

JORDAN

INTRODUCTION

Jordan has held periodic parliamentary elections over the last 20 years, with varying levels of participation. In 2007, the election was perceived to be lacking in legitimacy, and, as a result, the parliament was dissolved in 2009. A new election was held in 2010 but was boycotted by the major opposition group the Islamic Action Front (IAF), the political wing of the Muslim Brotherhood.⁶⁶ Like many countries in the Middle East and North Africa (MENA) region, Jordan experienced its own version of the Arab Spring during the 2011-2012 period, including calls for major reform of the legal and constitutional framework affecting elections. Although two of the most controversial elements of the electoral framework were retained in the 2012 election law (including the single, non-transferrable vote system for district seats and a districting system that disadvantages voters in urban areas), Jordan did introduce some changes, including to the registration system. This new system was tested in parliamentary elections held in January 2013, which the Muslim Brotherhood again boycotted. Despite these improvements, there are still many steps that could be taken with respect to voter registration in Jordan that would make it more inclusive, accurate and fair and help it to meet international standards.

INTERNATIONAL AND REGIONAL AGREEMENTS

Jordan is a party to various international agreements that address equal rights, suffrage and the right to participate in government and public affairs, including the International Covenant on Civil and Political Rights (ICCPR), the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), the Convention on the Political Rights of Women, the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), and the Arab Charter on Human Rights.⁶⁷

LEGAL FRAMEWORK

The 2010 and 2012 Laws and Executive Instructions

The 2010 Jordanian election law prescribed that the initial voters list start with the registry of holders of national identity cards. This list is maintained and managed by the Department of Civil Status and Passports (CSPD) under the Ministry of Interior. The law introduced an annual list revision and required that the provisional voters lists be made publicly available. Initially in 2010 there were fees

66 Dr. Amer Bani Amer, *Assessing Current Public Perceptions of Political Activism Development in Jordan*, Al-Hayat Center for Civil Society Development, 2011, 2.

67 Study Mission Report for Jordan's 2013 Parliamentary Elections, The Carter Center, 2013, <http://www.cartercenter.org/news/pr/jordan-021413.html>, 9.

associated with registering to vote,⁶⁸ but subsequently such fees were waived, in part due to civil society advocacy.⁶⁹ Citizens on the list could vote anywhere in their electoral district.⁷⁰ It was observed that this “facilitated tactical voting and increased the risk of multiple voting.”⁷¹

The 2012 election law, passed in preparation for elections originally anticipated for that year, required the creation of a totally new voters list. The law created a voter card that was available to eligible voters with a national identity card (that included a national number), which would be necessary to present at a specific polling station in order to vote.

Under the new system, registration and the creation and distribution of voter cards is implemented by the executive branch, via the CSPD under the auspices of the Ministry of Interior—not the Independent Election Commission (IEC or Commission), which was created by legislation and constitutional amendments in 2012.⁷² A citizen must be on the registry of national identity cards and register in person to receive the voter card. Under regulations later issued, anyone in a family book can register and obtain the voting card for someone else named in the family book⁷³—personal presence is not required. This measure was extremely controversial (see below).

Everyone who acquires a voter card is put on the preliminary voters list. It is at this point that the list is handed over from the CSPD to the IEC.⁷⁴ It is anticipated that the final voters list compiled by the Commission in 2012 will form the basis for the new voters list in future elections. Going forward, the Commission will add newly eligible voters to the voters list every January 1 and July 1.⁷⁵

Rather than being allowed to vote anywhere in the electoral district, the new law requires voters to choose at the time of registration a specific polling center in their district where they will vote.⁷⁶ This

68 “First Week Report on the Voter Registration Process 5th - 12th June 2010: Report Findings and Outcomes Related to, The Governmental Conduct Represented by the Staff of the Civic Status and Passport Directorate Offices,” Al-Hayat Center for Civil Society Development, 2010.

69 “Second Week Report of the Civil Coalition for Observing the Monitoring of the Registration Process, 2010 Parliamentary Election,” Al-Hayat Center for Civil Society Development, 2010.

70 See *Preliminary Statement of the NDI Election Observer Delegation to Jordan’s 2010 Parliamentary Elections*, National Democratic Institute, November 10, 2010, https://www.ndi.org/files/Jordan_2010_Election_Delegation_Statement.pdf.

71 *Final Report: Assessment of the Electoral Framework*, Democracy Reporting International and Identity Center, 2013, http://www.democracy-reporting.org/files/dri_jo_assessment_of_electoral_framework_v1_2013-04-04_1.pdf, 44.

72 Independent Election Commission Law No. 11 of 2012; Election Law 2012, Article 4.

73 Family books are issued to the head of the household on behalf of his family—and the head of family is automatically a man. There are separate pages for the head of household’s wife and children. That the family card, which is necessary for many public purposes in Jordan, is in the control of the male head of household can be problematic. See Catherine Warrick, *Law in the Service of Legitimacy: Gender and Politics in Jordan*, 2009, 152. In order to get a voter card, it is necessary to have a national ID card; to get a national ID card, it is necessary to present a family book. The procedure for obtaining the family book involves many steps. One is required to provide proof of Jordanian nationality for the head of the family; submit an application to “open a new civil record” by the head of the family to the office situated where the family resides; complete the “personal data-form record” by both husband and wife in order to obtain a national number; and present Jordanian birth certificates for all family members, along with one recent color photograph for the head of the family and wife, the marriage certificate, and the “Yellow Card of Crossing Points (Bridges)” of the Jordanian head of family, the Jordanian wife and adult sons and daughters. A Jordanian woman widowed, divorced or married to a foreigner is entitled to obtain a civil record and family book in her name, although the children of a divorced woman or one married to a foreigner are not added to the book regardless of their ages.

74 Election Law 2012, Article 4.

75 Election Law 2012, Article 7.

76 The Carter Center, *Study Mission Report*, 15.

represents an improvement, as it does address the possibility of multiple voting by creating voters lists specific to each polling place on which the voter must appear in order to cast a ballot.⁷⁷

The 2012 law does not define residency for the purpose of registration or voting. As a result, Executive Instruction 1 from the Commission established that if a voter's father or grandfather was born in another district, he or she can vote there. Voters from minority sects can also opt to vote in a district where a minority candidate was standing for election.

When a voter arrives at the polling place to vote, he or she has to present both the national identity card and the voter card.⁷⁸

2012 VOTER REGISTRATION

2012 Voter Registration

The original list based on the registry of national identification holders was 3,565,139. Of these, 2,272,182 registered and obtained voter cards. Fifty-six percent of registered voters turned out on election day.⁷⁹ Less than 40 percent of the eligible population, therefore, registered and voted in the 2013 election.

As will be discussed further below, some Jordanian observers raised concerns that, during the registration process, the government undertook a variety of measures to bolster the numbers of registrants in order to promote the credibility of the election in the face of an opposition boycott. Although international law encourages making voter registration as accessible as possible, some groups objected to the way in which the IEC extended the deadline for registration twice, which compressed the overall timeline for election preparations in the process.⁸⁰ To observers, changing the rules midway through the process possibly demonstrated a politicization of the election authorities, similar to what Jordanians had experienced in previous elections. In all, registration took place between August 7, 2012 and October 15, 2012.

Authority over the Process

Although the newly created Independent Election Commission was given responsibility under the law to manage most aspects of the voting system, authority for creating the voters list and the voter cards continued to rest with the Ministry of Interior's CSPD. Article 4 of the new election law gives

77 Democracy Reporting International and Identity Center, *Final Report*, 44.

78 Election Law 2012, Article 39.

79 *Elections in the Hashemite Kingdom of Jordan: January 23 Chamber of Deputies Elections – Frequently Asked Questions*, International Foundation for Electoral Systems, January 16, 2013, <http://ifes.org/faqs/elections-hashemite-kingdom-jordan-january-23-chamber-deputies-elections>, 7-8; Hermann Thiel, "Jordan's First Election Under a New Commission," International Foundation for Electoral Systems, January 24, 2013, <https://www.ifes.org/news/jordans-first-election-under-new-commission>.

80 Khaled Neimat, "Voter Registration Period Extended Again, Elections Expected Early Next Year," *Jordan Times*, September 30, 2012, <http://www.jordantimes.com/news/local/voter-registration-period-extended-again>.

the Department these responsibilities.⁸¹ Citizen monitoring organizations in Jordan were critical of the CSPD and found in some cases that it was biased. Observers had extra cause to be skeptical of the agency's neutrality given its actions in previous elections, including in 2007, when it was documented that the CSPD was involved in vote transfers.⁸²

According to the final April report of the domestic Civil Coalition for Monitoring Jordan Parliamentary Elections (RASED), CSPD staff offered preferential treatment to some candidates and public figures that were seen by observers inside CSPD managers' offices. According to the report, CSPD staff in several cases helped these figures in expediting their registration procedures and even helped them in illegal group registration or relocation from one district to another.⁸³

The European Union (EU) was further critical of the fact that "the Independent Election Commission lacked ownership over the voter registration process as it was not involved in recruiting, training and direct supervision of voter registration officers."⁸⁴

It did not help perceptions of bias when, according to RASED, it was discovered that thousands of military personnel were impermissibly on the registration list. The IEC refuted this charge, but later backtracked and purged their names from the list. According to RASED, "The integrity of the voters lists came under question also due to the delay in announcing the final lists by the IEC, as they were announced (70) days after the closure of the voters' registration process on October 15, 2012."⁸⁵ Moreover, the voter registration list that was made available was in "password protected PDF files not allowing for copy or conversion of the data for purposes of review, audit and analysis."⁸⁶ RASED also reports that the IEC "took no action to prosecute perpetrators of electoral crimes during the voters' registration period, although documented violations were presented to the IEC involving public servants under its jurisdiction at the time. The IEC subsequently formed several investigative

81 Article 4; "When the provisions of this law and the regulation issued pertaining to it become effective:

A. Executive instructions shall determine the specifications and content of the election card.

B. The Commission shall ask the Department to prepare an election card for any person who is entitled to vote and who has a national identity card that includes the National Number, based on the eligible voter's place of residence as indicated in the Department's records, in line with the local electoral districts specified in accordance with the provisions of this law and the regulation issued pertaining to this law.

C. The courts shall provide the Department with all final rulings and verdicts related to sequestration and bankruptcy, provided they are inclusive of the full names and national numbers of persons against whom said rulings and verdicts were issued at the time that this law became effective and at the beginning of the months of January and July of every year or any other date specified by the Board.

D. The Department shall undertake the necessary procedures to remove the names of deceased persons from its records in order to ensure that election cards are not issued in their names.

E. The Department shall notify the Commission of the completion of the process of preparing the election cards. . . .

M. The Department shall register the name of all eligible voters who received the election card in lists prepared for this purpose, and these lists shall be considered as the preliminary voters lists."

82 *Report on the Conduct of the 2007 Parliamentary Elections*, National Human Rights Council, 2007.

83 *Conclusion of the Report on Monitoring the 2013 Jordan Parliamentary Election*, Civil Coalition for Monitoring Jordan Parliamentary Elections (RASED), 2013, 11.

84 *Final Report: Parliamentary Elections*, European Union Observation Mission to the Hashemite Kingdom of Jordan, 2013, http://eeas.europa.eu/eucom/missions/2013/jordan/pdf/final-report_en.pdf, 15.

85 RASED, *Conclusion of the Report*, 5.

86 RASED, *Conclusion of the Report*, 3. "Transparency requires that voter registers be public documents that can be monitored and made available for inspection at no cost to the requester." *International Electoral Standards: Guidelines for Reviewing the Legal Framework of Elections*, International IDEA, 2002, http://www.idea.int/publications/ies/upload/electoral_guidelines.pdf, 46.

committees but with no output to the date of writing this report.”⁸⁷

Proxy Registration

Midway through the registration period, the Commission decided to allow “proxy registration,” whereby a family member could register and obtain the voter card for any other family member. In practice, as noted by citizen observers, even people who were not family members of the cardholder picked up voter cards in the name of other citizens, in violation of the regulations.⁸⁸ This proved to be the most controversial aspect of the administration of the election.

According to the National Democratic Institute’s (NDI) preliminary election statement, “NDI’s long-term observers heard few concerns about the accuracy of the voters list, but concerns were raised about the practice of allowing family members and, in some cases, non-relatives, to pick up multiple voter cards. There were also reports of a high number of voter cards being held by others, a practice that many believed would lead to potential voter fraud on election day.”⁸⁹

Citizen observation groups estimated that 62 percent of cards were obtained by one person for other family members, not by the person to whom the card belonged. This, they and others alleged, opened the door wide to vote buying and intimidation, by letting one person control a number of voter cards.⁹⁰ Indeed, a former member of parliament (MP) was alleged to have thousands of voter cards; it was widely reported that this prominent tribal politician delivered a speech with thousands of voter cards displayed in front of him. The IEC referred the case to the attorney general.⁹¹ After the politician was elected to parliament in the January election, he received parliamentary immunity and the court in charge of the case suspended hearings. He will continue to be immune to prosecution for the duration of his tenure in parliament and there is a three-year statute of limitations on the charge.⁹²

RASED found that between 108,000 and 121,000 cards were held illegally. In addition, 57,000 to 68,000 cards were never received by the applicants, and 4,500 to 6,800 voter cards included incorrect information that could prevent a citizen from casting a ballot due to data mismatches. Beyond the former MP, RASED alleged that party representatives were also holding voter cards for the purpose of vote buying.

The Carter Center estimated that 85 percent of registrations were by proxy and that there was widespread vote buying as a result.⁹³ In its preliminary statement, the EU reported that candidates and others were detained for forging and withholding voter cards and offering money for them. Although observers found the lists to be largely accurate and the efforts of the IEC commendable, as the EU

87 RASED, *Conclusion of the Report*, 13.

88 Author interview with Lama Khateeb, Resident Program Officer, National Democratic Institute, March 12, 2013.

89 National Democratic Institute, *Preliminary Statement*, 5.

90 *Preliminary Statement of the Integrity Coalition of Election Observations on the 2013 Parliamentary Elections in Jordan*, Identity Center, January 24, 2013, <http://identity-center.org/en/node/154>.

91 Nicholas Seeley, “The Jordanian State Buys Itself Time,” Middle East Research and Information Project, February 12, 2013, <http://www.merip.org/mero/mero021213>; Khaled Neimat, “Former MP Implicated in Suspected Election Crime,” *Jordan Times*, December 10, 2012, <http://jordantimes.com/former-mp-implicated-in-suspected-election-crime>.

92 Lama Khateeb, Resident Program Officer, National Democratic Institute, email message to author, May 1, 2013.

93 The Carter Center, *Study Mission Report*, 16.

stated, “Extensive proxy voter registration affected the credibility of the voter registration process and contributed to a general perception of distrust about the accuracy of the final voters list.”⁹⁴ Proxy registration also led to the registration of people without their knowledge or consent.⁹⁵

Government Involvement in the Registration Process

Several organizations and observers suggested that part of the reason proxy registration was suddenly allowed was to artificially inflate the total number of registrants for political purposes.⁹⁶ This notion is bolstered by the observation that the government undertook a number of measures to encourage groups over which it has particular influence to register.

Jordanian observers expressed concern that the government pressured public employees to register to vote. CSPD representatives were sent to the offices of ministries to register people; it was speculated that ministerial staff had little choice in the matter. The government also targeted companies and organizations with ties to the government or reliant on the government, sending representatives to offices and factories to register people.⁹⁷ The Carter Center also “received reports that public liaisons were appointed in public institutions to facilitate and encourage registration of public sector employees.”

There were many reports of rumors circulating in Palestinian communities that if they did not register to vote, their national identity cards would be taken away from them.⁹⁸ There were reports that Palestinians in camps participated because they feared their identification documents would be withdrawn if they did not.⁹⁹ There were some reports that when the registration numbers were not deemed high enough, Palestinian refugee camps were specifically targeted by the authorities for registration.¹⁰⁰

This conduct by the government may have been a violation of the ICPPR, as the authoritative interpretation of that document by the UN makes clear that “abusive interference,” intimidation or coercion in the registration process should be condemned by enforced laws.¹⁰¹ While General Comment 25 also makes clear that the state is required to facilitate the process of voter registration and remove unnecessary obstacles, it is important that this not cross the line into undue government pressure. Whether this transgression occurred must be assessed according to the context. Though reports of coercion were common amidst reports of the government’s concern that the legitimacy of the election be bolstered by high registration numbers, it is not clear to what extent this was the case in Jordan.

94 European Union, *Final Report*, 2.

95 Democracy Reporting International and Identity Center, *Final Report*, 45.

96 Democracy Reporting International and Identity Center, *Final Report*, 44.

97 Author interview with Amer Bani Amer, Founder and General Director, Al Hayat Center for Civil Society Development, March 28, 2013.

98 The Carter Center, *Study Mission Report*, 16.

99 Nicholas Pelham, “Jordan: Democracy Delayed,” *New York Review of Books Blog*, January 25, 2013, <http://www.nybooks.com/blogs/nyrblog/2013/jan/25/jordan-democracy-delayed>.

100 Laurie Brand and Fayez Hammad, “Identity and the Jordanian Elections,” *Foreign Policy*, January 17, 2013, <http://foreignpolicy.com/2013/01/17/identity-and-the-jordanian-elections>.

101 General Comment 25 of the UN Human Rights Commission.

Location of Registration and Voting

Voters were allowed to choose a polling center when registering to vote. As referenced, under the law, voters could choose for their electoral district to be their place of residence or the district where their father or grandfather was born. Members of minority groups could also register in an electoral district in which a minority was running for office. Approximately 400,000 citizens registered outside of their place of residence.¹⁰²

According to NDI partner Al-Hayat Center for Civil Society Development, there were no specific rules about how to determine if someone truly had the option to vote in a district outside of his or her residence. There were no requirements to demonstrate that one's father or grandfather's birthplace was in another particular jurisdiction. In reality, for many voters, opting to vote in their "home" district meant the district of their tribe. In general, officials allowed voters to make this choice without any verification of whether they were even from a known tribe located in a known area of the country. This practice was criticized by some as reinforcing the practice of voting on the basis of family or tribal ties rather than party or policies.¹⁰³

Citizen observers also reported problems caused by the distance people needed to travel to reach a registration center. NDI observed disorganization in the registration process, which involved many unnecessary forms, lengthy procedures, multiple visits, and long waits in crowded registration centers.¹⁰⁴ An inclusive, accessible registration system is essential to meeting the principle of universal suffrage, as has been noted in several international legal documents. These obstacles to registration need to be assessed in that light. Allowing people to register and vote outside of what they consider to be their residence can in some cases be problematic under international norms. While it is recognized that refugees should be afforded the right to vote from their place of origin and there is a growing body of support for voting rights for citizens living outside the country, the choices permitted by the Jordanian law have the potential to negatively impact elections. Enabling voters to choose in such a manner may allow candidates and parties to distort the electoral process by strategically placing voters in particular places, rather than requiring that voters vote for candidates to represent them where they truly have interests at stake. It encourages voting on the basis of tribal affiliation rather than on political and policy platforms, diminishing the positive democratic role of parties, also recognized by the international community. It is of note that international norms universally allow for residence to be one of the few restrictions that can be placed on citizens' right to register to vote.¹⁰⁵

After the voter registration deadline passed, the Independent Election Commission took over and displayed the preliminary voters list widely throughout the country. The law provided for, and the commission oversaw, what was seen as a fair and efficient process for challenging the accuracy of the list.

102 The Carter Center, *Study Mission Report*, 16.

103 Democracy Reporting International and Identity Center, *Final Report*, 8.

104 Author interview with Lama Khateeb.

105 Richard Klein and Patrick Merloe, *Building Confidence in the Voter Registration Process: An NDI Monitoring Guide for Political Parties and Civic Organizations*, National Democratic Institute, 2001, <https://www.ndi.org/node/12886>, 7: ". . . There is agreement that it is appropriate to define voter eligibility based upon certain other characteristics: citizenship, residency and age." See also "Code of Good Practice in Electoral Matters: Guidelines and Explanatory Report," Council of Europe, sec. I.1.1.c, <http://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD%282002%29023rev-e>; *Existing Commitments for Democratic Elections in OSCE Participating States*, Organization for Security and Co-operation in Europe, 2003, <http://www.osce.org/odihr/elections/13957>, 59.

EXCLUDED GROUPS

The EU Observation Mission to Jordan expressed concern over the number and types of groups barred from registering to vote. The final report noted that, “The Election Law suspends the right to vote to the members of the armed forces, general intelligence, public security, gendarmerie and civil defense while in active service. Further, it denies the right to vote to persons declared bankrupt, retarded, insane or interdicted. Additionally, there was no provision for proxy voting; voting abroad; voting of prisoners; and persons in pre-trial detention.”¹⁰⁶

The Carter Center was equally critical of the disenfranchisement of these groups, including in their recommendations:

In order to ensure that the widest possible pool of citizens can vote, mentally disabled persons should not be disenfranchised unless by a decision of a court or another competent authority. Further, while the Carter Center acknowledges the specific challenges related to granting the right to vote to active personnel of the army, gendarmerie and police, lawmakers should consider the possibility to grant them the right to vote in the near future.¹⁰⁷

IDENTIFICATION

The voter card was established by the 2012 law because of questions about the integrity of the national identity cards.¹⁰⁸ Nonetheless, to register to vote in Jordan and obtain a voting card, one must present a national identity card to the registrar. Although it is believed that the majority of Jordanians do have the national identity card, the process for obtaining one is not simple, as discussed above. Thus, identification requirements have the potential to disenfranchise some voters in limited circumstances.

ISSUES UNDER INTERNATIONAL LAW

One matter of concern regarding the process and Jordan’s international obligations relates to the authority over the electoral process. It is widely accepted under the precepts of ICCPR Article 25 that independent and nonpartisan election management is key to fulfilling the promise of ensuring electoral participation. Critical to free participation in elections is trust in the authorities managing them. In Jordan, the Ministry of Interior’s control over a key part of the electoral process was seen as problematic for the credibility of the registration exercise, and was of concern under international obligations since the executive branch continued to oversee the bulk of the voter registration process. As mentioned above, allegations of government pressure in the registration period would also be problematic under international obligations as the ICPPR interpretation of that document makes clear that “abusive interference,” intimidation or coercion in the registration process should be condemned by enforced laws.¹⁰⁹

¹⁰⁶ European Union, *Final Report*, 14.

¹⁰⁷ The Carter Center, *Study Mission Report*, 28.

¹⁰⁸ The Carter Center, *Study Mission Report*, 15.

¹⁰⁹ General Comment 25 of the UN Human Rights Commission.

Another area in which compliance with international as well as regional treaty obligations comes into question in the Jordanian system is with respect to proxy registration. Universal and equal suffrage is a central pillar of international obligations in elections. By allowing irregularities in the registration process, opening the door to substantial voter fraud, allowing people to be registered by others without their knowledge or consent, and possibly denying the ability to vote to some citizens by holding their cards, proxy registration possibly jeopardizes equality of the vote. The Arab Charter to which Jordan subscribes also states that a citizen has the right to choose his representative in free and fair elections under conditions guaranteeing equality among all citizens and ensuring the free expression of the will of the electorate. The irregularities that occurred through the proxy registration system in 2013, changes to the rules midway through the process, and inconsistent application of rules and regulations threatened to violate this and related principles.

Allowing people to register and vote outside of what they consider to be their residence can in some cases be problematic under international obligations. While it is recognized that refugees should be afforded the right to vote from their place of origin and there is a growing body of support for voting rights for citizens living outside the country, the choices permitted by the Jordanian law have the potential to negatively impact elections. Enabling voters to choose in such a manner may allow candidates and parties to distort the electoral process by strategically placing voters in particular places, rather than requiring that voters vote for candidates to represent them where they truly have interests at stake. It encourages voting on the basis of tribal affiliation rather than on political and policy platforms, diminishing the positive democratic role of parties, also recognized by the international community.

Though international practice on what reasonable restrictions may be placed on who is eligible to register and vote varies widely, the exclusion of many groups in Jordan from registration also needs to be examined. As the EU stated in its report,

The universality of the right to vote was curtailed by the exclusion of large groups such as the members of the armed forces, general intelligence, public security, gendarmerie and civil defense while in active service and is against international commitments and the principal of universal suffrage enshrined in Article 25 of the International Covenant on Civil and Political Rights. Some 220,000 officers and employees of the state security apparatus were excluded from the right to vote including civil defense, fire fighters and other civilian disaster management staff. In addition, the suspension of the right to vote to persons in pre-trial detention is in contradiction with international commitments and the principal of presumption of innocence.¹¹⁰

Finally, while the issue of documentation does not appear to be a major one in Jordan, it has the potential to be burdensome. Identification requirements for voting that are difficult or impossible for some citizens to meet may violate international norms. Comment on Article 25 establishes that, “The right to vote may be subject only to reasonable restrictions, such as setting a minimum age limit for the right to vote. It is unreasonable to restrict the right to vote on the ground of physical disability or to impose literacy, educational or property requirements.” Even more pertinent, the Comment also says, “States must take effective measures to ensure that all persons entitled to vote are able to exercise that right. Where registration of voters is required, it should be facilitated and obstacles to such registration should not be imposed.” Onerous documentation requirements can be found to be discriminatory,

¹¹⁰ European Union, *Final Report*, 14.

unreasonable and/or an obstacle to registration and thus in contradiction to Article 24 of the ICPPR, especially when such hardship falls particularly on certain groups of voters such as ethnic minorities, the poor or women.