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KOSOVO 2025

Final Report

Parliamentary Elections

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EU ELECTION OBSERVATION MISSION
KOSOVO* 2025
PARLIAMENTARY ELECTIONS

FINAL REPORT

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LIST OF ABBREVIATIONS

AAK-NISMA	Alliance for the Future of Kosovo – Social Democratic Initiative
AJK	Association of Kosovo Journalists
CEC	Central Election Commission
CEDAW	Committee on the Elimination of Discrimination against Women
CRA	Civil Registration Agency
CRC	Count and Results Centre
DIID	Department of Issuance of Identification Documents
ECAP	Election Complaints and Appeals Panel
ECtHR	European Court of Human Rights
EOM	Election observation mission
EU	European Union
GINP	Citizen Initiative National Justice
ICCPR	International Covenant on Civil and Political Rights
IRDK	New Democratic Initiative for Kosovo
JGP	Unique Gorani Party
KAS	Kosovo Agency of Statistics
KDTP	Turkish Democratic Party of Kosovo
LDK	Democratic League of Kosovo
LFPP	Law on Financing Political Entities
LGE	Law on General Elections
LIMC	Law on the Independent Media Commission
LpB	Movement for Coordination
LPPRC	Law on the Protection and Promotion of the Rights of Communities and their Members in Kosovo
LVV	Self-Determination Movement
IMC	Independent Media Commission
MCC	municipal counting centre
MEC	municipal election commission
MP	member of parliament
NDS	New Democratic Party

“Office”	Office for Registration, Certification and Financial Control of Political Entities
OoK	Out-of-Kosovo
ORK	Opre Roma Kosova
PA	Pension Administration
PAI	Ashkali Party for Integration
PDAK	Democratic Ashkali Party of Kosovo
PDK	Democratic Party of Kosovo
PKS	Party of Kosovo Serbs
PREBK	United Roma Party of Kosovo
PSC	polling station committee
PS	polling station
PVL	preliminary voter list
PwD	persons with disability
RTK	Radio Television of Kosovo
SC	Supreme Court
SD	Serbian Democracy
SDU	Social Democratic Union
SL	Serbian List
SNP	Serbian National Movement
SPO	For Freedom Justice and Survival
YTHP	Innovative Turkish Movement Party

I. EXECUTIVE SUMMARY

The 2025 parliamentary elections in Kosovo were peaceful and competitive, taking place under a new legal framework aimed at enhancing transparency and trust. Election day was generally well-run, yet, critical parts of the process were affected by poor organisation by the Central Election Commission (CEC), also causing critical delays in the announcement of polling station and final results. The campaign was dynamic, albeit marred by harsh rhetoric and misuse of public resources. Positively, the Election Complaints and Appeals Panel (ECAP) dealt swiftly with a significant number of cases, resulting in substantial fines for violations of the Code of Conduct for Political Entities. In Kosovo Serb-majority areas, social conditions remain dire, creating room for Serbia and *Srpska Lista* (SL) to exert undue pressure on voters. Although media freedom was widely recognised, the Independent Media Commission's (IMC) paralysis in the weeks before election day left media violations unaddressed. Nevertheless, voters and key actors in the process demonstrated resilience and a strong commitment to democratic principles.

The elections were conducted following a full governmental term under Prime Minister Albin Kurti's *Lëvizja Vetëvendosje* (LVV), during which opposition parties maintained strong municipal positions. The Government faced criticism for political polarisation and strained relations with the Kosovo Serb community. The election process witnessed attempts of politicisation of key institutions by the ruling party, particularly of the CEC and the IMC. The CEC became entangled in political disputes and politicised certain technical aspects of the electoral process. The attempt by LVV-nominated members of the CEC to prevent the certification of SL and the blocking of the disbursement of public funding to political parties placed significant pressure on the institution.

The 2025 parliamentary elections were the first to be held under the Law on General Elections (LGE), adopted in 2023, that introduced a number of novelties aiming to increase stakeholders' trust and enhance the effectiveness and transparency of the electoral process. The legal framework lays a sound basis for conducting democratic elections in line with international standards. However, the implementation of the new legal framework underscored aspects of the law that warrant further clarification to mitigate potential ambiguities and reinforce legal certainty. It is striking that, despite ample prior notice, the implementation of the new electoral law and the overall election organisation suffered from inadequate preparation.

A significant number of cases were submitted to ECAP, also leading to the imposition of substantial fines for violations of the code of conduct. The law provides clear timelines and well-defined procedures for handling electoral disputes. However, the process could be enhanced with additional clarity. During the electoral process, a few cases reached the Supreme Court, with most judgments upholding ECAP decisions.

The campaign was vibrant with no major incidents. However, negative rhetoric, harsh verbal attacks and inflammatory language were widespread during campaign events. In addition, the campaign was subject to foreign interference from Serbia and the United States administration. Women candidates were subject to sexist verbal attacks, had fewer resources than their male counterparts, and attracted less media coverage. No meaningful debates were held between leading candidates.

EU EOM observers and interlocutors reported instances of misuse of public resources by several political entities during the campaign, with some cases resulting in sanctions. The absence of strong monitoring mechanisms raises concerns about the effectiveness of campaign finance regulations.

Political entities from small non-majority communities faced financial challenges, which led to an uneven playing field during the campaign.

The political landscape in the Kosovo Serb community was marked by a perceived increase of political pluralism, with six political entities contesting the elections. However, SL remained dominant within the Kosovo Serb community, receiving endorsement from the President of Serbia Aleksandar Vučić and relying on the Serbian media and small Kosovo Serb media outlets for its campaign. Additionally, pressure on voters, dependent on Serbian social assistance and employment, was reported. In general, the Kosovo Serb-majority municipalities saw a relatively subdued campaign compared to other municipalities.

The performance of the CEC was marked by instances of political influence in its decision-making process, as well as tendencies to interpret its powers broadly and act outside the scope of its mandate, compromising its impartiality and independence. While the legislation allows for meaningful representation of eligible political entities in the lowest-level electoral bodies, their approved composition was challenged for being insufficiently representative. During the electoral period, the CEC held regular public sessions and generally published its decisions in a timely manner. However, it missed the opportunity to use established communication channels to address stakeholders' concerns and counter misinformation, especially after election day, through more effective and comprehensive communication and information sharing.

The operational capacity of the election administration was strained by inadequacy in the management, a lack of field coordination as well as a shortage of permanent and temporary personnel. The CEC experienced significant delays in certain aspects of the technical and administrative preparations and adopted several decisions late, including technical instructions and appointment and training of the lowest-level election bodies. This had a negative impact on efficiency and timeliness of preparations. Despite these challenges, dedicated electoral personnel at municipal and polling station levels demonstrated a good degree of commitment to follow through with the preparations and managed election-day operations well.

The legislation foresees several special voting arrangements to provide voters with opportunities to exercise their right to vote. A total of 2,670 homebound voters as well as those in healthcare institutions, elderly homes and penal facilities could cast their votes through mobile ballot boxes. Furthermore, 12,898 voters voted at one of the designated voting centres for conditional voting across Kosovo. Kosovars residing abroad could register for either postal or in-person voting at determined diplomatic missions, for the first time in these elections. Of the 20,324 eligible, 15,348 cast their ballot in person. In total, the CEC received 68,715 postal items with ballots, of which 63,705 envelopes with ballots were approved for the vote count and 4,898 items were rejected for various reasons. Upon verification of voter lists and evaluation of postal items, the commission identified 921 instances of possible multiple voting.

All eligible voters are automatically included in the voter list compiled by the commission based on data from the civil register and the database of identification documents. Despite provisions for challenges against voter registration data during a dedicated period, voters' access to voter lists was limited to their personal data, restricting meaningful public scrutiny. The final voter list contained a total of 2,075,868 voters, including 104,924 registered for out-of-Kosovo (OoK) voting. While EU EOM interlocutors indicated a high level of confidence in the inclusiveness of the voter list, concerns remained over its accuracy, primarily due to shortcomings in civil registration.

The certification process was inclusive overall, yet it was tarnished by the CEC's politically influenced disagreement over the certification of SL's candidates. All candidate lists with more than two candidates submitted for certification by political entities complied with the legal requirement for a minimum gender representation. The CEC certified 28 political entities with 1,279 contestants.

Election day was calm, and polling generally proceeded smoothly. EU EOM observers assessed the voting process positively in most polling stations, noting that, for the most part, polling station committees followed the procedures as prescribed, although confusion and inconsistencies in the implementation were observed, exposing gaps in the training of polling staff. The errors related primarily to the new procedures for assisted voting and the verification of voters' fingers for traces of ink. Moreover, the secrecy of vote was compromised in some polling stations, primarily due to their layout, the positioning of polling booths or the cameras. The counting process revealed an insufficient understanding of procedures, which was demonstrated by procedural omissions, including improper handling of unused ballots and other sensitive material prior to opening ballot boxes, concurrent performing of counting procedures, and inconsistencies in determining ballot validity.

On election night, the CEC critical IT systems were unavailable for an extended period, impacting the tabulation and publication of preliminary results and the intake of election materials at municipal counting centres. Due to the persistent technical problems, the insufficient technical preparedness of the counting centres and missing critical equipment and software, the counting of preferential votes at municipal counting centres was postponed, with a few centres starting as late as 16 February. Once the initial confusion over procedures, evident at most centres, was overcome, performance of the counting teams as well as the process were eventually assessed as largely efficient and transparent by observers. Some instances of ballot validity reassessments by the counting teams were reported from most municipal counting centres, indicating an insufficient understanding of these rules by the polling station committees and inadequate provision of training. The technical setbacks in the results processing system combined with limited or at times inaccurate information shared by the CEC significantly undermined public trust in the integrity of the counting and tabulation process and raised concerns over the CEC's cybersecurity measures.

Kosovo's media landscape is vibrant and diverse, but faces significant challenges, including deep ethnic divisions and financial constraints. The sector remained highly fragmented, with Albanian and Serbian communities primarily engaging with separate outlets, and only limited efforts made to foster cross-community dialogue. Additionally, some private media outlets showed signs of politicisation, and their ownership structures are not fully transparent. While constitutional protections uphold media freedoms, concerns remain over the challenges faced by the public broadcaster, including a dysfunctional board, issues with editorial independence, property disputes, budgetary constraints and human resource challenges. These limitations were especially evident at RTK2, the broadcaster's Serbian-language channel. During the election campaign, due to its governance deadlock, the IMC failed to enforce its regulatory oversight to impose sanctions, thus created a situation of prolonged uncertainty for media organisations. Nevertheless, the public broadcaster, RTK, provided largely equitable coverage of key electoral contestants on its main Albanian-language channel, reflecting a commitment to balanced reporting.

Election coverage was dominated by partisan attacks, allegations of media bias and a lack of opportunities to compare candidates directly on major TV channels, further exacerbated by LVV's boycott of three prominent private media outlets. While broadcasters offered election debates, most

failed to host policy-driven discussions, reflecting a weak debate culture among political contestants that limited voters' ability to evaluate party programmes. Legal provisions contributed towards a level playing field by regulating paid airtime and ensuring a minimum allocation of free airtime when paid coverage was utilised.

Campaigning online mirrored the aggressive tone of the public debates and rallies, but lacked substance, particularly in the first half of the campaign period. All political parties contesting the elections and over half of the candidates campaigned on social media, mostly on Facebook and Instagram. The harsh tone of the campaign was reflected on social media through videos of campaign events, which constituted a large part of the content posted by parties and candidates. The election-day silence was broken by several posts and ads, some of which resulting in sanctions by ECAP. Over €250,000 was spent on promoting more than 7,000 election-related ads on Facebook and Instagram, including ads from third parties.

Women will comprise 36 per cent of the next Kosovo Assembly and a majority of them were elected without the application of the gender quota. However, men still dominated the campaign, representing a significant majority of speakers at campaign events and televised debates. Political parties have not sufficiently addressed gender inequality on their platforms and in governing bodies as mandated by the Law on Gender Equality. Despite provisions in the LGE encouraging greater gender balance in the election administration, women represented less than 30 per cent of the membership at the central and local level.

Lacking resources, non-majority political entities conducted low-key campaign activities within their own communities. They also had limited access to broadcast media beyond the allotted free airtime mandated by law and were critical of the composition of the polling station committees, which they deemed insufficiently representative. Furthermore, the CEC's awareness-raising campaign on voting procedures in the Turkish, Bosniak and Romani languages was released belatedly.

The participation of persons with disabilities in the electoral process faced challenges due to a lack of access to voting centres and assistive tools, as well as the inconsistent application of new provisions regarding assisted voting. In addition, organisations representing persons with disabilities reported a lack of consultation from the CEC and municipal election commissions in terms of voter education campaigns and the registration of voters with special needs.

Priority recommendations

- 1. Strengthen legal safeguards in regard to membership and conduct of election officials to ensure the impartiality and independence of the election administration.*
- 2. Delimit and further specify responsibilities of the Central Election Commission, the CEC Secretariat and municipal election commissions to decentralise decision-making of the election administration where appropriate and ensure efficiency and timeliness of its operations.*
- 3. Conduct a comprehensive independent audit of the voter list, including through internal analysis of registration processes and statistical and field testing, in consultation with the relevant stakeholders to address concerns over accuracy and to increase public confidence.*

4. *Introduce clear legal definitions of key terms, including those related to inflammatory language and the designation of a ‘political entity supporter’ within the electoral process. Establish explicit criteria for determining proportional fines applicable to breaches of the Code of Conduct by political entities.*
5. *Appoint all members of the IMC in a timely manner and through a competitive and transparent selection process.*
6. *Establish a reliable and transparent results management system with clear and verifiable procedures to ensure accurate processing of the results data. Ensure prompt access to the preliminary results, including all relevant data such as voter turnout, valid and invalid votes as well as scanned results forms per polling station.*

II. INTRODUCTION

The European Union (EU) deployed an Election Observation Mission (EOM) to observe the 9 February 2025 parliamentary elections in Kosovo following an invitation from the President of Kosovo. The EOM was present from 8 January to 27 February 2025.

The EU EOM was led by the Chief Observer, Nathalie Loiseau, Member of the European Parliament from France. The EU EOM comprised a core team of ten experts based in Pristina and 18 long-term observers who arrived on 16 January and were deployed to all regions of Kosovo. Thirty-six short-term observers were present from 4 February to 14 February and were deployed throughout Kosovo.

For the election day, the EU EOM was reinforced with 27 locally recruited observers from diplomatic representations of EU Member States. In total, the EU EOM deployed 104 observers from all 27 EU Member States, as well as from partner countries Canada, Norway and Switzerland. In addition, a delegation of six Members of the European Parliament was led by Marta Temido, Member of the European Parliament from Portugal.

The mission’s mandate was to observe all aspects of the electoral process and assess the extent to which the elections complied with regional and international commitments for elections, as well as with national legislation. The EU is independent in its findings and conclusions. The mission followed an established methodology and adhered to the “Declaration of Principles for International Election Observation”, endorsed under United Nations auspices in October 2005 and now espoused by over 50 organisations.

III. POLITICAL CONTEXT

Kosovo organised the 2025 elections following the completion of a full governmental term. The political landscape in the last four years has been shaped by the government of *Lëvizja Vetëvendosje* (LVV) and Prime Minister Albin Kurti, while the main political parties in opposition, Democratic League of Kosovo (LDK), Democratic Party of Kosovo (PDK) and Alliance for the Future of Kosovo (AAK-NISMA) managed to maintain their strong standing in the municipalities following the 2021 local elections.

The outgoing governing coalition comprised 58 Members of Parliament (MPs) from the LVV caucus, along with eight MPs representing non-majority communities consisting of three Kosovo-Bosniak, two Kosovo-Turkish, one Kosovo-Roma, one Kosovo-Ashkali and one Kosovo-Egyptian MPs.¹ On April 4, 2021, Vjosa Osmani, who had contested the elections on a joint list with LVV, was elected President of Kosovo by the Assembly.

The Government has been criticised for contributing to the polarisation of the political landscape with Kosovo Albanian opposition parties and hindering the normalisation process with the Kosovo Serb community, which remains heavily influenced by Serbia. The affirmation of Kosovo's sovereignty has been a key focus of the ruling party's policies and initiatives. Sovereignty also emerged as a key campaign theme for LVV, encapsulated in its main slogan "From corner to corner". The LVV-led attempt to prevent the certification of Serbia-affiliated *Srpska Lista* (SL) was followed by intensified rhetoric aimed at delegitimising SL's participation in the elections, with LVV linking SL and Belgrade to the terrorist attack in *Banjaska* in September 2023. A large-scale operation followed on 15 January 2025 by Kosovo authorities to dismantle Serbia-operated structures in 24 locations across municipalities south of the Ibar/Ibër river. The international community criticised those actions as not conducive to the normalisation process of the EU-facilitated Dialogue between Pristina and Belgrade.

The election process witnessed politicisation of key institutions by the ruling party, particularly the Central Election Commission (CEC) and the Independent Media Commission (IMC). The CEC became entangled in political disputes and politicised certain technical aspects of the electoral process. The attempt by LVV-nominated members of the CEC to prevent the certification of SL, and the blocking of the disbursement of public funding to political parties, placed significant pressure on the CEC.

The participation in the elections of six Kosovo Serb political parties is seen as a positive development, leading to a perception of increased political pluralism in the community. In total six Kosovo Serb political parties contested the election, including SL, For Freedom Justice and Survival (SPO), Serbian National Movement (SNP), Party of Kosovo Serbs (PKS), Citizen Initiative National Justice (GINP) and Serbian Democracy (SD). However, SL continued to dominate the political landscape in the Kosovo Serb community, with Serbian President Aleksandar Vučić endorsing SL and repeatedly urging Kosovo Serbs to vote in large numbers for their candidates.

IV. IMPLEMENTATION OF PREVIOUS EU EOM RECOMMENDATIONS

The previous EU EOM deployed in Kosovo in 2021 for the municipal elections issued 23 recommendations on how to reform the electoral process to bring it fully in line with international and European standards and reflect international best practices. These recommendations include, *inter alia*, addressing inconsistencies, gaps and ambiguities of the legal framework, improving the accuracy of voter lists, providing legal consistency for electoral campaign rules, enhancing the transparency of campaign financing and effectively enforcing them,

¹ The number of MPs from LVV by the end of the mandate was reduced to 53 since some MPs left the party.

regulating the media and digital platforms sponsored by political parties as well as detailing provisions and improving timeframes for electoral disputes.

Out of the 23 recommendations offered, nine were fully implemented (including three of the six priority ones), four partially implemented, eight not addressed; and two recommendations related to campaign period limitation and design of ballot papers were not relevant to the parliamentary elections. Following the electoral reform initiated in 2022, which culminated with the enactment of the Law on General Elections (LGE) in 2023, several of those recommendations which required changes in the legal framework have been implemented. Namely, on election administration the law empowers municipal election commissions to conduct voter education activities, digitalises the process for out-of-Kosovo (OoK) voter registration, and prescribes more detailed criteria for candidate eligibility.

On campaign finance, the LGE prescribes that the Office for Registration, Certification and Financial Control of Political Entities (the “Office”) is the competent oversight authority for political and campaign finance and introduces timelines for declaration of relevant income and expenses for the campaign but does not provide for interim reporting. On electoral dispute resolution, the LGE offers an opportunity to challenge the final election results before their certification and extends some of the deadlines for filing and deciding complaints.

Two media-related recommendations pertaining to advertisement on online media portals and cooperation between the election administration and the main digital providers were partially addressed by the LGE. However, they have yet to be implemented partly due to lack of regulation and resources by the Independent Media Commission (IMC) while they would also benefit from further clarity. Another recommendation on media transparency of ownership was addressed by subsidiary IMC legislation. However, a priority recommendation for the IMC members appointment remains unaddressed.

Assisted voting was further detailed in the LGE and CEC Regulation, fully implementing one recommendation, but the transposition of the United Nations Convention of the Rights of Persons with Disabilities has yet to be incorporated in the Constitution despite a 2022 government decision.

V. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

A new electoral legal framework substantially aligned with international standards for democratic elections tested, revealing ambiguities not yet addressed by subsidiary legislation.

a. Electoral law

Kosovo is not signatory to any international treaties but direct applicability of a number of international conventions relevant to elections is acknowledged in the 2008 Constitution.² While the European Court of Human Rights (ECtHR) has no jurisdiction over Kosovo, the authorities are obliged to interpret human rights and fundamental freedoms in accordance with the judgments of

² Art.22, Constitution. Namely, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR); the European Convention on Human Rights and Fundamental Freedoms (ECHR) and its Protocols; the Council of Europe Framework Convention for the Protection of National Minorities, the Convention on the Elimination of All Forms of Racial Discrimination and the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW).

the ECtHR.³ Following Kosovo's membership in the European Commission for Democracy through the Law, known as the Venice Commission, the Code of Good Practice in Electoral Matters of the Venice Commission of October 2002 is applied as a reference for the conduct of democratic elections.⁴ The Constitution states that international human rights agreements and instruments are directly applicable and supersede Kosovo laws and other acts of public institutions. Fundamental rights, including the right to vote and to stand for election and the freedoms of expression, assembly and association are enshrined in the Constitution. The right to equality is also elaborated and affirmative action is provided for the advancement of women, communities and persons with disabilities, but equality is not adequately encouraged in practice.

Parliamentary elections are primarily regulated by the 2008 Constitution (as amended in 2020) and the 2023 Law on General Elections (LGE) and supplemented by CEC regulations, which expand on LGE provisions. Other applicable legislation includes the Law on Financing Political Parties (as last amended in 2022), the 2008 Law on the Protection and Promotion of the Rights of Communities and their Members in Kosovo (LPPRC), the 2007 Law on the Use of Languages, media related laws, relevant provisions of the Criminal Code and the Law on General Administrative Procedure. The revised legal framework provides a sound basis for conducting genuine democratic elections, substantially in line with international standards. Overall, there are well-defined rules of engagement for most stakeholders and prompt mechanisms for dispute resolution throughout the process. Yet further steps could ensure full inclusion, transparency and legal stability. Some legal gaps and ambiguities in law and regulations expose uncertainty for aspects of fundamental rights, notably freedom of expression, financial accountability and legal remedies.

The 2025 parliamentary elections were the first to be held under the new LGE, seen as an important milestone, although the process of adopting the law was criticised as hasty and non-inclusive, particularly by civil society. The new law implemented several previous EU EOM recommendations to further align the electoral legal framework with international standards, including enhancement of the CEC's financial autonomy, digitalisation of processes, establishment of an oversight authority for campaign finance, introduction of provisions to ensure media plurality and detailed provisions for assisted voting. Further, the law promotes greater gender inclusivity by offering financial incentives to political entities whose deputies include more than 30 per cent women. Beyond these recommendations, the LGE modifies the electoral system by increasing preferential votes from five to ten and changing the formula for allocation of mandates, introduces provisions for online campaigning and removes those that could lead to arbitrary withdrawal of observers' accreditation.

Despite these improvements, the law leaves broad regulatory scope to subordinate legislation while several provisions could benefit from further clarity and harmonisation with other legislative texts, notably with respect to regulation of the media, gender equality and campaign finance. Some technical provisions of the law lack precision, thus leaving room for uncertainty, while final results timelines, among others, could benefit from further elaboration. Also, the framework lacks definition of important terms related to breaches of the Code of Conduct for Political Entities, their supporters and candidates in the campaign, leaving room for subjective interpretation.

³ Art.53, Constitution. Nevertheless, since Kosovo is not a party to the ECHR, there is no venue for a case to be brought before the European Court of Human Rights and interpretation and enforcement of human rights remains within the Kosovo judicial system.

⁴ On 11 June 2014, the Committee of Ministers of the Council of Europe approved Kosovo's membership of the European Commission for Democracy through the Law (Venice Commission).

Recommendation - Ensure certainty of law by addressing ambiguities and gaps through well elaborated subsidiary legislation particularly on the Code of Conduct in the campaign, appointment of election administration staff and dispute resolution.

b. Electoral system

The 120 members of the Assembly are elected for a four-year term in a Kosovo-wide electoral constituency. An open list proportional representation system and preferential voting for up to ten candidates applies. One hundred seats are allocated to the parties, coalitions, citizen initiatives and independent candidates proportionally to the number of valid votes obtained, provided they pass a threshold of five per cent of the valid votes cast. Twenty seats are guaranteed for non-majority communities, including ten for the Kosovo Serb community, three for the Kosovo Bosniak, two for the Kosovo Turkish and one each for the Kosovo Gorani, Kosovo Roma, Kosovo Ashkali and Kosovo Egyptian communities, as well as a seat for the community among the latter three with the highest number of votes. Seats are allocated by the Highest Average Method, by applying the *D'Hondt* method, instead of the *Sainte-Laguë* formula in the previous law.

VI. ELECTION ADMINISTRATION

Deficiencies in internal planning and coordination adversely affected the conduct of the elections, and the lack of access to key information diminished public confidence in the process.

a. Structure and composition of the election administration

The three-tiered election administration structure comprises the Central Election Commission (CEC), municipal election commissions (MECs), and polling station committees (PSCs) for each polling station, as well as counting teams for each municipal counting centre (MCC), newly introduced during these elections.

The CEC is a permanent independent authority with broad regulatory and monitoring powers, responsible for organising and supervising elections. The CEC is composed of eleven members: a non-partisan chairperson and ten members appointed by eligible political parties represented in parliament. The CEC chairperson is appointed by the president from among judges of the Supreme Court (SC) or the appellate courts. Six members are appointed by the largest parliamentary groups not entitled to guaranteed seats and four members by the deputies representing non-majority communities in Kosovo.⁵ While the mandate of the chairperson is seven years, the mandates of the remaining members are bound to the term of the legislature.

Irrespective of the political nominations, the election legislation obliges the CEC members to perform their duties impartially and provides for some measures to guarantee their independence

⁵ From non-majority communities, one is nominated by the Kosovo Serb community, one by Kosovo Turkish community, one by Kosovo Bosniak community and one by the community of Kosovo Roma, Ashkali and Egyptians. Current members have been appointed upon political nominations as follows: two members each nominated by *Lëvizja Vetëvendosje* (LVV) and Democratic Party of Kosovo (PDK), and one member each nominated by Democratic League of Kosovo (LDK), Alliance for the Future of Kosovo (AAK), *Srpska Lista* (SL), *Vakat*, Kosovo Turkish Democratic Party (KDTP) and New Democratic Initiative for Kosovo (IRDK).

and professionalism.⁶ Nevertheless, the EU EOM noted instances of political influence in the CEC decision-making process, with individual members acting as defenders of interests of their nominating entity, compromising the CEC's independence and impartiality. Such patterns were demonstrated during certification of electoral contestants, approval of disbursement of public funds to political parties, and appointment of the lowest-level bodies. The EU EOM further noted recurrent tendencies of the current CEC composition to broadly interpret its powers and act outside the scope of its mandate, expanding its decision-making authority and intervening in the CEC Secretariat's and Office duties. This was facilitated by a lack of clarity in certain provisions of the LGE.

Apart from more solid practice in the members' performance, the CEC's independence could be enhanced through strengthening measures regulating their conduct and clearly delimiting the CEC's powers and curbing them to the benefit of the CEC Secretariat and lower-level electoral bodies. The pool of professionals from which the nominating entities select the CEC membership could also be expanded, with the aim to limit political affiliation.

Priority recommendation – Strengthen legal safeguards in regard to membership and conduct of election officials to ensure the impartiality and independence of the election administration.

The administrative, organisational, and technical responsibilities of the CEC are performed by the CEC Secretariat, which has been headed by an acting chief executive officer due to the CEC's inability to appoint a new one.⁷ The operational capacity of the election administration and its ability to fulfil its mandate were strained by inadequacy in the management as well as a shortage of permanent and temporary personnel. Hence, the CEC should ensure the timely appointment of staff in key positions to sustain operational capacities in crucial areas well in advance of elections. Operating within the structures of the CEC, although enjoying functional independence, the Office for Registration, Certification and Financial Control of Political Entities ("the Office") is responsible for maintaining the register of political parties, certifying political entities for participation in elections and monitoring and controlling the finances of political entities.

MECs are temporary electoral bodies with authority over the territory of a municipality. Appointed on 13 September 2024, the MECs were comprised of five to nine members.⁸ The law confers powers on MECs, among others, in overall administration of elections and counting at the MCCs, determination of polling premises, compiling lists of electoral personnel, and supervising their work and training. EU EOM observers assessed the MECs as generally efficient and transparent. They

⁶ The LGE includes safeguards against discretionary termination of CEC members' mandate. A person may serve as a CEC chairperson for no more than two terms. Partisan members are limited to a maximum of three consecutive terms in the CEC. A person cannot serve as a CEC member if she or he: is a member of national or local assembly or council, is a candidate to an elected public office, is a senior official in a political party, is a member of public election commission in or outside Kosovo, does not have voting rights, is a member of an election observer organisation, has been dismissed from the public administration for a violation of the law, has been convicted for a criminal offence to more than one year of imprisonment within the last three years, or has been a public official with a special status within the last five years.

⁷ The chief executive officer (director of the Secretariat) at the same time has held the post of the director of the Office.

⁸ Each of the 38 MECs shall be composed of a chairperson, municipal executive officer appointed by the CEC on a permanent basis, and six members nominated by eligible political entities represented in parliament or assemblies at municipal level. The CEC may decide on change to the number of members based on eligible political representation at local level. When appointing the MEC members, the CEC shall aim to ensure equitable representation of each gender and all communities with a significant population resident in the respective municipality.

were found to be largely staffed with well-experienced commissioners and managing the technical preparations well, despite various challenges. Some MECs expressed dissatisfaction with communication from the CEC, citing belated instructions and insufficient guidance, often resulting in confusion over certain procedures, and pointed to a lack of field coordination, at times impeding their operations. Many MECs deplored the CEC's disregard to their proposals regarding the PSC appointment, determination of electoral premises and selection of trainers, missing the opportunity to capitalise on local knowledge and experience. A few MECs also informed the EU EOM of insufficient support by municipal administrations in terms of office space, transportation and other needs.

Priority recommendation – Delimit and further specify responsibilities of the Central Election Commission, the CEC Secretariat and municipal election commissions to decentralise decision-making of the election administration where appropriate and ensure efficiency and timeliness of its operations.

Each PSC shall be composed of five members, with the possibility to increase membership to accommodate broader political and ethnic representation at local level.⁹ The legislation allows for meaningful representation of eligible political entities in the lowest-level electoral bodies, without providing sufficiently clear criteria for distribution of seats among individual political entities, thus granting the CEC wide discretion in determining the formula of appointment. The initial distribution failed to fully respect the legal criterion of reflecting the last parliamentary election results at the municipal level, to the benefit of some newly running entities.¹⁰

Following the decision of ECAP, the CEC revised the distribution of seats for PSCs and counting teams in 11 municipalities, primarily reallocating them among non-majority political entities. Many interlocutors from various political parties expressed discontent regarding the final attribution of seats. The disputes over seats contributed to significant delays in the appointment and training of the PSCs and counting teams across Kosovo, which were further exacerbated by difficulties of some political entities to secure sufficient PSC nominations.

Recommendation – Define clear criteria for the appointment of the polling station committees and counting teams to ensure equitable and broad representation of political entities and local communities.

b. Administration of the elections

Despite these being regularly scheduled elections, which offered the CEC an operational timeframe of over five months, the commission experienced significant delays in certain aspects of the technical and administrative preparations, indicating weaknesses in operational planning and internal processes. Difficulties in the procurement process severely hampered purchase of technical equipment for the counting centres, preparation of voter education materials, as well as logistical operations for distribution and retrieval of election materials, including postal votes for OoK voting. The CEC also informed the EU EOM that administrative constraints on the recruitment of temporary personnel curtailed the commission's ability to ensure adequate staffing levels, most

⁹ Members of PSCs and counting teams are nominated by certified political entities based on a formula determined by the CEC, reflecting the results from the last parliamentary elections at the central and municipal levels and data from the last population census.

¹⁰ The additional criteria were certification to participate in the upcoming elections and population data from the 2024 population census.

notably for campaign monitors, trainers and data entry clerks. These resulted from the recent review of the internal regulations, aimed at increasing professionalism and expertise of the permanent and temporary electoral personnel by introducing additional qualification criteria, which however did not correspond to the reality of the local labour market. Revision of these criteria, tailoring them to actual responsibilities of individual personnel categories, would expand the pool of potential applicants. In the long run, the CEC could explore possibilities of building rosters of trained temporary personnel, including from among students or specialists with professional certifications.

During the electoral period, the CEC held regular public sessions and generally published their decisions in a timely manner. However, some sessions were reduced to decisions taken only by email, and information on most discussed issues was limited, with only brief records in the minutes, thus reducing the transparency and accountability of the CEC.¹¹ Moreover, some instructions and decisions were adopted relatively late in the process, affecting the efficiency and timeliness of the electoral preparations. These included voting procedures and detailed instructions for operations and procedures at municipal and central counting centres. Further, representatives of media and civil society remarked on limitations in information sharing and their involvement by the CEC compared to previous electoral cycles. Throughout the electoral period, the CEC missed the opportunity to utilise its established communication channels, including its website and social media platforms, to enhance stakeholders' access to information of public interest and counter occasional misinformation regarding the process. Particularly after election day, with technical problems affecting the transmission and tabulation of the election results, the CEC failed to proactively and thoroughly inform the public on the character and impact of the issues on the results management and the overall process conducted at the MCCs.

Recommendation – Develop a comprehensive CEC communication strategy and publish all relevant decisions and information of public interest in a timely and inclusive manner.

As a result of belated appointment of PSCs and counting teams and late adoption of the counting procedures, the training programme for the electoral personnel was significantly delayed and at times the sessions were rushed, omitting thorough explanation of certain important aspects, including the validity of ballots. In particular, training for new counting procedures for preferential votes was delivered very close to election day, in some areas only on the day when the counting was supposed to start, while some counting teams only received brief instructions immediately prior to the start of the counting. The quality of the training sessions observed by the EU EOM varied across Kosovo. While most sessions were informative and interactive, at times, key topics such as the new regulation for assisted voting, PSC members' roles, and counting procedures were not uniformly addressed, leading to their inconsistent implementation on election day. EU EOM observers also noted limited availability of training materials in Serbian language and low quality of translation of those materials available, with inconsistent terminology used, which impacted the trainees' understanding of the procedures. The effectiveness of training for all polling and counting personnel could be enhanced using online training modules available throughout the electoral period.

c. Special voting arrangements

Voters who cannot attend their regular polling stations due to health reasons, physical condition, detention, imprisonment or other specific circumstances could request to vote outside the polling

¹¹ The CEC minutes are available only in Albanian language.

station using a mobile ballot box under provisions for voters with special needs.¹² Within the period between 4 January 5 February, eventually extended until 6 February, voters could apply either in person at their respective MECs or via an online registration platform. In accordance with the CEC decision, 108 mobile teams were deployed across Kosovo. Of 4,060 registered voters, 2,670 voters cast their ballots in mobile ballot boxes. According to EU EOM observers, some registered voters were not able to cast their votes due to the fact that the mobile teams could not reach them on time.

Voters registered in the final voter list, who for objective reasons could not vote at their assigned polling station, were able to cast their vote at one of the designated voting centres for conditional voting in any municipality inside Kosovo. For these elections, one such voting centre was established per municipality. To prevent multiple voting, votes were placed in security envelopes and later counted at the central Count and Results Centre after verification of the voter lists. On election day, most conditional voting centres experienced technical problems when accessing the digital platform for registering voters due to issues with user credentials and some centres, especially those in the northern municipalities, pointed to an insufficient number of ballots in connection with high numbers of voters who arrived to vote. According to the CEC decision, a total of 28,500 ballots were printed for polling stations designated for conditional voting, distributed to voting centres in numbers estimated based on turnout of voters casting conditional votes in the respective municipalities in the last elections.¹³ Of 12,898 votes cast conditionally, the CEC approved 12,192 to be counted.

Voters residing outside Kosovo were able to participate in the elections after successfully registering for OoK voting. Voters had three options to cast their ballot: in person at selected diplomatic missions of Kosovo, by post with ballots sent to post office boxes opened in the country of their residence or to a post office box inside Kosovo. Postal voting took place from 9 January to 8 February. Post office boxes were open in 22 countries and one in Kosovo.¹⁴ In total, the CEC received 68,715 postal items with ballots. The postal votes were stored under surveillance at the premises of the Institution of Ombudsperson where, on 9 February, the CEC staff started their evaluation to ascertain whether they were sent by registered voters and complied with all requirements. The process of verification was observed to be efficient and well managed. Upon completion of the verification on 24 February, 4,898 postal items were rejected for various reasons, per established rules.¹⁵

In-person out-of-Kosovo voting was newly introduced prior to these elections. After the registration, due to the low number of voters in some locations, as well as logistical and administrative difficulties, the CEC decided to cancel five planned voting centres abroad and instructed the affected voters to cast their ballots by post. On 8 February, 43 polling stations opened for 20,324 eligible voters in diplomatic missions in 19 foreign countries, of which 15,348 cast their

¹² Three categories of voters can apply for voting with mobile ballot box: persons with physical disabilities or homebound voters; voters located in special institutions (hospitals, retirement homes, prisons or detention centres); and voters under house arrest or under special circumstances (for security issues).

¹³ An additional 38,650 ballots were designated for voting with mobile ballot boxes and as reserve ones.

¹⁴ Voters must have voted individually (one ballot per one envelope sent) and posted the envelope in the country of their registration, otherwise the voting envelopes were rejected. Voters where PO boxes were not opened should have sent their ballots to the nearest PO box to the country of their registration.

¹⁵ These included ballots sent by voters who were not registered within the designated period, postal items with more than one envelope with ballots, postal item without envelopes with a ballot, postal items without certificate of registration, postal items without postage stamp, postal items sent in a different country from the country of registration as well as postal votes sent by a voter more than once.

ballot. The CEC expressed satisfaction with the overall conduct of the OoK in-person polls, evaluating it as well managed without any major incidents.

d. Voter education

The CEC launched its broad voter education programme already prior to the official announcement of elections, featuring in-person meetings, visual and audio-visual materials in the media and online. A large part of the information campaign targeted voters abroad, explaining the new method for registration and options on how to vote. The possibility to change one's assignment to a voting centre and verify voter registration data was also extensively explained in several voter information materials. The official education campaign further covered topics such as voter rights, participation of persons with disabilities, combating gender-based discriminatory speech, media literacy and election-day procedures. While the CEC aimed to provide more educational materials in five languages, most visual and audio-visual materials were primarily available in Albanian and Serbian. Educational materials explaining how to mark the ballot in other languages, including Bosniak, Romani and Turkish, appeared on the CEC's social platforms closer to election day. Positively, the CEC produced voter information campaigns in sign language, as required by law.

Despite these efforts, many EU EOM interlocutors considered the official voter information and education campaign insufficient and expressed doubts over its effectiveness and reach. This could be, among other factors, attributed to the fact that the education campaign was mainly conducted in public media and online. According to EU EOM observers, the official information campaign was not so visible on the ground and involvement of MECs in voter education remained limited, despite their new legal responsibility in this respect.

VII. VOTER REGISTRATION

Concerns over the accuracy of the final voter list persist despite Kosovo authorities' efforts to improve civil registration process.

a. Right to vote

The right to vote is granted to citizens of at least 18 years of age on election day, unless their voting rights were limited by a final court decision. Restrictions on voting rights further apply to those deprived of legal capacity. The new LGE removed criteria for voter eligibility that were justified under particular circumstances and for persons having been declared mentally incompetent by a final court decision, which brings it in line with international standards on the rights of persons with disabilities.

b. Voter registration procedures

The voter registration system is passive and centralised, with the final voter list of all eligible voters compiled by the CEC based on data from the civil register managed by the Civil Registration Agency (CRA) and the database of the Department of Issuance of Identification Documents (DIID).¹⁶ On 21 August 2024, the CEC approved the preliminary voter list (PVL), which contained records of 2,047,149 voters.¹⁷ By law, the voter list shall be publicly available, even outside

¹⁶ The CRA is required to provide the CEC with updates from the civil register at least twice a year. Following the call of the elections, the extracts from the civil register were provided by the CRA on a monthly basis.

¹⁷ In comparison to the 2021 local elections voter list, a total of 39,665 voters were removed after being declared dead and 8,513 for having renounced their Kosovo citizenship.

electoral years, with a foreseen period to challenge the voter registration data prior to elections. Although the LGE allows for accredited observers to be provided with access to the PVL upon request during the electoral period, according to the CEC's interpretation, this provision applies only to the scrutiny and challenge period which concluded prior to start of the observer accreditation. This situation arose since the CEC activity plan for the 2025 elections set a starting date for the observer accreditation period, despite the LGE's provisions ensuring observers' right to follow the whole electoral period. To ensure observers' access to the voter registration data and their possibility to scrutinise them, these terms should be aligned.

The PVL was published by the CEC on an electronic platform and available at the MEC offices for public scrutiny from 29 August to 26 December 2024. During this period, voters could request corrections of inaccuracies and omissions in their registration, reassignment to another voting centre within the municipality of their registration, as well as object to any voter's registration deemed inaccurate or invalid.¹⁸ While the LGE provides for the opportunity to challenge registration of a voter by another voter during the public scrutiny period, in practice, voters had access only to their personal registration data, limiting possibilities for meaningful scrutiny. The CEC published only disaggregated data on number of registered voters by municipalities and voting centres. In accordance with law, the certified political entities and accredited observer groups are also entitled to access the preliminary voter list via electronic means.

Recommendation – Regularly update and publish voter registration data, disaggregated by polling station, and enable voters' access to sufficiently detailed voter registration data, in line with data protection law. Develop a clear and well-regulated mechanism to address identified inaccuracies and respective objections.

The electoral legislation requires the CEC to ensure that the voter lists are cleaned, through the removal of outdated records and those of deceased voters. To verify the accuracy of the voter list and confirm voters' right to vote, the CEC may request information from the databases and registers of competent institutions, such as Kosovo Agency of Statistics (KAS), Cadastral Agency, Civil Registration Agency and Pension Administration (PA). After verification of data provided by KSA and PA, a total of 915 voters deemed deceased were removed from the voter list prior to approval of the PVL. In accordance with a CEC decision, citizens above 100 years of age who are not listed in the database of DIID were not included in the final voter list. Upon information from the Kosovo Judicial Council, 160 persons deprived of legal capacity were removed.¹⁹

On 4 January, the CEC unanimously certified the final voter list with a total of 2,075,868 voters, an increase of 174,888 voters compared to the 2021 elections. Due to migration and displacement, the voter list contains a higher number of records than the 2024 census which sets the resident population of Kosovo at 1,602,515 inhabitants.²⁰ The difference between voter registration and population data can be attributed to the distinct data compilation methodology when Kosovo citizens residing abroad were excluded from the population census although they remain lawfully registered in the civil register, which serves as a basis for the voter list. In the absence of official

¹⁸ The CEC received 17,219 requests for change of the voting centre, of which 16,503 were approved, and 11 requests for inclusion in the voter list which were all approved based on provided necessary documentation.

¹⁹ According to the CEC, while the list provided records of 251 persons, the CEC was not able to properly identify 91 of them due to a lack of personal identification number.

²⁰ The Kosovo Agency of Statistics population census report indicates the adult population slightly over 70 per cent (adults aged over 20 years) for data excluding the population assessment of the four northern municipalities.

data on the Kosovo diaspora, the CRA estimates that around one million Kosovars live outside Kosovo, based on numbers of officially issued documents for Kosovars residing abroad.

Aiming to improve and promote civil registration, including among vulnerable groups from non-majority communities, Kosovo authorities launched several informational campaigns and conducted several programmes with incentives for the official registration.²¹ Yet, the EU EOM interlocutors in Kosovo Serb-majority municipalities voiced concerns over the omission of a number of members of the Kosovo Serb community from voter registration due to persistent deficiencies in their civil registration. The CRA estimated that over 90 per cent of the Kosovo Serb resident population is duly captured by the Kosovo civil registration.

While the voter list is generally regarded as inclusive by most stakeholders, concerns remain over the voter list containing deceased voters, primarily due to administrative obstacles in obtaining official evidence for their removal, with the current system primarily relying on declarations of deaths by close relatives and allowing for limited powers of the public institutions in the process. To improve the death reporting system and collect data on deceased persons, the CRA as well as the CEC cooperate with some religious associations, primarily involved in burial services.

Priority recommendation – Conduct a comprehensive independent audit of the voter list, including through internal analysis of registration processes and statistical and field testing, in consultation with the relevant stakeholders to address concerns over accuracy and to increase public confidence.

c. Registration for out-of-Kosovo voting

Voters outside Kosovo had to register in advance either for postal or in-person voting. In the period between 29 August and 26 December 2024, voters could apply either via post or an online platform, introducing an additional safeguard for voter identification to prevent potential fraudulent registrations and voter impersonation, in line with a previous EU EOM recommendation.²² For these elections, the CEC received a total of 115,208 applications for registration, of which the CEC approved a total of 104,924 voters: 20,416 voters to vote in-person and 84,508 voters who opted for postal voting.²³ Eligible voters who did not register for OoK voting remained on the voter list and could vote at their regular polling station, or at a designated voting centre for conditional voting.

VIII. POLITICAL ENTITIES AND CANDIDATE CERTIFICATION

Overall inclusive candidate certification process tarnished by politically influenced voting by the CEC on certification of Srpska Lista.

²¹ For example, in November 2024, the Ministry of Internal Affairs announced a programme to legalise civil registration of those who possess only non-Kosovo documents, issued since 10 June 1999 until entry into effect of the respective MIA decision, within the period from 1 February 2025 and 30 April 2025. For Kosovo Roma, Ashkali and Egyptian communities, in the last years, the MIA launched projects for registration free of charge during the month of April.

²² Each application must have been accompanied by a copy of a valid identification document (ID card, passport or driving licence) and a photo of the voter holding the respective identification document.

²³ A total of 6,872 applications were rejected due to a lack of photo of a voter holding valid ID, a lack of valid ID, ID not matching the applicant, unintelligible documents, or a lack of any Kosovo ID. Further, 3,412 applications were annulled either upon request of voters or upon verification by the CEC as performed for multiple voters not belonging to one family using one email address. Voters had the opportunity to resubmit their applications in case of identified deficiencies (due to this, the overall number of rejected applications reached to 13,370).

a. Right to stand

Registered voters have the right to stand for election as a member of parliament. Individuals who have been deprived of candidacy rights by a final court decision or by a decision of ECAP, deprived of legal capacity, sentenced to imprisonment of more than one year for certain criminal offences within the last three years, failed to pay a fine imposed by ECAP or the CEC or failed to obey an order of ECAP are prohibited from standing for office. In addition, candidacy rights are restricted for certain groups of public officials while some other groups of public office holders aspiring for candidacy must step down from their positions prior to certification.

b. Certification of candidates

To contest an election, a political entity must be certified for this purpose by the CEC. Parliamentary candidates may be nominated by political parties, coalitions and citizen initiatives, or may stand independently. All aspiring electoral contestants are subject to the certification process upon submission of required documentation.²⁴ Non-parliamentary political entities are required to support their applications with signatures of at least 1,000 registered voters and pay a certification fee of €1,000. Voters could sign in support of only one contesting political entity, contrary to international good practice. The number of candidates included in the candidate lists cannot exceed the maximum number of seats to be allocated, excluding the guaranteed seats, by more than ten per cent, i.e. 110. Each political entity should indicate in its application whether it wishes to contest any of the seats guaranteed for representation of the non-majority communities. The law mandates a minimum representation of 30 per cent of either gender on candidate lists, with one candidate of each gender included among every three candidates.

The legislation provides for a sufficiently long period for submission of certification applications and collection of voters' signatures to support candidacies, as well as opportunity for applicants to correct any deficiencies in the submitted documents within five working days from receiving the notification. For these elections, the certification period lasted from 1 September to 11 December 2024. All documents, submitted electronically over an online platform, were verified by the Office for Registration, Certification and Financial Control of Political Entities (the "Office") which recommended all applications to be certified. According to the Office, two political entities were required to resubmit lists of supporting signatures for falling short of the required number after invalidation of some records due to incomplete data and perceived duplicate signatures. The affected entities, Opre Roma Kosova (ORK) and a coalition of Democratic Ashkali Party of Kosovo (PDAK) and Movement for Coordination (LpB) questioned the verification methodology and applied criteria, perceived as undue obstacles to their certification. The CEC did not publish its decisions related to candidate certification or the related Office's recommendations, detracting from transparency. All submitted candidate lists with more than two candidates complied with the legal requirement for a minimum gender representation.

An otherwise inclusive certification process of electoral contestants was tarnished by the CEC's politically influenced disagreement over the certification of SL candidates, which had been

²⁴ Although the LGE (Art. 12.2.9 and 16.3) also foresee automatic certification of registered political parties as electoral contestants, unless they failed to settle any overdue fines imposed by ECAP or the CEC or have been sanctioned for not complying with the obligations provided in the CEC regulation on functioning of political parties (Art. 16.13). Further, the provisions of the LGE that oblige the registered political parties which do not intend to contest the elections or intend to seek certification within a coalition to notify the Office remain in practice without actual implications in the process.

recommended by the Office for approval. Although the LGE grants the responsibility for certification of electoral contestants to the Office, with the CEC's decision intended as an administrative procedure to confirm certification of those who complied with the legal requirements, the CEC's failure to adopt a decision effectively stalled the process. On 31 December 2024, ECAP instructed the CEC to certify the SL candidates. In total, the CEC certified 28 political entities and their 1,279 contestants representing 20 political parties, five coalitions, two citizen initiatives and one independent candidate.

IX. CAMPAIGN ENVIRONMENT

Peaceful and vibrant campaign although marked by polarising rhetoric, harsh language and foreign interference.

The official 30-day election campaign began on 11 January, ending at 07:00 on election day. All the campaign events observed by the EU EOM were assessed as either enthusiastic or calm with no major security incidents. EU EOM long-term observers observed 75 campaign events in 22 municipalities including 23 rallies and 38 town hall meetings. EU EOM observers did not witness any instance of intimidation or violence. All public meetings and gatherings had to be approved by the municipal authorities and the police and concerns regarding this procedure were not observed.

Candidates reported enjoying freedom of assembly, expression and movement throughout the campaign. The main Kosovo Albanian political entities, including LVV, LDK, PDK, AAK-NISMA and the Coalition for Family, campaigned across Kosovo, and some sporadically in the north. LVV, LDK and PDK organised most of the large-scale campaign rallies. Door-to-door activities and small gatherings targeting specific groups of voters were the most frequent campaign methods used by all contestants. The main campaign topics were economic development, education, NATO and EU memberships, judicial reform and social welfare, with LVV distinctively focusing on the sovereignty of Kosovo. For Kosovo Serb contestants, the main campaign messages were the security and protection of the rights of Serbs within Kosovo.

Although the election campaign was vibrant with no serious incidents reported, it was marked by negative and inflammatory language and harsh verbal attacks on opponents, often by LVV, LDK, PDK and AAK-NISMA, at public events, debates and online. In addition, interference in the campaign was observed by the United States envoy for special missions, Richard Grenell, criticising Prime Minister Albin Kurti for not being a reliable partner to the United States.²⁵ The Coalition for Family's campaign messages denigrated the LGBT+ community and promoted traditional gender roles in society, sometimes inciting hatred. In the last weeks of the campaign, harsh rhetoric and personal attacks intensified, leading to numerous complaints filed with ECAP regarding campaign language.²⁶

Most parties engaged in dynamic online campaigning, with Facebook as the primary platform, followed by Instagram and TikTok. Online campaigning mirrored the harsh tone of rallies and debates, with videos from campaign events forming a large part of the content posted.

²⁵ Richard Grenell, the United States presidential envoy for special missions, posted on X (formerly Twitter) about Kosovo's Prime Minister Albin Kurti and the elections on 3 and 7 February 2025. In his posts, Grenell criticised Kurti's Government as "not trustworthy" and stated that "relations have never been lower".

²⁶ Over 100 complaints were filed to ECAP regarding the language used in the campaign.

The campaign in Kosovo Serb-majority municipalities was more subdued compared to other municipalities. Four out of six Kosovo Serb parties participated in three heated TV debates, where verbal attacks and inflammatory rhetoric overshadowed substantive discussions. Additionally, smaller parties faced challenges in campaigning due to limited resources and fines imposed by ECAP after LVV filed multiple complaints over the improper placement of campaign material.

SL's campaign was the most prominent out of the Kosovo Serbian parties, primarily through Serbian media and small Kosovo Serb outlets in which other political parties had no or very limited access. Interlocutors frequently reported SL members putting pressure on voters who are largely dependent on Serbian social assistance or employment in Serbia-managed institutions in the Kosovo Serb municipalities. On 3 February, the director of the Kosovo and Metohija Office announced that 22,000 Serbian dinars (€170) per month would be distributed to socially vulnerable and unemployed persons, starting with 5,000 recipients as of mid-February.

Moreover, President Aleksandar Vučić's endorsement of SL, his urging of voters to support the party, as well as ambiguous statements by the Serbian Orthodox Church, represented acts of interference in the election campaign.

EU EOM observers reported that non-majority political entities conducted small gatherings and door-to-door campaigning within their communities. Campaign messages focused on quality-of-life issues, language barriers in primary education for the Bosniak community, school enrolment for Roma girls, as well as the government's policies towards non-majority communities.

The law mandates public funding for political entities represented in parliament, with the CEC responsible for distributing these funds. However, the CEC exceeded its authority by subjecting the decision to a vote among its members regarding the disbursement of funds for January and February. Due to the refusal of LVV representatives at the CEC to approve the decision, political contestants had to conduct their campaigns without these funds.

In addition, the law includes a non-mandatory provision for allocating additional public funding for campaign activities to all certified political entities.²⁷ This provision was not implemented, creating an uneven playing field amongst contestants, especially for small political entities from the non-majority communities.

Recommendation – Make the provision for allocating public funds to all certified political entities mandatory to even the playing field.

Misuse of public resources by numerous contestants was reported by EU EOM observers and interlocutors at central and municipal levels. Most of the complaints submitted for misuse of state resources are related to the use of public premises, mostly government and municipality buildings

²⁷ Public funding can be provided for election campaigns, of which 90 per cent is allocated based on the number of seats in the Kosovo Assembly, while the remaining 10 per cent is to be allocated proportionally to all recently registered political entities certified by the CEC for the elections and not exceed 0.05 per cent of the annual budget. The provision was rendered non-mandatory with the 2013 amendment of the LFPP.

for campaign purposes.²⁸ Throughout the entire campaign, the “Office” within the CEC did not monitor campaign activities systematically in all municipalities due to recruitment challenges and institutional incapacity. Monitors were either recruited only for half of the campaign period or not recruited at all, which resulted in part of the election campaign being unmonitored.

Recommendation – Ensure the systematic and effective monitoring of the election campaign by introducing adequate terms of reference and recruitment procedures for CEC campaign monitors.

X. CAMPAIGN FINANCE

Campaign finance regulations provide for transparency in political party income and expenses, public funding, and set expenditure limits but gaps including the lack of interim reporting and unregulated third-party financing undermine accountability.

Party and campaign finances are regulated by the 2010 Law on Financing Political Entities (LFPP) as last amended in 2022, the LGE and CEC Regulations.²⁹ The Office for Registration, Certification and Financial Control of Political Entities (“Office”) is the competent oversight authority for political and campaign finance.

Public funding for regular political activities is available for political entities represented in the Kosovo Assembly, allocated annually and proportionally to the number of their seats. Additional public funding can be provided for election campaigns, of which 90 per cent is allocated based on the number of seats in the Kosovo Assembly, while the remaining 10 per cent is to be allocated proportionally to recently registered political entities certified by the CEC for the elections.³⁰ According to EU EOM interlocutors, this provision has never been implemented.

In line with international good practice, the legal framework foresees limits on campaign expenditures. The Office is, *inter alia*, responsible for limiting campaign expenses and monitoring and controlling the finances of political entities, investigating violations and imposing fines, in addition to reporting them to the relevant authorities. For these parliamentary elections campaign expenses were capped at €2,047,149.³¹ The LGE introduced the prohibition of the use of resources of institutions or public bodies at central or local level to support political entities in elections.³²

Political entities’ income can originate from their activities such as non-profitable legal entities, party membership fees and private donations. Most political entities reported to the EU EOM that their campaign income mainly originates from public funding, membership fees and limited private donations. Donations may be monetary or in-kind, namely goods or services. The law does not

²⁸ Cases of misuse of state resources in breach of the Code of Conduct as per art. 36, LGE: for instance, see [ECAP Decisions No 55/2025, 61/2025, 63/2025, 69/2025, 84/2025, 89/2025, 145/2025, 181/2025, 259/2025, 243/2025, 290/2025, 312/2025, 353/2025, 368/2025, 412/2025, 434/2025, 449/2025](#)

²⁹ Namely, the CEC Regulation N° 06/2024 on Management and Financial Supervision of Political Entities and CEC Regulation N° 07/2024 on Election Campaign, Monitoring of the Election Campaign and Financial Statement.

³⁰ Public funding for the campaign may not exceed 0.05 per cent of the annual budget. The provision was rendered non-mandatory with the 2013 amendment of the LFPP.

³¹ CEC Decision 01/1242/24 of 21 August 2024 prescribes that political entities are entitled to spend €1.00 per voter.

³² Art.36.3, LGE.

foresee any limits on income specifically around the campaign period, but donations to a single political entity by individuals and legal entities are limited to €2,000 and €10,000 respectively, while donations from foreign and anonymous sources, non-governmental, charitable and religious organisations, public enterprises and private companies with public procurement contracts, are prohibited.³³

The LGE modified campaign disclosure requirements by prescribing a starting point of 90 days before the election for the relevant income and expenses of political entities participating in the election to be disclosed. The deadline for reporting campaign income and expenditure by political entities is set 30 calendar days after the certification of the results. There is no requirement in the law for interim reporting of the income and expenditure of contestants during the campaign period and individual candidates and financing of the campaign by third parties remains unregulated, limiting the possibility of public scrutiny prior to election day counter to the principle of transparency.³⁴ Undisclosed spending by third parties further diminishes the transparency and accountability of campaign finance at odds with international standards.³⁵

Recommendation – Introduce interim reporting and disclosure of the income of contestants during the campaign period. Final reporting should include the income and expenses of individual candidates and entities campaigning for contestants (third parties).

XI. ELECTION DISPUTES

Effective adjudication of numerous complaints, however, the otherwise solid legal framework for handling electoral disputes would benefit from further elaboration.

a. Complaints and appeals and relevant forums

The law provides clear rules, guidelines and reasonable timelines for objections by relevant stakeholders regarding entry on or omission from the preliminary voter lists, against party and candidate certification, at various stages of polling and counting, as well as final results announced by the CEC. The Election Complaints and Appeals Panel (ECAP) is the main forum of adjudication of election-related disputes, including appeals to CEC decisions specifically provided for by the LGE. ECAP decisions are subject to appeal to the SC if related to a fine over €5,000 or affecting fundamental rights. ECAP is a permanent independent body of 11 members appointed by the Kosovo Judicial Council currently operating with ten judges under its Regulation for Submission and Decision-Making of Complaints as revised in 2024.³⁶ ECAP dismissed cases falling outside its remit and referred 17 cases to the IMC, which is responsible for adjudicating complaints against media outlets.

³³ Art.5 of LFPP and CEC Regulation N° 7/24.

³⁴ Interim reports refer to the disclosure of sources of funding and expenditures during the campaign period, to provide an opportunity for oversight bodies to address any potential problems encountered before election day.

³⁵ International Covenant on Civil and Political Rights (ICCPR), art.25; ICCPR, Human Rights Committee General Comment 25, para. 20; United Nations Convention against Corruption (UNCAC), art.6(2), 7(3) and 7(4).

³⁶ The LGE increased ECAP membership from six to 11; two members were only appointed on 24 January.

b. Pre-election complaints and appeals

Since the beginning of the process, ECAP has received over 600 cases. During the pre-election period, appeals against CEC decisions referred to the establishment of OoK voting centres (filed by LVV and dismissed).³⁷ There was one appeal related to the certification of political entities filed by SL against the CEC notification denying its certification. ECAP permitted the appeal deciding in favour of the appellant.³⁸ The subsequent certification of SL led to a further appeal by LVV for failure to comply with the regular CEC decision-making process, which was in turn dismissed for lack of legal standing by the SC.³⁹ Four appeals related to the non-disbursement of public funds by the CEC were dismissed for lack of competence. Other appeals filed by non-majority community political entities were related to the appointment of polling and counting staff, with ECAP instructing the CEC to reconsider the representation formula applied pursuant to the criteria set by the law. Another appeal filed by KDTP challenged the design of the ballot and was dismissed for having been filed past the deadline.

During the campaign some 400 complaints were filed with ECAP for breaches of the code of conduct during the campaign resulting in substantial fines imposed on political entities, especially for repeated violations, totalling some €642,000. Breaches related mainly to placing campaign material in public places, incitement to hatred and hate speech, misuse of public office and resources, and using children for campaigning. Most cases were brought by LVV, followed by PDK and LDK, while the majority were filed against LVV, LDK and PDK. In some cases, political entities were fined more than once for the same breach for failing to remedy it in the absence of a relevant ECAP order.⁴⁰ In other cases where entities took remedial action during the proceedings, the panel considered this a mitigating factor for lowering the relevant fine.⁴¹ Fines were also imposed on political entities for breaches of the code of conduct by alleged supporters. The criteria establishing the amounts of fines imposed were not always clear to the contestants, who in some cases complained about biased treatment by ECAP. Lower fines under €5,000 imposed on smaller political entities with fewer resources were not appealable, depriving them from effective remedy.

Priority recommendation – Introduce clear legal definitions of key terms, including those related to inflammatory language and the designation of a ‘political entity supporter’ within the electoral process. Establish explicit criteria for determining proportional fines applicable to breaches of the Code of Conduct by political entities.

c. Post-election complaints and appeals

During the counting process some 27 complaints were filed by political entities related to the counting process at the MCCs, of which six were approved validating the questioned ballots, and the rest dismissed as premature or rejected due to lack of evidence. In some cases, complainants were advised that they may challenge the final results when announced by the CEC.⁴² Five of the complaints related to the process followed at the Count and Results Centre (CRC) were filed by

³⁷ [Nine appeals were merged, Decision N° 1/2024.](#)

³⁸ [ECAP Decision N° 12/2024.](#)

³⁹ [Supreme Court Judgment N° 60/2024.](#)

⁴⁰ For instance, ECAP Decisions N° [459/2025](#), [347/2025](#).

⁴¹ For instance, ECAP Decisions N° [58/2025](#), [89/2025](#), [153/2025](#), [167/2025](#), [187/2025](#), [191/2025](#), [285/2025](#), [432/2025](#).

⁴² For instance, ECAP Decision [N° 591/2025](#) (MCC Skënderaj/Srbica), [N° 598/2025](#) (MCC Peja), [N° 599/2025](#) (MCC Prishtinë/Priština), [N° 600/2025](#) (MCC Gjakovë/Djakovica), [N° 603/2025](#) (Pejë/Peč). Pursuant to art.106.3, LGE.

LVV (3), AAK candidate (1) and PDAK-LpB (1), for alleged irregularities during the counting. Three were dismissed, one rejected and one approved leading to recounts.⁴³

Despite the volume of cases and resource challenges, ECAP is seen as fulfilling its mandate to determine appeals and complaints during various stages of the process in a professional manner and in line with legal timeframes with sufficiently reasoned decisions, published in a timely manner. The law offers clear timelines and well-articulated steps for processing electoral disputes. Yet, to ensure legal certainty it could benefit from further clarity, particularly with regards to the definition and interpretation of certain breaches, the criteria for determining the amounts of fines imposed, as well as by expanding the right to appeal decisions to the CEC.

Recommendation – Allow for all CEC decisions or actions to be challenged within the electoral process and all ECAP decisions to be appealed to the Supreme Court.

Before the announcement of the results, the SC had received 43 appeals against ECAP decisions, out of which 30 were dismissed or rejected confirming ECAP's decisions. Six appeals were approved overturning ECAP's decision and seven partially approved by lowering the fines imposed on first instance.

d. Electoral offences

The Criminal Code encompasses a comprehensive body of proscribed election-related offences, with a range of fines and imprisonment for more serious matters, including for acts of bribery or vote buying.⁴⁴ No serious incidents took place during the campaign or election day. Seven cases, four during the campaign and two on Election Day reached the Public Prosecutor's Office, which at the time of writing were still under investigation⁴⁵ One case directly observed by EU observers and investigated by the police in MCC Gjakovë/Djakovica involved copies of the sample ballot used for training found in the ballot box and discrepancies between the number of signatures and the number of ballots cast. No case considered by ECAP included elements of criminal offence, therefore none was referred to the Prosecutor's Office.

XII. MEDIA

Dynamic media campaign without full regulatory oversight, while the lack of meaningful debates and media boycotts hindered voters' ability to make an informed choice.

a. Media environment

Kosovo's media landscape is pluralistic and dynamic, yet fragmented, shaped by ethnic divisions and institutional challenges. Kosovo Albanian, Kosovo Serb and other non-majority communities mostly inhabit different informational spheres, separated by a language divide that very few media outlets seek to bridge. Television remains the primary source of information, with 19 terrestrial and 45 cable TV channels, mostly broadcasting out of Pristina. Private broadcasters dominate, though

⁴³ See Decision A N° 623/202. See also Decision A N° 634/2025.

⁴⁴ Chapter XVIII, Criminal offenses against voting rights, Criminal Code.

⁴⁵ Two on violation of the secrecy of vote through social media on OoK voting (art. 215, Criminal Code), two on violation of free decision of voters (art. 215, Criminal Code) in Mitrovicë/Mitrovica and two preventing to exercise the right to vote (art. 209, Criminal Code) and attacking official person (art. 402, Criminal Code) in Prishtinë/Priština.

the public broadcaster, Radio Television of Kosovo (RTK), plays an important role with four TV channels and two radio stations. Among private TV channels, eight have a significant audience: RTV21, Kohavision (KTV), Klan Kosova, TV Dukagjini, T7, ATV, Kanal 10, and TeVe1.

The public broadcaster, RTK, has faced political and operational challenges, including concerns over its independence in 2023⁴⁶ and a 2024 controversy regarding the publication of an article alleging that certain Albanian-language media outlets in Kosovo were being funded by Serbia, leading to leadership resignations.⁴⁷ Subsequent rule changes enabled the appointment of an acting director general, preventing a paralysis of RTK's operations, but the RTK board now lacks a quorum, with only four of 11 members remaining.⁴⁸ RTK board members are elected by the parliament through a simple majority vote, leaving its governing body reliant on the Assembly's timing and potentially aligning it with the ruling party's interests.

Recommendation – Ensure the financial sustainability and growth and independence of the public broadcaster, allocate its budget according to law, and elect its board members by the Kosovo Assembly in a timely manner.

RTK1 and RTK2 broadcasting in Albanian and Serbian languages are obliged to broadcast 15 per cent of their programming in non-majority languages. However, RTK2's limited financial resources negatively affected the quality of its programming and its capacity to develop new programmes. This led to reluctance among contestants to engage in RTK2's election-related content. RTK2 hosted three debates, but SL did not participate. Generally, political contestants do not consider RTK2 a viable platform for conveying their messages. Additionally, five local Serbian language TV channels operate with limited coverage, leaving non-majority and Serb parties without an effective broadcast channel for campaigning. NGO-funded Serbian language media outlets (*KoSSev*, *Radio Kim*, *Radio Kontakt plus*) aimed to provide balanced coverage of Kosovo Serb political entities based on their activities, however, with a limited focus on the election campaign in general.

Recommendation – Strengthen the public broadcaster's TV and radio stations to efficiently serve all non-majority communities. Provide financial, technical and capacity-building support to ensure high-quality public service broadcasting with diverse content in Serbian and non-majority languages.

Some 89 radio stations broadcast mostly entertainment in Kosovo and played a reduced role as political information sources during the campaign.⁴⁹ There is no print press in Kosovo, as prominent print media outlets have moved online. Local media had limited impact due to a small audience, financial constraints, and reluctance to cover election issues. EU EOM observers reported, and media monitoring results show insufficient coverage of non-majority political entities, while

⁴⁶ On 23 February 2023, five international press organisations co-signed a letter to Prime Minister Albin Kurti, protesting the appointment of a ruling party activist as director of the public television RTK.

⁴⁷ The EU Progress Report for Kosovo 2024 also noted the need to address concerns related to editorial accountability and independence of RTK.

⁴⁸ The EU has called on the Kosovo Assembly to elect the board members of RTK and IMC in a public letter dated 24 December 2024.

⁴⁹ Out of 89 radio stations, 58 broadcast programmes in Albanian language, 22 in Serbian language, 3 in Bosnian language, 2 in Turkish language, 2 in Gorani language, 1 in Roma language and 1 is multi-language. The two public radio stations (Radio Kosova 1 and Radio Kosova 2) broadcast around 15 per cent of their programming in non-majority languages.

candidates favoured social media over traditional outlets. Dependence on municipal funding raised concerns about editorial independence, with political and corporate interests fostering self-censorship⁵⁰ to maintain favourable relations with political power holders in a constrained advertising market.

Journalists were generally free to cover the campaign; however, incidents of obstruction and threats increased as the campaign progressed, prompting the Association of Kosovo Journalists (AJK) to raise concerns about actions and rhetoric targeting journalists and media outlets.⁵¹ The AJK also condemned verbal attacks on the media by Prime Minister Kurti and other LVV officials.⁵² Media representatives attributed the increasing hostility toward the press to LVV party members' use of language that incited violence against the media during the campaign.

b. Legal framework for the media

Freedom of expression is guaranteed by Article 40 of the Constitution of Kosovo, which defines it as including the right to “disseminating and receiving information, opinions and other messages without impediment” with possible restrictions stipulated in Article 40 (2) of the Constitution stipulating that this freedom may be limited in cases necessary “to prevent encouragement or provocation of violence and hostility on grounds of race, nationality, ethnicity or religion”. The Constitution also explicitly provides for the “freedom and pluralism of media” and forbids censorship.⁵³ The right to freedom of opinion is guaranteed (Article 24), and libel and defamation are decriminalised, in line with international standards.

The Law on General Elections (LGE) and the Law on the Independent Media Commission (LIMC) regulate the media during election campaign.⁵⁴ The LGE foresees a Code of Conduct to be issued by the IMC applicable to all journalists, editors, broadcast managers and publishers on all aspects of campaign coverage and advertising. This framework is complemented by other laws protecting the right to freedom of expression and independence of the media.⁵⁵ A new regulation adopted in December 2023 by the IMC aims to regulate media ownership⁵⁶, transparency and concentration. However, in line with the Constitutional provision that stipulates that “pluralism of media is guaranteed”, a legal standard or principle is needed to guide such regulation. Furthermore, 44 online outlets, registered as businesses or NGOs, are signatories to the Code of Ethics, issued by the Kosovo Press Council, a self-regulatory body.

⁵⁰ Kosovo is ranked 75th out of 180 countries in the RSF Press Freedom Index in 2024, a decline from the 56th place in 2023.

⁵¹ On 25 January, AGK condemned the obstruction of a Nacionale news team at an LVV rally in Malishevë/Mališevo, where journalists were called “worse than Serbia”. On 8 February, unknown individuals vandalised the Veriu.info portal, breaking the windows of its building. On election day, Klan Kosova reported nine cases to AJK, regarding verbal abuse, insults, and physical obstruction while reporting from various voting stations, primarily from supporters of the LVV. “Klan Serbia” and other derogatory comments necessitated police intervention in some cases.

⁵² <https://www.agk-ks.org/en/cases/denimi-i-gjuhes-se-zedhenesit-te-vetevendosjes-arlind-manxhuka/>

⁵³ Article 42 of the Constitution.

⁵⁴ Chapter VIII (art. 47-53) and XVII (art. 107-109), LGE, Law No 04/L-044– LIMC, (OG no. 5/05.04.2012)

⁵⁵ Namely, Law No 06/L-081 on Access to Public Documents, Law No. 04/L-046 on Radio and Television of Kosovo, Law No. 02/L-65 on the Civil Law against Defamation and Insult, Law No. 06/L-085 on the Protection of Whistle-blowers, law No. 04/L-137 on the Protection of Journalism Sources.

⁵⁶ IMC Regulation 03.2023 on the ownership and concentration of IMC licensees details ownership rules and aims to ensure media plurality to prevent media concentration. Currently there are two public media ownership databases in Kosovo; one maintained by IMC: <https://regjistri.kpm-ks.org/>, and the other Media Ownership Monitor established by BIRN: <https://kosovo.mom-gmr.org/en/>.

The new, controversial Law on IMC, adopted on 11 July 2024, has sparked debate over its lack of procedural safeguards and self-regulation mechanisms. It expands IMC board membership to 11, extends oversight to online media, and bans media ownership by political entities.⁵⁷ Concerns also arose over unclear criteria for blocking and sanctioning harmful online content. On 19 July, opposition parties PDK and LDK challenged the law in the Constitutional Court, with a ruling still pending. The AJK has also provided comments and requested a public opinion from Kosovo's President. The new law fails to address the lack of timely elections for IMC board members or the potential politicisation of the regulatory authority. Instead, it mandates that the IMC chairperson be elected directly by the Kosovo Assembly, contradicting European standards and good practices.⁵⁸

Comprehensive regulations governed the media coverage of the election campaign, as outlined in the CEC Election Regulation No. 07/2024 and IMC regulation KPM-2024/03 on Regulation on Obligations of Providers of Media Services. These rules prescribed balanced news coverage for candidates, imposed limits on paid political advertising, mandated the provision of free airtime for entities using paid ads, and required broadcasters to submit weekly reports to the IMC on their advertising schedules. The LGE also bans media coverage of campaign activities and opinion polls from poll opening until voting ends, including survey results 24 hours before polls close.

The IMC monitored campaign coverage according to its action plan and processed 102 cases of possible media violations and sent out Notices of Violations to at least 88 media outlets until 24 February, but was unable to issue fines for media violations due to its lack of quorum.⁵⁹ As a result, the IMC has been unable to fully enforce rules and regulations, and media outlets faced prolonged uncertainty regarding potential penalties.⁶⁰

Priority recommendation – Appoint all members of the IMC in a timely manner and through a competitive and transparent selection process.

c. Media monitoring findings

Television channels with Kosovo-wide coverage were the most active outlets covering the campaign based on pre-planned schedules for the election campaign.⁶¹ Around half of the prime-time airtime was allocated to election related content in monitored TV stations.⁶²

⁵⁷ While IMC board members should represent different groups, increasing the number of board members does not ensure political independence or timely appointments by the KA, as criticised by international organisations.

⁵⁸ The CoE Recommendation Rec (2000) 23 I/3. states that “The rules governing regulatory authorities for the broadcasting sector, especially their membership, are a key element of their independence. Therefore, they should be defined so as to protect them against any interference, in particular by political forces or economic interests.”

⁵⁹ On 17 January, the IMC amended its Rules of Procedure to allow the election of a new chairperson before the incumbent's mandate expired on 21 January. This move raised legal concerns, with local and international journalist associations denouncing it as “political influence”. The Kosovo Law Institute filed a lawsuit 28 January 2025, requesting the Basic Court in Pristina to annul the amendments to the Rules of Procedure of the IMC and the decision to appoint the new chairperson of the regulatory body.

⁶⁰ Most violations processed by the IMC involved political actors' use of offensive or vulgar language during the campaign and broadcast on media, lack of identifying political advertising, presence of children in the campaign, failing to send weekly diaries to IMC, and ten cases related to the breach of electoral silence on election day.

⁶¹ The EU EOM Media Monitoring Unit (MMU) quantitatively and qualitatively monitored five TV channels: RTK1 (public), Dukagjini (private), Klan Kosova (private), T7 (private), and ATV (private) during the entire duration of the official campaign, from 11 January to 8 February, during prime-time broadcast: 18:00-24:00 hours.

⁶² See Chart 1 of Annex 2.

Although the law requires media outlets offering paid political ads to also allocate free airtime, many contestants did not take advantage of this provision, leading to a surge of paid airtime toward the end of the campaign.⁶³ Additionally, beyond paid advertising, the law allows for the provision of sponsored airtime, with broadcasters required to submit weekly diaries to the IMC to ensure regulatory compliance.⁶⁴

LVV's boycott of private media Klan Kosova, Dukagjini, and T7 has sparked criticism from journalists' associations in Kosovo and internationally. LVV's media boycott, combined with debates that often included representatives from only one party, restricted voters' ability to compare leading candidates directly. Additionally, LDK did not participate in debates organised by the public broadcaster. Regrettably, no debates were held between the leading candidates, limiting voters' ability to make an informed choice on the candidates' platforms and campaign promises.⁶⁵

The state media RTK1 fulfilled its legal obligations and provided equitable news coverage for the main political parties, LVV, PDK, LDK, and AAK-NISMA.⁶⁶ Other political parties made up all together seven per cent of the total media coverage, including the sole independent candidate.⁶⁷ Each political entity was offered equal paid and free airtime as prescribed by law, and sponsored airtime mostly took the form of covering campaign rallies by LVV and one by PDK.

Private TV channels Dukagjini, Klan Kosova and T7 assigned more time to PDK and LDK in total airtime, and less to LVV. ATV also assigned most of its election-related airtime to AAK-NISMA, and PDK. The president was covered in a negligible amount of time in her institutional capacity, whereas the prime minister and government members were at times featured campaigning in their official roles.⁶⁸

The editorial coverage included interviews with candidates, talk shows, and programmes with analysts.⁶⁹ Opposition parties often focused on criticising the ruling party, and debates lacked in-depth analysis and merit-based comparison of party programmes. The tone of media coverage across all monitored TV channels was mainly neutral or positive, with instances of negative commentary by journalists towards LVV, the government and PM Kurti on Klan Kosova, T7 and in two instances in Dukagjini's Debat Plus.⁷⁰

Monitored Serbian language websites overall gave preference to SL in their election coverage and covered Serb opposition parties significantly less.⁷¹ Kosovo Online published around 450 election-

⁶³ Labelled free airtime was noted only on Klan Kosova on the last two days of campaign, on 7 and 8 February by AAK-NISMA, Coalition for Family, LDK and PDK.

⁶⁴ The IMC noted violations of the weekly diary submission requirement in at least 47 cases during the four weeks of campaign.

⁶⁵ There was some nonpartisan journalistic scrutiny of candidates' policies, particularly on Dukagjini's "Debat Pernime", where campaign promises are challenged by real-time fact-checking.

⁶⁶ See Chart 6.

⁶⁷ See Chart 4.

⁶⁸ On 24 January, Prime Minister Albin Kurti campaigned on new projects for KEK and the Kosovo A power plant. He also campaigned at the Davos Economic Forum, talked about the opposition, while representing Kosovo in his institutional capacity. He also promised subventions for medical students during campaigning, and the Ministry of Environment awarded a €32-million tender for social housing, a project promised in 2021.

⁶⁹ See Chart 2.

⁷⁰ See Chart 5.

⁷¹ The EOM Media Monitoring Unit qualitatively monitored the web pages of Kosovo Online, TV Most, Kossev, Radio KIM and Radio Kontakt Plus.

related articles, in which SL was mentioned around 70 times, while the five smaller Serb political parties were mentioned only 1-5 times.⁷²

XIII. SOCIAL MEDIA

Campaigning online mirrored the aggressive tone of the public debates and rallies but lacked substance.

a. Social media environment

Kosovo's internet penetration rate is estimated at over 95 per cent and around half the population is present on social media platforms. Facebook and Instagram are the most popular platforms, with over 800,000 and 600,000 users respectively. TikTok is a close third, with a growing number of users, surpassing 500,000. X has a small user base in Kosovo, but it is popular among journalists, politicians, and commentators, mostly to engage with international audiences.

TV remains the main source of information for Kosovars (82 per cent of Kosovars), followed by social media (65 per cent) and online news portals (45 per cent).⁷³ The COVID-19 pandemic led to the closure of all print media in Kosovo and news outlets have increasingly turned to social media to reach their audiences. Similar to traditional media, the Albanian and Serbian communities mostly inhabit different informational spheres, where events are often interpreted from an ethnic perspective. Topics that gain a lot of attention from one community are at times absent or only marginally mentioned in the social media bubble of the other.⁷⁴

Krypometër and *Hybrid.info*, two Kosovo Albanian organisations, conduct fact-checking programmes, with support from EU and other international donors. While they debunk social media content and articles coming from both Albanian and Serbian sources, they publish only in Albanian. Some 40 pieces of misinformation and disinformation have been debunked by the two between the beginning of January and election day, including 11 fake opinion polls, posted mostly on TikTok. *Alternativna*, a Mitrovica North-based Serbian news outlet, also conducts occasional fact checking for news in Serbian.

From the beginning of January and until 9 February, Russia-backed RT Balkan and Sputnik Srbija published some 60 articles on the elections, some with narratives alleging manipulations against the Serbian community. Many of these articles have been promptly debunked by *Hibrid.info*. The social media reach of the two outlets is limited by the fact that they are present only on X where their posts rarely reach more than 2,000 users.

⁷² TV Most webpage dedicated around 90 articles to elections, featured SL in around 50 articles, while other Serb and Albanian parties less than five times. *Kossev* dedicated around 80 articles to the election, with the most mention, 18 of SL, 9 of SNP, 7 of SD, and 1 article featured GI NP. Radio Kim's approximately 50 election-related articles mentioned SL 9 times, SD 6 times, SNP 3 times, and PKS 1 time. Radio Kontakt Plus' election coverage followed a similar pattern.

⁷³ <https://kosovo.mom-gmr.org/en/context/media-consumption/>

⁷⁴ The closure of parallel structures around the middle of January and the CEC decision on PS composition in several Serbian municipalities have received much more attention in Serbian social media. The same events attracted significantly less interest in the Albanian social media bubble.

b. Legal framework for social media

Digital rights in Kosovo are regulated by the Constitution, the Law on the Independent Media Commission (IMC), and other complementary acts or subsidiary legislation. The Constitution guarantees freedom of expression and pluralism of media, and it also enshrines privacy rights and data protection.

Privacy and data protection are covered by the Law on Protection of Personal Data (PPD), which is aligned with GDPR to a certain extent. The PPD law prescribes standards for data acquisition, analysis and management by government and the private sector, which sets clear rules for how both government and private sector should handle personal data. The Information and Privacy Agency (IPA), the regulatory body for data protection, has only recently developed its operational capacities, conducting 302 inspections last year and resolving 707 complaints in 2024 (up from 97 in 2023). Kosovo also has legislation that safeguards net-neutrality and proper access to the internet. A National Cybersecurity Strategy has been adopted but is yet to be operationalised.

Social media platforms operate primarily under their own policies and regulation mechanisms. However, content such as hate speech or incitement to violence falls under the criminal code, the law on protection against discrimination and, during elections, the Code of Conduct for Political Entities.

c. Social media monitoring findings

The Social Media Monitoring Unit tracked a total of nearly 900 social media pages belonging to political parties, candidates, supporters, NGOs, media and institutions. A sample of 5,262 posts, selected based on their virality, was evaluated, coming from 246 pages belonging to political parties, candidates, the four leading candidates and supporters.

All contesting political entities and over half the candidates maintained at least one social media account and campaigned on social media with varying intensity. Facebook was the most used platform, followed by Instagram and TikTok. LVV, AAK and LDK presented their leaders as “prime ministerial candidates”, while PDK had Bedri Hamza, the mayor of Mitrovica South, as the prime ministerial candidate. Except for Bedri Hamza, the other three prime ministerial candidates have larger social media followings than their parties.

Campaigning on social media generally lacked substance. Nearly three quarters (74 per cent) of the monitored posts did not contain any specific messages and either promoted the image and name of the party or candidate or reflected offline campaign events. Almost half of the monitored posts (41 per cent) represented videos, usually from campaign events, which sometimes included the inflammatory language used at rallies (4,4 per cent of monitored posts contained attacks on political opponents). ECAP has issued 38 fines, totalling €273,000, for breaches of the Code of Conduct for Political Entities on social media during the campaign period, including three fines to Coalition for Family for hate speech against LGBT+ community. On election day, the EOM observed 15 posts that breached the electoral silence as well as six political ads that were still running after 7:00AM. ECAP has also given seven fines for campaigning on social media on election day.

Facebook and Instagram ads were employed extensively by 12 political parties, over 400 candidates and several supporter and media pages. Over €250,000 was spent on promoting more than 7,000 election-related ads on Facebook and Instagram, including ads from third parties. Over two thirds of the ad impressions were delivered to men (see chart 11 in Annex 3), with the age group 18-24

being the only one with a more balanced gender targeting, suggesting that younger voters are less influenced by traditional voting patterns. The top individual spender was *Opre Roma Kosova*, who spent over €20,000 on ads but secured only 383 votes. PDK leads the aggregated party and candidate spending with €102,785, followed by LDK with €90,373 and LVV with €34,443. The top five spenders account for 97 per cent of the total, highlighting their financial strength compared to smaller contestants. 60 media and supporter pages ran some 693 third-party political ads, including 57 negative ads containing sarcastic comments on the level of support the candidates enjoy and the people they associate with, depicting them in negative contexts or insinuating captions.

Recommendation – Develop a coordinated effort among media outlets, civil society and tech companies to reinforce the existing factchecking initiatives, increase their reach by publishing their content in non-majority languages and ensure their sustainability.

XIV. PARTICIPATION OF WOMEN

A record 39 out of 45 women were directly elected to the Kosovo Assembly, but male domination of the campaign and inflammatory speech directed at women candidates were significant features of the parliamentary elections.

International human rights instruments, including the UN Convention on the Elimination of All Forms of Discrimination Against Women and the Istanbul Convention, supersede Kosovo's laws.⁷⁵ Gender equality is enshrined in the Constitution, the LGE (2023), and the Law on Gender Equality (2015). However, the legal framework that regulates women's political representation needs further harmonisation.

The LGE requires that party lists for parliamentary elections comprise at least 30 per cent of the less-represented gender, compelling political entities to place one female and one male candidate in every group of three candidates per list. The LGE also provides a financial incentive to enhance women's representation by earmarking an additional one per cent of the amount of public funds to be allocated to a political entity for each mandate won by women over the quota. On the other hand, the Law on Gender Equality sets a 50 per cent gender quota across all legislative, executive, and judicial bodies.⁷⁶ Furthermore, it introduces the Agency for Gender Equality to coordinate the implementation of the provisions of the law and ensure the adherence of Kosovo laws to the Committee on the Elimination of Discrimination against Women (CEDAW). Article 14 of the law also requires political parties to promote the equal participation of men and women within their governing bodies. Human rights organisations have advocated for the 50 per cent quota to become standard but a decision of the Constitutional Court on 26 December 2024, stated that Article 28 of the LGE on gender quotas remained consistent with the Constitution, setting its quota as a minimum threshold.

⁷⁵ CEDAW is enshrined in Article 22 of the Constitution and the Kosovo Assembly adopted an amendment to the Constitution in 2020, which gives direct effect to the Council of Europe Convention on preventing and combating violence against women and domestic violence - Istanbul Convention (CETS No.210).

⁷⁶ Article 6.8.

There were 443 women running for the 2025 elections, comprising 34.6 per cent of the 1,279 certified candidates.⁷⁷ While this is in line with the 30 per cent gender quota, it represents only a negligible increase compared to the previous parliamentary elections. The CEC does not publish gender-disaggregated data on voter and candidate registration.

The outgoing Kosovo Assembly included 40 women, one third of the total membership, while women led two out of 14 parliamentary parties. Positively, seven of the 14 parliamentary committees were chaired by women and the LVV parliamentary group, the largest in the Kosovo Assembly, was led by a woman. Results published by the CEC indicate that the new Kosovo Assembly will include 45 women, 39 of whom were elected without the application of the gender quota, an improvement compared to 2021.⁷⁸

While women contestants from the main political entities sometimes headlined campaign events, men had a dominant presence at rallies, representing a significant majority of participants and speakers. About 28 per cent of participants and 29 per cent of speakers in the 75 rallies observed by the EU EOM were women. Positively, observers noted that LVV, PDK, AAK, the Turkish Democratic Party of Kosovo (KDTP), and the New Democratic Initiative of Kosovo (IRDK) conducted campaign events directed at women activists. Several LVV and PDK events also featured women as keynote speakers, including Albulena Haxhiu, Minister of Justice, and Vlora Çitaku, former Minister of Foreign Affairs.

The political discourse, particularly on social media platforms and broadcast television, was often hostile towards women candidates who were criticised for their looks, emotional state, or marital status.⁷⁹ Women candidates had fewer resources than their male counterparts, less media coverage, and appeared in fewer televised debates. According to EU EOM monitoring, women were featured in 14.8 per cent of the prime-time programming across five TV channels from 11 January to 8 February. Kosovo Albanian political entities were also criticised by civil society organisations for promoting a patriarchal vision of women's role in society in their campaign manifestos, considering women through their reproductive role, instead of supporting gender equality in the labour market and in public life.

Although the LGE includes provisions encouraging women's participation in the election administration, they are not compulsory. Only two out of the 11 CEC members are women. Women also comprised 23 per cent of the MEC members, including 16 per cent of the chairpersons, while the EU EOM observed that 28 per cent of PSC members in the visited polling stations on election day were women.

⁷⁷ Among Kosovo Albanian political entities, LVV's candidate list featured the highest ratio of women at 37.3 per cent, while the Turkish Innovative Movement Party (YTHP) had the highest share of women among non-majority candidate lists at 52 per cent.

⁷⁸ Among the 39 women elected before the application of the quota, 22 are from LVV, 5 from PDK, 4 from LDK, 3 from SL, 2 from AAK, 1 from KDTP, 1 from NDS, and 1 SDU. While the outgoing Kosovo Assembly included 40 women, 44 women were initially elected in 2021, 34 of whom without the quota.

⁷⁹ For example, during a debate on the political show "Compass", broadcast on ATV on 28 January, AAK-NISMA candidate Gani Bajraktari (No.11) levelled personal attacks against LVV candidate Fatmire Kollçaku (No. 18) and asked her whether she had checked her "thyroid level".

Recommendation – Enhance the representation of women in elected institutions and election administration by putting in place robust strategies for the recruitment and promotion of women within parties’ governing structures and in candidate lists.

XV. PARTICIPATION OF YOUTH

While there are no legal provisions encouraging the participation of young people in politics, the LGE has no age requirement for registered voters wishing to stand for parliamentary elections. More than 12 per cent of newly elected MPs are under the age of 35.

Kosovo has a young population with a median age of 34.8 years, according to the 2024 housing and population census. The CEC reported that 125,852 Kosovo voters were registered for the first time, comprising six per cent of the electorate. While the Constitution does not mention youth as a protected class, the LGE recognises first-time voters as an important social group to whom the CEC Secretariat and the MECs should address their voter education campaigns.⁸⁰ Positively, MECs reached out to young voters in high school and university campuses to raise awareness about new voting procedures and online requests for a change of voting centre.

A Law on Youth (2024) was enacted to promote youth participation in government policymaking at the central and municipal level and improve youth social status and quality of life. While the law establishes a State Youth Commission, as an inter-institutional coordinating mechanism for the implementation of sectoral youth policies, along with other central and local organs, it has yet to be implemented. Positively, the Ministry of Culture, Youth and Sports produced a State Strategy for Youth (2024-2032) aged 15 to 29, which seeks, *inter alia*, to enhance their civic engagement and includes provisions for measuring their political participation, including in local and parliamentary elections.

While there are no provisions in the LGE encouraging political parties to promote the participation of young people within their ranks or on candidate lists, the law allows registered voters to stand as candidates and has no age requirement. Out of the 120 newly elected MPs, 15 (12.5 per cent) are under 35.⁸¹ Young people also comprised about 40 per cent of participants in campaign events observed, a sizable share of the overall attendance.

XVI. PARTICIPATION OF NON-MAJORITY COMMUNITIES

Lacking resources, non-majority political entities conducted low-key campaign activities within their own communities and had little contact with the general Kosovo electorate.

The Constitution defines Kosovo as a multi-ethnic society consisting of the majority Albanian (91.7 per cent) and non-majority communities (8.3 per cent), and places significant emphasis on the rights of these non-majority communities, notably by guaranteeing 20 seats for their representation in the Kosovo Assembly. Positively, 20 of the 28 certified lists represented non-

⁸⁰ Articles 68.4 and 107.3, LGE (2023).

⁸¹ Seven MPs from LVV, five MPs from PDK, two MPs from LDK, and one MP from PAI.

majority communities and four members of non-majority communities served in the outgoing government.⁸²

The rights of the non-majority communities are also protected under the LGE, the Law on the Protection and Promotion of the Rights of Communities and their Members in Kosovo (2008), and the Law on the Use of Languages (2007), which ensures the equal status of the Albanian and Serbian languages as official languages of Kosovo, and guarantees the right of all communities to preserve their linguistic identity and promote the equitable use of Kosovo's languages in education, media, and judicial proceedings among other sectors.⁸³

While the freedom of assembly and freedom of expression were generally respected during the campaign period, non-majority political entities criticised the absence of a level playing field. With fewer resources compared to the main Kosovo Albanian parties, non-majority political entities were obliged to conduct mostly small gatherings and door-to-door canvassing within their own communities, including in Prizren, Mamushë/Mamuša, Pejë/Peć, Dragash/Dragaš, Gjakova/Đakovica, Obiliq/Obilić, Fushë Kosovë/Kosovo Polje, Graçanicë/Gračanica, Lipjan/ Lipljan, and Podujevë/Podujevo where Kosovo Turkish, Bosniak, Gorani, Egyptian, Roma, and Ashkali voters are concentrated. EU EOM observers witnessed larger campaign events organised by Vakati Coalition and the United Roma Party of Kosovo-PREBK (Prizren), KDTP (Gjilan/Gnjilan) and IRDK (Pejë/Peć, Fushë Kosovë/Kosovo Polje, and Istog/Istok).

Although non-majority political entities participated in several televised debates, they had limited access to broadcast media beyond the allotted free airtime mandated by law. Debates featured political contestants belonging to the same community, thus restricting their potential outreach. On RTK1, KDTP faced the Innovative Turkish Movement Party, while the Social Democratic Union (SDU), the New Democratic Party, and *Naša Bošnjачka Koalicija* faced each other. One-on-one interviews on T7, KTV and RTV-Dukagjini also featured the Ashkali Party for Integration, PREBK, and SDU. Campaign messages focused on quality-of-life issues, language barriers in primary education for the Bosniak community, school enrolment for Roma girls, as well as the government's policies towards non-majority communities. Several interlocutors noted that some of these political entities had strong ties to the LVV-dominated government and were thus either vulnerable to manipulation or willing to leverage their connection for electoral gain.⁸⁴

While they reported good relations with the CEC and MECs, several parties were critical of the composition of the PSCs, which they deemed insufficiently representative, and filed complaints with ECAP as a result.⁸⁵ The CEC awareness raising campaign on voting procedures in the Turkish, Bosniak and Romani languages was also released belatedly, while training materials for PSC members were not available in Turkish in the municipalities of Prizren and Mamushë/Mamuša, in

⁸² Emilija Redžepi (Bosniak), Nenad Rašić (Serb), Fikrim Damka (Turkish), and Elbert Krasniqi (Egyptian).

⁸³ The Law on the Use of Languages elevates Turkish, Bosnian, Romani and Gorani as official languages at the municipal level. If a non-Serb, non-majority community comprises at least 5% of the population in a given municipality, its language earns the status of an official language. Article 2.3 stipulates that the Turkish language shall have the status of an official language.

⁸⁴ On 13 January, during a meeting in Treboviq/Trebović with Elbert Krasniqi, Minister of Local Government Administration and leader of the New Democratic Initiative of Kosovo (IRDK), Prime Minister Albin Kurti stated "Whoever is Egyptian and loves *Vetëvendosje*, tell them the number is 111."

⁸⁵ The Turkish Democratic Party of Kosovo, Social Democratic Union, Unique Gorani Party, and New Democratic Party of Kosovo filed complaints with ECAP about insufficient representation in MCCs and PSCs.

violation of the Law on the Use of Languages.⁸⁶ In a break from past practices, the ballot design included the Albanian and Serbian languages on the header while omitting the Turkish language.

XVII. PARTICIPATION OF PERSONS WITH DISABILITIES

The participation of persons with disabilities in the electoral process faced challenges due to a lack of access to voting centres and assistive tools, as well as limited outreach by the CEC and political parties

Legislation supporting voting rights for Persons with Disabilities (PwD) is in place, but more provisions are needed to promote political participation. In 2022, the government of Kosovo decided to incorporate the United Nations Convention on the Rights of Persons with Disabilities (CRPD) into the Constitution. In addition, the Council of Persons with Disabilities was established in 2021 to monitor the implementation of the National Strategy and Action Plan on the rights of PwD and cooperate with government structures in promoting their rights. Furthermore, the Administrative Instruction-No.33/2007 for Construction Buildings Technical Terms of Accessibility to Disabled Persons and the Law on training, professional retraining and employment of persons with disabilities (2009) were enacted to facilitate inclusion of PwD in the labour market and public life. However, these pieces of legislation have not been implemented consistently and there are no provisions in the LGE encouraging political parties to promote the participation of PwDs within their ranks.

The LGE and CEC Election Regulation No.9/2024 determine the procedure for registration, documentation, and voting with special needs and circumstances in institutions and at home through dedicated mobile teams. According to the CEC, 4,060 Kosovars registered as voters with special needs, 2,670 of whom cast a ballot on election day. MECs are mandated to organise information campaigns in their respective municipalities, targeting PwD among other vulnerable groups. However, unlike in past elections, organisations of persons with disabilities reported that they were rarely consulted by MECs and that they were not asked to assist with the registration of PwD as voters with special needs. They also shared that some PwD voters were either unaware they were supposed to register on a dedicated online platform or were deterred to do so because of their lack of familiarity with the new procedures, suggesting possible shortcomings in the CEC's voter information campaign. Furthermore, the EU EOM received anecdotal reports from civil society organisations that MEC mobile teams did not reach all registered voters on election day. Positively, the CEC did produce voter information campaigns in sign language, as required by law.

Due to the high percentage of assisted voting observed in previous elections, the LGE prescribed additional conditions for the 2025 elections.⁸⁷ However, the new procedures were not implemented consistently in almost two-thirds of polling stations observed on election day, with PSCs often allowing voters to be assisted without the required documentation, neglecting to record the assisted voters' details or the reason for which the assistance was requested. Furthermore, in some instances polling personnel allowed elderly and illiterate voters to be assisted without documentation, since

⁸⁶ The CEC posted infographics on voting procedures in Turkish, Bosniak, and Roma on its Facebook page on 29 January. Audiovisual messages about voting procedures were also broadcast on RTK1 in those languages.

⁸⁷ A voter with disability may be assisted by one other voter registered at the same polling station, except for PSC members and observers, and any voter may only assist another voter once. Assisted voters must also produce a medical certificate supporting their claim of disability and their details must be registered in the poll book.

in such cases obtaining a medical certificate may not have been possible, while in other instances these voters were denied assistance. Considering the inconsistent application of the procedures, the current regulation might benefit from further clarification.

While the CEC reported that close to 80 per cent of voting centres were considered accessible by the municipal authorities, EU EOM observers found more than a third did not provide independent access for persons with reduced mobility. Polling stations' layouts often did not accommodate PwD, and some polling stations were sometimes located on upper floors. Tactile ballot guides were not always available, or the polling staff was not aware of their presence (see section Voting, counting and tabulation of results). Moreover, EU EOM observers assessed that almost half of the MEC offices were inaccessible. Coordinated efforts between the election administration and the local authorities would be necessary to address these long-standing deficiencies in the accessibility of MECs and polling stations. Since voters may request change in their assigned voting centre, the possibility to choose an accessible voting centre or polling station on the ground floor could be considered.

Although campaign manifestos from the main Kosovo Albanian parties mentioned policies for persons with special needs, they rarely referred to proposals affecting PwD specifically. Civil society organisations reported that hearing-impaired people were unable to follow the campaign due to the absence of interpreters at campaign rallies. EU EOM observers also reported that no PwD spoke at the 75 campaign events observed. Moreover, the mission identified only two candidates with disabilities among the 1,279 certified candidates by the CEC; and neither of them got elected.

Recommendation – Improve access to voting centres and assistive tools to enable persons with disabilities to vote independently on an equal basis with others. Build collaborative relationships with organisations of persons with disabilities to adapt voter education initiatives to different categories of persons with disabilities.

XVIII. CITIZEN AND INTERNATIONAL OBSERVERS

Committed domestic observers enhanced the transparency of the electoral campaign.

Contributing to the transparency of the electoral process, the election legislation provides for citizen, international and partisan election observation and outlines observers' rights and duties, including principles of their impartiality and neutrality.⁸⁸ While the election legislation provides for election observation of the whole electoral process, the CEC delimited the accreditation registration period for the last month prior to elections, not aligning with deadlines for many important phases of the electoral process, including the public scrutiny for the preliminary voter list and the respective objection period.⁸⁹ Positively, the official accreditation was *de facto* required by

⁸⁸ The right to observe the elections is granted to accredited representatives of non-governmental, governmental and intergovernmental organisations, international organisations engaged in the field of elections and protection of human rights, representatives of foreign countries, and representatives of political entities.

⁸⁹ The period for accreditation of partisan observers was open from 30 December until 15 January which was eventually extended until 20 January. The non-partisan observer groups could apply for accreditation between 30 December and 25 January.

the election administration only for access to electoral premises on election day and observers did not report any obstacles to their work.

In an inclusive process, the CEC accredited 22 domestic organisations, including the Institution of Ombudsperson, with a total of 1,193 observers as well as some 18,600 partisan observers. The largest civil society observation effort was led by observer coalition Democracy in Action, which deployed long-term observers to monitor the election campaign and pre-electoral environment and regularly issued public reports on their findings on misuse of administrative resources, as well as tracking hate speech and campaign finance, enhancing the transparency and integrity of the electoral campaign. On election day, the coalition also conducted a parallel vote tabulation based on a sample of 500 PSs. As for international observers, the CEC accredited 11 international organisations, ten resident diplomatic missions and six delegations of foreign election management bodies.

XIX. VOTING, COUNTING AND TABULATION OF RESULTS

Transparent and well-managed election day; however, delays in preparations, procedural omissions and technical problems negatively impacted on the counting process as well as the tabulation and transmission of the preliminary results.

Election day was observed to be calm and generally polling proceeded smoothly, although isolated incidents in and around voting centres were reported by observers and media. Voting took place in 903 regular voting centres divided into 2,533 polling stations as well as 38 conditional voting centres with 56 polling stations. While the voting was generally assessed positively by EU EOM observers, with some procedural errors, difficulties with the implementation of procedures became more apparent during the counting phase. Partisan observers were present in 97 per cent of the polling stations observed, whereas citizen observers were reported in 23 per cent. Women made up 28 per cent of polling staff, including 23 per cent of chairpersons. Some 38 per cent of the voting centres did not provide independent access for persons with reduced mobility and 17 per cent of polling stations had unsuitable layouts for these voters.

ECAP received some 100 complaints related to election day, mainly referring to campaigning on election day, impact on voters and alleged irregularities during counting at polling stations. In the vast majority of cases, complaints were dismissed or rejected but for those approved, mainly related to campaigning, fines imposed totalled some €13,500. Complaints on the counting process at the polling stations that only questioned the results without documenting any possible irregularities were dismissed as premature since the results could still be rectified at an MCC level and the complainants were advised to challenge the final results if still aggrieved.

a. Opening and voting

The opening of polls was assessed positively in 40 of 43 polling stations observed by EU EOM observers. Most observed polling stations opened on time, with only a few experiencing slight delays under 30 minutes due to disorganisation or insufficient understanding of procedures by PSC members. While procedures were largely followed, some procedural oversights were observed, thus omitting important integrity safeguards such as recording of sensitive election materials. The conditional voting centres reported difficulties with access to the online registration platform, resulting in late opening and prolonged waiting time for voters.

Observers assessed the voting process as well-organised and transparent in 97 per cent of the 412 polling stations visited. Voting procedures were generally respected. The identity of voters was consistently verified against identification documents and voters duly signed printed voter lists. However, gaps in training of polling staff were evidenced by a number of procedural errors. New procedures for assisted voting were not implemented consistently in 64 per cent of polling stations observed, with PSCs often allowing voters to be assisted without the required documentation or neglecting to record the reason for assistance. Some PSCs informed EU EOM observers that MECs had instructed them throughout the day to exempt elderly voters over 65 years from the requirement to provide medical documentation to support their requests for assistance in voting, further impacting the inconsistent approach by the PSCs.

As an additional security measure, indelible ink was used to mark voters' fingers to prevent multiple voting. However, EU EOM observers noted that voters' fingers were not consistently checked for traces of ink in 15 per cent of observations. Moreover, EU observers reported that the ink marking on fingers could be removed. On the morning of election day, the CEC announced its decision, adopted on 8 February, to allow the use of expired identity documents for voter identification. Due to this belated decision, some voters were not allowed to vote since the PSCs were not fully aware of the new instructions.

The secrecy of vote was compromised in five per cent of polling stations observed due to polling station layout, positioning of polling booths and people standing too close to the booths, and in 17 per cent of observed polling stations due to the positioning of the camera.⁹⁰ The EU observers reported instances of group voting in four per cent of observed polling stations. Insufficient or missing materials were reported in 11 per cent of polling stations, namely, complaints forms, insufficient ballots for conditional voting, and candidate lists. PSCs did not receive or were not aware of the presence of tactile ballot guides for visually impaired voters in 45 per cent of polling stations observed. The posters with voting instructions were not displayed in 19 per cent of polling stations. In addition, the information was available mostly in Albanian language. In connection with the use of languages, EU EOM observers noted difficulties in communication within PSCs as well as with voters in several areas where non-majority languages are primarily in use.

b. Closing, counting and handover of election material

The EU observers assessed the closing and counting process negatively in eight of the 42 polling stations observed, due to procedural errors, although it was mostly evaluated as transparent. Prescribed integrity checks, such as counting and packing of unused and other sensitive materials, were not completed correctly in close to two-thirds of the observations before the start of the count. Counting procedures were not performed in the prescribed order in more than a quarter of instances or were performed concurrently, negatively impacting transparency. During the count, validity of the ballots was not determined in a consistent manner or in line with the established rules in four instances and such determination was disputed by some PSC members in six cases. EU EOM observers reported from eight counts that PSCs had difficulties in filling in the results forms as a result of insufficient understanding of the procedures or not having followed them properly. In seven polling stations, the PSCs did not publicly display copies of the results forms as required by law.

⁹⁰ The CEC introduced video cameras for all polling stations with the aim to deter irregularities in the voting and counting by capturing all operations at polling stations. The video cameras only recorded the process on memory cards. The stored recordings could be retrieved if requested by ECAP or a court as evidence and shall be destroyed after a set period of time as per CEC internal instructions.

On election night, CEC IT systems were unavailable for an extended period, impacting the publication of preliminary results and the intake of election materials at municipal counting centres. Despite the technical challenges, the EU EOM observers assessed the election material handover phase as transparent and efficient. The premises for storage of materials were largely adequate for such purpose and the MECs duly followed the prescribed procedures. EU EOM observers reported only few instances where election materials had to be opened by the MECs due to incorrect packing.

c. Verification of political entity results and counting of preferential votes

The counting of preferential votes, initially scheduled to start in the morning of 10 February, was postponed due to persistent technical problems, insufficient technical preparedness of the counting centres and missing critical equipment and software in several MCCs. Eventually, the counting started in only four municipalities in the afternoon on 11 February, with other MCCs gradually beginning in the following days, the latest on 16 February. However, throughout the first days, the digital platform used for results management remained unstable, with frequent interruptions reported. Additionally, poor internet coverage in some areas further exacerbated the technical issues, at times resulting in the need to repeat the count as the count results had not been properly saved in the system. The last MCCs, in Laposavić/Leposaviq, Pristina and Pejë/Peć, completed the counting on 21 February.

The EU EOM observed the counting process at all MCCs. The established counting procedures comprised robust safeguards for the integrity of the count and results tabulation process and included thorough verification steps for the results established by the PSCs at polling stations. This effectively resulted in an actual complete recount of the votes in most cases, providing an opportunity to correct potential counting errors made by the PSCs, albeit considerably protracting the process in the outcome. The counting teams first recorded data from the results forms compiled by the PSCs and, after the verification, compiled digital results forms with confirmed or newly determined results for the political entities. Subsequently, the preferential votes for individual candidates were determined and recorded in separate digital results forms. Nevertheless, due to initial technical problems and unpreparedness of the counting centres, several procedures were skipped, including posting of results from each polling station at the MCCs as well as collation of the results at the municipal level, reducing transparency for those who did not have access to the MCCs.

Initially, EU EOM observers reported confusion over procedures and their inconsistent implementation at most MCCs, but the performance of the counting teams significantly improved over time in the majority of them. However, the process was assessed negatively until the end in the MCCs in Zvečan/Zveçan, Zubin Potok and Laposavić/Leposaviq where the counting teams were not fully trained beforehand, MECs were not entirely aware of their duties during the count, as well as due to technical unpreparedness of the counting centres.

EU EOM observers evaluated the transparency of the counting process for those present inside positively, owing to streaming of the counting operations on screens, with each ballot shown, as well as real-time data entry. In a few instances, malfunctioning cameras streaming the operations prevented the teams from proceeding with the count until the problems were fixed. Partisan observers were present at all MCCs throughout the whole period of counting. The process was primarily characterised as slow but efficient and diligent. A number of instances where ballots assessed as invalid by the PSCs were reassessed by the counting teams as valid or vice versa were

reported from most MCCs. According to EU EOM observers, these corrections were made properly in accordance with the ballot validity criteria, revealing insufficient understanding of these rules by the PSCs and insufficient guidance provided during the training sessions. According to the CEC data published, validity and assorting per political entity of some 6,300 votes was reassessed by the counting teams.

d. Counting of votes from out-of-Kosovo, conditional and mobile voting

After the count at the MCCs was completed, ballots cast by OoK voters, conditional ballots and ballots cast by those registered as voters with special needs were counted at the CRC from 26 February to 5 March. The activities at the CRC were conducted in the presence of observers from several political entities. The count was preceded by a compilation of a digital list of all voters who voted by scanning the respective records in the paper voter lists. These were compared with records of the voters who opted for any of the alternative voting methods, in order to detect any instances of possible multiple voting. Upon verification of the voter lists as well as postal items, the commission identified 921 such cases.⁹¹ As per the regulations, the corresponding ballots were excluded from the count.

e. Tabulation and publishing of preliminary results

The CEC shared updates about the voting process and voter turnout throughout election day and began posting preliminary election results on a dedicated website on election night. However, due to technical problems with the results management platform, the website became unavailable shortly after the closure of the polls. Further, turnout as well as results data were missing or transmitted with a delay due to shortage of data entry clerks in certain areas. To overcome these difficulties, the MECs and the CEC resorted to processing the results data manually, with tabulation of results at the central level based on original results forms or scanned copies sent electronically by the MECs. According to the CEC, full system functionality was restored by midnight on election night, enabling the CEC to resume publishing of the preliminary results data early morning on 10 February. Instances of mathematically impossible results and missing or incorrect turnout data were widely reported, raising concerns about possible irregularities in the count.

Subsequently, reports emerged speculating on potential distributed denial-of-service attacks against the CEC results website, as well as a malware infestation of the main CEC website. According to the EU EOM assessment, the CEC results website lacked several basic optimisation features, especially for mobile devices. Its performance under heavy traffic was further degraded by the deficiencies of the server (managed by the Agency for the Information Society) and network and firewall misconfigurations. These technical setbacks, in combination with limited information shared by the CEC in regard to the system failure as well as missing and incorrect data uploaded online, significantly undermined public trust in the integrity of the counting and tabulation process and raised concerns over the CEC's cybersecurity measures. On 11 February, with the start of the counting at the first MCCs, the CEC strived to assure the public that the integrity of the vote remained intact, and the final results would accurately reflect the voters' will. The CEC has refrained from further commenting on the nature of the system failure until investigations by relevant authorities are finalised.

⁹¹ According to the CEC, 868 envelopes were excluded from the count since voters sent ballots more than once; in 19 cases, voters who sent postal votes also voted at diplomatic missions, and 34 voters who cast their vote conditionally also voted at their regular polling station.

Upon completion of the count of each ballot box at the MCC, the counting teams electronically submitted the results forms as well as their printed and signed copies. The MEC performed quality checks of the results data in the database to identify and flag potential errors in the count prior to sending them for the central tabulation and publishing. All printed results forms were scanned and sent to the CEC for verification; however, they were not displayed at the MCCs or uploaded online immediately after the count.

As a result of the technical challenges, the CEC decided to establish a new website to publish the preliminary results, including those for individual candidates, which was launched on 20 February.⁹² On this website, results data from the polling stations as well as verified and corrected results as counted at the MCCs were available. However, the original website remained active for some time, with different data sets, potentially leading to public confusion. The final voter turnout at regular polling stations was reported by the CEC at 42 per cent, with overall turnout at 46.6 per cent.

After the departure of the EU EOM, on 10 March, the CEC decided on a recount of results from 50 polling stations. Following the reception of the election materials and results from the MCCs, the CRC recommended to recount the election results of 15 polling stations from various Kosovo municipalities due to discrepancies between numbers of voters' signatures in the voter lists and the numbers of ballots found inside ballot boxes. Additionally, the election materials of 35 polling stations of the municipality of Vushtrri/Vučitrn were ordered for a recount in view of discrepancies identified in the results. Additionally, in consequence of ECAP decision on a complaint, 1,631 postal votes initially declared invalid were recounted. The recount resulted in reassessment of a total of 1,046 of these ballots as valid.

Priority recommendation – Establish a reliable and transparent results management system with clear and verifiable procedures to ensure accurate processing of the results data. Ensure prompt access to the preliminary results, including all relevant data such as voter turnout, valid and invalid votes as well as scanned results forms per polling station.

XX. RESULTS AND POST-ELECTION ENVIRONMENT

a. Publication of results

On 15 March, the CEC published final results after completing the verification and counting of the preferential votes of all polling stations and the count of conditional, special needs and OoK ballots. Kosovo's ruling party, LVV, led by Prime Minister Albin Kurti, secured 48 seats, falling short of an outright majority. PDK obtained 24 seats followed by LDK with 20 seats and AAK-NISMA with eight seats. SL secured nine out of 10 reserved seats for the Kosovo Serb community while one seat went to SPO. Of the 10 seats guaranteed for non-majority communities, KDTP obtained two seats while the IRDK, NDS, VAKAT, PREBK, SDU, PLE, PAI and JGP all got one seat. LVV and SL guaranteed the women representation without the need to apply gender quota with respectively 46 per cent and 33 per cent of their elected members being women. However,

⁹² <https://rezultatet2025.net/>

PDK, LDK, and AAK all had to apply the gender quota requirements to ensure adequate women representation.

b. Appeals related to the election results⁹³

Following the announcement of the final results by the CEC, political entities and candidates had 48 hours, until 17 March, to appeal against the final results. ECAP which received six appeals: three from PDK candidate Petrit Hajdari, demanding recount of votes in several PSs,⁹⁴ one from PDAK-LpB seeking the annulment of 211 postal votes cast for the Ashkali Party for Integration as well as 108 votes cast in municipalities, where allegedly the Ashkali community was not represented. Two appeals were made by LVV. ECAP dismissed all appeals as ungrounded on 19 March. On the LVV appeal requesting the annulment of 18,933 postal votes received by LDK and its candidates and subsequent repeating of the voting process, ECAP ruled that the complainant failed to substantiate their case to justify such a request and therefore dismissed the appeal as unfounded.⁹⁵ ECAP also rejected as unsubstantiated LVV's complaint requesting a recount in several polling stations in Skenderaj/Srbica, alleging that the prime ministerial candidate for PDK received between 94 and 100 per cent of the votes in most PSs, citing the improbability of such a voting pattern.

Three political entities, namely PDK, LVV and PDAK-LpB, appealed ECAP's decisions to the SC.⁹⁶ The SC rejected all cases as unsubstantiated, the first on 24 and the remaining two on 26 March respectively within the dedicated timeframe thus clearing the way for the CEC to certify the results. Meanwhile, on 26 March, the Basic Prosecution in Pristina authorised the police to initiate an investigation of the postal voting process, without disclosing further details. The LVV, unsatisfied with the SC judgment, opposed the certification of the results by the CEC while the matter of the postal voting process was referred to the Constitutional Court.

c. Post-election developments

On 21 February, a Kosovo-police-led operation closed the premises of the Center for Social Work in North Mitrovica, Zubin Potok, Leposavić/Leposaviq and Zvečan/Zveçan, which worked under the Serbian system, due to suspicion that "illegal actions related to the election process" were carried out in these institutions. While these operations were based on a court order, they are in line with the Government's previous practices of closing existing structures providing basic social services for Kosovo Serbs and other communities, without a previously agreed alternative arrangement within the EU-facilitated Dialogue. Following the CEC's final results, some non-majority Bosniak party leaders weighed in – Emilija Redžepi supported Albin Kurti's eventual mandate to form a government, while Duda Balje set conditions for her support, including municipal and education reforms.

Tensions between SL and LVV escalated after the final results announcement. SL's Igor Simić accused Albin Kurti of manipulating votes to secure a seat for Nenad Rašić, calling the Assembly illegitimate. PM Kurti and Nenad Rašić responded with claims of Serbian interference, detailing actors and methods involved in influencing the election outcome.

⁹³ Source: ECAP website, the EU Office and the media.

⁹⁴ Decision A N° 636/2025 dated 18.03.2025 merged appeals N° 636, N° 637 and N° 638 rejecting them as ungrounded.

⁹⁵ LVV argued that the voter list abroad included individuals registered with email addresses that had been used multiple times.

⁹⁶ PDK candidate Petrit Hajdari claimed that his votes did not add up across several PSs, LVV requested the annulment postal votes cast for LDK and PDAK-LpB contested the diaspora vote results at the CCR.

On 27 March, almost seven weeks after election day, the CEC officially certified the results, with nine votes in favour and two against. The two LVV-nominated members unsuccessfully opposed the certification, citing alleged irregularities in the postal voting process and arguing that certification should be delayed until all legal remedies were exhausted. Refusing to accept the OoK voting results, LVV, having exhausted all legal remedies in the process provided for in by the LGE, stated its intention to subsequently appeal to the Constitutional Court. The CEC replaced three elected MPs, two from LDK and one from PDK, who opted to remain in their roles as mayors instead of taking parliamentary seats.

XXI. RECOMMENDATIONS

NO.	FR page #	CONTEXT	RECOMMENDATION	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE INSTITUTION	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
LEGAL FRAMEWORK						
1	15	<p>Yet further steps could ensure full inclusion, transparency and legal stability. Some legal gaps and ambiguities in law and regulations expose uncertainty for aspects of fundamental rights, notably freedom of expression, financial accountability and legal remedies. [...]</p> <p>Some technical provisions of the law lack precision, thus leaving room for uncertainty while final result timelines, among others, need further elaboration. Also, the framework lacks definition of important terms related to breaches of the Code of Conduct for political entities, their supporters and candidates in the campaign and leaves room for subjective interpretation.</p>	<p>Ensure certainty of law by addressing ambiguities and gaps through well elaborated subsidiary legislation, particularly on the Code of Conduct in the campaign, appointment of election administration staff and dispute resolution.</p>	<p>CEC Regulations / Decisions</p> <p>ECAP Regulation No 01/2024 on procedures for submission and Decision-Making of Complaints</p>	<p>CEC ECAP</p>	<p style="text-align: center;">Rule of law</p> <p>UN Human Rights Council Resolution 19/36 (A/HRC/RES/19/36, 2012) 16 (c) <i>[The Human Rights Council]</i> “calls upon State to make continuous efforts to strengthen the rule of law and promote democracy by: (c) Ensuring that a sufficient degree of legal certainty and predictability is provided...”</p> <p>ICCPR, article 25. ICCPR, HRC GC 25, para. 20: “...This implies that voters should be protected [...] from any unlawful or arbitrary interference with the voting process.”</p> <p>UNCAC, article 7(4): “Each State Party shall, [...] adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.”</p>

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ELECTION ADMINISTRATION						
2	16	<p>Irrespective of the political nominations, the election legislation obliges the CEC members to perform their duties impartially and provides for some measures to guarantee their independence and professionalism. Nevertheless, throughout the pre-electoral period, the performance of the Central Election Commission (CEC) was marked by instances of political influence in its decision-making process as well as tendencies to broadly interpret its powers and act outside the scope of its mandate, facilitated by a lack of clarity in certain provisions of the LGE, compromising its impartiality and independence. Apart from more solid practice in the members' performance, the CEC independence could be enhanced through strengthening measures regulating their conduct and potentially expanding the pool of professionals from which the nominating entities select the CEC membership with the aim to limit political affiliation.</p>	<p>PRIORITY Strengthen legal safeguards in regard to the membership and conduct of election officials to ensure impartiality and independence of the election administration.</p>	LGE	KA	<p>State must take necessary steps to give effect to rights</p> <p>ICCPR, UN HRC General Comment 25 Para. 20: <i>“An independent electoral authority should be established to supervise the electoral process and to ensure that it is conducted fairly, impartially and in accordance with established laws which are compatible with the Covenant.”</i></p> <p>Para. 24: <i>“State reports should describe the conditions for access to public service positions, any restrictions which apply and the processes for appointment, promotion, suspension and dismissal or removal from office as well as the judicial or other review mechanisms which apply to these processes. Reports should also indicate how the requirement for equal access is met, and whether affirmative</i></p>

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						<p><i>measures have been introduced and, if so, to what extent.</i></p> <p>UN Center for Human Rights, Human Rights and Elections, para. 101: <i>“Provisions of the law shall ensure that an objective, unbiased, independent and effective administrative structure is in place. This entails careful attention to provisions for appointment, remuneration, duties, powers, qualifications and reporting structure of electoral staff. At all levels, staff must be insulated from bias and political pressure.”</i></p> <p>UN Declaration on the Right and Responsibility, art. 11: <i>“Everyone who, as a result of his or her profession, can affect the human dignity, human rights and fundamental freedoms of others should respect those rights and freedoms and comply with relevant national and international standards of occupational and professional conduct or ethics.”</i></p>

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3	17	<p>The operational capacity of the election administration was strained by inadequacy in the central management as well as a shortage of permanent and temporary personnel. While the law confers powers on MECs in various areas of administration and technical preparations of elections, their involvement by the CEC remained limited. Generally, the MECs were assessed as efficient and transparent, largely staffed with well experienced commissioners. However, belated instructions and insufficient guidance from the CEC as well as a lack of field coordination at times impeded their operations. Many MECs deplored the CEC’s disregard to their proposals in regard to the PSC appointment, determination of electoral premises and selection of trainers, missing the opportunity to capitalise on local knowledge and experience. To address the identified issues related to the conduct of the election administration, the authorities could also consider enacting a new legal act on election management bodies, regu-</p>	<p>PRIORITY Delimit and further specify responsibilities of the Central Election Commission, the CEC Secretariat and municipal election commissions to decentralise decision-making of the election administration where appropriate and ensure efficiency and timeliness of its operations.</p>	<p>LGE CEC Regulations</p>	<p>KA</p>	<p>State must take necessary steps to give effect to rights</p> <p>UN Economic and Social Council Principles of Effective Governance for Sustainable Development, E/2018/44-E/C.16/2018/8, Paragraph 31: <i>“Subsidiarity: To promote government that is responsive to the needs and aspirations of all people, central authorities should perform only those tasks which cannot be performed effectively at a more intermediate or local level.”</i></p> <p>CoE Recommendation CM/Rec (2007)7 of the Committee of Ministers to member states on good administration: <i>“good administration is an aspect of good governance; that it is not just concerned with legal arrangements; that it depends on the quality of organization and management; that it</i></p>

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		lating the CEC membership, internal organisation, delimitation of powers, as well as the appointment criteria at all levels of electoral bodies.				<i>must meet the requirements of effectiveness, efficiency and relevance to the needs of society...</i>
4	17	The legislation allows for meaningful representation of eligible political entities in the lowest-level electoral bodies, without providing sufficiently clear criteria for distribution of seats among individual political entities, thus granting the CEC wide discretion in determining the formula of appointment. The initial distribution failed to fully respect the legal criterion of reflecting the last parliamentary election results at the municipal level, to the benefit of some newly running entities, leading to challenges and subsequent revision ordered by ECAP. Despite that, many interlocutors from various political parties expressed discontent regarding the final attribution of seats.	Define clear criteria for the appointment of the polling station committees and counting teams to ensure equitable and broad representation of political entities and local communities.	CEC Regulations	CEC	Good practice Code of Good Practices in Electoral Matters of the Council of Europe Venice Commission, para. II.3.1.e.: <i>“Political parties must be equally represented on electoral commissions or must be able to observe the work of the impartial body. Equality may be construed strictly or on a proportional basis.”</i>
5	18	While the CEC held public sessions and mostly published its decisions on time, access to important information remained limited. Published decisions are not comprehensive, at times annexes are missing	Develop a comprehensive CEC communications strategy and publish all relevant decisions and information	No legal change required	CEC	Transparency and access to information ICCPR, UN HRC General Comment No. 34, para. 19: <i>“To give</i>

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		<p>and session minutes, often missing details on discussed topics, are available only in Albanian language. The CEC website is not very user-friendly or informative, with many pages outdated. Particularly after election day, with technical problems affecting the transmission and tabulation of the election results, the CEC failed to proactively and thoroughly inform the public on the character and impact of the issues on the results management and the overall progress in the process.</p>	<p>of public interest in a timely and inclusive manner.</p>			<p><i>effect to the right of access to information, 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.”</i></p>
VOTER REGISTRATION						
6	21	<p>By law, the voter list shall be publicly available, even outside electoral years, with a foreseen period to challenge the voter registration data prior to elections. During this period, voters can request corrections of inaccuracies and omissions in their registration, reassignment to another voting centre within the municipality of their registration, as well as object any voter’s registration deemed inaccurate or invalid. While the LGE provides for the opportunity to challenge registration of a voter by another voter, in practice, voters had access only to</p>	<p>Regularly update and publish voter registration data, disaggregated by polling station, and enable voters’ access to sufficiently detailed voter registration data, in line with data protection law. Develop a clear and well-regulated mechanism to address identified inaccuracies and</p>	CEC Regulations	CEC	<p style="text-align: center;">Universal suffrage Right and opportunity to vote</p> <p>ICCPR, art. 25: <i>“Every citizen shall have the right and the opportunity... To vote and to be elected at genuine periodic elections which shall be by universal and equal suffrage.”</i></p> <p>Transparency and access to information</p>

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		<p>their personal registration data, limiting possibilities for meaningful scrutiny. The certified electoral contestants and the accredited observers are entitled to receive of a copy of the PVL. However, the EU EOM received reports that stakeholders' notifications to the CEC of outdated records and those of deceased voters at times remained unaddressed. Only overall numbers of voters registered by municipalities and voting centres were publicly available.</p>	<p>respective objections.</p>			<p>ICCPR, UN HRC General Comment No. 34, para. 18: <i>“Article 19, paragraph 2 embraces a right of access to information held by public bodies. Such information includes records held by a public body, regardless of the form in which the information is stored, its source and the date of production.”</i></p> <p>Good practice</p> <p>Code of Good Practices in Electoral Matters of the Council of Europe Venice Commission Para. I.1.2.ii: <i>“There must be regular updates [of electoral registers], at least once a year.”</i> Para. I.1.2.iii: <i>“Electoral registers must be published.”</i></p>

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7	22	<p>The final voter list certified for the 2025 parliamentary elections comprised a total of 2,075,868 voters. Due to migration and displacement, the voter list contains a higher number of records than the 2024 census which sets the resident population of Kosovo at 1,602,515 inhabitants. In the absence of official data on Kosovo diaspora, the Civil Registration Agency estimates that around one million Kosovars live outside Kosovo. While the difference between voter registration and population data can be attributed to the distinct data compilation methodology of those data sets, concerns remain among stakeholders over outdated records as well as records of deceased voters in the voter list, primarily due to shortcomings in civil registration.</p>	<p>PRIORITY Conduct a comprehensive independent audit of the voter list, including through internal analysis of registration processes and statistical and field testing, in consultation with relevant stakeholders to address concerns over accuracy and to increase public confidence.</p>	<p>No legal change required</p>	<p>CEC</p>	<p>Universal suffrage</p> <p>ICCPR, art. 25: “Every citizen shall have the right and the opportunity... To vote and to be elected at genuine periodic elections which shall be by universal and equal suffrage.”</p> <p>State must take necessary steps to give effect to rights</p> <p>ICCPR, art. 2(2): “Where not already provided for by existing legislative or other measures, each State Party to the present Covenant undertakes to take the necessary steps, in accordance with its constitutional processes and with the provisions of the present Covenant, to adopt such laws or other measures as may be necessary to give effect to the rights recognized in the present Covenant.”</p>

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CAMPAIGN ENVIRONMENT						
8	25	Public funding can be provided for election campaigns, of which 90 per cent is allocated based on the number of seats in the Kosovo Assembly, while the remaining 10 per cent is to be allocated proportionally to all recently registered political entities certified by the CEC for the elections and not exceed 0.05 per cent of the annual budget. This provision being not mandatory was never implemented, creating an uneven playing field amongst contestants, especially for small political entities from the non-majority communities.	Make the provision for allocating public funds to all certified political entities mandatory to even the playing field.	The provision should be implemented or made mandatory with amendment of the LFPP	(KA)	<p style="text-align: center;">Equal suffrage</p> <p>2002 Council of Europe’s Venice Commission Code of Good Practice in Electoral Matter</p> <p>(I.2.3.) Equality of opportunity (a.) <i>Equality of opportunity must be guaranteed for parties and candidates alike. This entails a neutral attitude by state authorities, in particular with regard to: i. the election campaign; ii. coverage by the media, in particular by the publicly owned media; iii. public funding of parties and campaigns.</i></p>
9	26	As envisaged by law, the election campaign and code of conduct should be monitored by the relevant authorities. Throughout the entire campaign, the “Office” within the CEC did not monitor campaign activities systematically in all municipalities due to recruitment challenges and institutional incapacity. Monitors were either recruited only for half of the campaign period or not	Ensure the systematic and effective monitoring of the election campaign by introducing adequate terms of reference and recruitment procedures for CEC campaign monitors.	No legal change required	CEC	<p style="text-align: center;">Free suffrage</p> <p style="text-align: center;">Transparency and access to information</p> <p>UNCAC art. 7.3. <i>Each State Party shall also consider taking appropriate legislative and administrative measures, consistent with the objectives of this Convention</i></p>

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		<p>recruited at all, which resulted in a significant portion of the election campaign remaining unmonitored.</p>				<p><i>and in accordance with the fundamental principles of its domestic law, to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties.</i> Art. 7. 4. <i>Each State Party shall, in accordance with the fundamental principles of its domestic law, endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.</i> Paragraph 7.7 of the 1990 OSCE Copenhagen Document: <i>Ensure that law and public policy work to permit political campaigning to 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 and qualifications, or prevents the voters from learning and discussing them or from casting their vote free of fear of retribution.</i></p>

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CAMPAIGN FINANCE						
10	27	<p>The LGE modifies campaign disclosure requirements by prescribing a starting point of 90 days before the election for the relevant income and expenses of political entities participating in the election to be disclosed. The deadline for reporting campaign income and expenditure by political entities is set 30 calendar days after the certification of the results. There is no requirement in the law for interim reporting of the income and expenditure of contestants during the campaign period and individual candidates and financing of the campaign by third parties remains unregulated limiting the possibility of public scrutiny prior to election day.</p>	<p>Introduce interim reporting and disclosure of the income of contestants during the campaign period. Final reporting should include income and expenses of individual candidates and entities campaigning for contestants (third parties).</p>	<p>LGE, Law on Financing of Political Parties</p>	<p>KA</p>	<p>Transparency and access to information</p> <p>Council of Europe, Committee of Ministers Recommendation (2003)4, art. 13: <i>“States should require political parties to present the accounts [...]regularly, and at least annually, to the independent authority[...]States should require political parties regularly, and at least annually, to make public the accounts[.]or as a minimum a summary of those account.”</i></p> <p>Paragraph 256 of the 2020 Venice Commission and ODIHR Guidelines on Political Party Regulation: <i>“[...] it is important that some forms of regulation, with comparable obligations and restrictions as apply to parties and candidates, be extended to third parties that are involved in</i></p>

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						<p><i>the campaign, to ensure transparency and accountability. Third parties should be subjected to similar rules on donations and spending as political parties to avoid situations where third parties can be used to circumvent campaign finance regulations.”</i></p> <p>Prevention of corruption / fairness in the election campaign</p> <p>ICCPR, art.25. ICCPR, HRC GC 25, para. 20: “...This implies that voters should be protected [...] from any unlawful or arbitrary interference.”</p> <p>United Nations Convention against Corruption (UNCAC), art. 6.2: “Each State Party shall grant the body or bodies [...]the necessary independence [...] to enable the body or bodies to carry out its or their functions effec-</p>

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						<p><i>tively and free from any undue influence. The necessary material resources and specialized staff, as well as the training that such staff may require to carry out their functions, should be provided.”</i></p> <p>UNCAC, article 7(3): “<i>Each State Party shall also consider taking appropriate legislative and administrative measures, consistent with the objectives of this Convention and in accordance with the fundamental principles of its domestic law, to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties.</i>”</p> <p>UNCAC, art.7(4): “<i>Each State Party shall, [...] adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interest.</i>”</p>

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ELECTION DISPUTES						
11	28	<p>During the campaign some 400 complaints were filed with ECAP for breaches of the code of conduct during the campaign resulting in substantial fines imposed on political entities, especially for repeated violations, totalling some €642,000. Breaches related mainly to placing campaign material in public places, incitement to hatred and hate speech, misuse of public office and resources, and using children for campaigning. Most cases were brought by LVV, followed by PDK and LDK, while the majority were filed against LVV, LDK and PDK. In some cases, political entities were fined more than once for the same breach for failing to remedy it in the absence of a relevant ECAP order. In other cases where entities took remedial action during the proceedings the panel considered this a mitigating factor lowering the relevant fine. Fines were also imposed on political entities for breaches of the code of conduct by alleged supporters. The criteria establishing the amounts of fines imposed were not always clear to the</p>	<p>PRIORITY Introduce clear legal definitions of key terms, including those related to inflammatory language and the designation of a ‘political entity supporter’ within the electoral process. Establish explicit criteria for determining proportional fines applicable to breaches of the Code of Conduct by political entities.</p>	<p>CEC Regulations ECAP Regulation No 01/2024 LGE</p>	<p>CEC ECAP KA</p>	<p>Rule of law Right to an effective remedy</p> <p>UDHR, art.8: “Everyone has the right to an effective remedy [...]”.</p> <p>ICCPR, art.2(2): “[...] to adopt such laws or other measures as may be necessary to give effect to the rights [...]”.</p> <p>ICCPR, art.19(2): “[...] freedom to see, receive and impart information [...]”.</p> <p>ICCPR, art.2(3)(a) 3: “Each State Party [...] undertakes to ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy.”</p>

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		<p>contestants, who in some cases complained about biased treatment by ECAP.</p>				
12	29	<p>Lower fines under €5,000 imposed on smaller political entities with fewer resources were not appealable, depriving them from effective remedy. [...]</p> <p>The law offers clear timelines and well-articulated steps for processing electoral disputes. Yet, to ensure legal certainty and it could benefit from further clarity, particularly with regards to definition and interpretation of certain breaches, criteria for determining the amounts of fines imposed and expanding the right to appeal to CEC decisions not explicitly provided for in the LGE.</p>	<p>Allow for all CEC decisions or actions to be challenged within the electoral process and all ECAP decisions to be appealed to the Supreme Court.</p>	<p>LGE CEC Rules of Procedure ECAP Regulation No 01/2024</p>	<p>KA CEC</p>	<p>Rule of law Right to an effective remedy</p> <p>UDHR, art.8: “Everyone has the right to an effective remedy [...]”.</p> <p>ICCPR, art.2(2): “[...] to adopt such laws or other measures as may be necessary to give effect to the rights [...]”.</p> <p>ICCPR, art.19(2): “[...] freedom to see, receive and impart information [...]”.</p> <p>ICCPR, art.2(3)(a) 3: “Each State Party [...] undertakes to ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy.”</p>

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MEDIA						
13	30	<p>The public broadcaster RTK has faced political and institutional challenges over the years, including concerns over its independence. In 2023 and 2024 a controversy regarding a publication of an article alleged that certain Albanian language media outlets were funded by Serbia, led to RTK leadership resignations. While RTK managed to change its rules regarding the appointment of a new director general who oversees operations, the RTK board lacks quorum, with only four of 11 members remaining. RTK’s governing body is reliant on the Kosovo Assembly’s timing and susceptible to political influence of the governing party when electing its board members with a simple majority and allocating its budget on a yearly basis.</p>	<p>Ensure the financial sustainability, growth and independence of the public broadcaster, allocate its budget according to law, and elect its board members by the Kosovo Assembly in a timely manner.</p>	<p>No legal change required</p>	<p>KA</p>	<p>Freedom of opinion and expression Rule of law</p> <p>ICCPR, art. 19, General Comment 34, para. 16: <i>“States parties should ensure that public broadcasting services operate in an independent manner. Actions to ensure independence may include the setting out of the mandate of such broadcasters in law and the provision of legislative guarantees of independence and editorial freedom, as well as the provision of funding in a manner that does not undermine independence.”</i></p> <p>Council of Europe, Committee of Ministers Recommendation (2012)1, art. 26.: <i>“...- the public service media is consulted over the level of funding required to meet their mission and purposes, and their views are taken into account when setting the level of funding.”</i></p>

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						<i>The funding provided is adequate to meet the agreed role and remit of the public service media, including offering sufficient security for the future as to allow reasonable future planning.</i>
14	30	The public broadcaster mandated to broadcast in Albanian, Serbian and in other non-majority languages is operating on limited financial resources, especially its mainly Serbian language TV channel, RTK2. The TV station has been forced to reduce its quality programming, its viewership is low, resulting in political contestants' reluctance to engage with the TV channel's election-related content. The other five private Serbian language TV channels also operate with limited coverage, leaving non-majority Serb parties without an effective broadcast TV channel for campaigning.	Strengthen the public broadcaster's TV and radio stations to efficiently serve all non-majority communities. Provide financial, technical and capacity-building support to ensure high-quality public service broadcasting with diverse content in Serbian and non-majority languages.	Amend the Law on RTK	KA	<p>Freedom of opinion and expression</p> <p>Fairness in the election campaign</p> <p>Council of Europe, Committee of Ministers Recommendation (2018)1, art. 2.6: <i>"States should make particular efforts, taking advantage of technological developments, to ensure that the broadcast possible diversity of the media content, including general interest content, is accessible to all groups of society, particularly which may have specific needs or face disadvantage or obstacles when accessing media content, such as minority groups, refugees, children, the elderly and persons with cognitive or</i></p>

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						<p><i>physical disabilities.”</i> OSCE Tallin Guidelines on National Minorities and the Media in the Digital Age, 2019, art. I.2: <i>States should take all appropriate measures to fulfil their positive obligation to create an enabling environment for robust, pluralistic public debate in which everyone, including persons belonging to national minorities, can participate effectively and express their opinions, ideas and identities without fear.</i></p>
15	32	<p>The IMC board has been unable to fulfil its legal obligations and issue sanctions due to lack of quorum in its decision-making board during the election campaign. Media outlets in breach of laws and regulations must wait for a prolonged period of time after the elections to learn about potential sanctions.</p>	<p>PRIORITY Appoint all members of the IMC in a timely manner and through a competitive and transparent selection process.</p>	<p>No legal change required</p>	<p>KA</p>	<p>Rule of law</p> <p>Council of Europe, Committee of Ministers Recommendation (2000)23 art. I.1.: <i>“Member states should ensure the establishment and unimpeded functioning of regulatory authorities for the broadcasting sector by devising and appropriate legislative framework for this purpose. The rules and procedures governing or affecting the</i></p>

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						<p><i>functioning of regulatory authorities should clearly affirm and protect their independence.”</i></p> <p>Directive (EU) 2018/1808 of the European Parliament and of the Council, Article 30(4) <i>Member states shall ensure that national regulatory authorities or bodies have adequate financial and human resources and enforcement powers to carry out their functions effectively and to contribute to the work of ERGA.”</i></p>
SOCIAL MEDIA						
16	36	Krypometër and Hybrid.info, two Kosovo Albanian organisations, conduct fact-checking programmes, with support from EU and other international donors. While they debunk social media content and articles coming from both Albanian and Serbian sources, they publish only in Albanian. [...] Alternativna, a Mitrovica North-based Serbian news outlet, also conducts occasional fact checking for news in Serbian.	Develop a coordinated effort among media outlets, civil society and tech companies to reinforce the existing factchecking initiatives, increase their reach by publishing their content in non-majority languages and ensure their sustainability.	No legal change required	Media, CSOs, private sector, IMC	<p>Right of access to information</p> <p>ICCPR GC 25, para. 19: <i>“Persons entitled to vote must be free to vote for any candidate for election [...] and free to support or to oppose government, without undue influence or coercion of any kind which may distort or inhibit the free expression of the elector’s will. Voters should be able to form opinions independently,</i></p>

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						<p><i>free of [...] inducement or manipulative interference of any kind.”</i></p> <p>Fairness in the electoral campaign</p> <p>ICCPR, GC 25, para. 19: “<i>Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind.</i>”</p> <p>UN, OAS, OSCE Joint Declaration on Freedom of Expression and Fake News, Disinformation and Propaganda, art. 3.e: “<i>States should take measures to promote media and digital literacy, including by covering these topics as part of the regular school curriculum and by engaging with civil society and other stakeholders to raise awareness about these issues.</i>”</p> <p>Art. 3.f: “<i>States should consider other measures to promote equality (...), including with a view to</i></p>

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						<i>addressing the negative effects of disinformation and propaganda.”</i>
PARTICIPATION OF WOMEN						
17	38	<p>Women will comprise 37.5 per cent of the next Kosovo Assembly and a large majority of them were elected without the application of the gender quota. However, political parties are still dominated by men, and they have not sufficiently addressed gender inequality in their governing bodies – as mandated by the Law on Gender Equality. Men also had a dominant presence during the campaign period, representing a significant majority of speakers at campaign events and televised debates. Despite provisions in the LGE encouraging greater gender balance in the election administration, women comprise less than 30 per cent of the membership at the central and local level.</p>	<p>Enhance the representation of women in elected institutions and election administration by putting in place robust strategies for the recruitment and promotion of women within parties’ governing structures and in candidate lists.</p>	<p>No legal change required</p>	<p>Political parties</p>	<p>Women’s participation in public affairs Rule of law</p> <p>ICCPR, art.3: <i>“The States Parties to the present Covenant undertake to ensure the equal right of men and women to the enjoyment of all civil and political rights set forth in the present Covenant.”</i></p> <p>Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), art 4, para.1: <i>“Adoption by States Parties of temporary special measures aimed at accelerating de facto equality between men and women shall not be considered discrimination.”</i></p> <p>CEDAW, General Recommendation 23, para. 22: <i>“The system of balloting, the distribution of seats</i></p>

NO.	FR page #	CONTEXT	RECOMMENDATION	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE INSTITUTION	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
						<i>in Parliament, the choice of district, all have a significant impact on the proportion of women elected to Parliament. Political parties must embrace the principles of equal opportunity and democracy and endeavour to balance the number of male and female candidates.”</i>
PARTICIPATION OF PERSONS WITH DISABILITIES						
18	41	The participation of persons with disabilities in the electoral process faced challenges due to a lack of access to voting centres and assistive tools, as well as the inconsistent application of new provisions regarding assisted voting. In addition, organisations of persons with disabilities reported a lack of consultation from the CEC and MECs in terms of voter education campaigns and the registration of voters with special needs.	Improve access to voting centres and assistive tools to enable persons with disabilities to vote independently on an equal basis with others. Build collaborative relationships with organisations of persons with disabilities to adapt voter education initiatives to different categories of persons with disabilities.	No legal change required	Central authorities Municipal authorities CEC	Right and opportunity to vote ICCPR, art. 25: <i>“Every citizen shall have the right and the opportunity, without any of the distinctions mentioned in article 2 and without unreasonable restrictions: ... b) To vote and to be elected at genuine periodic elections which shall be by universal and equal suffrage and shall be held by secret ballot, guaranteeing the free expression of the will of the electors”.</i> CRPD, art. 29: <i>“States Parties shall guarantee to persons with</i>

NO.	FR page #	CONTEXT	RECOMMENDATION	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE INSTITUTION	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
						<p><i>disabilities political rights and the opportunity to enjoy them on an equal basis with others.”</i> CRPD, art. 9: “To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.”</p>
VOTING, COUNTING AND TABULATION OF RESULTS						
19	46	On election night, the CEC experienced serious technical problems with the newly introduced digital platform for results management and its IT systems were unavailable for an extended period, impacting the tabulation and publication of preliminary results	PRIORITY: Establish a reliable and transparent results management system with clear and verifiable procedures to ensure accurate processing	No legal change required	CEC	<p>Transparency and access to information</p> <p>ICCPR, UN HRC General Comment No. 34: Para. 18: “Article 19, paragraph 2</p>

NO.	FR page #	CONTEXT	RECOMMENDATION	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE INSTITUTION	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
		<p>and the intake of election materials at municipal counting centres. Persistent technical problems and instability of the software led to postponement of the counting of the preferential votes and impacted on the operations at the MCCs. As a consequence, the website for publishing preliminary results became unavailable shortly after the closure of the polls. Further, inaccuracies and omissions in data transmitted were noted. To overcome the technical problems, the CEC launched a new website later in the process, displaying different data sets due to corrections made after the verification of results and counting at the MCCs, potentially leading to public confusion. Moreover, the published results data did not include all important pieces of information, such as number of invalid votes.</p>	<p>of the results data. Ensure prompt access to the preliminary results, including all relevant data such as voter turnout, valid and invalid votes as well as scanned results forms per polling station.</p>			<p><i>embraces a right of access to information held by public bodies. Such information includes records held by a public body, regardless of the form in which the information is stored, its source and the date of production.”</i></p> <p>Para. 19: <i>“To give effect to the right of access to information, 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.”</i></p> <p style="text-align: center;">Good practice</p> <p>CoE Committee of Ministers’ Guidelines on the use of information and communication technology (ICT) in electoral processes, art. 5: <i>“ICT solutions should be available and reliable.</i></p>

NO.	FR page #	CONTEXT	RECOMMENDATION	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE INSTITUTION	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
						<p><i>An ICT solution should be functional, in line with the requirements and assumptions even in the event of a system failure or errors by users or others, or in case of attacks. Furthermore, the ICT solution should be reliable. It should retain its functionality, irrespective of shortcomings in the hardware or software in other parts of the electoral process.”</i></p>

XXII. ANNEX 1 – ELECTION RESULTS⁹⁷

Total number of registered voters	2,075,868
<i>Total number of voters registered for postal voting</i>	84,508* (84,600)
<i>Total number of voters registered for OoK in-person voting</i>	20,416* (20,324)
Total number of voters who voted	966,283
Total number of valid votes (accepted ballots)	938,010
Total number of invalid votes (including blank ballots)	27,433

* At the time of the official certification of the final voter list on 4 January 2025. Numbers in brackets indicate voters who were entitled to use either of the OoK voting method following the cancellation of some voting centres abroad.

Candidate list (in order of appearance on the ballot)	Votes	Percentage	Mandates
New Democratic Initiative of Kosovo (IRDK)	4,688	0.50	1
<i>Srpska Lista (SL)</i>	39,915	4.26	9
United Gorani Party (JGP)	1,734	0.18	1
United Roma Party of Kosovo (PREBK)	1,350	0.14	1
Egyptian Liberal Party (PLE)	3,251	0.35	1
Serbian Democracy (SD)	3,271	0.35	--
Albanian National Democratic Front Party (PBKDSH)	621	0.07	--
<i>Lëvizja Vetëvendosje! (LVV)</i>	396,787	42.30	48
New Democratic Party (NDS)	4,158	0.44	1
Party of Kosovo Serbs (PKS)	462	0.05	--
Our Bosniak Coalition (Our Initiative and Bosniak Party)	1,553	0.17	--
Kosovo Justice Turkish Party (KATP)	642	0.07	--
Ashkali Party for Integration (PAI)	2,196	0.23	1
Democratic League of Kosovo (LDK)	171,357	18.27	20
Democratic Party of Kosovo Ashkali – Movement for Co-operation (PDAK-LpB)	2,056	0.22	--
Citizen Initiative National Justice (GI NP)	620	0.07	--
Social Democratic Union (SDU)	3,042	0.32	1
Fatmir Bytyqi	191	0.02	--
Coalition for Family	20,023	2.13	--
Innovative Turkish Movement Party (YTHP)	1,800	0.19	--
Democratic Party of Kosovo (PDK)	196,474	20.95	24
For Freedom Justice and Survival (SPO)	4,139	0.44	1
Serbian National Movement (SNP)	1,846	0.20	--
Turkish Democratic Party of Kosovo (KDTP)	4,824	0.51	2
Coalition <i>Vakat</i>	3,471	0.37	1
<i>Opre Roma Kosova (ORK)</i>	384	0.04	--
Alliance for the Future of Kosovo – Social Democratic Initiative (AAK-NISMA)	66,256	7.06	8
<i>FJALA</i>	899	0.10	--

⁹⁷ Based on [statistics provided by the CEC](#) and the [CEC decision no. 01-727/2025](#) adopted on 15 March 2025.

XXIII. ANNEX 2 – MEDIA MONITORING RESULTS

The EU EOM monitored a sample of national broadcast media during the 30-day election campaign. The media monitoring included quantitative and qualitative monitoring of five TV stations, and qualitative monitoring of selected online media outlets to assess the media coverage of the campaign and other political issues, assessing the time and tone allocated to candidates, political parties, public officials, government ministers and other politically relevant subjects. The gender balance across the monitored media was also evaluated. This contributed to the EU EOM's assessment of female participation in political life.

The monitoring also tracked voter education by the CEC in the media. All monitored TV coverage broadcast in Albanian language, while online media was monitored qualitatively in Serbian language.

The monitoring sample for audio-visual media included the main state broadcaster and four private TV channels with nearly nationwide reach:

Five TV channels (quantitative monitoring)

- **RTK1** – Main public TV channel (national terrestrial coverage, Albanian language)
- **T7** – Private TV channel (cable TV with national coverage, Albanian language)
- **TV DUKAGJINI** - Private TV channel (cable TV with national coverage, Albanian language)
- **KLAN KOSOVA** - Private TV channel (cable TV with national coverage, Albanian language)
- **ATV** - Private TV channel, (cable TV with national coverage, Albanian language)

1. The TV channels were quantitatively monitored from 11 January to 8 February in prime-time, every day from 18:00 to 24:00 hours. On 9 February, election day, the media was qualitatively monitored for observing campaign silence, as well as during the counting period.

2. Total time allocated to political communication in national broadcast media's prime-time programming

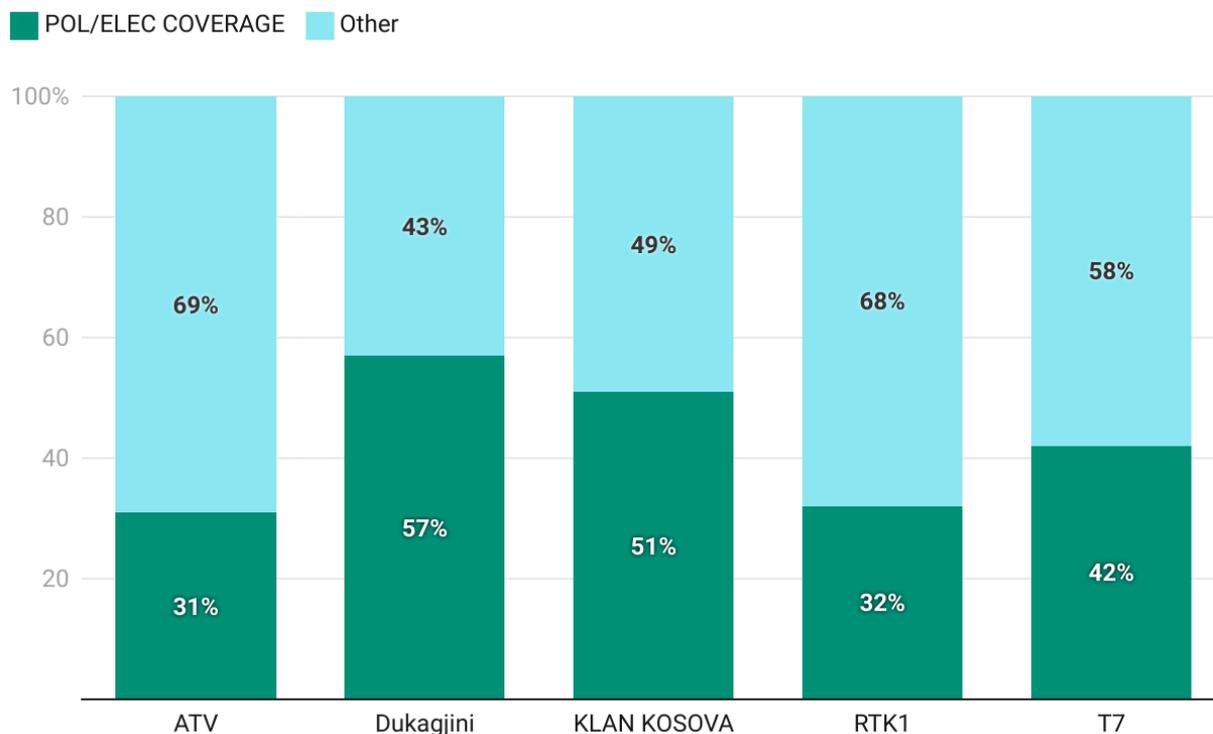
During the 29-day-long monitoring period, the EU EOM monitored a total of 870 hours of broadcast and coded TV broadcasts totalling 371 hours, 28 minutes, and 16 seconds.

How to read the charts: The bar/column/pie charts show the distribution of airtime (in percentage) allocated to political parties by each media outlet, as well as the tone of coverage (negative, neutral, positive) allocated by the media to contestants, with base airtime in the relevant categories.

Chart 1 – demonstrates the share of political and electoral content on broadcast media, coded by the Media Monitoring Unit (MMU).

Volume of political and electoral coverage

11 January till 9 February 18:00 - 24:00



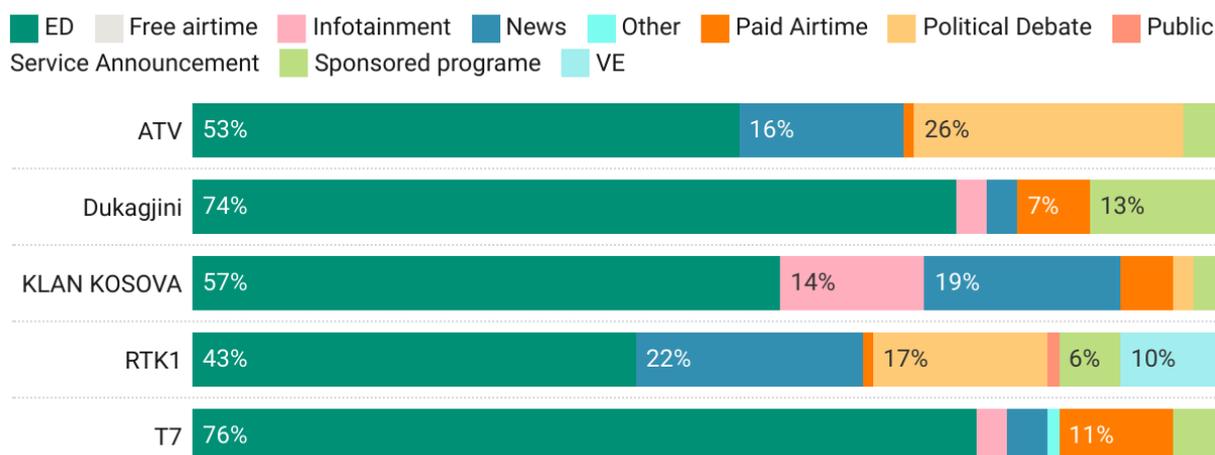
Base Airtime: ATV 53:41:08, Dukagjini 99:43:39, KLAN KOSOVA 89:21:29, RTK1 55:10:55, T7 73:31:05 (Base Airtime - The total amount of television broadcast time coded for each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 2 – shows the programme formats used in political communication. Most TV channels used Editorial programmes, (ED) that includes talk shows and interviews with political actors. Political debates included programmes organised with more than one political party. Only the public broadcaster carried CEC-produced voter education.

Share of political and electoral coverage by format

11 January till 9 February 18:00 - 24:00



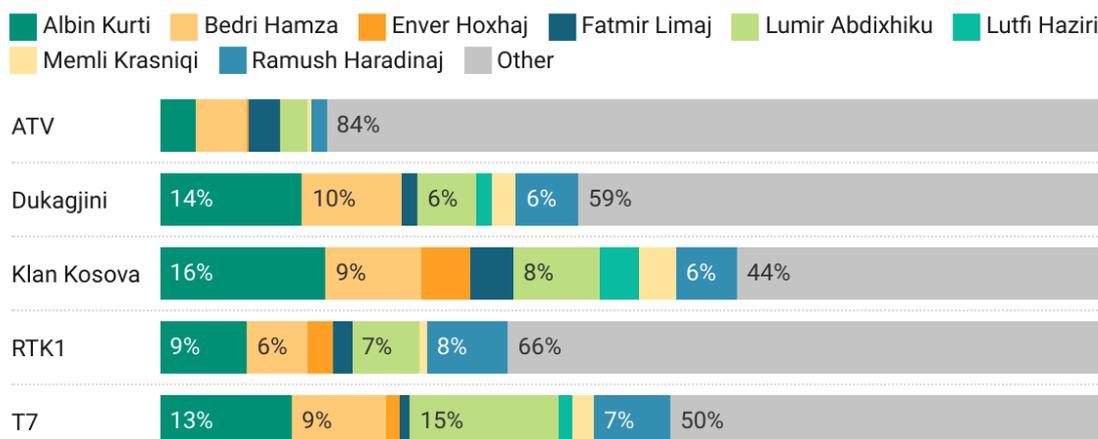
Base Airtime: ATV 53:41:08, Dukagjini 99:43:39, KLAN KOSOVA 89:21:29, RTK1 55:10:55, T7 73:31:05 (Base Airtime - The total amount of television broadcast time coded for each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 3 – shows the proportional distribution of airtime in all programmes among all candidates during the campaign.

Share of airtime allocated to all candidates

11 January till 9 February 18:00 - 24:00



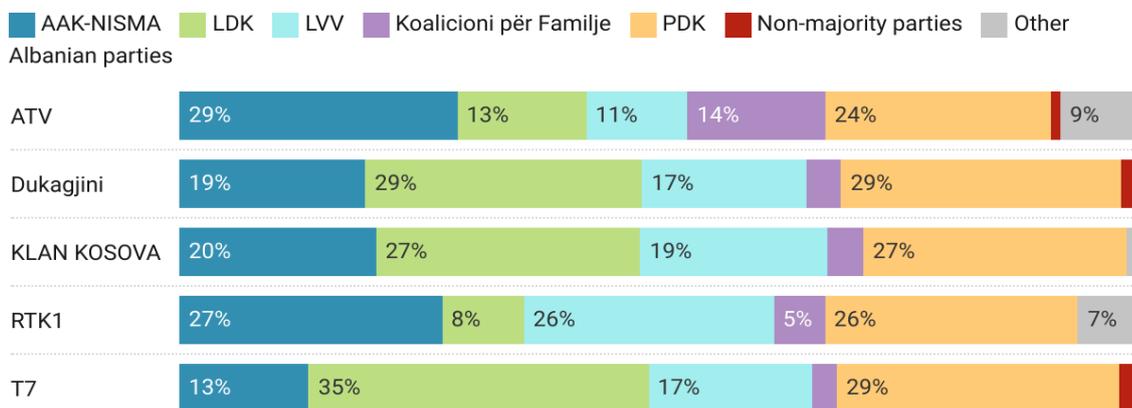
Base Airtime: ATV 46:31:07, Dukagjini 80:07:46, KLAN KOSOVA 80:32:48, RTK1 40:53:53, T7 61:42:17 (Base Airtime - The total amount of television broadcast time allocated to each individual candidate on each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 4 – shows the share of airtime allocated to main Albanian political parties, other Albanian political parties, and the non-majority community parties; such as Serbian, Turkish, Egyptian, Roma, Ashkali and Gorani parties in all programmes.

Share of airtime allocated to all parties

11 January till 9 February 18:00 - 24:00



Base Airtime: ATV 48:13:00, Dukagjini 96:35:45, KLAN KOSOVA 85:27:03, RTK1 46:41:00, T7 71:59:04 (Base Airtime - The total amount of television broadcast time allocated to each political party on each channel)

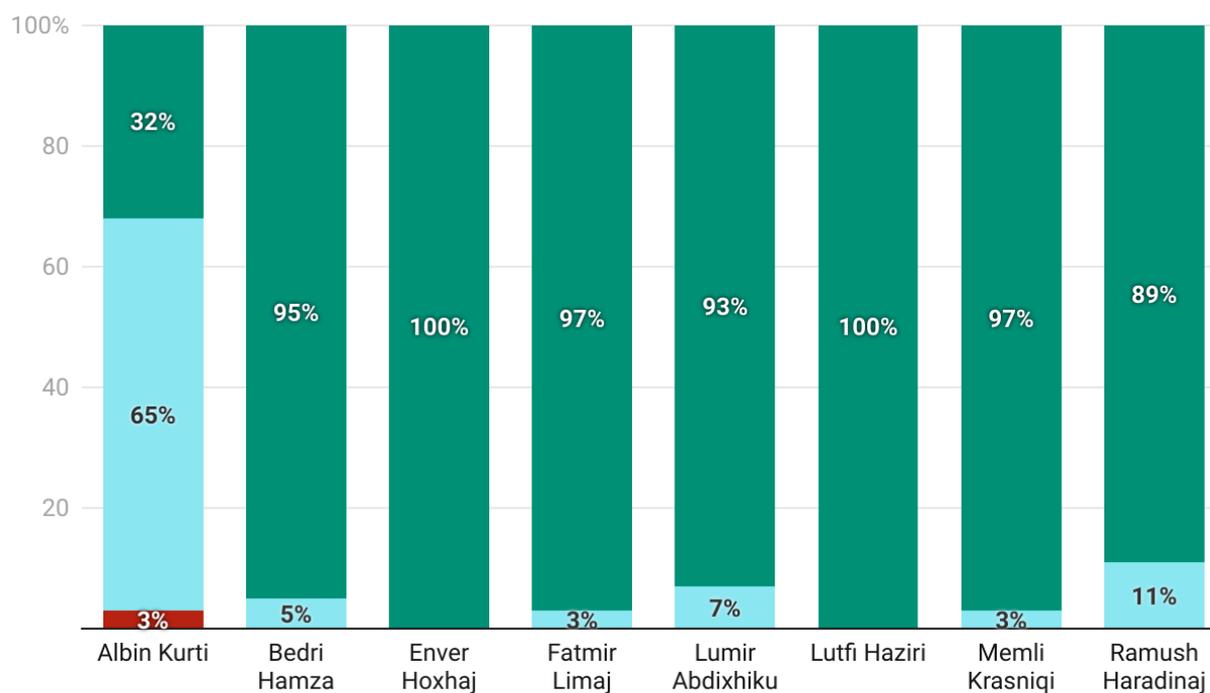
Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 5 – shows the tone of coverage allocated by the media for the most featured candidates within prime-time programming.

Tone of coverage

11 January till 9 February 18:00 - 24:00

■ Negative ■ Neutral ■ Positive



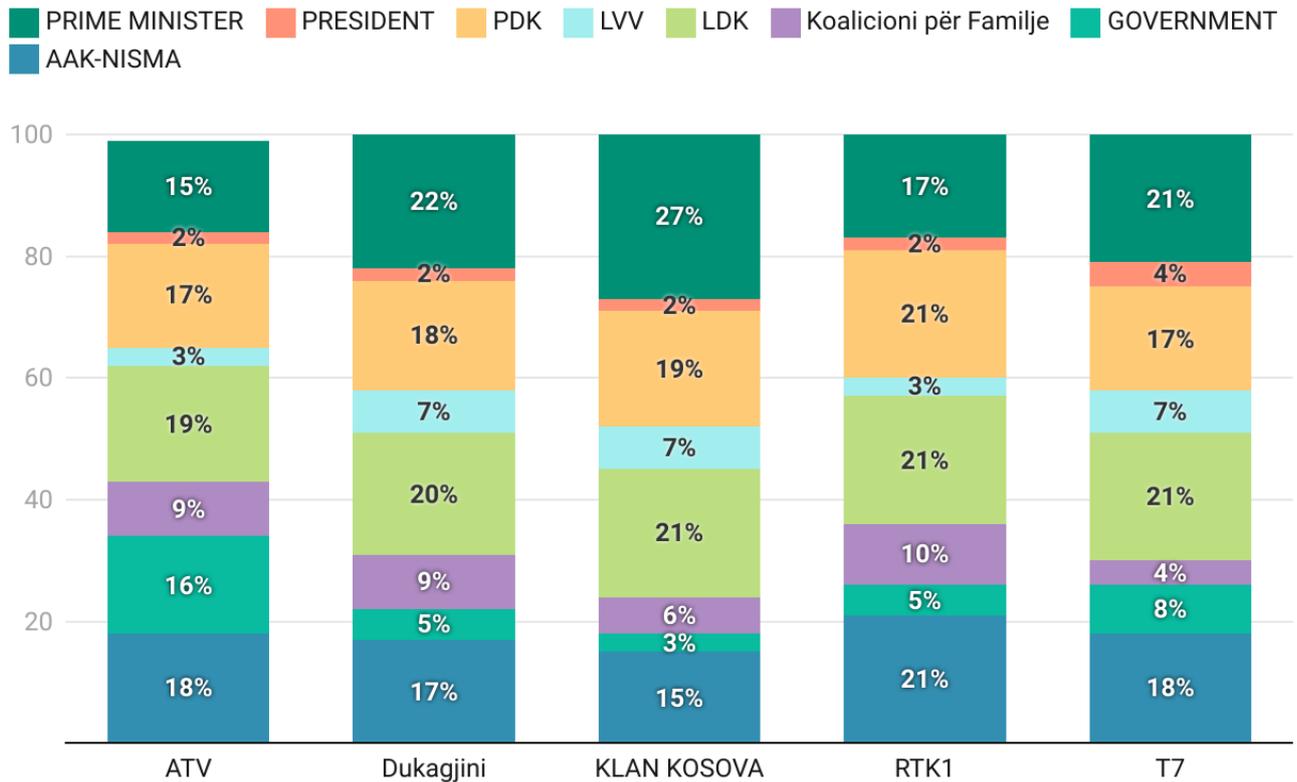
Base Airtime: Albin Kurti 37:20:08, Bedri Hamza 25:38:31, Lumir Abdixhiku 24:07:40, Ramush Haradinaj 18:10:27, Fatmir Limaj 07:30:17, Memli Krasniqi 06:39:14, Enver Hoxhaj 05:41:11, Lutfi Haziri 05:14:38 (Base Airtime - The total amount of television broadcast time allocated to most featured candidates within prime-time programming on each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 6 - shows the proportional distribution of news airtime among main political actors. These include the main political parties, the President, the Prime Minister and the government ministers. Other political parties were featured in less than two percent of the airtime in news coverage.

Share of the news coverage by political actors

11 January till 9 February 18:00 - 24:00



Base Airtime: ATV 08:05:24, Dukagjini 03:05:10, KLAN KOSOVA 16:36:28, RTK1 12:09:18, T7 02:46:22 (Base Airtime - The total amount of NEWS broadcast time allocated to the most featured political actors on each channel)

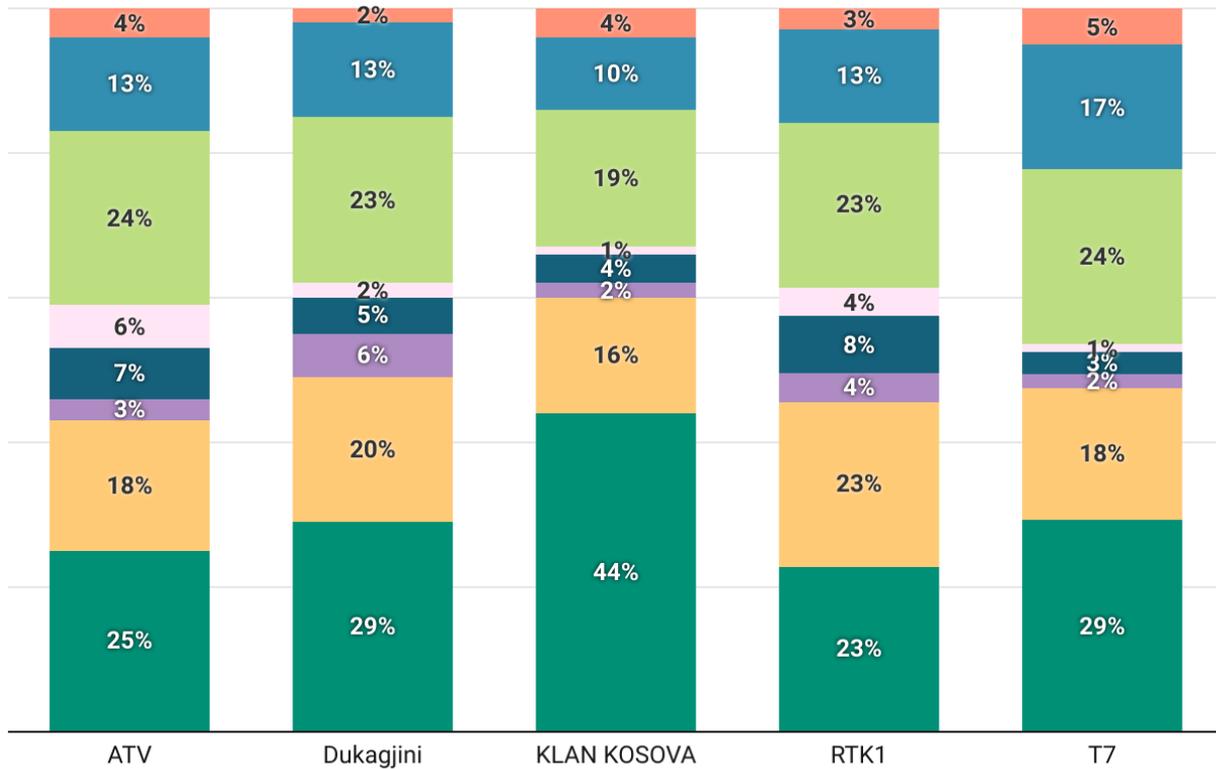
Chart: EU EOM Kosovo 2025 · Created with Datawrapper

Chart 7 – displays the share of news coverage for the president and candidates as they were featured in prime-time news.

Share of the news coverage by president and candidates

11 January till 9 February 18:00 - 24:00

■ Vjosa Osmani (Pres)
 ■ Ramush Haradinaj
 ■ Lumir Abdixhiku
 ■ Ferid Agani
 ■ Fatmir Limaj
■ Eman Rrahmani
 ■ Bedri Hamza
 ■ Albin Kurti



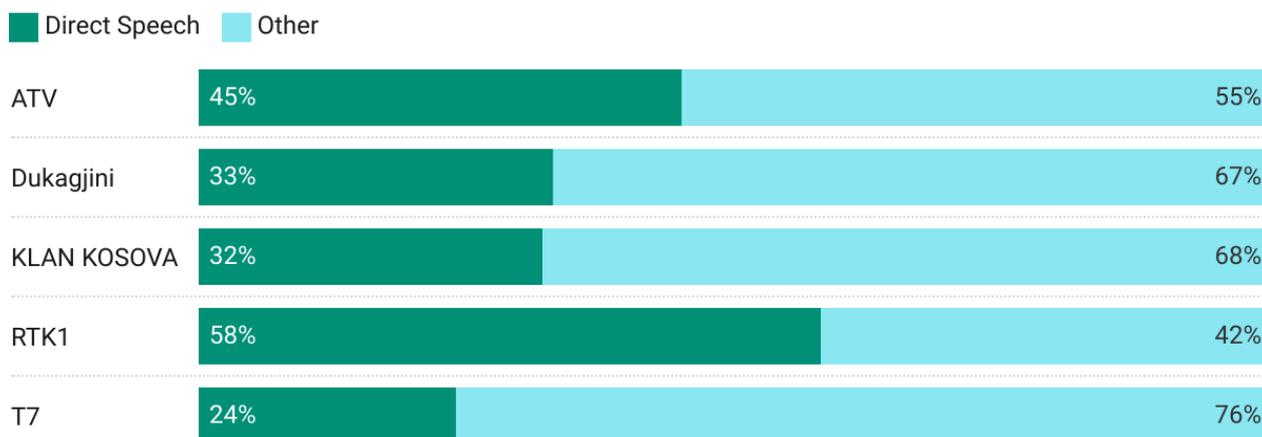
Base Airtime: ATV 04:52:44, Dukagjini 02:18:52, KLAN KOSOVA 10:15:11, RTK1 09:09:03, T7 02:00:38 (Base Airtime - The total amount of NEWS broadcast time allocated to the most featured individual political actors on each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 8 – details the share of direct speech of the candidates during newscasts on TV channels. Only RTK1 allocated more than half of its news coverage to direct quotes for various political actors, while journalistic commentary dominated the news on private TV channels.

Share of direct speech of the actors in the news coverage

11 January till 9 February 18:00 - 24:00



Base Airtime: ATV 08:32:51, Dukagjini 03:21:25, KLAN KOSOVA 17:14:12, RTK1 12:37:49, T7 03:02:21 (Base Airtime: The total amount of NEWS broadcast time on each channel)

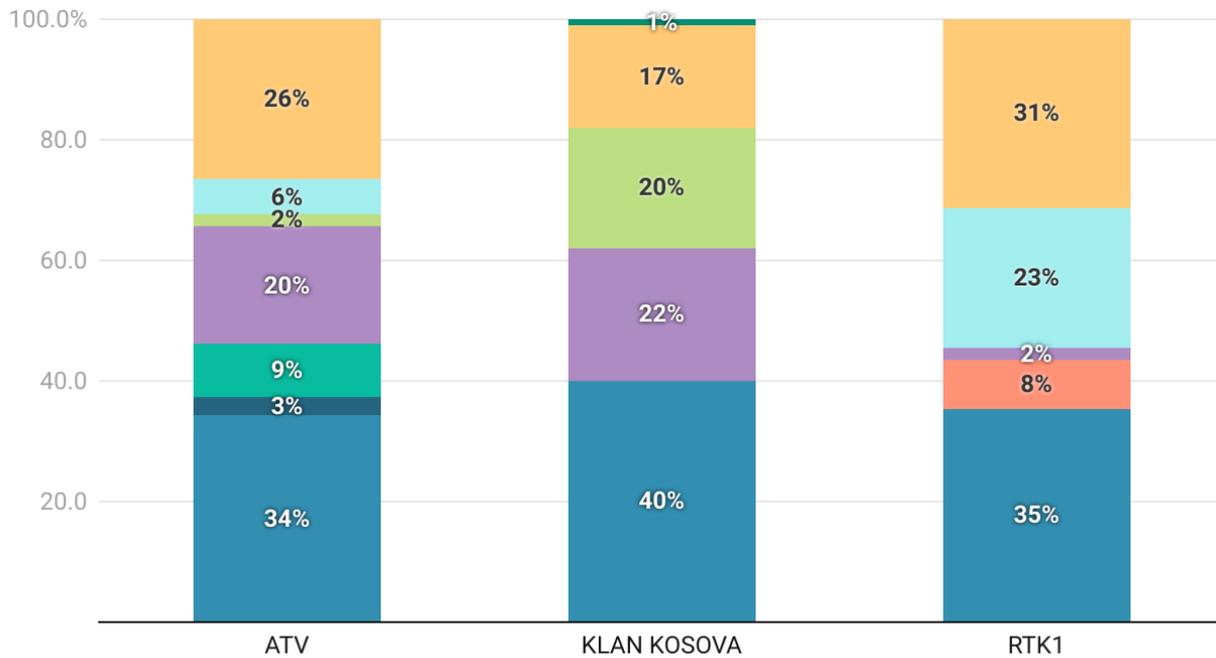
Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 9 - Political debates, where more than one party or party representative participated, were organised in three TV channels. The chart below shows the proportional distribution of time allocated to various political actors, who either participated in the debates, or were mentioned during the debate.

Political debates

11 January till 9 February 18:00 - 24:00

■ AAK-NISMA
 ■ FJALA
 ■ GOVERNMENT
 ■ Guxo
 ■ Koalicioni për Familje
 ■ LDK
 ■ LVV
 ■ PDK
 ■ PRIME MINISTER



Base Airtime: ATV 14:11:53, KLAN KOSOVA 1:20:45, RTK1 9:13:53 (Base Airtime - The total amount POLITICAL DEBATE broadcast time allocated to political actors on each channel)

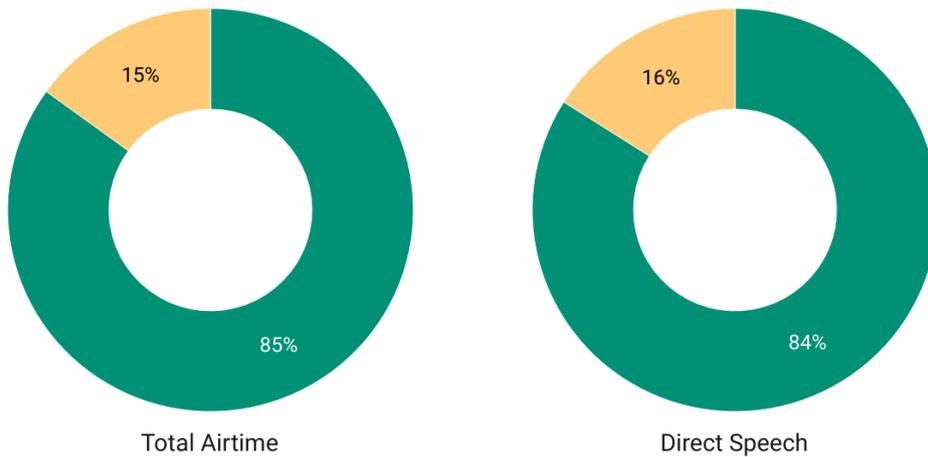
Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 10 - shows the total airtime allocated to female politicians across all monitored TV stations in prime-time broadcast during the campaign.

Actors coverage by gender

11 January till 9 February 18:00 - 24:00

Male Female



Airtime Base: 316:00:10, Direct Speech Base: 228:06:37 (Base Airtime - The total amount of television broadcast time allocated to individual political actors)

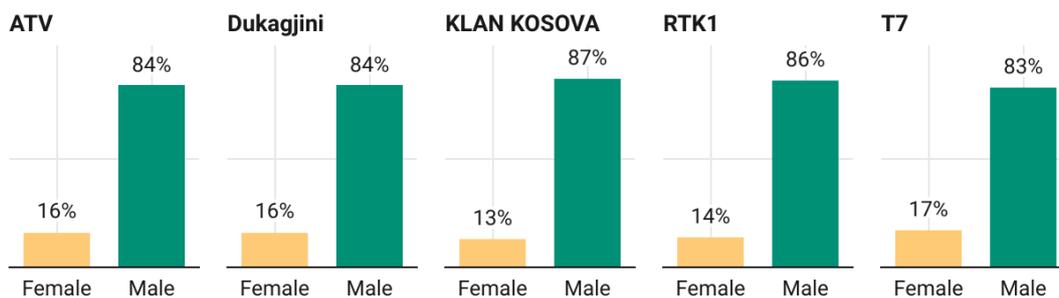
Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 11 - illustrates the total airtime allocated to female and male actors on each TV channel.

Actors coverage by gender

11 January till 9 February 18:00 - 24:00

Female Male



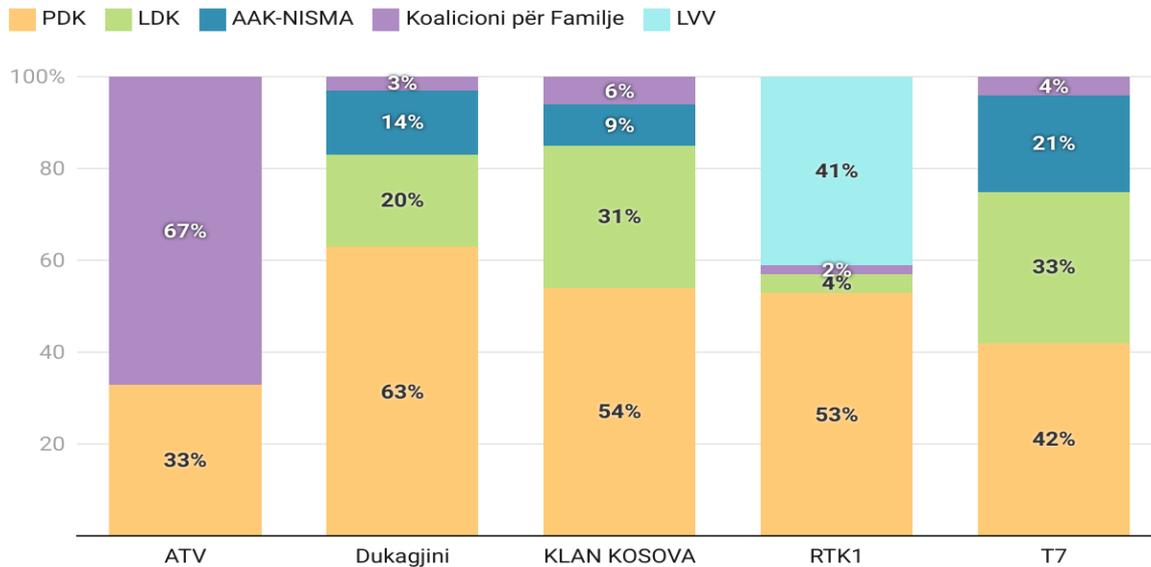
Base Airtime: ATV 48:03:56, Dukagjini 81:13:16, KLAN KOSOVA 81:26:19, RTK1 42:13:52, T7 63:02:47 (Base Airtime - The total amount of broadcast time allocated to individual political actors on each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 12 - shows the distribution of paid airtime by political parties. Paid airtime includes political advertising, short videos, and brief paid broadcast segments of campaign coverage.

Paid airtime

11 January till 9 February 18:00 - 24:00



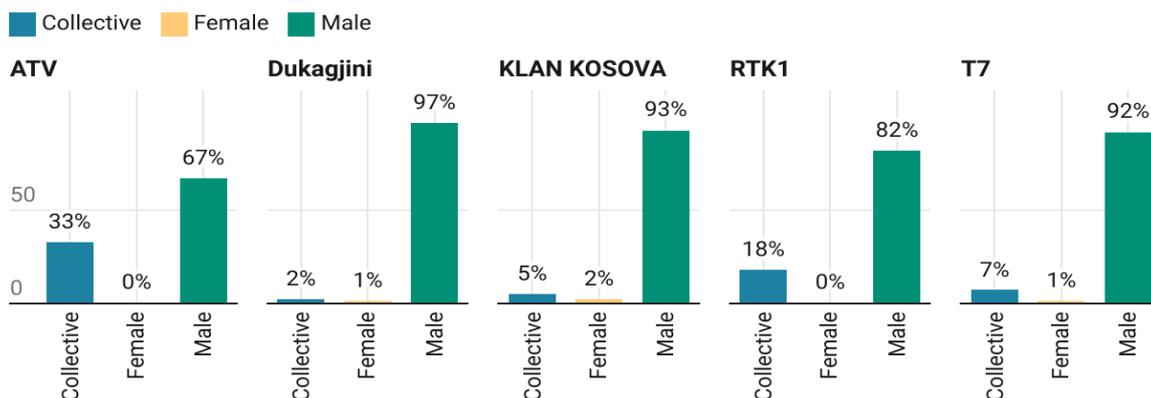
Base Airtime: ATV 00:16:04, Dukagjini 06:58:37, KLAN KOSOVA 04:50:18, RTK1 00:22:18, T7 07:57:42 (Base Airtime - The total amount of PAID AIRTIME broadcast time allocated to political actors on each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 13 - shows the distribution of paid airtime by male and female candidates, as well as political parties, (referred to as Collective) in all programmes.

Paid airtime by gender

11 January till 9 February 18:00 - 24:00



Base Airtime: ATV 00:16:04, Dukagjini 06:58:37, KLAN KOSOVA 04:50:18, RTK1 00:22:18, T7 07:57:42 (Base Airtime - The total amount of PAID AIRTIME broadcast time allocated to political actors on each channel)

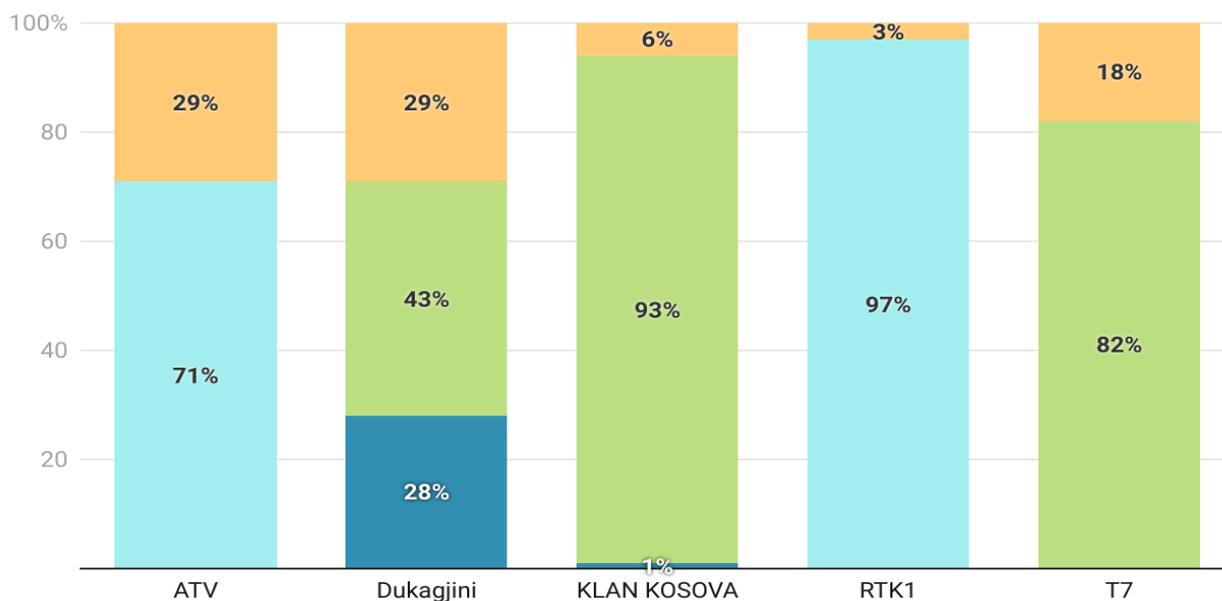
Chart: EU EOM Kosovo 2025 • Created with Datawrapper

Chart 14 - shows the distribution of sponsored programmes in the five TV channels, including coverage of rallies and other campaign events.

Sponsored programme

11 January till 9 February 18:00 - 24:00

■ PDK
 ■ LVV
 ■ LDK
 ■ AAK-NISMA



Base Airtime: ATV 02:13:00, Dukagjini 13:05:20, KLAN KOSOVA 02:16:18, RTK1 03:08:25, T7 03:49:02 (Base Airtime - The total amount of SPONSORED programme broadcast time allocated to political actors on each channel)

Chart: EU EOM Kosovo 2025 • Created with Datawrapper

XXIV. ANNEX 3 – SOCIAL MEDIA MONITORING RESULTS

EU EOM Kosovo 2025 applied different and complementary approaches and techniques to analyse online platforms and to gather information on online election-related content.⁹⁸ These methods include quantitative and qualitative data analysis, legal analysis, meetings with relevant stakeholders and cooperation with different CT members and LTOs.

The EU EOM analysed an indicative set of accounts, profiles, groups, pages and topics with a nationwide relevance, to capture key campaign trends on the monitored platforms.

The sample was selected considering:

⁹⁸ Messaging networks, such as WhatsApp, Telegram, Viber or Messenger are not included in the scope of the EU EOM methodology due to data protection and privacy matters. However, EOMs may include relevant information coming from credible national and international organisations that specialise in monitoring online platforms and networks.

- The relevance (metrics of interactions on Facebook and Instagram, reach on X and views on TikTok) and the potential influence of the page/group on the political agenda and discourse (based on qualitative assessment)
- The content of the page (if topics covered by the posts relate to social, political, and electoral issues)
- Political affiliation of the account, page, or group

The social media monitoring and data collection tools used were:

- Gerulata – social media monitoring and data extraction
- Python, Excel – data extraction and processing
- Meta Ad Library – tracking political ads on Facebook and Instagram
- DataWrapper – data visualisation

The EU EOM identified and included in its database the following list of social media pages:

	Facebook	Instagram	TikTok	X
Political parties	33	16	8	13
Candidates	132	384	135	0
PM Candidates	4	4	1	4
Supporters	6	4	22	0
Influencers	3	0	6	15
Media	38	5	25	13
NGOs	0	11	1	9
Institutions	14	0	0	4
TOTAL	230	424	198	58

Table 1. Social media accounts monitored

The Social Media Monitoring Unit tracked a total of 910 social media pages belonging to political parties, candidates, supporters, NGOs, media and institutions. A selection of posts, based on their virality (total number of interactions they received) was analysed for content. The monitoring covered the entire campaign period (11 January to 8 February) on the three top social media platforms popular in Kosovo, Facebook, Instagram and TikTok. Additionally, the EU EOM used the Meta Ad Library to analyse advertising on Facebook and Instagram by contestants and third parties.

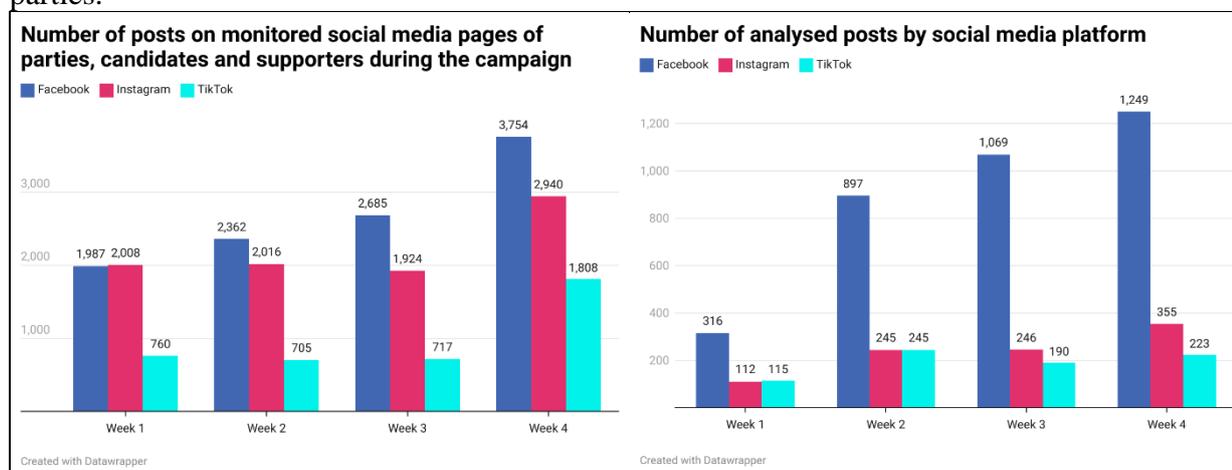


Chart 2. Total number of posts and analysed posts for parties, candidates and supporters during the campaign period (5,262 total analysed posts)

Selection criteria for analysed posts:

- Top five posts in terms of virality for each political contestant on Facebook, Instagram and TikTok (daily)
- The five most viral posts for each PM candidate across all platforms (daily)
- Top 40 posts (maximum two posts per candidate) for the rest of the Albanian candidates and top 10 posts (maximum two posts per candidate) from non-majority candidates (daily)
- Top 15 posts from supporter pages (daily)

Social media environment

According to the 2024 census, Kosovo has a resident population of 1,602,515 and a high internet penetration rate, estimated at over 95 per cent. While internet access is not generally a problem, occasional power outages during winter and mobile network congestion may impact on the availability and quality of internet services.

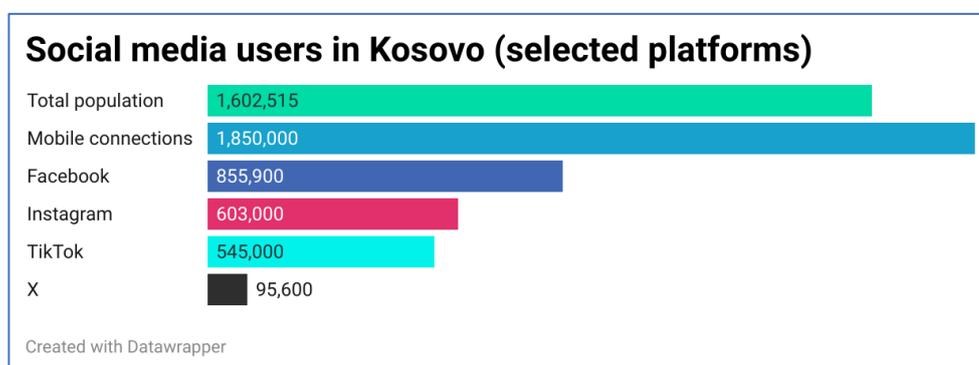


Chart 3. Social media users in Kosovo

Findings of the EU EOM Social Media Monitoring Unit

All contesting political entities and over half the candidates had at least one social media account and campaigned on social media with varying intensity. Facebook was the most used platform, followed by Instagram and TikTok. LVV, AAK and LDK presented their leaders as “prime ministerial candidates”, while PDK had Bedri Hamza, the mayor of Mitrovica South as the prime ministerial candidate. Except for PDK, the other three prime ministerial candidates had larger social media followings than their parties.

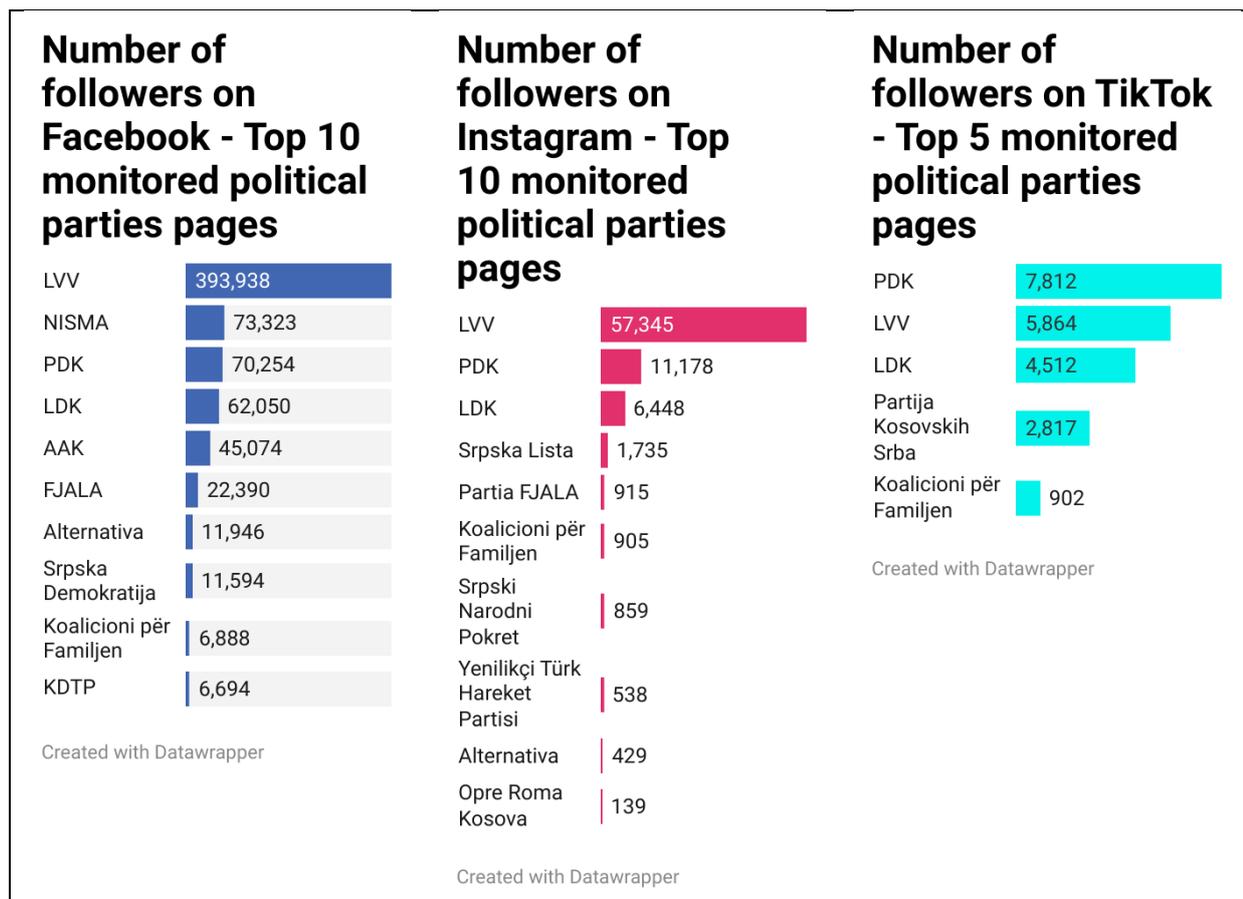


Chart 4. Top monitored accounts of political parties by platform

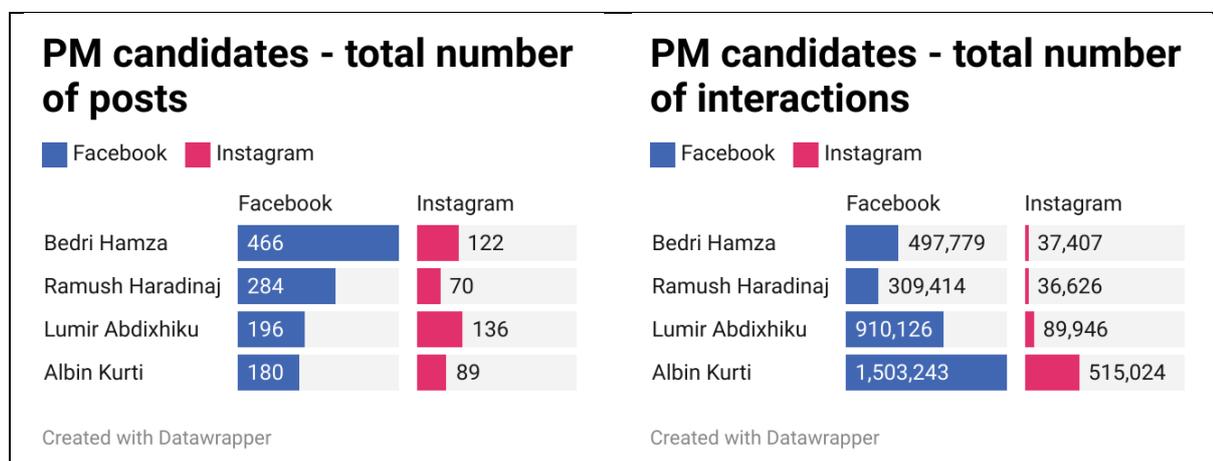


Chart 5. Number of posts and interactions for PM candidates accounts

The majority of posts were based on videos or pictures, usually from campaign events and with minimal captions. This brought on-line the harsh language of the campaign, which, although not systematic, was present throughout the campaign. ECAP has sanctioned numerous instances of language found in breach of the Code of Conduct for Political Entities, but this did not seem to have made a difference.

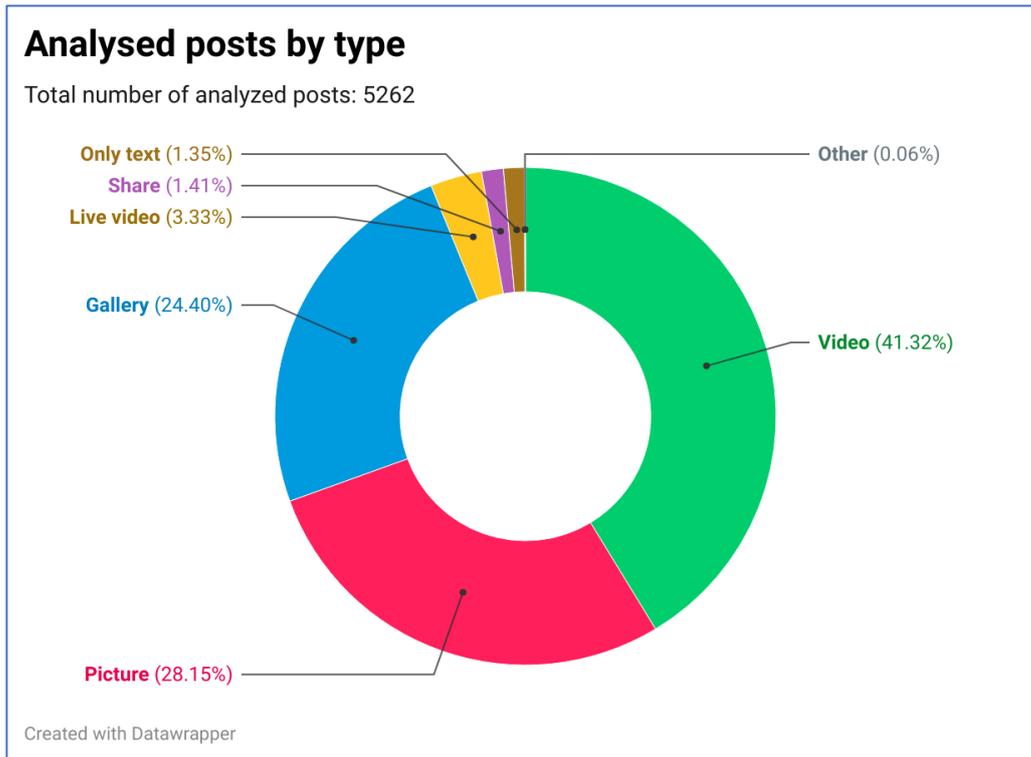


Chart 6. Type of analysed posts

The first two weeks of the online campaign were relatively calm and lacked substance, with less than 10 per cent of posts promoting ideas the electoral manifestos of the parties. Around the midpoint of the campaign, the political parties published their programmes and started promoting them. As the intensity of campaigning on social media increased in the final two weeks of the campaign, so did the relative prevalence of inflammatory language and political attacks, the latter particularly among Serbian political parties. A CEC decision on the composition of polling stations committees in Serbian-majority municipalities was presented by some Serbian political parties as either an attempt to reduce the representation of the Serbian community or an attempt to favour one Serbian party that cooperates with the Government. However, these types of posts were not observed systematically and represent 6.54 per cent of monitored posts.

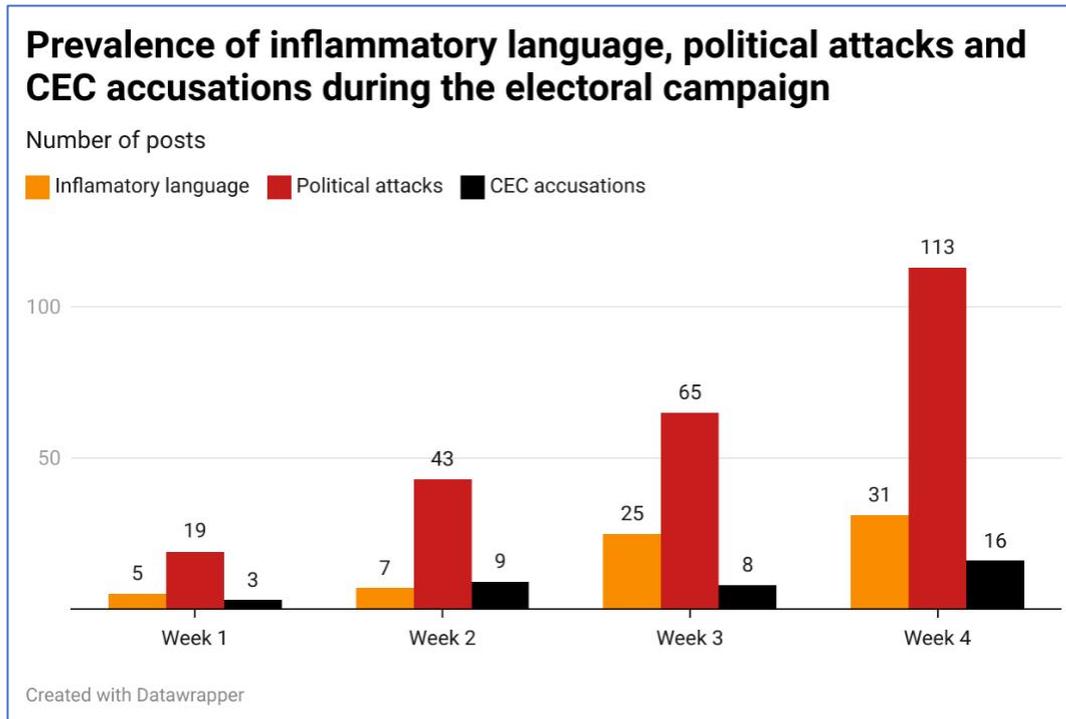


Chart 7. Prevalence of inflammatory language, political attacks and CEC accusations during the electoral campaign

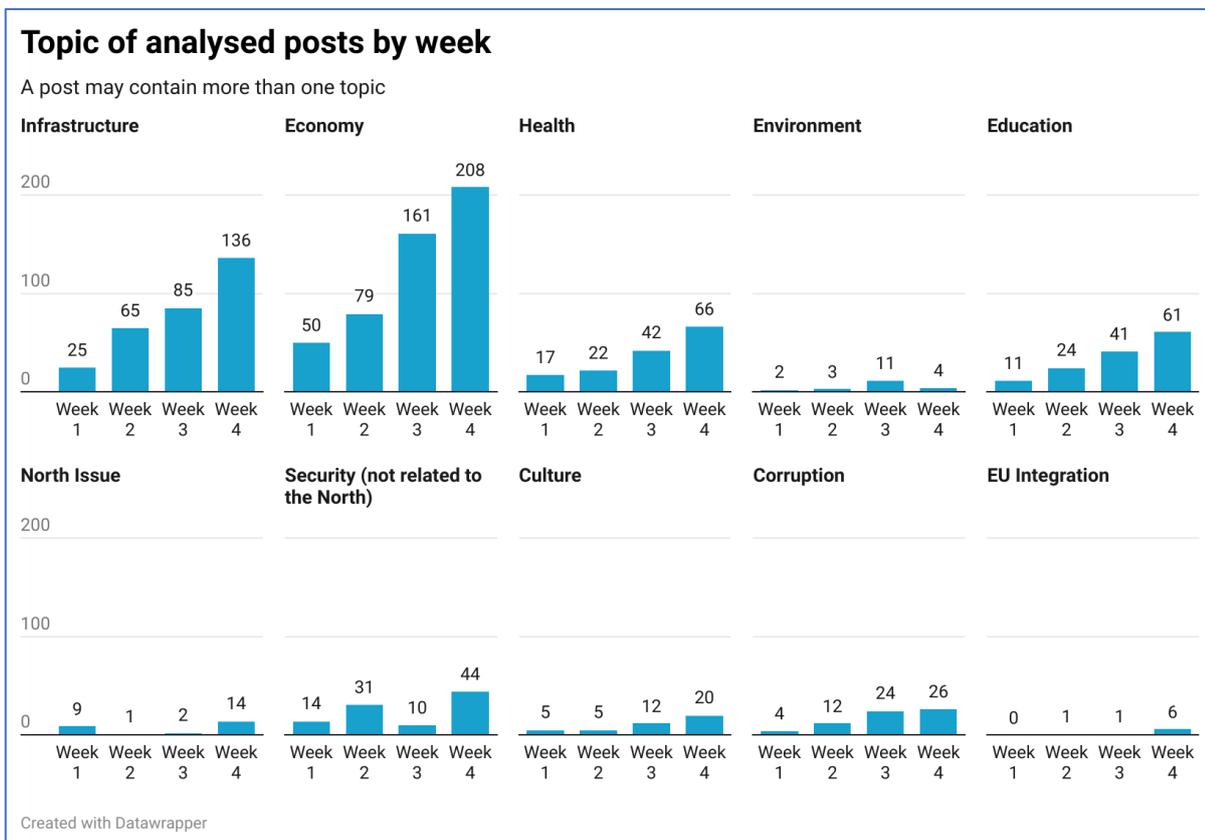


Chart 8. Topics of analysed posts by week

Facebook and Instagram ads were employed extensively by 12 political parties, over 400 candidates and several supporter and media pages. Over €250,000 was spent on promoting more than 7,000

election-related ads on Facebook and Instagram, including negative ads⁹⁹ from third parties¹⁰⁰. Five parties dominated spending on social media ads, accounting for 97 per cent of the total sums spent. Opre Roma Kosova, the top individual spender with €20,358, gathered only 370 votes.

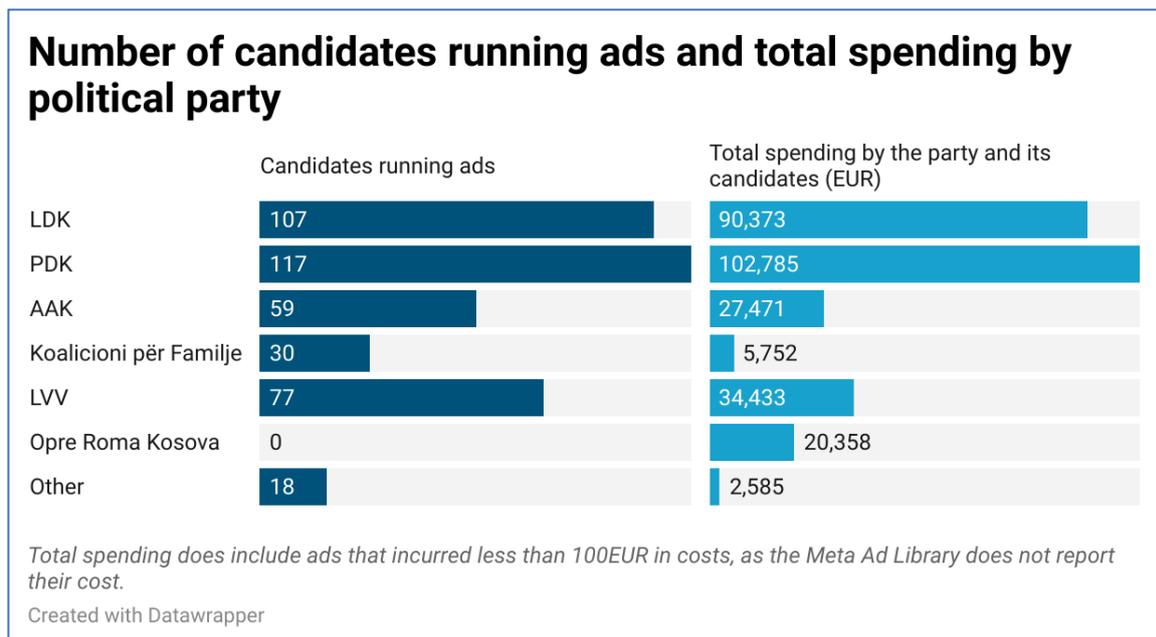


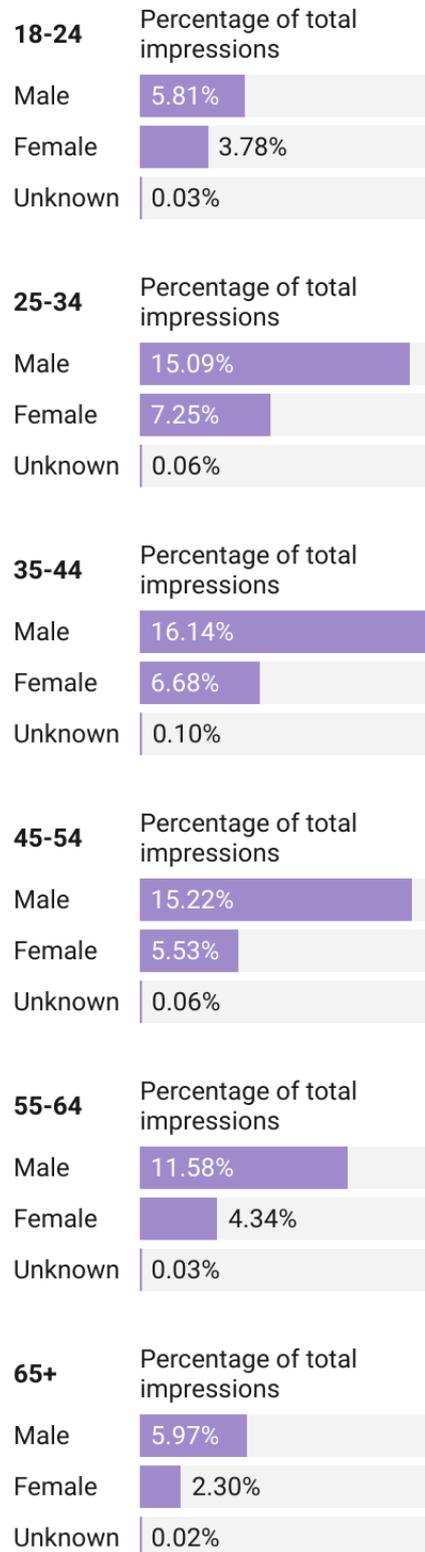
Chart 9. Ad expenditure for political parties and candidates

Political ads by contestants disproportionately targeted men aged 25-54. Except for ads targeting young voters (18-14 years), who had a more balanced gender targeting, over two thirds of ad impressions were targeted at men, suggesting that contestants perceive male voters as more likely to vote or having an influence over the votes of the other family members.

⁹⁹ Negative ads represent ads that seek to diminish the support of a party or candidate, through various means, such as sarcastic comments on the level of support the candidates enjoy and the people they associate with, depicting them in negative contexts or insinuating captions.

¹⁰⁰ Third-party ads represent ads for or against a party or candidate that are run by pages that are not official pages of that party or candidate.

Ad impressions by age group and gender

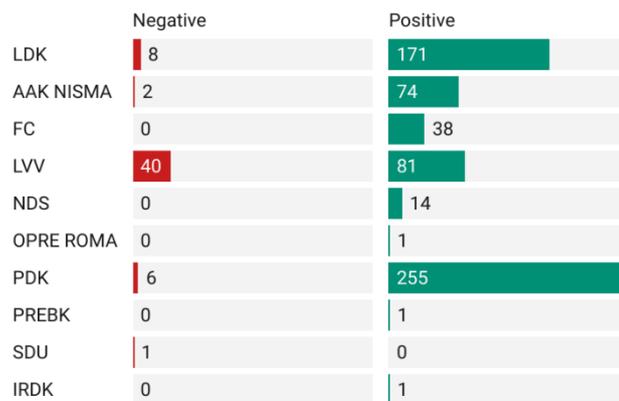


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Around 10 per cent of the ads (693) were third-party ads that either promoted or attached political parties and their candidates. Some 60 media and supporter pages ran third-party ads, not always along party lines. Media pages such as GazetaBlic, Jepi Zë, Mitropol, Plus Televizion and Veriu.info ran ads promoting candidates from various parties, in what appears to be more of a promotion service and not a manifestation of political affiliation.

Targets of political ads by third parties

Number of third-party ads promoting or attacking the political party or their candidates.



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Chart 10. Third party-ads by type and target

◀ Chart 11. Breakdown of ad impressions by age group and gender

