INTERNATIONAL ELECTION OBSERVATION MISSION
Republic of Serbia – Early Parliamentary Elections, 25 October 2026

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

PRELIMINARY CONCLUSIONS

The 25 October early parliamentary elections saw active citizen engagement with high voter turnout and vigorous competition between two main contenders, but unfolded in an atmosphere of profound polarization, with the equality of campaign opportunities seriously compromised. Entrenched advantages enjoyed by the ruling party, including misuse of state resources, together with intimidation and pressure on voters, candidates, and civil society, as well as disruptions of campaign activities, further marred the electoral environment. Election preparations were managed efficiently and candidate registration was inclusive, although concerns remained about the impartiality of election administration, particularly at lower levels. Recent legislative changes addressed several longstanding shortcomings, while leaving some priority recommendations unaddressed. Widespread distrust in the integrity of the voter register persisted, compounded by inadequate public explanations from the authorities about noted irregularities. A pronounced bias in monitored media coverage in favour of the incumbent party, coupled with an online environment marked by inflammatory rhetoric and information manipulation, hampered voters' ability to obtain impartial and reliable information. Election day saw high voter engagement and the International Election Observation Mission (IEOM) positively assessed all stages of the election day process in the vast majority of polling stations observed. Nevertheless, reported incidents of physical violence raised serious concerns and some procedural shortcomings were noted.

Overall, the legal framework provides an improved basis for the conduct of democratic elections. Extensive amendments adopted in 2025 and 2026 addressed several ODIHR recommendations, some only partially, although the legislative process lacked meaningful consultation and the changes did not enjoy broad political consensus. Further, the late adoption of certain provisions affected legal certainty and their effective implementation, while others will only become applicable after these elections. Significant ODIHR and Venice Commission of the Council of Europe recommendations, including priority ones, remain unaddressed, including on the prevention of the misuse of state resources, voter intimidation and pressure, dissuasive sanctions for campaign and campaign finance violations, the safety of journalists, effective media regulatory oversight, and remaining restrictions on voting rights.

The election administration at the central and local level managed election preparations efficiently, with the Republic Electoral Commission (REC) generally operating transparently and within legal deadlines. However, the influence of the political affiliations of REC members on its deliberations and decisions on contentious issues raised concerns about the consistency and impartiality of its decision-making. At the local level, ODIHR EOM observers reported varying levels of transparency and co-operation with observers, as well as widespread distrust in the impartiality of Local Election Commissions (LECs) due to their composition. In the absence of clear and objective criteria for determining polling station locations and voting hours, arrangements for out-of-country voting raised concerns about the transparency of decision-making and the disproportionate inconvenience of voters in certain countries. Despite steps to improve accessibility, barriers to the independent and equal participation of voters with disabilities remained.

Voter registration is passive, with some 6.5 million voters included in the Unified Voter Register (UVR). Longstanding concerns about its accuracy and integrity persisted, including allegations of fictitious entries, deceased voters and incorrect addresses, warranting further examination by relevant state institutions. The authorities did not provide substantive public explanations for reported discrepancies, including alignment with the total population of approximately 6.6 million according to the 2022 census, or clarify whether acknowledged deficiencies were being systematically addressed, leaving widespread

public distrust unaddressed. In line with previous international recommendations, a new Voter Registration Audit Commission was established, including representatives of civil society. However, delayed and restricted access to relevant data hampered its ability to conduct a comprehensive audit and assess the accuracy of the voter register before the elections. Nevertheless, voter registration was generally accessible, with voters given sufficient opportunity to verify and correct their records, and measures put in place to enhance transparency facilitated public scrutiny of the UVR.

Candidate registration was inclusive, with all 19 submitted lists registered, one of which subsequently withdrew. The REC verified supporting signatures efficiently and in a generally transparent manner. Recent amendments addressed a previous ODIHR and Venice Commission recommendation by allowing voters to support more than one candidate list; individual independent candidacies remain prohibited, contrary to OSCE commitments. Half of the 18 contesting lists were granted national minority status, but the REC relied primarily on formal party registration records without adequately assessing whether the lists met the substantive criteria for such status. This approach risked undermining the purpose of preferential registration provisions intended to facilitate genuine national minority representation.

While the legal gender quota has contributed to women's parliamentary representation, women remained underrepresented in political decision-making, particularly in executive office and political party leadership. Nevertheless, women were well represented in election administration at all levels. All registered candidate lists complied with the 40 per cent gender quota. Overall, 47 per cent of all candidates were women, but only one list was headed by a woman. Women were visible in the campaign as candidates, speakers and rally attendees, although contestants paid limited attention to gender equality and women's political participation in their programmes. Incidents of violence and alleged threats against women, including online, were further instrumentalized in partisan exchanges, detracting from substantive discussion of gender equality.

The campaign was highly polarized, with political competition dominated by two main contenders whose campaigns portrayed the elections as decisive for the country's future. Accusations from the Serbian Progressive Party (SNS)-led campaign linking the student movement and civil society organizations to foreign interests, including online, deepened political divisions and detracted from substantive political debate. The use of state resources to convey campaign messages, together with the timing and presentation of substantial financial benefits announced before and during the campaign, including commitments of almost one billion euro, blurred the distinction between state and party activities and undermined the equality of campaign opportunities, at odds with international standards and OSCE commitments. Contestants were able to campaign vigorously. However, disruptions of campaign activities, instances of intimidation and confrontation, inconsistent police responses and numerous allegations of pressure on public-sector employees and vote-buying raised concerns about contestants' ability to campaign freely and voters' freedom to make their choices without pressure or undue influence.

Online campaigning was extensive but remained largely unregulated, with no dedicated oversight mechanism and inadequate safeguards against information manipulation, weakening accountability in the online campaign environment. The broader online environment was marked by divisive and inflammatory rhetoric, harassment and threats, as well as reported cyber-security incidents, coordinated inauthentic activity and disinformation, including AI-generated content. Further, fact-checking organizations identified that these disinformation narratives and AI-generated content were amplified by mainstream media. These shortcomings, compounded by the lack of transparency in how social media platforms prioritise and amplify content, increased the vulnerability of the online information environment to manipulation and risked limiting voters' access to reliable information necessary to make an informed choice. Reports of unlawful digital surveillance, including the alleged use of Pegasus spyware, remained unresolved, while widespread distrust of law enforcement and security institutions raised concerns about the protection of privacy and other fundamental rights.

Despite substantial legislative amendments which addressed several previous ODIHR and Venice Commission recommendations, including by introducing expenditure limits and regulating third-party campaigning, the campaign finance framework and its implementation did not ensure adequate transparency, effective oversight and accountability. The Agency for Prevention of Corruption (APC) monitored campaign activities, but its failure to estimate their costs, together with a largely restrained approach to oversight and enforcement, limited its ability to detect and address potential campaign finance violations. Despite the modest scale of third-party campaigning, the lack of registration and disclosure, coupled with limited awareness of the new requirements and absence of timely guidance from the APC on their application, weakened compliance and effective enforcement.

Pervasive political and economic pressure undermined media editorial independence, while changes in ownership and distribution further constrained the operations and reach of analytical and critical journalists and broadcasters. Attacks, threats and harassment against journalists, compounded by impunity on the part of perpetrators, legal and financial pressures and hostility from senior public officials, contributed to self-censorship and constrained critical reporting. Despite opportunities for contestants to present their programmes, ODIHR EOM media monitoring found that campaign coverage was marked by pronounced imbalances in exposure and treatment. Contrary to its legal obligations and public-service mandate, RTS favoured "United Serbia" and singled out the "Student List" for negative treatment. National private broadcasters similarly favoured "United Serbia", particularly through extensive exposure of Aleksandar Vučić, while predominantly portraying the "Student List" negatively, with *TV Informer* displaying pronounced hostility. Overall, most monitored broadcasters failed to provide voters with the substantive and impartial information necessary to make an informed choice, contrary to international standards and OSCE commitments. Divisions within the Regulatory Authority for Electronic Media (REM) prevented effective oversight and timely remedies, leaving the overwhelming majority of complaints unresolved before election day, at odds with international standards and good practice.

The electoral dispute resolution framework provides expedited procedures, but restrictions on legal standing for voters are contrary to international standards, OSCE commitments and good practice. The REC considered complaints in public sessions and promptly published its decisions, enhancing transparency. However, at times complaints were handled in a formalistic manner and substantive arguments were not addressed. The Administrative Court generally upheld REC decisions, at times without substantively examining the arguments raised in appeals, and did not hold oral hearings, limiting opportunities for appellants to present their arguments and have them adequately examined. The APC adjudicated campaign-related complaints, but delays, insufficient reasoning in some decisions, together with the lack of transparency of proceedings concerning public officials, limited the effectiveness and accountability of its enforcement activities. Overall, the handling of election disputes did not consistently ensure effective legal remedies.

While recent amendments expanded the rights of citizen election observers, who were generally able to observe the electoral process without significant restrictions, they faced growing hostility, with senior political figures repeatedly questioning their independence and accusing them of serving foreign interests. Civil society organizations nevertheless conducted extensive election observation, contributing to the transparency of the process. Still, such rhetoric risked undermining public confidence in citizen election observation and discouraging participation in electoral oversight, at odds with international standards and OSCE commitments.

Election day saw high voter engagement, reflecting citizens' commitments to exercise their democratic rights. IEOM observers assessed voting positively in 96 per cent of polling stations observed as procedures were followed overall. Nevertheless, reported incidents of physical violence, including against polling staff, citizen observers and journalists, raised serious concerns. IEOM observers noted a statistically significant number of cases of group or family voting, inadequate safeguards for the secrecy

of the vote, and signs of pressure or intimidation outside some polling stations. Women constituted 49 per cent of polling board members in the polling stations observed. Regrettably, independent access for voters with physical disabilities was not provided in 61 per cent of polling stations observed. Citizen observers were present in nearly half of polling stations observed, contributing to transparency. The IEOM assessed counting and tabulation positively in the vast majority of polling stations and LECs observed, while noting some procedural shortcomings during counting, including those affecting transparency, and some discrepancies in results protocols during tabulation.

PRELIMINARY FINDINGS

BACKGROUND

The 25 October early parliamentary elections took place amid deepening political and societal polarization, growing concerns over the exercise of fundamental freedoms, including of peaceful assembly, respect for the rule of law, media independence and shrinking civic space.[1] The polarized environment has increasingly affected the functioning of public institutions. The outgoing government, elected in 2023, was led by the Serbian Progressive Party (SNS), which has governed in coalition with the Socialist Party of Serbia (SPS) since 2012.

Following the deaths of 16 people in the collapse of a canopy at the newly renovated Novi Sad railway station in November 2024, student-led protests spread across the country, demanding transparency and accountability, and alleging corruption. Amid continued protests and incidents of violence, which led to university blockades, Prime Minister Miloš Vučević resigned in January 2025.[2] In May 2025, the student movement, supported by some opposition parliamentary parties, demanded early elections, and announced its intention to contest them.

On 9 September, President Aleksandar Vučić dissolved the National Assembly and called early parliamentary elections for 25 October.[3] Since 2007, six of eight parliamentary elections have been held more than a year early.[4] The decision followed months of public statements signalling that elections were likely, resulting in increased political activity by several of the eventual contestants, including a well-publicized tour of the country by the President. On 27 September, 19 days into the campaign, Aleksandar

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1 See 2026 communications from UN Special Rapporteurs on academic freedoms, human rights defenders and independence of the judiciary, and from the UN High Commissioner for Human Rights expressing concern about the shrinking civic space in Serbia. See also a 2025 communication from five UN Special Rapporteurs regarding the use of spyware against journalists and activists and the 2025 police raid on a citizen election observation group. See also speech by Michael O'Flaherty, Council of Europe Commissioner for Human Rights on "Fundamental Freedoms Under Pressure: Human Rights and Accountability in Serbia" (17 September 2026) and PACE Resolution 2659 (2026) and Report on the Functioning of democratic institutions in Serbia

2 In his 28 January 2025 resignation statement, the Prime Minister cited attacks on students in Novi Sad and the need to reduce tensions. During a 15 March 2025 demonstration, a mass panic caused injuries and prompted allegations of the use of a sonic weapon, which the government denied. The demonstration, described as Serbia's largest-ever, was measured by authorities at 107,000 and by the independent Public Assembly Archive at between 275,000 and 325,000. In April 2025, UN Special Rapporteurs expressed concerns that an acoustic weapon may have been used, and cited broader restrictions on freedom of peaceful assembly.

3 The President stated that political turbulence made it necessary for citizens to determine Serbia's future path. A summary of the government's proposal was published on 7 September. President Vučić's declaration was reported by the media. On 7 September, the funeral of Ratko Mladić, who was convicted of war crimes, crimes against humanity and genocide by the International Criminal Tribunal for former Yugoslavia, was held in Belgrade with military honours and attended by high public officials, including ministers, sparking strong criticism from some of the opposition and international community.

4 See PACE Resolution 2659 (2026) on the Functioning of democratic institutions in Serbia, which states that, "While legally possible, the frequent organization of elections at short intervals disrupts the functioning of democratic institutions, including the parliament and independent State institutions, and hampers the full implementation of laws and control of the executive, no matter which political forces are in power".

Vučić resigned as president to contest the parliamentary elections.[5] The Speaker of Parliament, Ana Brnabić, assumed the role of acting president.

Serbia has been an EU candidate country since 2012; however, there has been no formal progress in the accession negotiations since 2021, due to the EU's concerns related to the rule-of-law, media freedom and Serbia's low alignment with the EU's foreign and security policy.[6]

While the legal gender quota has contributed to women's parliamentary representation, women remain underrepresented in political decision-making, particularly in executive office and leadership positions within political parties. Women held 37.6 per cent of seats in the outgoing parliament and 9 of 31 ministerial positions. Their continued underrepresentation in decision-making positions, together with limited measures to promote their political visibility and influence, indicates insufficient efforts by the authorities and political parties to enhance women's active participation in political life. The suspension of the 2021 Law on Gender Equality in 2024 weakened moves to further protect gender-equality across all sectors, including politics, at odds with international standards.[7] Previous ODIHR recommendations in this regard remain largely unaddressed.

LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The parliamentary elections are primarily regulated, *inter alia*, by the Law on the Election of Members of Parliament (LEMP) and the Law on the Unified Voter Register (LUVR), supplemented by instructions and decisions of the Republic Electoral Commission (REC). The electoral legal framework underwent extensive amendments in 2025 and 2026, including changes to several key laws shortly before the elections.[8] The authorities stated that the amendments aimed to address previous ODIHR recommendations. While public hearings were organized, the legislative process lacked meaningful and inclusive consultation, due to inadequate feedback mechanisms and limited parliamentary deliberations. The changes also lacked broad political consensus, at odds with international standards and good practice.[9]

The legal framework provides an improved basis for the conduct of democratic elections. Positively, recent amendments addressed several previous ODIHR recommendations. The amendments introduced, *inter alia*, mechanisms for independent audit and transparency measures for the voter register, allowed

5 The President's second term was due to expire on 31 May 2027. The Constitution limits presidents to two terms.

6 See the media reports on the European Council decision, and the European Parliament's press release on a report adopted by 468 votes to 116 on 8 July 2026 referring to "democratic backsliding, weakened rule of law, failure to implement key reforms and lack of alignment with EU foreign policy".

7 Article 3 of the CEDAW states that "States Parties shall take in all fields […] all appropriate measures, including legislation, to ensure the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms". See also Articles 2, 5, 4, 6, and 12 of the Council of Europe Convention on preventing and combating violence against women and domestic violence (Istanbul Convention), and the Recommendation CM/Rec(2003)3 of the Committee of Ministers of the Council of Europe to member States on balanced participation of women and men in political and public decision making.

8 Substantive changes were made to the LUVR in 2025, to the LEMP and other election-related legislation in May 2026, to the Law on Financing Political Activities (LFPA) in July 2026, and to the Law on Prevention of Corruption (LPC) on 31 August 2026. ODIHR provided legal opinions on several draft amendments. The media legislation was also amended in 2023 and 2025.

9 Public hearings on the LEMP, LFPA and LPC amendments were held in Kragujevac, Niš, Novi Sad and Belgrade in May, June and August 2026, respectively. Drafts were circulated to former members of the Working Group for the Improvement of the Electoral Process, which had not operated since early 2025. While the authorities stated that stakeholders could submit comments, several ODIHR EOM interlocutors reported insufficient time to review drafts and provide substantive input, limited opportunities to influence proposed changes and inadequate feedback on their proposals. Parliamentary committee deliberations were limited and all amendments were tabled by an individual ruling-party MP and adopted without broad opposition support. The 2024 Venice Commission Revised Interpretative Declaration provides that amendments within one year to elections are permissible if they are in accordance with international electoral standards and based "on consensus between government and opposition and on broad public consultations".

voters to support more than one electoral list and contestants to rectify deficiencies in nomination documents, established deadlines for Constitutional Court adjudication of election-related complaints, removed certain electoral deposit requirements, introduced campaign expenditures limits and additional safeguards against the misuse of public offices, increased the APC's oversight responsibilities, and introduced additional safeguards on access to public premises for campaigning on equal terms. However, the late adoption of some amendments impacted stakeholders' understanding of the new requirements, affected legal certainty and their effective implementation. Some other provisions will only become applicable after these elections.[10] Certain electoral provisions need further clarification to ensure their consistent interpretation and application.[11]

A number of previous ODIHR and Venice Commission recommendations, including priority ones, remain unaddressed. These include recommendations related to the prevention of voter intimidation and pressure, and the misuse of state resources and its proactive oversight, dissuasive sanctions for campaign and campaign finance violations, ensuring the safety of journalists and effective oversight by the media regulator, composition of election administration, and lifting the remaining restrictions on voting rights.

The 250 members of the Parliament (*Narodna Skupština*) are elected for four-year terms through a proportional representation system with closed candidate lists in a single nationwide constituency. Mandates are distributed among candidate lists that receive at least 3 per cent of the votes cast, while lists representing national minorities are exempt from the threshold.

ELECTION ADMINISTRATION

The elections were administered by the REC, 166 local electoral commissions (LECs) and some 8,392 polling boards (PBs), all operating in permanent and extended compositions.[12] The REC's membership reflects parliamentary representation, with additional members nominated by electoral contestants.[13] A dedicated unit was established within the National Assembly Service to support the REC, partially addressing a previous ODIHR and Venice Commission recommendation.[14]

The REC administered election preparations efficiently, met all legal deadlines and generally operated transparently, with sessions open to observers and the media, livestreamed and decisions promptly

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10 Mandatory training and certification provisions will become fully operational only in 2028, and the related REC instructions, due within three months of the adoption of the amendments, are not yet in place. The late introduction of third-party campaigning regulations limited the time available for stakeholders to understand and comply with the new requirements. The APC reported there was uncertainty among relevant stakeholders regarding the scope of the revised definition of public officials. The interpretation of the revised criteria for national minority list status remained disputed during the election process.

11 For example, provisions governing out-of-country voting lack sufficient detail. The legal framework addressing the misuse of public office and resources does not adequately regulate institutional communication and major announcements by public authorities that may confer an indirect electoral advantage. Furthermore, the grounds for the Agency for Prevention of Corruption (APC) to initiate proceedings against public officials are insufficiently defined, potentially leading to inconsistent application. The law also does not specify a deadline for the APC to initiate misdemeanour proceedings following an established violation.

12 Of the 8,332 polling stations, 8,210 were established in-country, including 29 in penitentiary institutions and 93 in 37 countries to facilitate out-of-country voting. On 5 October, the REC decided that voters residing in Kosovo* could vote at polling stations in the neighbouring municipalities of Vranje, Kuršumlija, Raška and Tutin. *All references to Kosovo, whether to the territory, institutions or population, should be understood in line with the United Nations Security Council Resolution 1244/99. PBs are constituted only for the election period.

13 The REC's permanent composition comprises a chairperson and 16 members, including 8 women. For these elections, contestants nominated 18 additional members, including 5 women, to its extended composition. All members have deputies.

14 The unit was established following amendments to the Rulebook on Internal Organization and Job Classification within the National Assembly Service in December 2024. Between February and September 2026, 19 staff were recruited or reassigned to the unit.

published.[15] However, the influence of the political affiliations of REC members on their positions and voting was particularly pronounced during deliberations and decisions on contentious issues, raising concerns about the consistency and impartiality of the REC's decision-making.[16] On a number of occasions, opposition-nominated members were unable to introduce or amend agenda items, while the ODIHR EOM observed that decisions were nearly always adopted without incorporating their objections or alternative proposals (See *Election Dispute Resolution*).[17]

The LECs generally managed technical preparations efficiently and published most decisions online. However, ODIHR EOM long-term observers reported varying levels of transparency and co-operation with citizen and international observers as well as a widespread lack of trust in the impartiality of LECs among interlocutors who cited the dominance of ruling coalition representatives and local authority employees in their membership.[18] In line with a prior ODIHR recommendation, the REC collected and published gender disaggregated data on the composition of LECs, which showed that women accounted for some 44 per cent of permanent members and their deputies.

The appointment of PBs was finalized by 14 October. The REC introduced a mandatory allocation of permanent PB membership slots to parliamentary parties' representatives, which lower-level election officials and other stakeholders assessed as fair and helpful.[19] ODIHR EOM data indicated that some less active lists without nationwide party structures managed to fill around 60 per cent of their allocated PB member slots.[20]

Voters, including those temporarily residing abroad, could request to vote at their temporary place of residence by 3 October. On 4 October, following voters' requests to vote at specific locations abroad and a proposal by the Ministry of Foreign Affairs (MFA), the REC established 93 out-of-country polling stations, 28 of which in Republika Srpska, Bosnia and Herzegovina.[21] Despite repeated requests from the REC, the MFA did not provide preliminary information on the number of applications for out-of-country voting or proposed polling station locations, submitting its proposal only hours before the deadline. This limited the REC's ability to meaningfully review the proposal and consider alternative arrangements.[22] The REC also decided that polling stations abroad would operate according to Belgrade time, departing from previous practice and disproportionally inconveniencing voters in certain countries.[23] The allocation of polling stations abroad and voting hours was contested by voters and opposition contestants and some opposition-nominated REC members questioned whether the allocation

15 Following the calling of elections, the REC held 29 sessions; meeting materials were generally provided to REC members and accredited observers in advance.

16 Guideline II.3. of the 2002 Venice Commission Code of Good Practice in Electoral Matters states that "an impartial body must be in charge of applying electoral law". Some REC members reported that they did not always have timely access to documentation, staff and premises necessary for their work.

17 Such decisions, among others, included allocation of the polling stations abroad, voting time for out-of-country polling stations and rejection of amended instructions for mobile voting.

18 The LECs' permanent membership, composed of 7 to 13 members depending on the number of voters in their respective administrative unit, proportionally reflects political representation in local councils. Since the call of the elections, some 5 per cent of the LEC members and deputies were replaced.

19 The allocation was prepared by the Republican Statistical Office using mathematical and sociological methods, which, according to the REC, included the use of artificial intelligence for the first time.

20 The three most active contestants – "United Serbia", the SPS-led "Factor of Stability!" and the "Student List" – filled over 90 per cent of their available PB positions.

21 This is a 12 polling stations increase compared to 2023. In the 2023 early parliamentary elections, 39,270 voters were registered to vote abroad, compared with 102,147 voters in 2026, an increase of approximately 160 per cent.

22 The MFA informed that the proposal for the allocation of polling stations abroad takes into account not only the number of registered voters but also their geographical distribution, security and logistical considerations, and staffing availability.

23 Neither the law nor the REC instruction on polling station allocation establishes clear and objective criteria for determining the locations and voting hours of polling stations abroad.

adequately accommodated voters' needs.[24] The absence of clear and objective criteria for determining polling station locations and voting hours further undermined the transparency of these arrangements and raised concerns among some interlocutors about impartiality of out-of-country voting arrangements.[25]

Despite a previous ODIHR recommendation, mobile voting procedures continued to lack adequate safeguards against misuse, as neither voters' written consent nor authorization for persons submitting requests on their behalf were required.[26] The REC did not address these deficiencies as it did not adopt the amendments to the mobile voting instructions proposed by some of its members and concerns about the integrity of mobile voting thus remained.

The REC organized a series of training activities for election officials, including online courses and training of trainers for PB members. ODIHR EOM long-term observers assessed the trainings as generally consistent and with a few exceptions, well attended, although some clarifications provided to the participants were insufficient or misleading. The REC also disseminated voter information through broadcasters and social media, although its materials received very limited television coverage.[27] Despite previous ODIHR recommendations, the materials did not adequately address voters' rights, the prevention of group voting or the importance of the secrecy of the vote, limiting their effectiveness in safeguarding these fundamental principles.

The REC took steps to improve accessibility for voters with disabilities, requesting local authorities to assess polling station accessibility and providing some voter education and training materials with accessibility features, such as sign language interpretation, audio readers and text zoom-in options for persons with visual and hearing impairments.[28] Nevertheless, efforts to ensure independent and equal participation of voters with disabilities remained insufficient, as many polling stations were not fully accessible on election day and assistive materials and accessible voting formats were not consistently available (see *Election Day*). [29]

VOTER REGISTRATION

The right to vote is granted to citizens aged 18 or older, except those fully deprived of legal capacity or suffrage rights by a court decision, contrary to international standards.[30] Voter registration is passive, with eligible voters automatically included in the electronic Unified Voter Register (UVR) based on their permanent residence. The Ministry of Public Administration and Local Self-Government (MPALSG)

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24 The REC rejected as ungrounded several complaints filed by opposition contestants and voters concerning the allocation of polling stations abroad and voting hours (see the *Election Dispute Resolution* section).

25 In *Vamos and others v. Hungary* (dec.), the ECtHR concluded that "where the State does permit voting from abroad, even though this is not an obligation […] it must do so in a non-discriminatory manner". See also the 2026 Venice Commission's Updated Report on Out-of-Country Voting, in particular paragraph 135 *et seq*.

26 The law provides that mobile voting could be requested by sick, elderly, or disabled voters, or by other persons on their behalf, until 11:00 hrs. on election day.

27 The REC produced four voter information videos for distribution to national, regional and local broadcasters. It also disseminated information through its social media channels, including on registered candidate lists, voting procedures, voting from home and ballots in national minority languages.

28 The REC requested local authorities to provide detailed information on polling station accessibility, including the availability of ramps, elevators and lifting platforms, designated parking, audio-tools, and appropriate signage.

29 Paragraph 8 of the General Comment 11 to the CRPD states that "States parties must therefore recognize and promote the participation of persons with disabilities in political and public life not only as a legal obligation under article 29 but as an essential component of societies grounded in equality and human dignity".

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

maintains and continuously updates the UVR based on data provided by relevant agencies and voters. As of election day, 6,451,292 voters were registered, including 102,147 registered to vote abroad.[31]

IEOM interlocutors expressed a persistent lack of trust in the accuracy and integrity of the voter register, often citing the contradictory data on the total population of 6,647,003 according to the 2022 census, alleged fictitious entries, records of deceased persons, inaccurate or non-existent residential addresses, and unusually high numbers of registered voters at certain addresses and in some municipalities that could not be explained by emigration.[32]

The authorities acknowledged that the UVR contained some records of deceased persons and incorrect residential addresses. However, the MPALSG did not clarify whether these inaccuracies were being systematically identified and corrected or provide substantive explanations for the publicly reported discrepancies, instead informing the ODIHR EOM that it considered the allegations politically motivated.[33] The lack of a substantive public response by the authorities to concerns about the accuracy of the voter register did little to address the persistent public distrust in the voter registration process.[34]

Contributing to the transparency and inclusiveness of the voter registration process, the MPALSG and the MFA provided information on procedures for updating voter records, including for voting at a temporary place of residence or abroad. In line with the LUVR, the MPALSG published weekly updates on the number of voters by municipality and household, as well as changes to the UVR, allowing for effective scrutiny of the register. The ODIHR EOM observed that voters were generally aware of the procedures for verifying records, requesting corrections and checking their assigned polling stations.

In 2025, the LUVR was amended with the aim of enhancing transparency in the voter registration process and restoring public confidence in the integrity of the UVR. The amendments established the Voter Registration Audit Commission (VRAC), mandated to analyse personal data from the UVR, civil status and residence registers. The VRAC is required to publish its first report, including recommendations to improve the maintenance and accuracy of the UVR, by 28 October.[35] Still, some other ODIHR and Venice Commission recommendations on the voter register remain unaddressed.

The authorities did not ensure timely and sufficiently comprehensive access to the data necessary for VRAC to conduct an effective audit of the voter register and to complete its first report. Access to the UVR and data from the citizenship, residence and civil status registers was provided in stages and remained subject to restrictions, which the authorities justified by the need to protect personal data despite legal safeguards in place. VRAC members initially had access only to individual-record searches rather

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31 This figure does not indicate voters registered in Glogovac, Đakovica, Dečani, Kačanik, Štimlje, and Suva Reka in Kosovo*, who nevertheless retain the right to vote. As of election day, the MPALSG did not respond to the ODIHR EOM's request for clarification regarding the reasons for their exclusion from the reported figures and any implications for their ability to exercise their voting rights.

32 These concerns were raised by media, LEC representatives, political contestants, civil society and voters in Apatin, Belgrade (Mladenovac, Sopot, Vračar), Čačak, Mali Zvornik, Novi Pazar, Šabac (Ljubovija, Loznica, Valjevo), Sjenica, Subotica (Mali Iđoš, Ada, Odžaci), Zaječar and Zrenjanin. For example, in Zrenjanin, ODIHR EOM long-term observers verified that 42 voters were registered at the same single-family house; in Zvezdara, ODIHR EOM long-term observers documented a case of 12 individuals registered at an address who were unknown to the resident.

33 The authorities informed the ODIHR EOM that the legislation does not limit the number of persons registered at a single address and allows certain groups of voters to be registered at non-residential premises. They also noted instances of incomplete address records in Belgrade, including entries without apartment numbers or with '0' recorded as the house number. However, they maintained that corrections to such records should be made only upon requests from the voters concerned.

34 Paragraph 19 of the UN Human Rights Committee General Comment No. 34 on Article 19 of the ICCPR states that "States parties should proactively put in the public domain Government information of public interest. States parties should make every effort to ensure easy, prompt, effective and practical access to such information".

35 Parliament appointed the VRAC members and their deputies on 28 January for a five-year term. Women are significantly underrepresented in its composition, accounting for only 3 of the 20 members and deputies. VRAC members are subject to confidentiality obligations concerning voters' personal data.

than bulk datasets, limiting their ability to cross-check data against residency and citizenship databases. Further, data access was provided in a dedicated room, subject to technical restrictions limiting automated analysis.[36] These limitations hampered the VRAC's ability to conduct the systemic verification of voter registration data envisaged by the law

VRAC members nominated by opposition parties and civil society also raised concerns about delays in responses from the relevant ministries to requests for verification of specific records. In contrast, VRAC members nominated by the parliamentary majority maintained that the authorities had provided substantial institutional and technical support and that the audit should be confined to data legally relevant to voter registration. They emphasized that discrepancies identified through preliminary data analysis required further verification and should not be treated as established irregularities.[37]

CANDIDATE REGISTRATION

All eligible voters have the right to stand for parliament. Candidate lists may be nominated by political parties, coalitions of parties or groups of at least 10 voters, but not by individual independent candidates, contrary to OSCE commitments.[38] Nominations closed on 4 October, with each list required to submit at least 10,000 certified supporting signatures from voters.[39] Following the May 2026 amendments, and in line with a previous ODIHR and Venice Commission recommendation, voters may support more than one candidate list. IEOM interlocutors expressed concerns that these provisions could be misused to facilitate the registration of proxy lists, including through the forgery of voters' signatures.

National minority lists require 5,000 support signatures. Recent amendments further defined the criteria for granting national minority list status and extended the right to nominate such lists to groups of citizens.[40] However, ambiguities remained in the registration procedures.[41] The REC granted national minority status to all lists nominated by parties registered as representing national minorities and rejected complaints challenging the eligibility of certain lists, without adequately addressing the concerns raised. By relying primarily on formal party registration rather than adequately assessing whether lists met the substantive criteria for national minority status, the REC risked undermining the purpose of preferential registration provisions to facilitate genuine national minority representation.[42]

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36 The authorities informed the ODIHR EOM that the VRAC had been granted phased access to the voter register's database starting on 10 March, the electronic data exchange system on 5 May, and the functionality to retrieve underlying records on 6 July. They further stated that additional requests from VRAC members required time for technical implementation and ensuring secure access.

37 So far, the VRAC has established its operational and methodological framework, conducted individual and sample-based checks of UVR data in 10 local self-government units, and piloted comprehensive voter-register checks in Sevojno, including verification against the death register. On 9 October, it began using a platform to cross-match UVR data with registers of personal identification numbers, permanent residence and ID documents.

38 Paragraph 7.5 of the 1990 OSCE Copenhagen Document commits participating States to "respect the right of citizens to seek political or public office, individually or as representatives of political parties or organizations, without discrimination".

39 The signatures can be certified at municipalities, courts, and public and private notaries. In Paragraph 130 of the 2022 Joint Opinion on the Constitutional and Legal Framework Governing the Functioning of Democratic Institutions – Electoral Law and Electoral Administration in Serbia, ODIHR and the Venice Commission recommended exempting political parties represented in parliament from the signature requirement.

40 National minority lists may be nominated by parties or coalitions composed exclusively of parties registered as representing national minorities. The amendments also restored the possibility to consult the relevant National Minority Council when determining national minority list status.

41 The law does not clearly establish the sequence of procedures for registering lists and determining their national minority status. The REC registered the lists before deciding whether they qualified for national minority status.

42 Paragraph 30 of the 1990 OSCE Copenhagen Document states that participating states "further reaffirm that respect for the rights of persons belonging to national minorities as part of universally recognized human rights is an essential factor for peace, justice, stability and democracy". Paragraph 6.2 of the General Comment 23 to ICCPR states that "positive measures of protection… may also be necessary to protect the identity of a minority and the rights of its members".

The REC verified nomination documents and supporting signatures against the UVR and decided on registration within 48 hours of submission. The verification identified various irregularities for multiple candidate lists, including an insufficient number of support signatures, multiple signatures, candidates or supporters not registered in the UVR, and incomplete documentation.[43] In line with the May 2026 amendments, nominating entities were given 48 hours to remedy identified deficiencies.[44] The "Student List" alleged unequal treatment by municipal authorities in the certification of supporting signatures, which reportedly delayed its signature collection.[45] The REC's verification of supporting signatures was conducted transparently and was open to the media, observers and candidate representatives, while the MPASLG's electronic verification against the UVR was not publicly accessible. The recent amendments require the REC to refer suspected misuse of voters' personal data in signature collection to the prosecutor's office.[46]

Overall, the candidate registration process was inclusive, with all 19 submitted lists registered, one of which subsequently withdrew.[47] Of the 18 remaining lists, nine were nominated by political parties, seven by coalitions and two by groups of voters. Half of the lists were registered under the criteria applicable to national minorities. All registered candidate lists complied with the requirement to include at least 40 per cent of the less represented gender, with at least two of every five consecutive candidates belonging to that gender. Overall, 47 per cent of all candidates were women, however, only one list was headed by a woman.

ELECTORAL CAMPAIGN

The official campaign commenced on 9 September and ended on 22 October, was well visible throughout the country and online and contestants were able to campaign vigorously. However, the campaign was characterized by unequal opportunities for contestants, extensive advantages of incumbency, highly divisive rhetoric, and instances of intimidation and pressure. The campaign was highly polarized with political competition dominated by two main contenders, the SNS-led "Aleksandar Vučić - United Serbia" ("United Serbia") and the "Student List - Students are Winning" ("Student List").[48] Several other registered lists conducted limited campaign activities. Contestants campaigned through rallies, smaller meetings, door-to-door activities, billboards, call centres, street stands and online.[49]

The "United Serbia" campaign was highly personalized around Aleksandar Vučić, with his campaign tour featuring prominently online and its messages amplified by pro-government media and influencers. The "Student List" pursued a collective, movement-centred campaign in which individual candidates had limited prominence and online relied on official social media accounts and a network of activist groups, student organizations, parties and influencers, operating independently to highlight candidates'

43 Following official complaints, the registration documentation of the list "Dad, this is for you – Petar Đurić" was subject to additional scrutiny. On 30 September, its registration was annulled after an additional 125 signatures were invalidated, leaving the list with an insufficient number of valid signatures. The list was granted 48 hours to submit the missing signatures; following the additional submission on 2 October, the list was registered. The REC members from the opposition stated that re-submission of missing signatures by the list was intentionally done at night to avoid a duty shift that included REC members from the opposition, thereby, as they alleged, avoiding proper scrutiny.

44 Two other lists were able to correct their documentation: the "People's Choice" and the "Bogoljub Karić-Movement Power of Serbia-BK"; both were subsequently registered.

45 Separately, an additional verification of supporting signatures conducted by the REC for another candidate list identified irregularities in the certification process, most of which involved municipal authorities.

46 On 23 September, following additional checks with the authorities responsible for certifying supporting signatures, the REC invalidated some 4.5 per cent of the signatures submitted by the "Bogoljub Karić – Movement Power of Serbia – BK", identifying indications of possible misuse of voters' personal data. However, the list still had a sufficient number of valid signatures and was registered.

47 See the list of registered contestants on the REC website.

48 "United Serbia" included candidates from five smaller parties. The "Student List", endorsed by some 18 opposition parties and various civil society organizations, included no outgoing MPs.

49 ODIHR EOM long-term observers found no evidence of active campaigning or billboards by the Liberal Green Party, "Strength Coalition *(SNAGA)*", "Dad, this is for you - Petar Đurić", and "Mother Serbia-Gruda".

professional expertise, electoral integrity and alleged pressure and intimidation. "United Serbia" emphasized stability, economic development, infrastructure, and national security, while the "Student List" focused on institutional and democratic reforms, combating corruption and the rule of law. Both portrayed the elections as decisive for the country's future, with the student movement presenting them as a referendum on the government. The SNS-led campaign repeatedly made unsubstantiated claims that the student movement and civil society organizations are part of a foreign-backed "colour revolution". These narratives were amplified online and accusations of foreign interference intensified as election day approached.[50] Such rhetoric, together with the portrayal of political opponents as threats to the country's future, contributed to a significantly polarized environment and detracted from substantive debate on policy alternatives.

Women were visible in the campaign as candidates, speakers and rally attendees, but contestants generally paid limited attention to gender equality and women's political participation in their programmes and campaign commitments.[51] Incidents of violence and alleged threats against women, including online, were further instrumentalized in partisan exchanges, with SNS representatives repeatedly portraying the student movement as a threat to public safety, including the safety of women.[52]

Nine national minority lists contested the elections, although their campaign activities and visibility varied considerably. Their campaigns largely focused on regional development and the interests of their respective communities, although some maintained only a limited online presence.[53] Nationalist and divisive rhetoric directed against some minority contestants was of concern.[54]

Despite legal prohibitions on the use of public resources for electoral purposes, the campaign was marked by extensive advantages of incumbency and the blurring of state and party activities. Immediately before and during the campaign, the state Pension and Disability Insurance Fund (PIO) distributed up to 1.9 million letters signed by the then president, combining information on one-off pension payments with campaign messaging.[55] While not prohibited, but contrary to international good practice, budget amendments were announced shortly before the campaign providing for one-off payments to pensioners,

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50 On 14 October, Serbia's Ministry of Foreign Affairs reportedly sent a protest note to Croatia alleging electoral interference, which Croatian Prime Minister Plenković rejected as "ridiculous". On 4 October, the SNS website published Vučić's allegations of interference by foreign services and actors in Croatia, Montenegro and Kosovo*. Russian officials also alleged concerns of Western attempts to interfere in the elections, while on 1 October Russian President Putin was quoted as hoping that Vučić would become prime minister; on the same day, at a campaign event Mr Vučić characterized the student movement as a part of "an imported colour revolution". On 20 October, in a YouTube interview with Russian media entrepreneur Kseniya Sobchak, Mr. Vučić said in reference to the student movement "those people are getting open support from Albania, Croatia and Montenegro, from all the leaders there".

51 At campaign events observed by the ODIHR EOM LTOs, 27 per cent of the principal speakers were women.

52 In response to a number of derogatory messages from "Student List" supporters, SNS leaders and activists stated that they would not yield to what they described as misogyny and threats of retaliation from the student movement. On 30 September, Mr. Vučić stated: "When they beat women like this when they are in the opposition, imagine what they would do to women and people in Serbia if they were in power". At an 11 October press conference, Ms. Brnabić said in reference to the "Student List": "their policy toward the women of Serbia: violence, violence, and more violence." Women activists from the "United Serbia" list informed the ODIHR EOM that they felt gender-based intimidation in Užice and Zrenjanin, while "Student List" representatives reported it in those locations and also Belgrade, Kragujevac, Šabac and Vršac. Women's rights organization Femplatz reported to the ODIHR EOM online harassment and physical threats.

53 For example, the "Albanian Coalition" mostly campaigned in Albanian communities rather than online; the "Mother Serbia – Gruda", the "Russian Party – Serbia in BRICS", and the "Party of Russian-Serbian Unity" had very limited online outreach.

54 Mr. Vučić described the "Albanian Coalition" as having been created by the "enemies of Serbia" and its leader as the "most vicious among them". Paragraph 100 of the 2026 Venice Commission Report on freedom of expression, prohibition of hate speech and promotion of pluralism in the context of electoral campaigns notes that "hate speech during election campaigns […] not only impact the vulnerable minority groups but also distort the public debate".

55 See media reporting questioning the source of funding for the printing and distribution of the letters. The Commissioner for Information of Public Importance and Personal Data Protection informed the ODIHR EOM that its investigation into possible legal violations would not be completed before election day.

veterans, families with children and other adult citizens, with a combined estimated cost of almost EUR 1 billion.[56] Additional subsidies and benefits for selected groups were announced at the national and local level during the campaign.[57] While the timing and presentation of these financial measures raised concerns about their potential use to secure electoral advantage, the inclusion of campaign messaging in official communications more directly blurred the distinction between state functions and partisan campaigning, at odds with OSCE commitments and good practice.[58] Combined, these practices undermined the equality of campaign opportunities and highlighted the persistence of shortcomings identified in previous ODIHR recommendations. The ruling party also raised allegations with the ODIHR EOM, echoed in the media, that the "Student List" was using state university resources for campaign purposes, which the student movement denied.[59]

The campaign was punctuated by altercations between the supporters of two main lists and incidents of violence.[60] There were also repeated disruptions of "Student List" street activities by "United Serbia" supporters, including incidents of intimidation, which in some instances appeared intended to provoke confrontations, while police responses were inconsistent.[61] Representatives of the student movement alleged harassment and surveillance of their activists by the police and other state institutions, which they

56 Legislation does not prohibit major budgetary announcements or increases in social benefits before or during the campaign, contrary to international good practice and a previous ODIHR recommendation. The budget amendments announced on 31 August provided for automatic payments in September of RSD 20,000–35,000 to pensioners, RSD 25,000 per child receiving benefits and up to RSD 25,000 to veterans. All adults not receiving these payments were eligible for RSD 6,000. Paragraph B.1.1.3 of the Guidelines of the Venice Commission and OSCE/ODIHR for Preventing and Responding to the Misuse of Administrative Resources During Electoral Processes states that "no major announcements linked to or aimed at creating a favourable perception towards a given party or candidate should occur during campaigns".

57 After the elections were called, the maximum payment under a rural housing subsidy scheme increased from RSD 1.5 million to RSD 2.5 million. On 26 September, the Minister for Energy announced reductions in energy prices for some pensioners throughout the winter. In several areas, ODIHR long-term observers reported one-off financial assistance payments, accelerated processing of social assistance requests and increased public works coinciding with the campaign. In Bor, the city administration began disbursing annual household grants of RSD 25,000 on 6 October, several weeks earlier than in previous years.

58 Paragraph 5.4 of the 1990 OSCE Copenhagen Document states the need for "a clear separation between the State and political parties". Paragraph B.1.1.3 of the Guidelines of the Venice Commission and OSCE/ODIHR for Preventing and Responding to the Misuse of Administrative Resources During Electoral Processes states that "no major announcements linked to or aimed at creating a favourable perception towards a given party or candidate should occur during campaigns".

59 Student activists operating the 'Svi u blokade! – FDU' account, which was active during the campaign, stated that they worked on a voluntary basis. On 8 October, the FDU Dean's Office stated that the faculty "is not engaged in the campaign and makes no pre-election spots for anyone". The APC rejected as ungrounded a complaint alleging that a candidate of the "Student List" had used her official university email account to co-ordinate financial assistance for faculty employees through the "Solidarity Network". The APC found that the activity was undertaken in an individual capacity, was neither organized nor financed by the Citizens' Group, and did not promote the electoral list or solicit electoral support.

60 On 25 September, the Ministry of Interior reported a case of an attack on SNS activists and vandalism of a "United Serbia" campaign stand by an individual in Kula. The Public Prosecutor opened an investigation into a violent confrontation between "United Serbia" and "Student List" supporters in Novi Sad on 29 September. According to the student movement and media reports, a "Student List" activist was injured in an attack involving a scythe while campaigning door-to-door in Grocka, Belgrade, on 3 October. Altercations between supporters of "United Serbia" and "Student List" in the Belgrade neighbourhood of Konjarnik took place on 6 and 7 October. On 6 October, Informer reported that two female SNS-list candidates were physically attacked by protesters during Aleksandar Vučić's rally in Valjevo. On 7 October, media reported an apparent fight between two groups of SNS activists in Konjarnik, near a "Student List" campaign activity.

61 Attempts to disrupt "Student List" campaign activities through confrontational shadowing by "United Serbia" activists, loud music or coordinated motorbike revving were observed or documented by 12 of 15 ODIHR EOM LTO teams. In one instance, an SNS organizer confirmed to LTOs that this was a deliberate strategy. On 8 October, ODIHR EOM LTOs in Niš observed predominantly one-sided provocations by "United Serbia" activists against the "Student List", with limited police intervention. On 7 October, police in Niš detained a student activist for two days following allegations that he had shoved an SNS activist obstructing a "Student List" stand. On 16 October, the Public Prosecutor announced an investigation into allegations that SNS activists had been paid by a public-sector company to organize political violence and vote-buying in 2025.

perceived as attempts to obstruct their campaign.[62] The ODIHR EOM received numerous credible allegations of pressure on public-sector employees to support the ruling party.[63] Allegations of vote-buying, particularly targeting national minorities and economically vulnerable groups, in particular Roma, were also reported to ODIHR EOM observers.[64] Taken together, these incidents and reports, compounded by inconsistent police responses, raised serious concerns about the ability of contestants to campaign without intimidation or interference and voters to make their electoral choices free from pressure or undue influence, at odds with OSCE commitments and international standards.[65]

Campaigning online is mostly unregulated, with some recently established legislation introducing provisions concerning the use of public officials' social network accounts and online third-party campaigning. Social networks have become a leading source of information for the public, with Instagram and Facebook being the most widely used platforms. Online campaigning was extensive, including through paid advertising.[66] The "United Serbia" and the "Student List" dominated the campaign on social network platforms, with their posts consistently attracting the highest number of views and interactions. Mirroring the broader campaign environment, online campaigning was highly polarized, with widespread inflammatory and derogatory rhetoric, as well as online harassment and threats. Several cyber-security incidents were also reported, including on campaign-related websites, attempted breaches of online accounts and the publication of personal data of journalists and activists.[67]

Political contestants also expressed uncertainty about which institution was responsible for addressing online campaign-related incidents. No institution is specifically mandated to oversee online campaign

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62 The Economic Crime Police searched a warehouse containing "Student List" campaign materials on 16 September and temporarily impounded a van transporting campaign materials on 1 October. Some representatives and candidates of the student movement alleged surveillance by the authorities. Specific allegations of harassment, police violence and intimidation were reported in Belgrade, Niš, and Užice.

63 In almost all ODIHR LTO areas, interlocutors reported pressure on public-sector employees to attend "United Serbia" rallies or staff campaign stands, allegedly under threat of employment-related repercussions, including non-renewal of contracts. In Niš, kindergarten teachers were reportedly instructed to staff a ruling-party campaign stand, while in Užice, several medical professionals reportedly faced employment-related repercussions for their political activism. Senior municipal officials in Zaječar and Vršac were observed campaigning during working hours. In Vranje, ODIHR long-term observers noted unknown individuals dressed in black that appeared to be monitoring attendees at a "Student List" rally.

64 Media reported allegations of pressure on socially vulnerable groups and public-sector employees to attend a "United Serbia" rally, and of payments for attending a "Factor of Stability!" rally. Roma organization representatives and local media in Šabac, Užice, Niš and Vranje informed the ODIHR EOM LTOs that economic vulnerability and employment discrimination made Roma communities susceptible to vote-buying and mobilization for ruling-party events. The Roma Party leader also publicly alleged economic pressure on Roma communities. In Čačak, the SNS Instagram account published a series of posts showing public officials and public-company directors visiting vulnerable groups and individuals and distributing gifts ahead of the elections. In Sečanj, allegations that a municipal enterprise had attempted to bribe voters were referred to the public prosecutor.

65 Paragraph 7.7 of the 1990 OSCE Copenhagen Document requires participating States to ensure that "political campaigning be conducted in a fair and free atmosphere in which neither administrative action, violence nor intimidation bars the parties and the candidates from freely presenting their views [...], or prevents the voters from learning and discussing them or from casting their vote free of fear of retribution". Paragraph 19 of the UN Human Rights Committee's General Comment No. 25 states: "Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind".

66 On 23 September, the ODIHR EOM started qualitative and quantitative monitoring of the online campaign, with a selection of over 70 accounts of political parties or electoral lists, party leaders, state institutions, and key political actors, across Facebook, Instagram, TikTok, and X, supplemented by a social media listening tool for quantitative and qualitative analysis. Since 9 September, based on data from Meta Ad Library, the highest spenders from official pages were the "Student List", at approximately EUR 191,900 (RSD 22.45 million), and the "United Serbia" list, at approximately EUR 111,500 (RSD 12.29 million). Campaign advertisements also appeared on Google, YouTube and other online platforms, without disclosure of sponsorship.

67 On 21 September, a Distributed Denial-of-Service (DDoS) attack targeted the website of a radio programme supporting the "Student List", with a second attack on 28 September. On 8 October, the political party 'Movement of Free Citizens' announced that its official email account received a security alert from Google regarding attempts to compromise the account by actors Google designates as 'government-backed'. On 5 October, a list was published online with personal data of journalists and activists along with their political profiling.

activities and to address risks to electoral integrity in the digital environment.[68] Fact-checking organizations identified disinformation narratives and AI-generated content disseminated through fake social network accounts and amplified by mainstream media. Most ODIHR EOM interlocutors expressed greater concerns about domestic disinformation and inauthentic online behaviour, including concerns about the possible involvement of public institutions, than foreign information manipulation and interference. Coordinated bot attacks targeted numerous social network accounts, while coordinated inauthentic activity amplified ruling party messages in comment sections on Facebook and X.[69] Social media platforms are not legally obliged to assess, mitigate, and address systemic risks to the electoral information environment.[70] The absence of a dedicated oversight mechanism and effective safeguards against information manipulation, compounded by platform's limited transparency regarding expenditure on political advertising, including for third-parties, weakened accountability for online campaigning. Together with the growing reliance on social media platforms, whose algorithms for prioritizing and amplifying content lack transparency, these shortcomings increased the vulnerability of the online information environment to manipulation and risked limiting voters' access to reliable information necessary to make an informed choice.[71]

Many ODIHR EOM interlocutors expressed strong distrust of law enforcement and security institutions, compounded by widespread concerns about alleged digital surveillance. These concerns were publicly dismissed by the responsible institutions and a criminal complaint alleging unlawful surveillance remained unresolved before election day.[72] The Special Department for High-Tech Crime, responsible for prosecuting relevant offences informed the ODIHR EOM that it does not maintain disaggregated records of complaints, including those related to elections. The Commissioner for Information of Public Importance and Personal Data Protection reported having sought information from relevant authorities, but found insufficient evidence to pursue further action, while the Protector of Citizens initiated proceedings following a surveillance-related complaint. The unresolved allegations and their dismissive

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68 Paragraph 14 of the 2024 Interpretative Declaration of the Code of Good Practice in Electoral Matters as concerns Digital Technologies and Artificial Intelligence, notes "State authorities should address the challenge posed by organized information disorder campaigns, which have the potential to undermine the integrity of electoral processes." See also Paragraph 138 of the 2025 ECtHR, Bradshaw and Others v. the United Kingdom, in which the Court held that "while States may not have a separate and autonomous obligation to investigate arguable claims of a breach of an individual's rights under Article 3 of Protocol No. 1, a flagrant failure by a State to investigate credible allegations of interference in its elections could raise an issue under that Article if it impeded its ability to take positive measures to protect the electorate from the impairment of the very essence of its right to benefit from elections 'under conditions which [would] ensure the free expression of the opinion of the people'."

69 See the Balkan Free Media Initiative report. Ilija Srdanović's Instagram account was reportedly temporarily suspended on 20 September and 16 October. Other targeted accounts included online portal Mašina, a photojournalist, and influencers supporting the "Student List". The SHARE Foundation set up a website to document these incidents, and reported over 62 instances from 28 September to 23 October. On 20 October, the social network accounts of several media outlets were reportedly targeted.

70 While TikTok informed the ODIHR EOM that it had set up a dedicated task force for the Serbian elections, Google had no country-specific activities.

71 See Paragraphs 5 and 14 of the 2024 Venice Commission Interpretative Declaration of the Code of Good Practice in Electoral Matters as concerns Digital Technologies and Artificial Intelligence.

72 As a response to SHARE Foundation's findings on the targeting of students and opposition politicians with spyware, the Security and Intelligence Agency (BIA) issued a statement on 3 September, describing the allegations as "mere trivial sensationalism", adding "The content of these allegations clearly shows the true intentions of the individuals and organizations making them – working in the interests of certain foreign services and pressure groups." On 3 September, President Vučić called the allegations "stupid and meaningless", adding that the students "know nothing except how to attract the attention of foreign intelligence agencies". On 6 October, a criminal complaint was filed against unknown perpetrators within the BIA, the police, and the NSO Group (the Israeli company that manufactures Pegasus) with the High Public Prosecutor's Office in Belgrade over the installation of Pegasus spyware on a personal mobile device. On 19 October, SHARE Foundation reported that the rector of Belgrade University and a senior prosecutorial associate at the Prosecutor's Office for Organized Crime had also been targeted with Pegasus spyware. Paragraph 135 of the Venice Commission's 2024 Report on a rule of law and human rights compliant regulation of spyware states that "spyware's unprecedented intrusiveness and potential for continuous surveillance pose serious risks to human rights […] making clear and strict regulation essential to prevent and eradicate abuse".

treatment by enforcement institutions and senior officials reinforced existing concerns about the protection of privacy and other fundamental rights.

CAMPAIGN FINANCE

Campaign finance is primarily regulated by the LFPA, which was substantially amended in July 2026 to introduce expenditure ceilings, regulate third-party campaigning, and link additional public funding to women's representation. While addressing a number of prior ODIHR recommendations, several shortcomings remain regarding third-party reporting, the APC's inspection and proactive oversight powers, financial disclosures during the final week of the campaign and the effectiveness of sanctions. Overall, the current campaign finance regulations and their implementation do not ensure adequate transparency and accountability, and effective oversight.

Campaigns are financed from public and private sources through a dedicated campaign account.[73] All lists which requested funds were allocated an equal share of the first instalment of public campaign funding, RSD 34.7 million (approx. EUR 297,000) each. However, the funds were disbursed only 10 days before the elections.[74] The remaining 60 per cent of the total instalment is paid after election day, in proportion to seats won, to those who have submitted their preliminary financial report. For the first time, the annual Women's Political Participation Fund of RSD 52,707,500 (around EUR 449,000) is to be distributed proportionally among electoral lists that elect more than 40 per cent women. Nonetheless, because allocations remain contingent on obtained results, the provision offers limited incentive for parties to actively promote women candidates before election day. Parties may use annual public funding allocated for parliamentary representation to finance their election campaigns, conferring an advantage on incumbent parties.[75]

Private funding can include membership fees, donations, legacies and income from a party's own property. In an election year, individuals may donate up to RSD 820,965 (approx. EUR 7,000) and legal entities up to RSD 1,641,930 (approx. EUR 14,000).[76] Cash donations and donations through online payment services are prohibited. However, the APC took no action regarding contestants who offered fundraising through PayPal services during the campaign.[77] The overall restrained approach of APC raised concerns about the effectiveness of its oversight and enforcement of campaign finance rules.

For the first time, campaign expenditure is capped at EUR 6 million per electoral list (approx. RSD 702 million). However, the ceiling is substantially higher than contestants' average campaign expenditure and is therefore unlikely to effectively limit spending disparities between

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73 Foreign, anonymous, cash and intermediary contributions are prohibited, as are those from public institutions, state-owned enterprises, trade unions, associations, foundations, religious communities, gambling and excise operators.

74 EUR 1 = RSD 117. The list "Dad, this is for you – Petar Đurić" did not state, upon submission of its candidate list, that it would use public funds to cover campaign costs. Paragraph 238 of the 2020 ODIHR and Venice Commission Guidelines on Political Party Regulation states that allocation "should occur early enough in the electoral process to ensure equal opportunities throughout the period of campaigning". Delaying it "until late in the campaign or after election day can undermine electoral campaign equality by working against less affluent political parties".

75 Paragraph 129 of the 2020 ODIHR and Venice Commission Guidelines on Political Party Regulation states that "The use of public resources for the performance of parliamentary duties may be limited or suspended in proximity to elections to minimize the structural advantages of incumbency and the appearance of a self-protecting cartel of parties in parliament".

76 One Average Monthly Salary (AMS) is approx. RSD 109,462 (approx. EUR 936).

77 The citizen movement behind the list "Dad, this is for you – Petar Đurić" and the political party "Pokret obnove Kraljevine Srbije" offered the online donation option.

contestants.[78] Unofficial campaigning began before the elections were called; however, as these expenses fell outside the campaign finance rules, they do not count towards the newly introduced ceiling.[79]

The APC oversees contestants' campaign finances, the use of public resources, and the conduct of public officials during the campaign. Although the APC applies a standardized methodology to its field monitoring, extended to third-parties for the first time, and publishes the monitors' reports, the campaign activities are recorded without estimating their costs, thereby limiting the ability to detect unreported expenditures and in-kind support.

Third parties who are not associated with a contestant and spend more than 25 per cent of one average monthly salary (AMS; approximately EUR 230) to campaign for or against contestant(s) must register with the APC and identify their campaign materials.[80] No third party registered with the APC. However, the ODIHR EOM noted activities by actors not formally affiliated with contestants in support of both the "United Serbia" and the "Student List", some of which fell within the third-party regime due to the expenditure incurred.[81] While the overall scale of third-party campaigning was modest, the lack of registration and disclosure raised concerns about compliance with the new requirements. Limited awareness of the applicable legal provisions among electoral stakeholders, combined with APC's failure to promptly clarify potential cases of third-party liability, created uncertainty of what constitutes third-party campaigning and weakened effective enforcement.

Contestants and third parties must submit their financial reports to the APC.[82] Contestants' preliminary financial reports covered the period up to 18 October. Reports from 16 of the 18 lists were timely published on the APC website in machine readable format, facilitating public scrutiny.[83] As contestant spending during the final week of the campaign are disclosed only after election day, voters had incomplete information about the sources of funding and campaign financing before casting their ballots.[84] Final campaign finance reports are due within 30 days of the publication of the final election results. Fines for violations of campaign finance provisions amount to up to RSD 2,000,000 (around EUR

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78 The expenditure ceiling of EUR 6 million per list is nearly three times the second most expensive campaign reported in the 2023 early parliamentary elections. Paragraph 19 of UN Human Rights Committee General Comment No. 25 (1996) recognises that reasonable campaign expenditure limits may be justified to prevent disproportionate spending from distorting the democratic process. Article 9 of Council of Europe Recommendation Rec(2003)4 stated that "states should consider adopting measures to prevent excessive funding needs of political parties, such as, establishing limits on expenditure on electoral campaigns". See also section I.2.3.e of the Venice Commission Code of Good Practice in Electoral Matters. According to the preliminary campaign finance reports, the highest expenditures were incurred by the "United Serbia" list, at RSD 481 million (around EUR 4.1 million), followed by the "Student List", at RSD 236 million (around EUR 2.0 million) and the "Russian Party – Serbia in BRICS", at RSD 221 million (approx. EUR 1.9 million).

79 Paragraphs 247 and 262 of the 2020 ODIHR and Venice Commission Guidelines on Political Party Regulation call for clearly defined campaign periods and rules on activities not allowed during the pre-election campaign.

80 Third parties may use only their own funds and loans, may not contribute to the entity they support and are subject to an annual expenditure ceiling of 10 AMS, RSD 1,094,600 (approximately EUR 9,400).

81 On 12 October, the APC found that paid advertising by the Facebook page "Naprednjaci" could not be attributed to "United Serbia", accepting the list's denial of any connection without further investigation. The APC indicated that it would examine possible third-party liability but set no timeframe. According to Meta Ad Library records, by election day the page had spent EUR 17,600 (RSD 2 million) promoting "United Serbia", exceeding the annual third-party expenditure limit. Possible cases identified by the EOM include Kreni-Promeni, a non-contesting party campaigning for the "Student List", notably through the production of campaign material, as well as paid online advertising by ITblokada, amounting to EUR 16,860, and a number of pages supporting the "United Serbia" list, the top six of which together spent EUR 119,450.

82 The APC held online training sessions and published information on the obligations of contestants and third parties.

83 The lists "Dad, This Is for You – Petar Đurić" and "Liberal Green Party – For a Free and Cleaner Serbia" did not submit preliminary reports.

84 See operative paragraphs 3 and 4 of UNCAC CoSP Resolution 11/7 on interim reporting and on publication of donation sources before election day.

17,100), equivalent to just 0.3 per cent of the expenditure ceiling, and therefore are insufficiently dissuasive.[85]

MEDIA

A pervasive culture of political and economic pressure undermines the editorial independence of the media in Serbia. Many ODIHR EOM interlocutors described public funding allocations as favouring outlets close to the authorities and leaving critical media, particularly local outlets, financially vulnerable in a limited advertising market.[86] While social networks are the most widely used, television attracts far more daily audience time, with national broadcasters, namely public *RTS* and private *B92*, *Happy*, *Pink* and *Prva*, being the most frequently used sources of information. These broadcasters, as well as most regional broadcasters, are widely perceived as pro-SNS.[87]

The main television channels providing critical and analytical reporting, *N1* and *Nova S*, are licensed in Luxembourg and operate in Serbia as cross-border media services. Following the sale and restructuring of their parent company's telecommunications operations, *N1* and *Nova S* were excluded from digital television platforms acquired by state-controlled Telekom Srbija. Their remaining cable operator moved them to a more expensive subscription package, further limiting their reach. Restructuring and ownership changes at the group operating *N1* and *Nova S* heightened concerns about editorial independence, amid personnel changes and the cancellation of a prominent satirical programme.[88] By contrast, the tabloid *TV Informer* expanded its reach through regional broadcasting and nationwide terrestrial distribution over Telekom Srbija's infrastructure without a national terrestrial license.[89]

Journalist associations raised concerns about the increasing number of attacks, threats and harassment of journalists, including online. During the campaign, reported incidents included physical aggression, threats, obstruction of reporting, including by the police, and cyberattacks targeting media.[90] High-ranking public officials continued to verbally attack critical and analytical journalists and media.[91] Investigative journalists also faced legal and financial pressure from strategic lawsuits against public participation (SLAPPs), including those initiated by senior public officials.[92] Women journalists faced

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85 Article 16 of Council of Europe Recommendation Rec(2003)4 on common rules against corruption in the funding of political parties and electoral campaigns states that "the infringement of rules concerning the funding of political parties and electoral campaigns to be subject to effective, proportionate and dissuasive sanctions".

86 In May 2026, the Council of Europe Commissioner for Human Rights observed "a distorted media market in which state media funding and advertising are predominantly channeled to pro-government media". The Association of Independent Electronic Media, in its 2026 project co-financing analysis, identified politically motivated allocations that disadvantaged independent local media. Paragraph 41 of the 2011 General Comment 34 on Article 19 of the ICCPR states that "government subsidies and advertising must not be used to impede freedom of expression".

87 The European Commission's 2026 Rule of Law Report noted that "concerns over limited pluralism and biased reporting in favour of the government persisted" in public media.

88 *N1* news director Igor Božić had been removed in April. Subsequent changes included cancellation of *Nova S*'s "24 minuta sa Zoranom Kesićem" and a Nova.rs editorial appointment opposed by the newsroom. Luxembourg regulator ALIA reportedly opened an inquiry into editorial control. *Nova S's* news director, Slobodan Georgiev, described the situation as a "hostage crisis".

89 On 2 October, REM requested information on the legal basis for terrestrial distribution of *TV Informer* and *Kurir TV*. The matter remained unresolved before election day. ANEM reported that a company owned by the publishers of Alo and Informer had expanded its network with 13 local media outlets.

90 An ODIHR EOM review of media and association reports identified over 60 safety-related episodes during the campaign period, including physical or attempted attacks, threats, obstruction of reporting and digital interference.

91 In September, the Slavko Ćuruvija Foundation recorded at least 108 verbal attacks on journalists and media by officials and SNS representatives, including 30 in Aleksandar Vučić's statements and posts.

92 On 21 October, KRIK reported 14 active cases it identified as SLAPPs. Belgrade mayor Aleksandar Šapić brought two property-reporting lawsuits against BIRN, which described them as SLAPPs. Recognizing the chilling effect of SLAPPs on freedom of expression and public participation, the Council of Europe Committee of Ministers urged member States to adopt comprehensive and effective strategies to counter them.

gender-specific intimidation, including online misogynistic abuse and threats of sexual violence.[93] Overall, police failures to respond to prosecutors' requests impeded investigations, while the Ministry of Interior stated to the ODIHR EOM that attacks on journalists were often provoked by journalists themselves.[94] Persistent impunity for attacks and threats, coupled with official hostility and restrictions on access to information, contributed to self-censorship and further constrained critical reporting, prompting some journalists to leave the country, citing concerns for their safety.[95]

All broadcasters were required to provide non-discriminatory campaign coverage, while public broadcasters had to ensure equal and balanced presentation of electoral lists. Both public and private broadcasters monitored by the ODIHR EOM aired brief campaign segments submitted by contestants in their newscasts.[96] However, these opportunities could not compensate for the lack of impartial and balanced campaign reporting.[97] RTS1 failed to fulfil its legal obligations and public-service mandate by favoring "United Serbia" in exposure and treatment, allocating it 14 per cent of politically relevant news coverage, compared with 9 per cent for the "Student List", 5 per cent for Factor of Stability, the Russian Party and European Serbia, and no more than 4 per cent for each remaining contestant. The "Student List" was the only contestant to receive negative coverage. Footage supplied by the "United Serbia" and "Factor of Stability!" featured their leaders attacking the "Student List", notwithstanding the prohibition on broadcasting contestant-produced negative campaigning.[98] Further, RTS1 aired one-sided criticism of the "Student List" through its coverage of "United Serbia" press conferences and its own editorial commentary.

The national private broadcasters *Pink*, *Prva*, *Happy,* and *B92* displayed a clear bias in favour of the "United Serbia", allocating it between 46 and 60 per cent of politically relevant news coverage, predominantly positive in tone, while the "Student List" received between 13 and 28 per cent, predominantly negative in tone; other contestants received under 3 per cent each. *TV Informer* was particularly hostile, devoting 60 per cent to the "United Serbia", predominantly positively, and 28 per cent to the "Student List", almost exclusively negative, including repeated insults and inflammatory comparisons by presenters, editors and guests.[99] *N1* and *Nova S* devoted 40 and 35 per cent, respectively, to the "United Serbia", although around three-quarters of the coverage was negative. Further, *N1* declined

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93 During the campaign, a *Bečejski mozaik* journalist reported receiving rape threats and misogynistic and ethnic insults after covering SNS gatherings. RTS reported online insults and targeting of one of its journalists following her interview with Aleksandar Vučić. A *TV Informer* presenter described sexualized intimidation while heading to an SNS rally. The European Commission's *2026 Rule of Law Report* noted that "female journalists were particularly vulnerable to threats and attacks, especially online."

94 At its 24 September meeting, the Permanent Working Group for the Safety of Journalists was informed by the General Prosecutor's office that only 1 of the 99 journalist-safety cases opened between January and August had resulted in a final conviction. The police had not responded to 58 requests from prosecutors.

95 On 20 August, Reporters Without Borders reported that six Serbian journalists had left the country due to safety concerns, withholding some of their identities for their protection. During the campaign, Slavija Info editor Ljubomir Stefanović announced that he had left Serbia and sought asylum in Montenegro following a police search of his home on suspicion of causing panic and disorder in connection with an X post alleging that President Vučić would order shooting at citizens on election day. Paragraph 23 of the 2011 General Comment 34 on Article 19 of the ICCPR calls for timely investigation and prosecution of attacks against journalists.

96 RTS also allocated each electoral list a free 30-minute presentation on RTS2 in evening slots between 20:00 and 21:40, and a 20-minute presentation on Radio Belgrade 1 at 13:00 or 13:30.

97 From 27 September to 22 October, the ODIHR EOM monitored news coverage on RTS1, *Pink*, *Happy*, *Prva*, *B92*, *TV Informer*, *N1,* and *Nova S* during prime time (18:00–24:00), also including *Happy*'s 16:30 news programme.

98 Both REM's election-campaign Rulebook and RTS's internal campaign rules explicitly prohibit broadcasting contestant-produced negative campaigning against other contestants.

99 On 30 September, two *TV Informer* programmes drew a comparison between the "Student List" and statements by Nazi Reich Minister of Propaganda Joseph Goebbels, claiming that the former followed a "Goebbels recipe." On 27 September, *TV Informer* described the "Student List" as a "rapist-sect" and individual candidates as "anti-Serb extremists".

to host Mr. Vučić as the representative of "United Serbia" in its electoral-list presentation slot.[100] The "Student List" received 26 and 32 per cent, respectively, mainly positive or neutral in tone.

Debates on RTS and several cable channels with limited viewership provided a platform for direct exchanges, but their value was diminished by a lack of effective moderation, resulting in chaotic and accusatory confrontations rather than substantive discussions. These opportunities were overshadowed by the dominant exposure of "United Serbia" leader Aleksandar Vučić, who benefited from lengthy interviews and almost daily live broadcasts of his campaign speeches, generally carried in full during prime time by numerous, mainly regional, broadcasters.[101] ODIHR EOM media monitoring showed that all monitored broadcasters failed to provide voters with the balanced and substantive information necessary to make an informed choice.[102] The systematic imbalance in exposure and treatment undermined legally prescribed equal campaign opportunities, at odds with international standards, OSCE commitments, and good practice.[103]

The Regulatory Authority for Electronic Media (REM) is tasked to supervise broadcasters and adjudicate complaints. Its Council has nine seats, eight of which are filled. After nearly two years of institutional deadlock, the Council elected a president on 22 September, but remained divided over key monitoring and enforcement decisions. These divisions prevented the expansion of the monitoring sample and the adoption and publication of provisional monitoring findings, and left most complaints unresolved before election day.[104] Closed online sessions, coupled with the absence of published minutes and complaint decisions before election day, further undermined transparency.[105] Overall, the REM failed to provide effective oversight and timely remedies for election-related violations, which contributed to the advantage of incumbency and was at odds with international standards and good practice.[106]

ELECTION DISPUTE RESOLUTION

The REC adjudicates election-related complaints, with its decisions subject to appeal before the Administrative Court. Expedited deadlines ranging from 48 to 72 hours apply for filing and deciding complaints and appeals, in line with international standards and good practice. However, fragmented legal provisions establish differing rules on legal standing, restricting voters' right to challenge decisions

100 *N1* cited his longstanding refusal to appear on the channel and repeated insults and accusations against the channel. Although SNS was invited to send another representative, Mr. Vučić and Ana Brnabić called the decision "fascist", with Ms. Brnabić comparing it to persecution in Nazi Germany and the Ustaša regime.

101 Vučić's live campaign speeches lasted between 25 and 40 minutes and were broadcast by up to 46 television channels. The ODIHR EOM also observed 15 interviews and talk-show appearances by Aleksandar Vučić, averaging 90 minutes each and broadcasted on up to 28 television channels.

102 Paragraph 7.8 of the 1990 OSCE Copenhagen Document protects voters' access to contestants' views and non-discriminatory media access. Human Rights Committee General Comment 25, paragraph 25, links free political communication to electoral rights. Council of Europe Recommendation CM/Rec(2007)15, II.1–2, recommends fair, balanced, and impartial broadcast campaign coverage.

103 Paragraph 16 of the 2011 General Comment 34 on Article 19 of the ICCPR obliges states parties to "guarantee public broadcasters' independence and editorial freedoms." Paragraph 8.1 of PACE Resolution 2254 (2019) further notes that "the use of public service media to promote a specific political party or candidate must be classified as illegal misuse of public funds".

104 On 30 September, REM's monitoring service reported that Aleksandar Vučić's campaign materials broadcast by RTS1, *RTV*, *B92*, *Pink*, *Prva* and *K1* involved the political misuse of children, contrary to the law. Although the Council unanimously opened proceedings on 7 October, it failed to secure a majority for measures following the hearings on 14 October.

105 By the end of the campaign, the REM's complaints register contained 95 complaints, including 30 filed against TV Informer. The REM informed the ODIHR EOM that it had discontinued proceedings relating to 11 complaints and declined to open proceedings on 13 others. The Law on Electronic Media requires proceedings to be initiated within 48 hours of learning facts indicating a probable campaign-related violation, a concluding decision to be adopted and served within 72 hours of initiation, and publication of complaint decisions and Council minutes.

106 Council of Europe Recommendation Rec(2000)23, Appendix paragraphs 3, 21 and 25, calls for regulatory independence, complaint powers and public reporting. Recommendation CM/Rec(2007)15, I.7, supports timely exercise of legally available rights of reply or equivalent remedies during campaigns.

to certain cases specified by law, contrary to OSCE commitments, international standards and good practice on effective remedies.[107] Many ODIHR EOM interlocutors expressed concerns about judicial independence, citing perceived political influence and a lack of confidence in the impartiality of the judicial decision-making.[108]

The Constitutional Court may adjudicate electoral disputes outside the jurisdiction of other courts and annul elections in whole or in part where irregularities significantly affect the results. In line with a previous ODIHR and Venice Commission recommendation, recent amendments introduced a 20-day deadline for the Constitutional Court to adjudicate electoral disputes. However, uncertainty remains regarding the scope of the Court's jurisdiction and the availability of legal remedies.[109]

The REC considered complaints in public sessions and promptly published related decisions in its online register, enhancing the transparency of the dispute resolution process. However, despite extensive deliberations in REC sessions, voting patterns on substantive complaints largely followed political affiliations.[110] Prior to election day, the REC adjudicated 27 complaints, primarily concerning candidate registration, the extended composition of LECs and voting abroad.[111] Eight complaints were dismissed on procedural grounds, including seven for lack of legal standing.[112] Two cases were upheld.[113] In decisions concerning voting abroad, the REC adopted a formalistic approach leaving some substantive arguments unaddressed and, after rejecting the complaints as unfounded, did not act *ex officio* under its general mandate to facilitate enfranchisement, at odds with international standards and good practice.[114] The Administrative Court received 14 appeals and upheld REC decisions in all but one case rejected on

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107 Citizen observers can only submit a complaint regarding their right to observe the printing and handover of ballots. Paragraph 5.10 of the 1990 OSCE Copenhagen Document states that everyone shall have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity. Article 2.3(a) of ICCPR states that "any person whose rights or freedoms as herein recognized are violated shall have an effective remedy". See also Guideline II.3.3.3.f of the Venice Commission's Code of Good Practice in Electoral Matters "all candidates and all voters registered in the constituency concerned must be entitled to appeal". See also the 2010 ECtHR Namat Aliyev v. Azerbaijan case law.

108 ODIHR EOM LTOs reported low trust in the judiciary among their interlocuters. In its 2026 Rule of Law Report, the European Commission noted the low level of perceived judicial independence among the general public.

109 The Constitutional Court maintains that it does not act as a third-instance court and considers its jurisdiction residual, applying only where effective judicial protection is not otherwise available.

110 For example, in decisions concerning complaints related to voting abroad, only opposition-nominated REC members voted in favour of upholding the complaints.

111 Four concerned national minority lists, alleging that list leaders or candidates were publicly recognizable as active members of non-minority parties, which, under the amended legislation, precludes granting minority list status. Seven complaints challenged the registration of the "Aleksandar Vučić - United Serbia" electoral list, contesting the use of the President's name in the list title and alleging that his association with the electoral list was incompatible with his presidential office.

112 The REC rejected two complaints concerning national minority status, finding that voters may challenge REC decisions only where expressly provided by law. It also rejected a complaint against a LEC decision on the determination of PSs and two requests to establish PSs abroad in locations with more than 100 voters, finding that the complainants lacked legal standing.

113 As a result, the REC annulled its decision on the candidate list "Dad, this is for you – Petar Đurić" due insufficient supporting signatures.

114 In a complaint seeking additional PSs abroad, the REC found no obligation to establish a PS at every diplomatic mission and held that the exception permitting PSs with fewer than 100 voters applied only within Serbia, thereby narrowing the statutory exception. It did not address arguments concerning the lack of information from the MFA and maintained that granting the complaint would require annulment of the entire decision, precluding the requested remedy. In another complaint challenging uniform voting hours across countries (07:00–20:00 Serbian time), the REC argued that it was not bound by the previously applied practice and that the schedule complied with legal requirements, without adequately addressing concerns about voters' practical access to PSs. Paragraph 70 of the 2025 Venice Commission's Updated Rule of Law Checklist states that the obligation to give reasons also applies to administrative decisions.

technical grounds.[115] The court largely endorsed the REC's reasoning in most cases and in some decisions did not provide substantive assessments of the issues raised by appellants.[116] Despite previous ODIHR recommendations, the court did not hold oral hearings which limits opportunities for appellants to present their arguments and have them adequately examined.[117]

The APC adjudicates complaints and may act *ex officio*, conducting proceedings in closed sessions. While it publishes decisions under the LFPA and maintains general data regarding cases, it does not publish the original complaints, limiting transparency. During this election campaign, the APC took between 3 and 35 days to decide on complaints, resulting in delays and potentially undermining the effectiveness of the legal remedy.[118] Prior to election day, the APC decided on 18 cases concerning the use of public resources, establishing violations by the SNS in six cases, while rejecting others as unfounded.[119] No misdemeanour cases were initiated, and there is no specific deadline to do so. Some APC decisions lacked sufficient reasoning, while the differing treatment of apparently similar cases raised concerns about the consistency of its decision-making.[120]

Complaints alleging the misuse of public resources by contestants and misuse of public office by public officials were considered under the LFPA, with the related decisions published. At the same time, allegations concerning individual public officials also require separate proceedings under the LPC; information on proceedings initiated under the LPC was not systematically published. Only decisions imposing sanctions on public officials were made public, limiting transparency and public scrutiny of the APC's enforcement activities.[121]

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115 In a case challenging the national minority status of the "Rasim Ljajić - Ljudski (SDP-CDP)" list, the Administrative Court ruled that publicly recognisable active membership in a non-minority party should be assessed based on sustained public political activity supporting that party, such as participation in its election campaigns.

116 For example, in an appeal submitted by "Student List" alleging that the REC had failed to properly exercise its statutory competence by not taking differences in local time zones into account, the Court found that the REC had correctly applied the relevant provisions, without further elaborating on their interpretation. The Court left unaddressed the issue of the REC's interpretation of its competence in determining the number of PSs abroad in a case submitted by the "European Serbia."

117 The Administrative Court informed the ODIHR EOM that it considers public hearings impracticable due to the short statutory deadlines. Paragraph 100 of the Explanatory Report of the Venice Commission's Code of Good Practice in Electoral Matters states: "The appeal procedure should be of a judicial nature, in the sense that the right of the appellants to proceedings in which both parties are heard should be safeguarded".

118 The three-day deadline for adjudicating LFPA complaints begins only upon acknowledgement of notification by the party concerned.

119 The established violations concerned SNS social media posts promoting a recent road reconstruction, a municipal cultural event, and the opening of school facilities. The APC rejected as unfounded a complaint alleging the use of public resources for SNS electoral promotion, including the Minister of Finance' announcement on 7 September of cash payments to pensioners and other groups.

120 In two cases, the APC established LFPA violations concerning SNS social media posts featuring publicly funded infrastructure works or facilities for party promotion. In another, it found no violation because SNS had republished information available elsewhere, without assessing whether its subsequent use constituted party promotion. In another case, the APC found that the SNS violated the law by using photographs taken at the public Landol clinic for electoral promotion. In a complaint alleging the use of a public enterprise ("Indjja put") vehicle to transport campaign materials, the APC found insufficient evidence of a violation, relying mostly on statements from the parties concerned.

121 The LPC provides a five-day deadline for deciding campaign-related complaints. Related to these proceedings, the APC issued 22 warnings to public officials, including for failing to comply with the recently introduced requirements to separate official and campaign activities on social networks.

CITIZEN AND INTERNATIONAL OBSERVERS

Recent amendments expanded the rights of citizen observers, who were generally able to observe the electoral process without significant restrictions.[122] Contributing to transparency, several civil society organizations conducted nationwide long-term observation and published interim reports.[123]

Citizen election observers faced growing hostility, with political figures, including senior state officials, repeatedly questioning their independence and accusing them of serving foreign interests and seeking a change of government.[124] Such rhetoric risked undermining public confidence in independent election observation and discouraging participation in electoral oversight, at odds with international standards protecting citizen observers as human rights defenders.[125]

ELECTION DAY

Election day saw high voter engagement reflecting citizens' commitments to exercise their democratic rights. Nevertheless, it was marred by several reported incidents of physical attacks, including against polling staff, citizen observers and journalists, raising serious concerns.[126] Although the legally mandated 48-hour campaign silence was observed in traditional media, some contestants continued campaigning on social media, including on election day. The reported turnout estimate reached some 69 per cent, with voters queuing outside polling stations in the country and abroad from early morning. The REC announced turnout data, throughout the day up until 18:00. It began posting preliminary election results and scans of results protocols down to the polling station level by 21:30, contributing to transparency.[127] Aleksandar Vučić conceded defeat within hours of the closing of the polls. On election day, the data of approximately 6.7 million voters from 8,271 polling stations was leaked online, making it possible to search by voters' names, surnames, parents' names, polling stations and municipalities, raising serious concerns about personal data privacy protection.

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122 The law provides for citizen and international election observation and citizen observers are entitled to unhindered access to the entire electoral process. The REC accredited 26 citizen observer groups and 15,539 observers, and 57 international and foreign organizations and 637 observers. The international organizations included some of the well-established independent ones that have endorsed the Declaration of Principles for International Election Observation (DoP) commemorated at the United Nations in 2005, but also several groups that have not endorsed the DoP and have no proven track record in international observation.

123 These included the Center for Research, Transparency and Accountability (CRTA) and the Center for Free Elections and Democracy (CeSID). The Bureau for Social Research (BIRODI) monitored media coverage and submitted complaints to the REM, while Transparency Serbia focused on misuse of administrative resources and political campaign finance, reporting alleged irregularities to the relevant oversight bodies.

124 On 4 October, Mr. Vučić said, in reference to CRTA: "They are part of the colour revolution and creators of lies about the sound cannon. They are paid by the EU and other European governments". The same day, acting President Ana Brnabić wrote on X: "I call on the citizens of Serbia to no longer heed CRTA's opinions, assessments, or directives, because they have shown multiple times that their sole goal is a change of government, regardless of the people's will". On 6 October, Mr. Vučić said "Someone from outside has poured in a huge amount of money … to heat up the atmosphere".

125 Paragraph 12(2) of the 1998 UN Declaration on Human Rights Defenders states that "the State shall take all necessary measures to ensure the protection by the competent authorities (…) against any violence, threats, retaliation, de facto or de jure adverse discrimination, pressure or any other arbitrary action as a consequence of his or her legitimate exercise of the rights…". UN Rapporteurs underscored the critical role of election observers as human rights defenders in statements issued in October 2022 and April 2024. In Paragraph 104 of its Report on election observers as human rights defenders, the Venice Commission concluded that "states have the fundamental duty to protect individuals, including human rights defenders, within their jurisdiction, regardless of whether the violations are committed by State or non-State actors, and whether these observers are domestic or international".

126 Among reported incidents were: the Voždovac LEC Secretary informed ODIHR EOM LTOs that she had been beaten by a group of citizens while attempting to address an issue involving a broken ballot box at a polling station; media reported, *inter alia*, that in Doljevac (Prokuplje), some 30 people attacked individuals inside a polling station; extended PB members from the "Student List" were attacked in Pančevo and Vražogrnci (Aleksandrovac); and observers were attacked in Belgrade and Zvezdara. The Ministry of Interior reported attacks on police officers outside SNS premises in Lazarevac. Several physical attacks on journalists were also reported in Belgrade, Bežanijska Kosa, Niš, and Pavlovac near Vranje.

127 The REC website was temporarily inaccessible following the closure of polling stations.

Women were well represented as commission members in polling stations observed by the IEOM; they constituted 49 per cent of PB members, but only chaired 39 per cent of the observed PBs. Regrettably, some 61 per cent of polling stations where voting was observed did not provide for independent access for voters with physical disabilities, and in 20 per cent, the interior layout was not suitable for these voters.

One-third of the polling stations observed opened with a slight delay. The IEOM negatively assessed the opening procedures in 20 of 146 polling stations observed, noting restrictions on observers' work (6 cases), a lack of a clear view of procedures (19 cases), the presence of unauthorized persons (5) and interference with PB work (8). While procedures were generally followed, ballot boxes were not properly sealed in 14 polling stations. In a number of incidents, particularly at the opening, IEOM observers were initially denied access to the polling stations as their names were not found on the printed list of accredited observers.

The IEOM observers positively assessed voting in 96 per cent of the 1,485 observed polling stations. However, contrary to the prescribed election procedures, in close to half of the polling stations observed, the polling officials did not consistently inform voters about the voting process and their right to secrecy of the vote. In 5 per cent of polling stations observed the IEOM noted that the process was not smooth, mostly due to poor organization, inadequate layout and overcrowding. Citizen observers were present in slightly more than half of the polling stations observed, contributing to transparency.[128]

Negative assessments were mostly attributed to overcrowding in 7 per cent of the observed polling stations, tension inside and outside voting premises in 4 and 3 per cent of the polling stations respectively, and voters not always marking their ballots in secrecy in 15 per cent of observations. Moreover, the IEOM observed inconsistent practices regarding the use of curtains in voting cabins. Notable procedural shortcomings observed by the IEOM included group or family voting in 7 per cent of polling stations visited, and instances of voters taking photos of their ballots in 4 per cent of observations. Of serious concern, the IEOM also noted signs of pressure or intimidation outside the polling stations in 2 per cent of cases. Official remarks in PB records or complaints were filed in more than 100 polling stations observed by the IEOM throughout election day.

The IEOM assessed the counting positively in 126 of the 133 polling stations observed. The negative assessments were mostly due to procedural errors and omissions, as well as cases of tension inside the polling station. Shortcomings included failure to count voters' signatures before opening ballot boxes in 19 cases, PBs not inserting ballots from mobile voting in the ballot boxes in 9 cases and an inconsistent determination of the validity of ballots in 6 cases. Challenges in reconciling results in the protocols were noted in 6 cases. The IEOM observed 8 cases of election materials not being properly packed and sealed upon completion of counting. Some shortcomings in the transparency of the counting process were noted; in 16 observations, the results protocols were not posted at the entrance of the polling station as prescribed, and in 9 cases, those present at polling stations had difficulties seeing voters' marks on ballots during the count.

The process of the tabulation was assessed positively in all but 3 of the 113 LECs where it was observed. Overcrowding was reported in 11 cases and tension inside or outside the premises was observed in 16 LECs. Discrepancies in PB results protocols were noted in 27 cases and in 5 LECs the IEOM observers negatively assessed the receipt of PB protocols. Complaints were registered in 7 of the observed LECs.

The English version of this report is the only official document.
An unofficial translation is available in Serbian

[128] Apart from CRTA and CeSID, the IEOM observers noted the presence of citizen observers from Kreni-Promeni and IT Blokada. Observers from organizations such as *Građani na Straži, Zapis, Mreža za monitoring izbora, Mreža Posmatrača, Mreža Mladih Srbije, Čuvari Pobede, Narodna Volja, MiM, Erudita*, BIRODI, *Budni* and *Nova Generacija* were also observed.

MISSION INFORMATION & ACKNOWLEDGEMENTS

Belgrade, 26 October 2026 – This Statement of Preliminary Findings and Conclusions is the result of a common endeavour involving the OSCE Office for Democratic Institutions and Human Rights (ODIHR), the OSCE Parliamentary Assembly (OSCE PA), the Parliamentary Assembly of the Council of Europe (PACE) and the European Parliament (EP). The assessment was made to determine whether the elections complied with OSCE commitments and other international obligations and standards for democratic elections and with national legislation.

Mr. Gilles Baum (Luxembourg) was appointed by the OSCE Chairperson-in-Office as Special Co-ordinator and Leader of the OSCE short-term observer mission. Ms. Federica Onori (Italy) headed the OSCE PA delegation, Mr. Piero Fassino (Italy) headed the PACE delegation and Mr. Andreas Schieder (Austria) headed the EP delegation. Mr. Eoghan Murphy is the Head of the ODIHR EOM, deployed from 15 September.

Each of the institutions involved in this International Election Observation Mission (IEOM) has endorsed the 2005 Declaration of Principles for International Election Observation. This Statement of Preliminary Findings and Conclusions is delivered prior to the completion of the electoral process. The final assessment of the elections will depend, in part, on the conduct of the remaining stages of the electoral process, including the count, tabulation and announcement of results, and the handling of possible post-election day complaints or appeals. ODIHR will issue a comprehensive final report, including recommendations for potential improvements, some eight weeks after the completion of the electoral process. The OSCE PA will present its report at its Winter Meeting. The PACE will present its report at the January 2027 part session. The EP will present the report at a forthcoming meeting of the European Parliament D-RS delegation.

The ODIHR EOM includes 14 experts in the capital and 30 long-term observers deployed throughout the country. On election day, 388 observers from 39 countries were deployed, including 30 long-term and 237 short-term observers deployed by ODIHR, as well as a 71-member delegation from the OSCE PA, a 20-member delegation from the PACE and 16-member delegation from the European Parliament. Opening was observed in 146 polling stations and voting was observed in 1,485 polling stations across the country. Counting was observed in 133 polling stations, and the tabulation in 113 LECs.

The observers wish to thank the authorities for their invitation to observe the elections, and the Republic Electoral Commission and the Ministry of Foreign Affairs of the Republic of Serbia for the assistance. They also express their appreciation to other state institutions, political parties and civil society organizations and the international community representatives for their co-operation.

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