of women voters."

Some 1.8 million citizens were registered to vote in yesterday's elections. Public confidence in the election administration was generally high, and training for election officials was comprehensive, although voter education remained limited. Election day was generally calm and observers assessed it positively overall. Voting procedures were largely respected, but in a number of cases election boards did not fully keep to procedures during the vote count.

"We would like to praise a job done by the very dedicated women and men of the electoral boards, who demonstrated how well trained they were," said Leopoldo Lopez Gil, head of the EP delegation. "They contributed to the orderly and calm running of the electoral process and set an example of civic engagement."

North Macedonia's media landscape is diverse and media freedom largely respected. Throughout the campaign period, media generally covered all candidates, with some channels favouring specific candidate lists. Televised debates helped inform voters ahead of election day. At the same time, the need for further reforms in the media sector was noted.

"These elections were competitive and well run, particularly given the challenge of organizing two different elections at the same time," said Jillian Stirk, who headed ODIHR's election observation mission. "But the negative rhetoric and increasingly nationalistic undertones of some parties and candidates was extremely worrying, and the campaign would have benefited from more detailed oversight. We hope that going forward, North Macedonia will continue to strengthen its democracy, and ODIHR remains ready to provide support for these efforts."

The international election observation to the second round of the presidential election and the parliamentary elections in North Macedonia totalled 344 observers from 42 countries, made up of 238 ODIHR-deployed experts, long-term, and short-term observers, 72 from the OSCE PA, 23 from PACE, and 11 from the EP.

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