



STATEMENT OF THE NATIONAL DEMOCRATIC INSTITUTE'S PRE-ELECTION ASSESSMENT MISSION (PEAM) AHEAD OF BOSNIA AND HERZEGOVINA'S 2026 GENERAL ELECTIONS

Sarajevo, Bosnia and Herzegovina – June 19, 2026

INTRODUCTION

This statement is offered by a pre-election assessment mission (PEAM) organized by the National Democratic Institute (NDI) for Bosnia and Herzegovina's general elections scheduled for October 4, 2026. The high-level delegation visited Bosnia and Herzegovina (BiH) from June 14 to 19, 2026 to demonstrate the international community's support for credible elections and democratic norms; to provide an independent and impartial assessment of pre-election day processes and the electoral context; and to offer practical and constructive recommendations based on internationally accepted best practices for more participatory, transparent, and accountable elections. The delegation recognizes elections ultimately belong to citizens and that it is the people who will ultimately determine the credibility of their own elections.

The delegation was led by Tanja Fajon, former Minister of Foreign and European Affairs, Republic of Slovenia. The delegation also included Carsten Schürmann (Germany), Election Technology Expert and Professor of Computer Science at IT University Copenhagen; Natalia Slepuhin (Moldova), civic activist and Executive Director of civic organization Primăria Mea (My City Hall); Mark Stevens (United Kingdom), Independent Elections Expert; Borislav Spasojevic, Senior Advisor for Southeast Europe, International Republican Institute (IRI); and Richard L. Klein, Global Director of Elections, NDI.

The delegation carried out its work on a strictly nonpartisan basis in accordance with the [Declaration of Principles for International Election Observation](#). The findings and recommendations were made in reference to international and regional standards for credible elections, including the [International Covenant on Civil and Political Rights](#), [Convention on the Elimination of all Forms of Discrimination Against Women](#), [UN Convention on the Rights of Persons with Disabilities](#), [UN Convention Against Corruption](#), [European Convention on Human Rights](#) and [OSCE Commitments](#).

During the mission, the delegation met with a wide array of election stakeholders in Sarajevo, Banja Luka, and Mostar, including: the Central Election Commission (CEC); Communications Regulatory Agency (CRA); Personal Data Protection Agency in BiH (PDPA), party leaders from across the political spectrum; civil society actors; nonpartisan citizen election observer groups; media practitioners; and members of the international and diplomatic communities.

The delegation is grateful for the warm welcome and cooperation it received from all interlocutors with whom it interacted in Sarajevo, Banja Luka and Mostar. The delegation's work was made possible with funding from the National Endowment for Democracy (NED). The findings and recommendations are solely those of NDI and the delegation.

SUMMARY

The 2026 general elections are taking place 30 years after the Dayton Peace Agreement at a critical moment for BiH. There is growing disagreement over the governing arrangements of the country. These elections are being held in the midst of a political crisis in Republika Srpska (RS) and during growing uncertainty over the appointment and role of a new High Representative. These factors impact the functioning of government institutions, particularly at state level, and create a challenging environment for holding elections.

Though recent elections have generally been well administered, they have also been beset by polarizing ethnic divisions and allegations of malpractices by political contestants. In particular, longstanding and pervasive concerns about illegal voting, improper counting of ballots, and manipulation of results have undermined public confidence in elections. Against this backdrop, there is near-universal support among voters, civil society and political parties across BiH for the use of election day technology. While not viewed as a panacea, it is seen as having the potential to enhance transparency, participation and accountability in elections and build public confidence in the process and results.

The legal framework is generally conducive to holding democratic elections; however, it has not undergone comprehensive review since its adoption. Despite widespread agreement about threats to electoral integrity and support for the use of technology to address those concerns, domestic efforts at electoral reform have failed to find political consensus. In response, the High Representative invoked the ‘Bonn Powers,’¹ imposing legislation to amend the legal framework, and secure funding for the new election day technology. Building on successful pilot exercises conducted during the 2024 municipal elections, biometric voter verification, electronic counting of ballots, and transmission of results are being adopted for the 2026 general elections. However, introduction of these changes were significantly delayed, leaving the CEC with a very compressed timeframe in which to adequately prepare for the use of the new technology on election day.

Political parties and civic organizations have raised serious concerns over the lack of information regarding how the election day technology will be implemented or a timeline for when this information will be available. Additionally, there is limited time to educate voters about how the new technology will impact the voting process on election day. Concerns were also expressed that the new technology could necessitate changes to the ballot paper design. These potential changes could see candidate names replaced with numbers, making preferential voting confusing, potentially disenfranchising voters. Further, the use of election day technology potentially introduces new challenges around protection of biometric data; cybersecurity and the secrecy of the ballot. Recognizing these concerns, the CEC is in the process of contracting an independent company to conduct a security audit of the election day technology. While the role of the HR, and the use of the Bonn Powers was instrumental in the adoption of the new technology, it has also further heightened tensions around the country's constitutional arrangements.

Though time is limited, implementation of the new technology by the CEC is now underway. The tender for the provision of equipment has been completed.² The CEC is currently undertaking another tender for an independent audit of the equipment. To employ the new technology, the CEC is required to issue regulations on its use and for the protection of biometric data in consultation with PDPA BiH and Agency for Identification Documents, Records and Data Exchange (IDDEEA) and this is yet to be finalized. Clear procedures for the use of technology must also be developed. Training materials for municipal election commission (MECs) and polling station commissions (PSCs) and voter education materials still need to

¹ Introduced in 1977, the ‘Bonn Powers’ enable the High Representative to impose and annul laws; appoint and remove officials; and remove judges and annulment of the decisions of the Constitutional Court.

² Concerns were raised that the winning bid was not the lowest. While three losing bids filed appeals, one appeal was withdrawn and two were dismissed.

be produced. Further, the CEC still needs to receive and test the equipment to identify potential operational challenges in advance of election day, and to familiarize municipal and polling station committees, political contestants and voters about the election day technology.

The Election Law of BiH gives the CEC overall responsibility for the conduct of all elections. Though parties raised concerns about the composition and capacity of the CEC, many interlocutors the delegation spoke with nevertheless expressed confidence in the institution. The CEC, however, continues to face obstacles in organizing the elections. Disbursement of election funds was delayed for 15 days, leaving the CEC with only 135 days to prepare for and conduct the elections. The CEC's operational roadmap, including a request to increase staff to support the management of information technology (IT) and cyber security, has yet to be approved.

In previous elections, nomination of PSC members was abused by some political parties, resulting in political control of some polling stations and opening up election day processes to potential fraud. Election Law reforms also included changing the appointment of PSC members. Now the CEC is responsible for appointing non-political presidents and vice-presidents for each PSC. In addition, only political parties with representation in the parliamentary assembly can appoint other members. While the delegation heard concerns that political parties will undermine implementation of this reform, it has the potential to improve the integrity of the PSCs.

Electoral integrity issues are not limited to election day. Concerns have been raised during past elections regarding a number of issues, including: premature campaigning; intimidation of voters; misuse of administrative resources; and unequal access to public broadcasters. Citizen observers have already raised with the CEC incidents of premature campaigning, hate speech, and the misuse of administrative resources. Amendments to the Election Law of BiH in 2022, also imposed by the HR, included a definition of hate speech and banned the exploitation of public funds for campaigns. However, enforcing these measures remains a challenge that will require monitoring of the campaign environment and timely and effective election dispute resolution.

While freedom of expression is legally protected and the country boasts a proliferation of media outlets, voters continue to lack access to a broad range of information as a result of weak institutions, a lack of pluralism in news reporting, and a media environment divided along ethnic lines. There is an increasing shift to online campaigning and digital sources of information, but this environment lacks regulation, and online media are reportedly the leading source of false narratives and hate speech.³ While the Election Law of BiH states that online media reporting on the election campaign must ensure public and transparent information about ownership, many online media outlets lack such transparency. As in past elections, stakeholders expect that most political parties will primarily orient themselves towards their own ethnic communities for electoral support, and the campaign will be largely shaped by identity politics. While the media organize political debates, not all parties participate, limiting the opportunity for voters to make an informed choice.

Barriers remain to the full and equal participation of all citizens in elections. Constitutional and electoral restrictions continue to limit eligibility for certain key offices and representative bodies, affecting both citizens who do not identify as Bosniak, Croat or Serb, including members of national minorities, and some members of the country's three constituent peoples depending on their place of residence. Furthermore, despite the Election Law of BiH requiring candidate lists to include at least 40 percent of candidates from any one gender, women remain underrepresented in political life.

³ See [Report](#) by EU and Council of Europe, Towards Coregulation of Harmful Content Online in Bosnia and Herzegovina.

Civil society plays a vital role in supporting the democratic process. While it is the election authorities who conduct elections, transparent, participatory, and accountable elections are not possible without the vibrant participation of civic organizations. For the October elections, civil society groups should be important counterparts to the electoral administration and political stakeholders. They help enhance transparency, accountability, and integrity of the elections, including deploying citizen observers to assess all stages of the process, conducting voter information campaigns, tracking the misuse of administrative resources and public funds, promoting the participation of women and youth, and monitoring online information and campaigning. However, serious concerns remain regarding an uneven and shrinking civic space, as well as funding challenges that undermine authentic civil society. Further, the accreditation process for citizen observers is administratively burdensome creating organizational challenges for deployment.

Urgent and Important Recommendations

There are just over 100 days until the elections. While time is limited, the new election day technology can potentially address widespread concerns about illegal voting, improper counting of ballots, and manipulation of results. Regardless of the outcome of these elections, the use of election day technologies can enhance public confidence in the process and results which, in turn, can also more broadly strengthen the country's democratic institutions. Credible elections should be a shared goal of all stakeholders regardless of their political perspective. There are practical and meaningful steps that can still be taken to promote more credible elections. As such, the delegation offers the following urgent and important recommendation.

- All state and entity level institutions should expeditiously provide all required support to the CEC for the conduct of the elections and the use of election day technology.
- While ultimately decisions reside with the CEC, it should consult on the implementation of election day technology with all political parties and civil society.
- CEC should provide the public and all electoral stakeholders with clear timelines for the implementation of election day technology, provide timely and frequent updates on its implementation, and establish regular platforms for engagement with all political parties and civil society.
- Reflecting the urgent need for comprehensive voter education, the CEC, political parties and civil society as well as the media should all engage in campaigns to inform citizens on how election day technology will affect voting, counting and transmission of results.
- The CEC should provide detailed information on the use of technology on election day, such as the number of voters verified with biometrics and through manual procedures for each polling station.
- In line with the United Nations Special Rapporteurs' report⁴ recognizing election observers as human rights defenders⁵, the CEC should simplify and reduce the requirements for accreditation of citizen observers to remove unnecessary barriers.

Beyond these summary recommendations, our full report contains detailed recommendations to help ensure all eligible citizens are able to vote on election day and their votes count.

These elections are important not only for BiH. Every election is now seen as a test of democracy and human rights. The effort here to enhance the credibility of elections will also benefit all citizens to exercise their fundamental right to vote and to determine who will govern on their behalf.

⁴ <https://srdefenders.org/information/the-situation-of-election-observers-as-human-rights-defenders/>

⁵ <https://gndem.org/stories/gndem-special-note-on-un-special-rapporteurs-statement-explicitly-recognizing-election-observers-and-human-rights-defenders/>

POLITICAL AND ELECTORAL CONTEXT

General elections in Bosnia and Herzegovina (BiH) will take place on 4 October 2026 at the state, entity,⁶ and cantonal level. Reflecting the country's complex constitutional and electoral arrangements, elections will be held for the tripartite Presidency and members of the House of Representatives of BiH, members of the House of Representatives of the Federation BiH (FBiH), President and Vice-Presidents of Republika Srpska, members of the National Assembly of Republika Srpska (RS), and members of the 10 Cantonal Assemblies of the Federation. The October polls will be the country's tenth general elections since the signing of the Dayton Peace Agreement⁷ and will provide approximately 3.4 million registered voters, inside the country and abroad, with an opportunity to select their chosen representatives for well over 500 elected offices at the cantonal, entity and state levels.

The electoral landscape is characterized by a polarized ethnic environment, prompted in part by an electoral system which encourages a narrow ethnic perspective, as parties seek votes from their respective ethnic communities. In addition, disagreements over the country's governing arrangements, as established by the Dayton Peace Agreement, continue to impact the functioning of institutions in the country, particularly at state level. Some actors argue for more entity-level powers, even to the extent of questioning the territorial integrity of BiH. The 2026 elections are also occurring in the wake of a political crisis in Republika Srpska (RS) and a period of uncertainty over the appointment of a new High Representative (HR).

Past efforts to reform the electoral process have repeatedly failed to achieve political consensus among institutions and political forces, resulting in a leading role for the international community, notably the HR, to create a more conducive framework for the holding of elections in the country. In advance of the 2026 elections, the HR, employing the "Bonn Powers", introduced amendments to the Election Law of BiH, including new election day technology for biometric voter identification, ballot counting, and electronic transmission of results at polling stations. These reforms have the potential to address some long-standing electoral integrity risks, but their full implementation and enforcement ahead of the 2026 elections remain a key test for the electoral authorities and political stakeholders.

Over recent electoral cycles, international and citizen observers have reported that elections have generally been well administered by the CEC. At the same time, voters, parties, and election observers have also consistently highlighted a number of serious challenges. In particular, they have raised concerns about illegal voting, improper counting of ballots, ballot stuffing, voter impersonation, and manipulation of results. Beyond these election day issues, concerns remained regarding the misuse of administrative resources, abuse of nomination procedures for polling station commissions, a lack of adequate oversight of campaign finance, and allegations of fraud in some areas. These shortcomings have contributed to diminishing public confidence in the electoral process and electoral bodies.

For BiH, holding credible, transparent, inclusive elections, which enjoy political and public confidence, is important in its own right. Such elections can also strengthen broader democratic practices in the country and create a more conducive environment for discussion of critical issues facing the country, including inter-communal relations, necessary reforms and the country's future direction.

⁶ The country of Bosnia and Herzegovina (BiH) comprises two autonomous entities of the Federation of Bosnia and Herzegovina (Federation BiH or Federation) and Republika Srpska (RS) plus self governing Brčko District

⁷ The Dayton Peace Agreement, formally known as the [General Framework Agreement](#) for Peace in Bosnia and Herzegovina was signed in 1995 at the end of the conflict.

OBSERVATIONS

Legal Framework for Elections

The legal and regulatory framework for elections in BiH largely consists of the BiH Constitution, as provided in the General Framework, the Election Law of BiH, the Law on Financing of Political Parties, as well as several entity-level laws that also apply, including the constitutions of the Federation and RS. Further, the Election Law of BiH mandates the CEC to enact regulations for the implementation of the laws. The country is party to the major international and regional instruments for democratic elections, and the legal framework, despite some shortcomings, is conducive to holding democratic elections.

While the High Representative introduced a series of amendments to the Election Law of BiH in 2022, including, *inter alia*, providing a definition of hate speech, a prohibition on the misuse of administrative resources in the campaign, and a prohibition on the abuse of nomination procedures for polling station commissions, a comprehensive review of election-related legislation remains outstanding. The High Representative also introduced the amendments to the Election Law of BiH in 2024 related to the introduction of election-day technology. The CEC has to develop regulations for the use of technology in the electoral process, but as of now, proposed amendments for the design of the ballot paper and counting and recounting procedures, all taking account of the new technology, have not passed through the parliament. The Venice Commission Code of Good Practice in Electoral Matters stipulates that fundamental changes to the election law should not be undertaken within a year of an election. Accordingly, substantive changes, such as to the electoral system or constituency boundaries, should not be undertaken until the next electoral cycle. This does not, however, preclude the adoption of administrative regulations to facilitate the management of elections.

Boundary Demarcation

The Election Law of BiH provides that the number of mandates allocated to each constituency in multi-member constituencies used for the election of the House of Representatives of BiH, the House of Representatives of the FBiH, and the National Assembly of RS shall be reviewed every four years by the respective assembly. This is to protect the equality of the vote by ensuring proportionality between the number of mandates and the number of registered voters. However, constituencies for the RS National Assembly were last reviewed in 2012, and those for the House of Representatives of BiH and for the House of Representatives of the FBiH only in 2001. The last census was undertaken in 2013. Past analysis by citizen and international observers indicates that, at odds with regional and international standards, equal suffrage is not provided for, with variations between constituencies for both state and entity level elections often well in excess of 15 percent.⁸

Right to Stand for Political Office

Due to a lack of political consensus, there has not been a comprehensive review of election-related legislation, resulting in some gaps and inconsistencies, including a failure to update laws to reflect decisions of the BiH Constitutional Court and European Court of Human Rights on ethnicity restrictions on the right to stand. Political parties can nominate candidates for all levels of elections or candidates may stand independently. However, the right to stand is restricted by ethnicity and residency requirements, as only voters self-declared as Bosniaks, Croats or Serbs may stand as candidates for the state and entity presidencies, provided that they reside in the appropriate entity. The European Court of Human Rights has repeatedly deemed these restrictions incompatible with the European Convention of Human Rights. In addition, the Constitutional Court of BiH ruled that provisions in the constitutions of both the Federation

⁸ See Venice Commission, [Code of Good Practice in Electoral Matters](#) (2002) and UN [International Covenant on Civil and Political Rights](#) (1966). For analysis of variances in constituency size see ODIHR [Final Report](#) on 2022 General Elections

and RS concerning the election of entity presidents are discriminatory towards citizens not self-declaring as belonging to any of the three constituent peoples and are contrary to the BiH constitution and the European Convention on Human Rights. However, these restrictions remain unaddressed.

Election Dispute Resolution

Complaints regarding violations of electoral rights and procedures, and the conduct of the campaign, are handled by the CEC, while Municipal Election Commissions (MEC) may adjudicate campaign violations within their respective jurisdictions. However, there is a lack of clarity regarding the respective responsibilities of the CEC and MECs in this regard. Timelines for the submission and adjudication of complaints and appeals are short, with complaints required to be submitted within 24 hours of a violation, and an appeal within 48 hours of a decision. The right to file complaints and appeals is limited to voters and political subjects whose rights are violated. Although citizen observers do not have the right to formally submit complaints, they did report the CEC's willingness to accept reports on observed irregularities and violations.⁹ Stakeholders indicated to the delegation that although voters may submit complaints when their electoral rights are violated, many do not do so for fear of retribution.

For past elections, concerns were raised about the CEC lacking sufficient resources to manage election disputes, with missed deadlines and decisions not being made public, undermining the right to an effective legal remedy. For the 2026 elections, the CEC informed the PEAM that it still lacks staff and capacity to adequately fulfill its responsibilities with regard to election dispute resolution.

Election Administration

Electoral Administration Operations and Budget

The CEC has overall responsibility for the conduct of elections. CEC members are appointed by the House of Representatives of the Parliamentary Assembly of BiH for seven-year terms with a rotating presidency. The appointment of four new members in 2020 was challenged on the basis that the list of nominees did not meet the legal deadline, but the Court of BiH rejected the complaint and an appeal. According to the law, the CEC, and MECs, must reflect the ethnic composition of their respective constituencies and include at least 40 percent of members of each gender. At present, however, only two of the seven CEC members are female.

The CEC generally administered the process well in 2022, but faced a number of challenges and pressures. These included budgetary shortfalls and delays in budget disbursements and procurement, as well as a related shortage of qualified staff for key areas of activity, including election disputes, campaign finance, cyber security, and information technology (IT). CEC's request for an increase in its number of staff was not approved by the Council of Ministers, meaning it will go into these elections with the same number of staff as previously, despite taking on critical new responsibilities, including in IT management and monitoring misuse of administrative resources.

On 7 May 2026, when calling the 2026 General Elections for 4 October, the CEC stated that 24.3 million Bosnian Marks (BAM) would be required to conduct the elections. Separately, 112.5 million BAM had previously been made available to the CEC as a multi-year funding envelope for the introduction of specific election technologies following an intervention by the High Representative that enabled the use of Central Bank of BiH profits for this purpose after the funds had not been included in the 2025 state budget.

The CEC has responsibility for the Central Voter Register (CVR). Voter registration is passive and centralized for in-country voters. Finalization of the CVR follows a period of updating records and

⁹ See Pod lupom [Final Report](#) on the 2022 General Elections.

verifying and correcting voter registration data, both online and at Voter Registration Centers, and by incorporating data provided by other agencies. The law also provides for voting from abroad by mail or in-person at embassies and consulates. Out-of-country voters can register through an online platform. According to the CEC election calendar, the CVR is due to be completed by 20 August 2026. The main concerns raised regarding voter registration are that the number of voters on the CVR (in 2022 it was some 3.3 million) is too high, reflecting in part the number of deceased persons on the CVR and the large number of persons no longer in the country. This creates a risk of abuse, which can be addressed through the introduction of biometric identification of voters at polling stations, but also leads to inaccurate voter turnout figures.

The relationship between the electoral authorities and political contestants is critical for confidence in the process and acceptance of the outcome. The CEC has been praised for exhibiting a good degree of transparency, which will be critical to maintain for the 2026 polls. Decisions were published online in a timely manner, apart from election disputes, and CEC sessions were open to the public and broadcast online. However, civil society is not granted access to the voter lists for analysis. The CEC remains prone to mistrust and pressure from some political actors, notably since 2019, impacting public confidence in a key institution and in the process. For instance, following the elections in 2022, there were allegations of fraud linked to the election of the president of RS. This led to verbal attacks against some CEC members, including gender-based attacks. Political leaders also claimed, without legal basis, that they would remove CEC members if elected. Pressure on the CEC has also manifested itself through the late disbursement of funds for previous elections and the failure of the government and parliament to pass CEC's proposed regulations.

Planned Introduction of Election Day Technology

Following a pilot trial in the local elections of 2024, the CEC is planning to introduce a number of election day technologies, different to those used in 2024, for the 4 October elections, largely aimed at enhancing the integrity of voter identification, preventing multiple voting and speeding up the counting and transmission of votes, while guaranteeing vote secrecy. Specifically, the plan is to have biometric identification devices in all polling stations to authenticate voters by fingerprint verification using biometric data. This is intended to prevent impersonation, voting for a deceased person, and the use of another person's ID document. The plan also includes ballot boxes equipped with scanners that would scan all ballots as they are inserted into the ballot box, enabling the electronic tallying of votes at the close of polling and the transmission of data to the CEC.¹⁰

The tendering and procurement process for the new supplier of the technology was very lengthy and only concluded in March 2026, some 200 days prior to the election. The procurement of a separate company for testing the security of the system is still ongoing. Despite widespread public support for the introduction of the technology across both entities, there was an apparent lack of political will to support the initiatives, resulting in the international community and HR being the driving force behind its introduction.¹¹ Delays caused by the tendering and procurement processes will create compressed timelines for the introduction of the technology. The CEC informed the delegation that machines will be provided by the vendor only in August, which means that the machines, which are different from those used in 2024, will only be available for testing, training and public information campaigns from that time.

The CEC also lacks adequate numbers of dedicated IT staff to manage the introduction and operation of the election day technology and still needs to develop detailed procedures for the management of the

¹⁰ The introduction of election day technology does not include electronic voting. Voters will mark the ballot manually, shading boxes to indicate their choices so as to enable scanning of the ballot.

¹¹ There were complaints regarding the tendering process but the Procurement Review Body rejected the complaints and confirmed the CEC decision.

technical processes. The CEC informed the delegation that initial training for MECs will begin at the end of June, but the new machines will not be available at that time, requiring subsequent rounds of training. Thorough training of all responsible MEC and PSC officials, including technical operators for each polling station, in all areas, will be critical for the success of the new technology.

The introduction of election day technology such as that envisaged by the CEC, creates opportunities for more efficient management of the process, but also raises expectations and carries risk, which needs to be managed, including making all stakeholders aware of the realistic timing for the preliminary results. There will need to be system configuration and substantive end-to-end testing of new machines and processes, including load testing and identification of internet black spots, and the enhancement of cybersecurity measures, including data transmission and data management procedures. The use of scanners on ballot boxes will also require a smaller ballot paper than previously used. CEC proposals to amend the format of the ballot paper, possibly including the removal of candidate names and replacement by a number for each candidate instead, are being considered by the proposed regulation, as this has not been agreed yet. Such changes will likely cause some concerns and will require substantive voter education.

While polling indicates public support for the new measures, there is a lack of awareness about them. The CEC announced in the 7 May press conference that it will conduct a detailed information campaign, which will be necessary to raise public awareness, not least as the new scannable ballot boxes also require voters to mark ballots by shading as opposed to marking with a cross, which is another change to the system. The CEC also plans public displays of the new equipment in a number of major towns across the country, but outreach to rural areas may be difficult to achieve in the given timeframe.

Nomination of Polling Station Commissions (PSCs)

While there are different models globally for the administration of polling stations, the overriding principle is that the composition must have the confidence of political stakeholders in order to ensure confidence in the integrity of the process. In previous elections, the nomination process for PSC members was abused by some political parties, resulting in political control of some polling stations and opening the process to fraud. In addition, the CEC and MECs struggled to maintain proper oversight of the PSC nomination process.¹²

The Election Law of BiH has now been amended in two key respects with regard to nomination of PSCs. The CEC now appoints presidents and deputy presidents of PSCs, who must not be members of a political party, through open competition procedures. MECs still appoint other PSC members nominated by political contestants, but only one member from the same political contestant may serve on a given PSC. For general elections, political subjects represented in the BiH Parliamentary Assembly, the FBiH Parliament, or the RS National Assembly in the previous election cycle may nominate PSC members and deputy members, provided they have a certified list for the relevant level of authority. Remaining vacancies may be filled from reserve lists. In 2022, it was estimated that MECs had to use reserve lists to fill some 50 percent of PSC positions, which meant time was lost for training and preparation of PSC members. Given the potential for compromised PSCs to undermine electoral integrity and confidence in the process, it is important that political contestants respect the new provisions, and higher-level election commissions maintain adequate oversight¹³

Political and Campaign Environment

¹² See observer reports from ODIHR and Pod lupom.

¹³ Article 2.19 of the Election Law of BiH provides that the CEC can take remedial action in cases of non-compliance.

In May 2026, the CEC published a list of 75 political parties and four independent candidates certified to contest the October polls. The certification of coalitions took place in mid-June.¹⁴ It is expected that the elections will be highly competitive and with freedom of association provided for. As in previous elections it is expected that political parties will orient themselves towards their own ethnic communities for electoral support and the campaign will be shaped by identity politics to a large extent.

Prohibitions on Campaign Malpractices, Including Use of Administrative Resources

Requisite campaign freedoms are provided for, and in previous elections have been largely respected. However, premature campaigning (after announcement of elections and prior to the 30-day campaign period),¹⁵ hate speech and misuse of administrative resources have been reported in both the 2022 general elections and the 2025 early elections for the president of the RS, impacting the campaign environment and level playing field.¹⁶ The July 2022 amendments to the election law introduced a definition of hate speech and prohibitions on the misuse of administrative resources in the campaign in an effort to try to address these malpractices. Most interlocutors expected these malpractices to be evident for these polls also and the CEC has already received 50 complaints of premature campaigning.

In past elections, citizen and international observers reported widespread abuse of administrative resources, including campaigning by civil servants, use of public works and benefits for campaign purposes and also use of patronage networks and control of state employees to exert undue pressure on voters. The July 2022 amendments introduced extensive restrictions in the Election Law of BiH relating to prohibitions on the misuse of “public funds and resources”, including the use of public office, the role of civil servants, and use of public facilities, staff and equipment.¹⁷ However, for the prohibition to be effective, enabling contestants to compete on an equal basis, campaign practices will need to be monitored and regulations enforced, with mechanisms to deal with complaints in a timely manner.

Campaign Finance

Transparency and accountability around campaign finance are critical for the integrity of the political and campaign environments. The UN Convention against Corruption and related Conference of the States Parties resolutions (Resolution 11/7) call for measures that enhance and protect transparency in the funding of political parties and electoral campaigns; ensure the existence of an oversight body with the resources and staff to monitor and supervise the funding of political parties and campaigns; reporting on expenditure by parties and candidates on a regular basis and the publication of financial reports in a timely manner.¹⁸

Political parties are entitled to annual public funding based on established criteria in the Law on Political Party Financing, as well as private sources of funding including membership fees and contributions. The CEC is mandated to oversee political party and campaign finance, but has lacked the capacity and

¹⁴ The CEC announced that 77 parties had submitted a request for certification, but only 75 had passed the certification process.

¹⁵ For the 2022 General Elections, citizen observer coalition [Pod lupom](#) reported that: It was observed that a significant number of political subjects had conducted election campaigns before its official start, particularly in the segment of paid advertising on social media platforms.

¹⁶ Para 7 of the OSCE [Copenhagen Document](#) (1990) states that there should be “necessary legal guarantees to enable [political parties] to compete with each other on an equal basis before the law and by the authorities”. The Council of Europe Venice Commission [Code of Good Practice in the Field of Political Parties](#) (Art 41) states that “...any party must refrain from receiving assistance, financial or in kind, from any public authorities ...”

¹⁷ See Article 7.2a of the Election Law of BiH for a full list of prohibitive actions and activities.

¹⁸ Adopted by consensus by the Congress of State Parties (CoSP) in December 2025 ([Resolution 11/7](#))

dedicated staff to do so adequately.¹⁹ Parties are required to report on funding and expenditures, including expenditure on online media, and the introduction of a requirement for contestants to open a dedicated bank account for campaign expenditure in 2022 was positive development. However, there is not an adequate verification and monitoring mechanism, limiting the CEC's ability to identify prohibited sources of funding. Further, there is no deadline for the CEC to audit or publish reports and no requirement for interim reporting by contestants. Overall, the CEC lacks the capacity to adequately provide oversight of campaign finance.

Media and Information Environment

There is a proliferation of media in the country, with some 40 TV channels, 150 radio stations, several daily newspapers and news agencies, almost 200 magazines and about 600 news websites. However, this does not generally translate into a pluralism or diversity of news reporting as media institutions are quite weak and the media environment is divided along ethnic lines.²⁰ Watchdog organizations report that media freedoms are deteriorating, with the recriminalization of defamation in RS and a rise in verbal and physical attacks against journalists in BiH.²¹

Freedom of expression is provided for and the legal framework for media is largely in line with international standards. During an election, broadcast media is obliged to respect principles of balance, equal access, fairness and impartiality. However, The Communications Regulatory Authority (CRA), which is mandated to resolve media-related complaints, lacks clear deadlines and procedures for dealing with election-related complaints. While some media organises debates during the election campaign, it was reported to the delegation that a number of political parties do not participate, which limits the opportunity to make an informed choice.

Media face some structural limitations, including a relatively small media market in BiH and competition from media in neighbouring countries with a common language. Among private media there is a heavy reliance on advertising from state-owned corporations, which can influence coverage. There are three public broadcasting services, with one at the state level (Radio and Television of Bosnia and Herzegovina or BHRT) and one in each of the two entities. However, BHRT has come under severe financial pressure in recent years, and in a recent report the High Representative went as far as to say that the financial problems faced by BHRT illustrate that “institutions created at the State level cannot survive financially under constant attack by the entities.”²²

There is an increasing shift to online campaigning and online sources of information in BiH as elsewhere, but at the same time there is a lack of regulation of the online environment and online media are the leading source of disinformation and hate speech.²³ The Election Law of BiH contains only vague provisions relating to the conduct of the campaign online. Online media which reports on the election campaign is required to ensure public and transparent information about its ownership and is also required to respect the principles of balance, equal access, fairness and impartiality. However, it is not clear how this is monitored or enforced. While parties are obliged to report on expenditure for online advertising some 60 percent of online portals reportedly lack transparent ownership information, thereby negating transparency and accountability.²⁴

¹⁹ Campaign finance is largely regulated by the Election Law of BiH, Law on Political Party Financing and laws of the entities relating to party financing, as well as by CEC regulations.

²⁰ See [Reporters Without Borders](#)

²¹<https://safejournalists.net/bh-journalists-a-total-of-35-attacks-on-neighboring-journalists-and-media-outlets-registered-in-bih-in-2025-political-pressures-intensifying/> and [Reporters Without Borders](#)

²² April 2026 [Report](#) of the Office of the High Representative

²³ Report by EU and Council of Europe, [Towards Coregulation of Harmful Content Online in Bosnia and Herzegovina](#) (2024).

²⁴ See [report](#) from UNESCO and the Press and Online Media Council in Bosnia and Herzegovina (2025)

Civil Society and Citizen Election Observation

The Election Law of BiH provides for observation by citizen and international observers, as well as for observation by political contestants, and in 2022 there was a significant deployment of such observers. Civil society interlocutors reported a number of challenges to their work. These include operating in a fragile and polarized environment, weak institutional follow-up on civil society findings and recommendations, and cumbersome accreditation procedures for citizen observers. Civil society also reports having trouble gaining access to information of public interest.

A wide array of citizen organizations as well as citizen observer organizations, in particular the civil society coalition Pod lupom, make a significant contribution towards strengthening democracy and democratic institutions in BiH, including work on election integrity, transparency and accountability, media and information integrity, civic engagement, human rights, women's and youth participation, and local community-level democratic activism. For the 2026 elections, the PEAM delegation was informed that civil society plans to undertake a substantial observation of the pre-election and election day phases, with Pod lupom alone intending to deploy observers for the pre-election and election day periods, as well as conducting a process and results verification for transparency (PRVT), also known as parallel vote tabulation (PVT) or quick count.

Participation of Underrepresented Voices

Participation of "Others" and National Minorities

As mentioned in *The Right to Stand above*, citizens who do not identify as Bosniak, Croat or Serb, including members of national minorities, face constitutional and electoral restrictions that limit access to certain key offices and representative bodies. These restrictions remain one of the central unresolved issues in BiH's electoral framework and have been the subject of repeated European Court of Human Rights judgments.

Participation of Women

Despite the legal requirement that the less represented gender comprise at least 40 percent of each candidate list, and rules on the placement of candidates on those lists, women remain underrepresented in political life. The quota has not translated into comparable numbers of elected women, partly due to insufficient political will within parties to place, promote, and support women candidates beyond minimum legal requirements and partly due to the preferential vote system, which has favored men. The 2025 Global Gender Gap Index indicates that the situation has been incrementally improving, BiH was ranked 86th in 2023, 78th in 2024 and 73rd in 2025. However, in terms of political representation, as of 2025, women comprised just 19 percent in the House of Representatives, 28 percent of the Federation House of Representatives and 25 percent of the RS National Assembly. A survey on barriers to political participation of women in BiH, found that parties which had gender equality as a core principle for the party often lacked resources to recruit women into politics, indicating that larger dominant political parties have not prioritized the participation of women.²⁵

During the election campaign, the Election Law of BiH requires political parties and coalitions to ensure equal promotion of candidates of both genders in media appearances, at public gatherings and other forms of election campaigning, in order to ensure equality of candidates of both genders. However, in 2022, international observers reported that women candidates were infrequently afforded a leading role at rallies, campaign narratives often invoked gender stereotypes and women candidates were often targets of insult and ridicule online and some women were targets of online sexualised attacks and harassment.²⁶

²⁵ [UNDP Survey on Barriers to Political Participation of Women in Bosnia and Herzegovina](#) (2019)

²⁶ ODIHR [Final Report](#), 2022 General Elections

PEAM interlocutors informed the delegation that overall they were not optimistic that the 2026 polls would see any major increase in the representation of women in elected institutions.

Participation of Persons with Disabilities

Bosnia and Herzegovina is a signatory to the Convention on the Rights of Persons with Disability (CRPD). However, the right to vote in BiH is denied to persons deprived of legal capacity by a court decision, including on the grounds of intellectual and psychosocial disability, which is at odds with the CRPD.

The Election Law of BiH provides that when identifying locations for polling stations MECs should take into consideration accessibility for persons with disabilities. However, this is not an obligation, and in the previous elections concerns regarding a lack of independent accessibility to polling stations were noted by observers, with at least half of polling stations not providing for independent access. The CEC informed the delegation that it does not expect any change for 2026, as previous polling places will mostly be used again.

Upon request voters who are blind, illiterate or persons with a disability may be assisted in voting by another voter of their choice. The Election Law of BiH states that in the event that the polling station is provided with election technologies enabling a person with disability to cast his or her vote independently, the assistance of another person shall be excluded in order to protect the secrecy of voting. However, the delegation understands that no such assistive tools will be made available for these elections, meaning that voters requiring such assistance will continue to rely on assisted voting rather than being able to vote independently.

Detailed Recommendations

- All state institutions should provide support to the CEC for the implementation of the new election technology, recognizing that these technologies are supported by citizens across BiH.
- Relevant state institutions should urgently approve the CEC's operational and staffing needs, particularly for IT, cybersecurity, voter education, and election dispute resolution.
- The CEC should keep political parties and civil society (including citizen observers) updated on implementation and to answer questions about the election day technology.
- The CEC should adopt a final ballot design in consultation with political parties and civic organizations that balances requirements of new technology with ease of use by voters.
- The CEC should commit to sharing the audit report of the election day technology, with appropriate redactions to protect security, with all political parties, civil society organizations and the media.
- As far as feasible in the time available, the CEC should undertake a nationwide "end-to-end" test of all election day technology to identify any potential challenges and ensure the function as expected on election day.
- The CEC should ensure clear contingency plans and detailed instructions for PSCs for managing cases where technology fails in the polling station, to ensure citizens do not lose the right to vote unduly.
- The CEC should publish for every polling station the number of voters verified with biometrics and through manual procedures.
- In line with open election data principles,²⁷ the CEC should not just publish aggregate and polling station level results online, but results for all polling stations and all electoral races in a machine readable file.

²⁷ <https://openelectiondata.net/>

- In line with the United Nations Special Rapporteurs' recognition of election observers as human rights defenders,²⁸ the CEC should simplify and reduce the requirements for accreditation of citizen observers to remove unnecessary burdens.
- The CEC should document changes to the voting process including how biometric devices and optical scanners are configured, the online and offline nature of voter identification and fingerprint verifications, confirm that ballot images are stored on smartcards, and how smartcards are protected, audited, stored, and destroyed. The documentation should include explanations of risk mitigations in the case fingerprint verification fails, loss of Internet access, and mismatch of automatic and manual count.
- Political contestants should engage in voter education with their supporters about the election day technology and avoid spreading unverified claims that could undermine public confidence in the process.
- Political contestants should submit lists of PSC members in a timely manner and respect the legal requirement that only one member from the same political subject may serve on a given PSC.
- Political contestants should publicly commit to conduct their election campaigns in accordance with the Election Law of BiH ensuring there is no hate speech, inflammatory rhetoric or misuse of administrative resources, or other malpractices.
- In consultation with the CEC, a wide array of civic organizations should engage in voter education targeting different communities and groups of voters on the new election technology.
- Citizen observers should employ systematic methodologies focusing on trends to monitor the use of new technologies on election day but remain vigilant and scrutinize the entire process.
- Citizen observers should employ systematic methodologies for monitoring pre-election, election day and post-election processes, including the use of new technology, with a focus on identifying trends.
- The media should prepare rapid, credible, and easy-to-understand accurate information to misleading narratives or public concerns related to the introduction of election day technologies.

NDI is a non-profit, non-partisan, non-governmental organization that works in partnership around the world to strengthen and safeguard democratic institutions, processes, norms, and values to secure a better quality of life for all. NDI envisions a world where democracy and freedom prevail, with dignity for all. NDI has observed approximately 200 elections in every region in the world. The Institute has carried out programs in Bosnia and Herzegovina since 1996 following the Dayton Peace Agreement.

²⁸ <https://srdefenders.org/information/the-situation-of-election-observers-as-human-rights-defenders/>