Final Report

Monitoring Misuse of Administrative Resources During 2025 Local Elections in North Macedonia

February 2026

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Executive Summary

Local elections were held in North Macedonia on 19 October 2025, with second-round run-off contests taking place on 2 November. During these elections, trained monitors from ten civil society organizations (CSOs) conducted a monitoring of potential misuse of administrative resources (MAR) across a diverse sample of municipalities.

This monitoring was undertaken based on the understanding that MAR represents a risk to electoral equality, institutional neutrality, and good governance, particularly where the boundaries between public authority and electoral competition become blurred. It was focused on identifying overarching patterns, practices, and contextual drivers of MAR, rather than on providing exhaustive assessments of legality, individual responsibility, prevalence or enforcement. The findings reflect observed dynamics and trends, offering insight into how MAR-related risks manifested across different contexts.

From a regulatory perspective, while several forms of potential MAR are addressed by the legal framework in North Macedonia, gaps and ambiguities leave room for undue practices. In particular, unclear legislative boundaries between official and political activity for various categories of public officials leave space for both actual malpractice and perceptions of misuse, especially where the distinction between governance and campaigning is difficult for voters to discern. Although misuse related to launching newly publicly funded projects is partly addressed in the Electoral Code, relevant provisions are limited to a relatively short pre-electoral and campaign period and do not adequately cover the campaign use of communications around strategically timed, ongoing, or promised projects. Similarly, restrictions on the use of public premises are weakened in practice by a broadly framed exception provision that is not linked to formal, transparent procedures. In contrast, more clearly formulated and communicated restrictions, such as bans on the use of public vehicles, limitations on political activity by public servants during working hours, and police neutrality obligations, have generally seen higher levels of compliance. Overall, while effective implementation and enforcement remain essential, weaknesses in the existing legal framework contributed to a permissive environment in which malpractices could occur and need to be addressed.

Across municipalities, MAR did not manifest uniformly, nor was it attributable to a single political actor or governance level. The most consistent and overarching pattern observed was the role of political–institutional overlap. The prominence of MAR was closely linked to whether contestants were affiliated with positions of political or institutional authority at the local or central levels. Where such overlap existed, candidates and parties were more frequently observed to benefit from indirect forms of advantage, including enhanced visibility through public events, association with public projects or investments, promotion through public actor-linked communication channels, or the mobilization of public resources and networks. Other factors influencing the occurrence of MAR to various degrees included levels of political competition, incumbency dynamics, urban–rural context, and the level of local administrative autonomy, while no uniform regional or demographic patterns emerged.

Observations during the pre-electoral and campaign periods accounted for the majority of MAR-related findings and were most indicative of MAR nature and dynamics. The most prominent MAR manifestations fell broadly into two interconnected clusters. The first consisted of promotional practices that enhanced the profile and credibility of electoral contestants by leveraging institutional standing, governance records, and public functions. These included the showcasing and communications around publicly funded projects and investments; visible involvement and endorsement of candidates by public officials; and the use of communication channels

associated with public offices or officeholders for messaging with clear campaign elements. Such practices were pervasive and widespread. While most of them did not directly contradict the law, their timing and framing contributed to indirect electoral advantage, particularly where incumbents or contestants with closer links to institutional or political positions of power were involved.

The second cluster consisted of facilitative practices, most notably the prohibited use of public premises and, only to a limited extent, of public vehicles to host or support campaign activities. These practices reduced logistical and financial barriers for better-connected contestants and were often characterized by limited transparency regarding access conditions, exceptions, or cost arrangements, raising concerns about equality of opportunity.

Overall, MAR-related practices observed ahead of voting were assessed as having affected the equality and fairness of electoral competition in most of the municipalities, albeit predominantly to a moderate or limited extent rather than in a systematic or overtly abusive manner.

Limited observations during campaign silence and on election day(s) revealed comparatively few MAR-related manifestations. Conduct during these phases was generally professional and orderly, with the process assessed as free from practices undermining the neutrality of public officials, the separation of state and party, or the fairness of competition in the majority of monitors' reports. Reported issues were limited in scale and mostly isolated, including instances of continued visibility of campaign materials, attempts of voter influence, interference by public officials in election board work, or partisan conduct by individual election board members. Taken together, these observations did not point to systemic deficiencies or entrenched patterns of malpractice, confirming that the pre-electoral and campaign periods were the primary phases shaping MAR-related risks and dynamics.

Positively, the monitoring did not identify MAR-related practices negatively targeting or impacting underrepresented or vulnerable societal groups; however, findings indicate that MAR can intersect with existing inequalities in participation and visibility. Women were seen as generally underrepresented in positions of institutional authority and in prominent campaign-related roles, while they were typically also only rarely seen among individuals involved in MAR-related campaign appearances or non-neutral conduct by public officials, the majority of whom were assessed as male. Issues related to non-ethnic Macedonian communities featured regularly in observed campaign activities, reflecting the political salience of ethnicity in a number of municipalities; however, monitors did not record systematic or overt patterns of pressure, coercion, or inducement directed at such communities. For persons with disabilities, observed challenges primarily related to accessibility and inclusion in electoral processes rather than to MAR-specific malpractice.

The monitoring examined the involvement of third parties in the campaign only to a limited extent and did not establish direct or substantiated links between third-party activities and MAR. At the same time, the observed involvement of different third-party actors in campaigns in support of different candidates, combined with the largely unregulated nature of their activities, was assessed as a potential risk area, particularly with regard to opacity of funding sources, indirect support, and the difficulty of tracing possible links to public institutions or resources.

Beyond documenting MAR-related practices, the monitoring also had observable effects on stakeholder behavior, awareness, and civic oversight dynamics. It brought greater attention to MAR as an electoral integrity issue and reinforced the role of civic oversight as a legitimate and constructive part of the electoral process. In several municipalities, the presence of monitors and

the prospect of public reporting were assessed as having a deterrent effect, encouraging more cognizant conduct by public officials and institutions, particularly where baseline norms of accountability already existed. Regular interaction between monitors and institutional actors, electoral contestants, and members of the public contributed to greater awareness and dialogue on MAR-related risks, while also highlighting the need for further targeted awareness raising and capacity building among public officials, political parties, and the wider public to support both identification and prevention of MAR-related practices. At the same time, the implementation of the monitoring strengthened the practical capacity of participating CSOs through hands-on application of structured and replicable observation tools and methodology. The implementation of this pilot additionally generated practical lessons on design, resourcing, tools, and engagement that may inform similar initiatives in the future.

About This Report

This report presents comprehensive observations from the monitoring of potential MAR during 2025 local elections. It builds on the preliminary report published in November 2025, shortly after the conclusion of the electoral process,[1] and further consolidates and analyzes findings across all thematic areas covered by the monitoring. It should thus be read in conjunction with the preliminary report, which contains more detailed references to individual cases and examples that are generally not reproduced here.

Drawing on both quantitative and qualitative data, this report identifies key patterns, assesses their relative prominence, and explores contextual factors that may have influenced the occurrence and forms of MAR. It also offers a number of recommendations, presented in the final section. Furthermore, given the pilot nature of the project, lessons learned and practical insights from the implementation of the methodology are included in this report to inform the design of future similar efforts and further enhance capacity in this field.

Overall monitoring findings should not be read as an exhaustive or fully representative account of MAR prevalence during the local elections 2025. They present a snapshot based on a limited scope and sample, and thus carry inherent limitations related to first-time application, capacity, timeframes, and reliance on publicly available and directly observable information.

This report is available in Macedonian, Albanian and English.

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[1] Monitoring Misuse of Administrative Resources During 2025 Local Elections in North Macedonia, Preliminary Report (English version), November 2025. See links for Macedonian and Albanian versions.

Context and Methodology

This monitoring activity was designed in an effort to review and reassess the MAR-related regulatory framework and practice, including in light of issues identified and recommendations provided during previous elections as part of national and international observation efforts. To this end, under the guidance of International Foundation for Electoral Systems (IFES) North Macedonia project team, 70 trained monitors from 10 CSOs[2] conducted the monitoring in a diverse sample of 26 municipalities.[3] Carried out between 15 September and 2 November 2025, the monitoring covered the pre-electoral and campaign periods, campaign silence, and both rounds of voting, where applicable. It followed a comprehensive methodology tailored to the existing legal framework and informed by experiences from similar monitoring efforts internationally, ensuring impartial, independent, and non-interfering observation. Observations were gathered through field work, desk research, and stakeholder inquiries, and reported through structured tools.

The initiative aimed to strengthen CSO capacity to monitor MAR and broader electoral issues, while raising awareness among political and institutional actors about the risks associated with MAR. Through its findings and recommendations, it sought to build a body of knowledge to guide public discussion, future reform efforts, and contribute to long-term improvements in electoral integrity and good governance.

The monitoring focused on identifying observable practices and recurring patterns, rather than assessing individual intent or legality of actions, or intervening in real time. It did not envisage proactive flagging of cases to oversight bodies, the verification of campaign finance reporting, or an assessment of enforcement activities by responsible institutions, and the findings were therefore not intended to serve as formal evidence for legal or administrative proceedings.

For the purposes of this project, MAR was understood as undue advantage that parties or candidates may have through the use of official positions or access to public resources to influence the electoral process. Based on international good practice, the term covers not only financial or material resources, but also the use of staff, institutional infrastructure, and the prestige of public office for electoral gain.[4]

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[2]   Association for home Care and Support "Assistive Center" (Assistive Center), Association for Rural Development Local Action Group Agro Lider (LAG Agro Lider), Civil Society Organization of Citizens for Strengthening Democratic Values THREE C CONSULTING Skopje (Three C Consulting), Association of Citizens for the Protection of Environment Verdevita Gostivar (Verdevita), Association of citizens for research, analysis and policy making Eurothink – Center for European Strategies – Skopje (Eurothink), Mountaineering Club Association "KAB Struga 2017" (KAB Struga 2017), Union for Gender Equality: National Network Women for Women (National Network Women for Women), Association for Social Development – "For Tetovo" (For Tetovo), Association for International Youth Cooperation INTERAKTIV – Bitola (INTERAKTIV-Bitola), and Institute for Research and Policy Analysis – Romalitico (Romalitico).

[3]   Bitola, Bogovinje, Butel, Chair, Centar Zhupa, Debar, Delchevo, Dolneni, Gostivar, Kisela Voda, Kochani, Kumanovo, Lipkovo, Makedonski Brod, Ohrid, Prilep, Saraj, Shuto Orizari, Shtip, Struga, Strumica, Studenichani, Tearce, Tetovo, Valandovo, and Vrapchishte.

[4]   In its Handbook for the Observation of Campaign Finance, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) defines MAR as " undue advantages obtained by certain parties or candidates, through use of their official positions or connections to governmental institutions, to influence the outcome of elections". Joint Guidelines for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes further broaden the understanding of administrative resources to include not only financial and material resources, but also the use of public staff, institutional infrastructure, and even the prestige of public office to gain

Legal Framework Pertaining to MAR

The legal and regulatory framework in North Macedonia establishes a range of safeguards intended to prevent MAR in the electoral context. Core requirements and bans are set out in the Electoral Code (EC). This includes prohibitions on the use of public funds and municipal budgets for electoral purposes, restrictions on the use of public premises, vehicles, equipment and other resources, limitations on public employment and procurement-related activities during electoral periods, and requirements aimed at institutional neutrality and equal electoral conditions. These provisions are supplemented by a broader set of laws, sub-legal regulations, and ethical standards that regulate the conduct of public officials, public sector employees and public security providers, the use of public funds, and call for separation between official functions and political activity.[5]

At the same time, shortcomings in the overall MAR regulatory framework, including gaps, imprecise formulations, and limitations in scope, create loopholes that leave room for undue practices. Several of these weaknesses were reflected in the monitoring findings from these elections; the key issues from the regulatory perspective are addressed below. While effective implementation and enforcement remain essential, weaknesses in the existing legal framework contributed to a permissive environment in which certain misuse-related practices could occur.

Use of public premises for campaign purposes: Under EC Art. 8-b(1), the use of public premises for campaign purposes is prohibited. Art. 82(1) specifies that pre-election rallies may not be held in military, religious, or health institutions, schools, kindergartens, or other public facilities, and, according to Art. 82(4), also, state or municipal facilities may not be used for campaign purposes. At the same time, Art. 82(2, 5, 6) provides for exceptions whereby the heads of public institutions may permit the use of public premises if no other suitable venues are available and if equal conditions are ensured for all contestants. In principle, this framework seeks to balance safeguards against preferential treatment with a degree of flexibility, particularly relevant in rural or remote areas where alternative venues may be limited.

At the same time, as formulated, Art. 82(6) does not explicitly require such exceptions to be granted through a formalized, objective, and transparent procedure, nor does it mandate timely public disclosure of decisions authorizing the use of public premises. Also, these articles do not mention the option of paid-for use, which appears to have in practice been widely availed of.[6]

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political advantage. IFES, in turn, defines MAR as "any use of state resources to support or undermine any political actor (such as a political party or coalition or a candidate for public office)" (IFES, The Abuse of State Resources, 2011).

[5] Relevant legislation and regulatory instruments include the *Electoral Code*; the *Law on Prevention of Corruption and Conflict of Interest (LPCCI)*; the *Law on Public Sector Employees*; the *Law on Administrative Servants*; the *Law on Civil Servants*; the *Law on Financing of Political Parties*; and the *Law on Public Procurement*. In addition, codes of conduct adopted for members of parliament, members of government, and local self-government officials, as well as instructions and guidance that maybe issued by the SEC and the SCPC provide supplementary normative standards relevant to the prevention of MAR during elections.

[6] Paragraph B.1.1 of the ODIHR and the Venice Commission Joint Guidelines on Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes stipulates that "the legal framework should provide effective mechanisms for prohibiting public authorities from taking unfair advantage of their positions by holding official public events for electoral campaigning purposes [...]". Paragraph B.1.2 elaborates that when the use of public premises is permitted, the law should "provide for equal opportunity and a clear procedure for equitably allocating such resources to parties and candidates."

These gaps detract from legal certainty about applicable provisions and leave space for possible questions about justified use or perceptions of selectivity. In practice, this made it difficult to distinguish between permissible exceptions and potentially preferential access, particularly where decisions were taken informally or without publicly available justification. In the context of the monitoring, the absence of clear procedural requirements and disclosure obligations complicated the assessment of compliance and required monitors to rely on contextual indicators rather than verifiable administrative records.

Involvement of public officials in campaigning: Several key principles on preventing conflict of interest and ensuring service in the public interest are embedded in the legal framework governing different categories of public officials, providing a due conduct framework also during elections. The Law on Prevention of Corruption and Conflict of Interest (LPCCI; Art. 3-4) obliges officials to act impartially, be guided by public interest, and prohibits the use of public office and position to advance personal, third-party, or political party interests. The Laws on Public Sector Employees, on Administrative Servants (Art. 53(1) and 60), and on Civil Servants (59(1) and 64) reinforce the principles of impartiality in performing official duties and prohibit political activity in an official capacity or during working hours for different groups of public sector staff. In addition, the codes of ethics for members of government, parliament, and local officials reiterate the principle of impartiality when performing official duties/during working hours and emphasize the need to ensure a distinction between public duties and political activity.

At the same time, the legal framework does not explicitly regulate campaign-related activities of public officeholders, including public appearances, endorsements, or social media support. Nor does it establish requirements or guidance encouraging officeholders to take leave or otherwise clearly separate official responsibilities from campaign activities. Furthermore, the guidelines related to avoidance of political activities during the performance of official duties and/or during working hours, while grounded in appropriate principles of neutrality, are too generic to support compliance and enforcement in practice.[7] As a result, in practice it proved difficult, for voters and monitors alike, to distinguish between legitimate governance activities and permissible political expression, on the one hand, and potentially problematic use of official visibility, authority, or resources, on the other. In this respect, the framework would benefit from clearer guidance on the applicability of these principles to public officials at different levels of government, including where central-level officeholders participate in or support local election campaigns.

In contrast, legal requirements governing police conduct during elections are clear and strict. In addition to provisions regulating security at campaign events and during the voting process, EC Art. 179(2) prohibits participation in election campaigning while wearing an official uniform. The Law on Police further enshrines the principle of political neutrality, with Art. 105 prohibiting police officers from founding or leading political parties, engaging in party activities that compromise impartial performance of duties, displaying party symbols in police premises or vehicles, or attending political activities in police uniform except when acting in an official duty capacity.

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[7]   Paragraph 4.2 of the ODIHR and the Venice Commission Joint Guidelines on Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes requires the law to "provide for a clear separation between the exercise of politically sensitive public positions, in particular senior management positions, and candidacy [...] Such rules may include a clear instruction on how and when campaigning in a personal capacity may be conducted, suspension from office or resignation of certain public authorities running for elections." The ODIHR Final Report on the 2021 local elections (p. 17) notes that "the legal framework for campaigning should be further amended to include clear rules for the participation of public officials, including on social networks."

Use of publicly funded projects and related announcements, inaugurations, and publicity to promote candidates: Outside the electoral legislation, the Law on Public Procurement provides the accountability framework for the use of public funds, restricting irregular or accelerated procurement or contracting that would not serve public interest. EC Art. 8-a prohibits the launch of new, previously unplanned public development projects, extraordinary budgetary disbursements or benefit payments, and new budget-funded employment procedures once the elections are called. These restrictions are reiterated in LPCCI Art. 34. In addition, starting 20 days before the campaign period, the organization of public events linked to the start or use of infrastructural developments and facilities, such as transport, utility, social, or educational infrastructure, is prohibited.

While these provisions reflect the underlying objective of preventing the use of publicly funded projects to influence voters, their scope and timing leave considerable space for candidates affiliated with positions of power to derive electoral advantage from enhanced visibility associated with public investments. First, the applicability of the restrictions is limited to a relatively short pre-electoral period, which does not address advantages arising from high-value or high-impact projects that are planned, budgeted, initiated, or publicly promoted shortly before the respective deadlines. Several such instances were noted during the monitoring. Second, the effectiveness of the stricter restrictions applicable in the final pre-campaign phase is reduced by the explicit exception in Article 8-a(2), which allows public officeholders or candidates to make statements about public projects during campaign rallies, interviews, debates, or in response to journalists' questions. In practice, this exception permits extensive reference to, and promotion of, publicly funded projects throughout the electorally relevant period, thereby weakening the intended safeguards against undue advantage. [8]

Use of public institutions' and officials'-associated online spaces in electoral promotion: Based on EC Art. 75-e.4, from the announcement of elections until their completion, media outlets, including broadcasters, print, and online portals, are prohibited from publishing advertisements financed from state or municipal budgets, or from entities exercising public authority, except for those permitted under the law. Labelling requirements are applicable to all paid campaign materials, including online. However, the campaign on social media and on online portals remains unregulated. Similarly, the use of municipal websites in campaign contexts and public officials' communications, just as the overall campaign involvement of the latter, are not subject to any regulations.

The absence of regulation in the online sphere limits effective oversight, transparency, and accountability, particularly given the potential for indirect promotion, amplification, or targeting through third-party actors operating outside formal campaign frameworks. These gaps have been subject of repeated international observer recommendations and constitute additional loopholes for potential MAR practices.[9]

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[8]   See related past ODIHR and Venice Commission recommendations in the 2013 and 2025 legal opinions on the Electoral Code.

[9]   ODIHR Final Report on the 2021 local elections. In the 2025 legal opinion on the Electoral Code (para. 20), ODIHR welcomed the then-planned amendment to Art. 8-b to stipulate that during the election campaign public institutions, entities and officials may not use either institutional or their official social media profiles to support, promote, or discredit election participants.

Thematic Observations and Findings

1. Overarching Observations and Trends in MAR-Related Practice

Across the municipalities observed, manifestations of MAR were identified in varying forms and degrees of prominence. They were not confined to a single political force or coalition, nor to any isolated areas; observations in some municipalities showed only few or no clearly verified instances. Rather than following a uniform pattern, the presence, form, and perceived impact of MAR appeared to be shaped by a combination of structural and contextual factors.

The most consistent and overarching pattern across all municipalities was the role of **political–institutional overlap**. The prominence of MAR was closely linked to whether electoral contestants were affiliated with, or had access to, positions of political or institutional authority at the local or central levels. Where such overlap existed, candidates and parties were more frequently observed to benefit from indirect forms of advantage, including visibility through public events, association with public projects or investments, promotion through official communication channels, or the mobilization of public resources and networks.

These institutional connections also shaped campaign dynamics more broadly. Contestants linked to positions of authority or institutional representation, both at local and central levels, were better placed to frame campaign messages around past performance, delivery capacity, or future promises implicitly underpinned by access to public funds and decision-making power - a dynamic reported by monitors in municipalities such as Butel, Tearce, Chair, Ohrid, Prilep, and Shtip. In contrast, less established parties and independent candidates generally faced more limited access to comparable channels of visibility and appeal.

A related, cross-cutting dimension concerned the **alignment or misalignment between local and central political power**. In municipalities where the same political force held authority at both levels, MAR manifestations tended to be less overt and more image-based, often embedded in routine governance activities rather than explicit competitive advantage. By contrast, contexts marked by divergent local and central power structures, such as Tearce and Strumica, or by cross-municipality incumbency and candidacy, as observed in Kisela Voda, displayed more complex and contested dynamics. In these cases, different actors sought to leverage the levels of authority available to them: local administrations relied on municipal infrastructure and personnel, while central-level actors drew on government programs, ministerial visits, or nationally administered resources. These differing political–institutional constellations emerged as a key structural driver shaping how MAR manifested in practice.

However, the monitoring has demonstrated that several additional contextual factors also played a role in whether MAR manifested, in what form, and with what prominence. Importantly, these factors did not operate uniformly. In different settings, the same conditions were observed to either constrain or facilitate MAR, underscoring that no single factor consistently produced the same outcome.

Political competitiveness, rivalry, and polarization: Political competition emerged as both a driver and a constraint on MAR. On the one hand, heightened rivalry and polarization created incentives for contestants to deploy all available means to gain advantage, including administrative leverage, as observed in Ohrid and Tearce. Conversely, an overall quieter campaign environment, as observed in Delchevo, coincided with lower prominence of MAR-related concerns. At the same time, competitive and polarized environments also fostered mutual monitoring and oversight. In municipalities such as Chair, the presence of strong political

rivalry appeared to encourage reciprocal scrutiny among contestants, limiting the scope for unchecked misuse. Similarly, in Shuto Orizari, the heightened importance of electoral outcomes intensified both incentives for misuse and mutual controlling efforts.

Incumbency and perceived electoral "safe seats": The presence of incumbents in the race, perceptions of electoral strongholds and expectations of electoral victory also shaped MAR dynamics, although not in a uniform manner. In some contexts of incumbency, MAR-relevant practices appeared more common and normalized, in others - more subtle and embedded in informal loyalty networks or governance rather than overtly purposeful, while yet in others, like in Bitola, the presence of an incumbent candidate did not translate into heightened MAR prominence. Electoral uncertainty generally appeared to contribute to greater proclivity to resort to MAR practices. In contrast, where outcomes were widely seen as predictable, campaigns tended to display lower MAR concerns, as in Shtip, Gostivar, and Vrapchishte.

Urban vs. rural context and municipality size: Municipality size and settlement patterns further influenced MAR dynamics. In smaller or more rural municipalities, monitors more frequently observed informal or community-based overlaps between political authority and administrative or social structures (e.g. Tearce, Bogovinje, Lipkovo, Saraj, Studenichani, Dolneni, Valandovo). In such contexts, personal relationships and closely-knit communities appeared to increase the scope for subtle influence. At the same time, the example of Valandovo has also shown that smaller communities could also foster accountability, serving as MAR deterrent. By comparison, in larger urban municipalities, greater media presence, CSO engagement, and public scrutiny generally contributed to more noticeable restraint and caution in using public resources (Bitola, Kisela Voda, Ohrid, Shtip). In these settings, higher levels of awareness among officials and political actors appeared to influence behavior, with MAR tending to be less material and more visibility-oriented, involving official communication channels, public messaging, or project-related events.

Institutional and financial autonomy: Finally, the degree of institutional and financial autonomy of local authorities was also seen as shaping MAR dynamics. Dependence on central government funding, particularly under certain political constellations, increased the vulnerability of local administrations and officials to political influence, as reported in Tearce. Conversely, more stable and predictable municipal resources, as observed in Shtip, were assessed as supporting transparency and limiting opportunities for misuse.

Overall, based on monitors' assessments, the totality of MAR manifestations observed across municipalities impacted the equality and fairness of electoral competition to varying degrees:

- **Higher impact:** MAR manifestations assessed as having a more pronounced effect on equality and fairness of electoral competition - *Tearce, Tetovo, Saraj, Lipkovo, Bogovinje*
- **Moderate impact:** MAR manifestations were observed more sporadically and tended to create uneven visibility or access rather than constituting overt or decisive manipulation of the electoral process - *Ohrid, Prilep, Butel, Chair, Valandovo, Shuto Orizari, Makedonski Brod, Struga, Studenichani, Kochani, Strumica, Dolneni*
- **Limited or negligible impact:** MAR manifestations limited in scale, not clearly identifiable or having negligible impact on electoral equality - *Bitola, Delchevo, Kisela Voda, Gostivar, Vrapchishte, Shtip,*
- **No perceived impact:** No MAR practices observed or seen as impacting equality and fairness - *Centar Zhupa, Debar, Kumanovo*

Across the four impact categories, no uniform **regional or demographic patterns** emerge in relation to MAR manifestations. A limited concentration of municipalities assessed as higher-impact is, however, observable in the northwest of the country. This concentration appears to reflect a combination of contextual factors, including political dynamics, power configurations, and, in several cases, the presence of non-ethnic Macedonian communities or ethnically mixed populations. However, these factors do not operate independently and should not be understood as determinants of MAR. Mixed and minority-populated municipalities otherwise appear across all impact categories, including those where MAR manifestations were limited or negligible.

2.   MAR During Pre-Electoral and Campaign Periods (First and Second Rounds)

By law, the official campaign period for the first round of voting lasted 20 days, starting on 29 September 2025. Based on the first-round results, run-off mayoral contests were held in 11 municipalities, with the second-round campaign commencing on 20 October 2025. Legal prohibitions to initiate new publicly funded development projects entered into force on 9 August, the day elections were called, while restrictions on holding events linked to the start of construction or use of infrastructural developments and facilities applied from 9 September.

Based on monitors' reporting, the campaign in monitored municipalities was visible, competitive, and largely peaceful. Campaign intensity tangibly picked up in the last week before the first round and maintained this dynamic also between the rounds. During these periods, monitors also noted an uptick in MAR-related practices, including the use of public premises and the involvement of public officials, as candidates and their supporters sought to further expand outreach and visibility.

At the same time, monitors assessed the campaign as somewhat more subdued than in past and national-level elections, with community-based outreach, door-to-door campaigning, and smaller gatherings prevailing over larger events and rallies. The use of campaign posters and billboards was likewise reported to have been less prominent as an outreach method.

Based on the methodological focus of the monitoring and patterns emerging from monitors' reports, four areas accounted for most of MAR-related observations during the pre-electoral and campaign periods. These areas are examined in detail in the following sub-sections, with a focus on overarching patterns and trends, drawing on illustrative examples where relevant.

A.   *Use of public premises, vehicles, and equipment in campaigning*

Public premises and equipment

Throughout the monitoring, frequent use of public premises for campaign purposes was noted. Such practice constituted the most common form of MAR-related irregularity that raised questions of compliance with legal prohibitions in place. Of a total of 1,115 campaign events and contestant activities followed by the monitors, over 30 per cent took place at public premises. Of these, the majority of cases, 242, involved the use of public facilities and spaces for campaign events or candidate appearances. In another 110 observations, public premises were used for other campaign-related purposes, such as campaign headquarters, coordination, logistics, or material storage. Public premises use was registered across 21 municipalities, with highest prevalence in Bitola, Gostivar, Saraj, Shtip, Struga, Shuto Orizari, Tetovo, and Vrapchishte. This showed both geographical spread and concentration in key urban and multiethnic areas. In contrast, in 5 municipalities (Butel, Chair, Centar Zhupa, Debar, Ohrid) no cases of public

premises use for any kind of campaign-related activities were recorded, with events reportedly taking place predominantly outdoors, in open spaces or at private venues.

Schools and kindergartens constituted by far the most frequently used category of public premises, followed by cultural centers, municipal administrative buildings, museums, galleries, sports halls, stadiums, and other publicly owned spaces. This pattern suggests that educational institutions were among the most commonly approached with requests to provide public space for campaign purposes and, by the virtue of their administrative position, may have also been the most vulnerable and susceptible to expectations or possible pressure, overt or tacit, to accommodate such requests. While many campaign events were reported to have taken place in the evening hours, monitors noted instances where the use of public venues for campaign purposes disrupted their normal operations. In Gostivar, for example, a sports day event organized by the AKI[10] Youth Forum at the "Gostivar" secondary school reportedly resulted in the cancellation of scheduled sports classes for students on that day.

Despite monitors' efforts to verify the grounds on which public venues were made available, it was often impossible to determine whether any formal exceptions, as envisaged by the Electoral Code, had been granted and on what basis. In some cases, monitors established paid-for use (some 6 per cent of related observations). For example, in Centar Zhupa and Delchevo monitors were informed that some of the venues used by contestants, including at schools and cultural centers, were paid for. In Valandovo, Strumica and Struga, monitors were shown direct evidence of rental contracts signed and invoices issued or paid, such as, for instance, for the use by VLEN coalition of a cultural center in the latter.

However, in the majority of observations, facilities appeared to have been provided free of charge (over 50 per cent of observations) and in a considerable number of cases (over 40 per cent) there was no clear evidence of publicly available formal decisions authorizing their use under the exception clause. In Saraj, for example, monitors were informed of authorizations for the use of schools in vague terms, with promises by the local administration to send evidence, which, however, was never provided. In Tetovo, a campaign event by VLEN at the secondary medical school "Nikola Stejn" was reported to the monitors as authorized, with the mayor having thanked the school principal during the meeting for providing the space. Some interlocutors, such as several public venue owners in Dolneni, argued that such activities fell under "community engagement" by public bodies hosting the events rather than campaign support and therefore required no special permissions or process. Although in many cases it appeared that public facilities would generally be available for such use to all and any party or candidate, as monitors were assured of in Gostivar and verified in Saraj, limited reports were made to the monitors of unequal contestant access to public premises. Yet, no evidence of rejections was provided.

The use of public premises was observed across the political spectrum; however, the highest numbers of cases were linked to activities in support of candidates affiliated with the AKI coalition, VMRO-DPMNE, VLEN coalition, and SDSM. Aggregate observations suggest that the parties in positions of power and locally well-connected parties and candidates often benefited from informally granted access to public facilities, whereas smaller parties and independent candidates faced greater obstacles with access to public venues. Overall, the frequent use of public premises for campaign purposes and the lack of transparency around the exception mechanism raised questions of compliance with legal restrictions.

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[10]   See Annex 1 for the composition of the coalitions in the 26 observed municipalities.

Monitoring the possible use of public equipment or other similar resources proved challenging in practice, as monitors rarely had sufficient insight, access, or observation and comparison opportunities to enable conclusive assessments. Only in under 20 per cent of observations monitors suggested possible use of public equipment or resources, especially of furniture, screens, projectors, electricity or internet, mostly stemming from the contestant use of public venues, such as schools. At the same time, in some 80 per cent of related reports, monitors did not observe or receive reliable information indicating that such equipment had been used for campaign purposes.

Public vehicles

Relatively few instances of official vehicle use for campaign purposes were reported. In total, only 28 cases were recorded in 8 municipalities (Tetovo, Bogovinje, Shtip, Shuto Orizari, Tearce, Struga, Kochani, and Dolneni). Observed cases were mostly associated with a limited number of public institutions or entities owning these vehicles, typically public enterprises, municipalities, as well as ministries or government, also pointing to isolated rather than widespread practice. Reported use included travel by candidates or supporters but also transport of campaign materials. Reports from Tetovo and Bogovinje, both of which yielded greater numbers of public vehicle use reports, noted an additional practice of field visits by officials and involving contestants framed as "work inspections". Overall, most cases of public vehicle use were noted in connection with campaigns of VLEN candidates, followed by those of VMRO-DPMNE.

The relatively low occurrence of public vehicle use during the campaign was attributed in part to the legal requirement for all public vehicles to be registered in the State Commission for the Prevention of Corruption's (SCPC) online vehicle register and, based on the government decision adopted shortly before the elections, to carry red license plates with yellow embossing.[11] These measures constituted welcome transparency tools encouraging compliance with the related legal ban. At the same time, these measures were not used to their full potential during these elections as the SCPC's register remained incomplete and red license plate marking was not consistently carried out.[12] Monitors noted that these implementation gaps hampered also their attribution and verification efforts. As in other cases, in Kisela Voda and Delchevo, several administrative vehicles identified as belonging to the representatives of the central government, including the Prime Minister, did not carry red license plates. Monitoring was further complicated by the observed practice of parking vehicles at a distance from campaign event locations, as seen in Shuto Orizari.

Another aspect noted in some places, including Shuto Orizari and Prilep, concerned the use of by public figures and contestants of rented vehicles. While such practices do not in themselves constitute misuse, they were seen as potential attempts of circumventing existing legal restrictions, especially if public funds were used to pay for the service. In this context, transparency in campaign finance reporting and effective post-electoral oversight remain essential for verifying the nature of such transactions and any possible links to public funds.

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[11]   As per the 29 July 2025 government decision and the related Rulebook by the Ministry of Internal Affairs, publicly owned vehicles are to carry red number plates with yellow letter and number embossing.

[12]   According to the SCPC, as of 29 September, only 635 institutions had submitted the required vehicle data, while 879 had not, despite the 18 August legal deadline. As of 6 November, a total of 6,659 vehicles were included in the register.

Overall, while the number of instances of public vehicle was limited compared to concerns noted in past elections, the observations underscore the importance of continued awareness-raising and consistent enforcement of legal restrictions. In this context, a positive practice reported in Shuto Orizari where some candidates agreed not to provide party-paid transport for voters to polling stations on election day deserves mention as a welcome informal cooperative measure contributing to the reduction of actual and perceived risks of partisan transportation.

B. *Involvement of public institutions and public officials in campaigning*

Role of appointed and elected officeholders and their respective institutions and entities

The campaign has seen considerably mobilization and involvement of different public institutions, entities, and public officials in supporting candidates' and parties' campaigns. This involvement has typically taken two forms:

> **(1)** participation in campaign activities organized by candidates and their respective political forces, or
> **(2)** hosting of events and activities mostly dressed as being part of general governance and institutional duties that featured campaign elements and offered a platform for contestant promotion.

Regarding the **first form of support**, findings indicate that senior appointed and elected officeholders at both central and local levels were consistently identified as the most visible public officials in campaign-related activities. Ministers, deputy ministers, and members of parliament were the categories of public officials most frequently observed attending campaign events of candidates affiliated with their political forces. Among monitors' reports that identified their involvement, nearly two-thirds (64 per cent; 58 cases) noted central-level officials as the most frequently present category. Mayors likewise featured prominently: in 59 per cent of reports (48 cases) that referenced mayoral involvement, they were identified as the most frequent participants in campaign activities. These patterns were particularly notable in Dolneni, Delchevo, Shuto Orizari, Kochani, Saraj, Tetovo, and Valandovo for central-level support and in Kumanovo, Makedonski Brod and Vrapchishte for mayoral support.

Other local-level actors, such as councilors, senior municipal officials, and heads of public enterprises or agencies, were also regularly observed in campaign contexts, but were more often identified as playing a secondary role. When these categories are considered together, approximately 63 per cent of references described them as the "next most frequent" participants rather than the dominant actors. However, in several municipalities, including Bitola, Delchevo, Makedonski Brod, Ohrid, Prilep, and Shtip, these categories of local officials were also seen as playing a prominent role, what may suggest an inclination in these areas towards more local and lower-level official support, possibly due to the nature of competition.

The involvement of public officials was most frequently observed in relation to VMRO-DPMNE candidates, followed by those affiliated with the AKI, VLEN, SDSM, and ZNAM, with fewer instances noted for Levica, Poinaku, and the Turkish Democratic Party.

The most common forms of support provided by public officials during campaign events were speeches and public statements that directly promoted a candidate or party, highlighted institutional or municipal achievements in the campaign context, or explicitly linked local achievements to the election of the contestant being promoted. Such speech-based

endorsements accounted for approximately 82 per cent of all instances in which public-official support was assessed as having occurred sometimes or frequently.

Assessing conclusively whether elected and appointed senior officeholders participated in campaign events during working hours and/or in an official capacity proved challenging for the monitors. In some cases, they concluded (based on factors such as the evening timing of events, absence of references to official titles, and presence as attendees rather than active contributors) that officials participated in a private capacity or as representatives of political parties. At the same time, monitors documented multiple cases where officials participated in an official capacity, as evidenced by explicit references to their public functions in introductions or speeches, or by other attributes of official position present. In total, 169 campaign events observed across 19 municipalities (some 15 per cent of all campaign events followed) featured active participation of public officials in official or mixed roles, most notably in Gostivar, Tetovo, Bogovinje, Kochani, Prilep, Saraj, Valandovo, and Shuto Orizari.

As a positive practice, monitors identified several examples where public officials at different levels demonstrated awareness of applicable restrictions and actively sought to delineate the boundary between their public duties and campaign activities. These included officials taking leave for campaigning or publicly communicating their working hours to clarify when activities constituted official duties versus campaigning. Such practices were noted in Kisela Voda and Butel. In Chair, the campaign team of VLEN candidate holding a senior government position proactively informed monitors that cabinet staff attended campaign events only outside official working hours. In Strumica, the sitting SDSM mayor was reported to have 'frozen' his party membership and largely abstained from campaign activities. Similarly, the mayor of Tetovo from VLEN publicly announced that he would focus on municipal duties until 14:00 during the campaign period. Such steps reflect good-faith efforts to comply with legal and ethical standards and could be further encouraged as positive practice, including through clearer legal provisions or the development of practical guidance to support public officials in separating official duties from campaign activities.

In the context of the **second form of support**, multiple events and activities organized by central and local-level authorities or public entities contained campaign elements, blending routine governance or community engagement activities with candidate promotion, thus contributing to boosting candidates' visibility and outreach. Out of a total of 200 prominent municipal or other locally organized public events followed by the monitors, 147 (over 70 per cent) featured a candidate, party or coalition representatives in a speaking or otherwise visible role or contained other clear campaign elements. Candidates affiliated with VMRO-DPMNE, VLEN, and AKI were reported to have benefited most frequently from such promotion through municipal or other local public events. Taken together, events assessed as in favor of candidates from these political forces accounted for around 90 per cent of all observations in which the beneficiary could be identified. Public events blurred with campaign elements were identified in all 26 monitored municipalities, with somewhat greater concentration in Gostivar, Bitola, Vrapchishte, and Tetovo.

At the same time, the role of local authorities in some municipalities was assessed positively. Those in Valandovo and Strumica were noted to have acted and communicated transparently and fairly towards contestants and monitors alike. In Bitola, Chair, Kumanovo, Debar, Delchevo, and Shtip the municipal administrations were seen as acting overall professionally, showing awareness of the importance of neutrality during campaigns, and remaining focused on their core public service duties, without notable campaign involvement or politicized communications. Other municipalities, for instance Prilep, remained engaged in positive ways, including by hosting events that featured representatives from multiple parties.

Overall, the frequent and often highly visible involvement of appointed and elected public officials in campaign activities, as well as the overlap between public events and those serving campaign purposes, created a perception of a common and largely normalized practice - part of what was often seen to be coordinated efforts to promote affiliated candidates and parties. Where observed, such involvement was seen as contributing to the perception of unequal conditions between the contestants, particularly disadvantaging those without representation in, access to, or affiliation with local or national power structures, including formal public institutions, as well as party-linked networks of political influence. While many instances did not qualify as violations, the lack of clear legal boundaries and guidance on permissible forms of support pose challenges to upholding ethical standards of public office and the principle of separation between official duties and political activity, including in cases where public officials at different levels of government, such as central-level officeholders, engage in or support local election campaigns.

Role of civil servants and public sector employees

Monitors also assessed the frequency and the nature of involvement of civil servants and public sector employees in the campaign, including in light of stricter legal restrictions on engagement in political activity during working hours or when performing official duties. Across the monitored municipalities, such involvement of these categories of employees was noted as limited. In around 30 per cent of related reports, monitors noted some level of campaign involvement by public servants during working hours or while on duty, but in only about 11 per cent of these cases such involvement was seen as recurrent, happening *sometimes* or *frequently*. Cases of public sector employees' campaign involvement were most frequently recorded in Tetovo and Shtip, with additional concentrations in Kochani, Ohrid, Tearce, Valandovo, Gostivar, Saraj, and Prilep.

Where involvement by public servants was reported, monitors more often observed passive forms of participation than active campaigning, suggesting a tendency toward less overt engagement in campaign activities. Limited incidence and patterns of more passive engagement may point to a greater awareness of legal and ethical restrictions and a degree of caution exercised by public servants to preserve neutrality while on duty. At the same time, it likely also reflects the practical challenges faced by monitors in establishing with certainty whether activities took place during official working hours or outside of them.

At the same time, some instances of involvement in more active roles were recorded, as were several reports of subtle pressure within institutional hierarchies to attend or support party activities. For instance, in Struga, monitors received reports that some school directors actively pressured employees to support specific candidates. In Kisela Voda, reports noted that staff from healthcare and social services were often engaged in campaign activities after working hours - while permissible, the organized nature of participation may have been indicative of possible institutional pressure or coercion. In Strumica, directors of local public enterprises were observed campaigning openly within the institutions they led or using their authority to mobilize staff through verbal instructions and phone calls. Between the two rounds in Tetovo, the VLEN coalition organized daily coffee giveaways in the city center, where municipal and public sector employees were observed being engaged during official working hours in what appeared to be a political activity.

Role of public security providers

The role of the police and other public security providers during the elections was generally assessed as professional, neutral, and impartial. In the majority of municipalities, monitors noted that the police contributed to maintaining an overall peaceful environment and demonstrated a high level of professionalism, which was highlighted as positive practice and an improvement over previous elections. For instance, in Strumica, Shtip, Kumanovo, Kochani, Delchevo, Dolneni, Bogovinje, Makedonski Brod, and Kisela Voda monitors observed that while the police were visibly present, especially on election day(s) and around campaign activities in open public spaces, their engagement remained aligned with standard security functions, providing a sense of protection without indications of bias. Based on the observations and evidence collected, no instances of undue police involvement in campaign activities, harassment, intimidation, unequal treatment, or failure to provide protection were reported.

Only a handful of reports raised questions about police conduct that could suggest possible selective lenience (Tetovo, Saraj) or passivity vis-a-vis perceived politicized contestant conduct (Studenichani). In Saraj, for example, monitors observed party activists keeping informal records of voters and making phone calls to encourage voter turnout in the presence of police officers, what was perceived as a degree of lenience towards respective political forces.[13] Overall, however, such observations remained at the level of perception, without clear, verified or recurrent instances of undue police conduct.

C. Use of publicly funded projects and related announcements, inaugurations, and publicity to promote candidates

Monitors assessed compliance with legal restrictions to launch new publicly funded projects, extraordinary budgetary disbursements or benefit payments after the announcement of the elections and to promote the start of construction or use of infrastructural developments and facilities through public events starting 20 days before the campaign period.

Observations showed that while numerous publicly funded projects received visibility and publicity during the campaign, the majority appeared to have been ongoing, previously planned and budgeted and therefore did not appear to contravene existing legal restrictions. Instances of new, previously unplanned or unbudgeted projects or public works were identified only infrequently, accounting for some 17 per cent of observations, with recurrent occurrences remaining rare. Examples included at least twelve new projects in Tetovo related, among others, to reconstructions of several roads and of a sports field which were launched during the electoral period, as evidenced by public procurement records. Similarly, in Butel, a couple of new projects were announced and started (closed pool, traffic bumps, modern bridge) and new details about an already started project (building of a policlinic) were released after the start of the electoral campaign. At the same time, monitors acknowledged occasional practical challenges in establishing when exactly projects were initiated, budgeted and in what forms and scale due to limited and/or insufficiently detailed publicly available budgeting and procurement information.

Where a consistent and widespread pattern was observed was in the use of public projects for electoral promotion, both before and during the official campaign period. Officials at national and municipal levels frequently referred to completed, ongoing, or foreseen projects and infrastructural improvements during campaign events and communications of direct or implicit

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[13]   EC Art 179-a classifies as a misdemeanor and envisages fines for the prohibited use (Art. 55.4) of voter register data by candidates, political parties and their representatives to track voters on election day.

support of affiliated candidates and parties. Similarly, incumbent mayors and councilors seeking re-election and candidates showcased such projects as achievements of the respective political force in office, linking continued improvements to their election. This most commonly involved the promotion of infrastructure projects such as roads, water and waste management systems, major urban constructions, and investments in health, education, sports and recreational facilities. In case of incumbents, the legal framework and ethical standards do not provide any guidance or safeguards regulating how they may reference or promote public projects or achievements while performing official functions during an electoral period. Overall, multiple observations related to the promotion of projects were received from at least 14 municipalities, with more pronounced patterns noted in Kochani, Ohrid, Tetovo, and Shuto Orizari.

In several municipalities, monitors further noted that certain projects appeared to have been approved shortly before legal deadlines or strategically launched or highlighted during the electoral period, as reported for example in Butel, Chair, and Shtip. While such practices were not in themselves contrary to the law, they raised questions about strategic timing aimed at maximizing visibility and communication impact during the campaign, offering incumbents and affiliated candidates significant advantages in building campaign narratives centered on demonstrated achievements, development, and effectiveness. Given the predictable timing of local elections, such dynamics may also reflect that general state-level and municipal budgetary and procurement planning may, at least to some extent, take account of campaign considerations and electoral timelines, particularly with regard to the timing of project approval, launch, or public communication. This dimension is not specifically addressed by the existing regulatory framework.

Overall, the extensive references to public projects and investments across many monitored municipalities indirectly benefited the image of incumbents and affiliated candidates, reinforcing perceptions that their election would ensure the continuation of improvements and progress. Such references blurred the line for voters between regular governance and campaigning and contributed to unequal promotional opportunities, favoring contestants enjoying the support and endorsement by parties in positions of power and with a governance record that could be showcased.

Finally, monitors identified no verified instances of new or ad hoc social benefits, subsidies, or other payments granted outside existing entitlements. While a small number of allegations relating to possible party-related employment or contractual arrangements were reports, notably in Chair and Makedonski Brod, these could not be conclusively verified within the scope of the monitoring but may warrant further review by the oversight bodies.[14]

D. Use of public institutions' and public officials' communications to promote candidates

Monitors carried out only limited and mostly context-based monitoring of municipal and public officials' digital communications. A more comprehensive report on this issue has been prepared by IFES North Macedonia, in partnership with the Metamorphosis Foundation.[15] Focused and systematic monitoring of MAR-related practices in the online space would require more comprehensive and tailored approaches and tools, reflecting the distinct dynamics, scale, and modes of digital communication. Within these constraints, observations indicated that,

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[14]   In Chair, AKI candidate's campaign criticized the VLEN opponent of alleged 720 politically motivated employment and procurement decisions in connection with the campaign. While allegedly reported to the SCPC, these claims remained unverified or clarified during the monitoring period.

[15]   See Institutional and Municipal Communication on Facebook and Their Official Webpages During the 2025 Local Election Campaign in North Macedonia, Metamorphosis Foundation.

alongside explicit endorsements and indirect candidate support through the promotion of public projects and other achievements, the use of various communication channels and promotional messaging in the digital space emerged as another notable campaign feature. It was observed to varying degrees in around two thirds of municipalities monitored.

Use of institutional communications

Monitoring of communications by local public institutions and entities showed that the use official communication channels to promote contestants was generally limited and isolated. Social media accounts of municipalities and other public institutions emerged as the most frequently observed channel where communications blurred with campaigning, accounting for around 12 per cent of related reports. Other forms of institutional promotion, including through official websites, printed materials, paid media advertising, public advertising space, and publicly owned communication systems, were reported only sporadically and without evidence of systematic or coordinated use.

Where institutional communications were blurred with campaigning, this most commonly involved the sharing or amplification of campaign-related content, such as links to candidate events or party activities (Tetovo, Kochani, Butel, Makedonski Brod), or the presentation of incumbent candidates' activities and achievements as institutional successes in ways closely aligned with campaign narratives (Tetovo, Ohrid, Makedonski Brod, Gostivar). In other cases, institutional announcements concerning public events or procedures were framed so as to foreground specific political actors (Kochani, Chair, Delchevo), or public channels were used to disseminate media content favorable to particular contestants (Bogovinje, Valandovo, Kochani). While such practices remained isolated rather than systematic, they nonetheless illustrate how institutional communication tools can contribute to unequal visibility during electoral periods.

Use of individual public officials' communications

Compared to institutional channels, the use of individual public officials' communication platforms, in particular social media profiles, emerged as a more frequent and impactful source of campaign-related messaging. Monitors observed officials using both official and private accounts to promote campaign activities, showcase past, ongoing, or planned municipal projects, and link governance performance to electoral outcomes in organic, shared, and limited paid posts, often blurring the distinction between official duties and campaigning. A recurring challenge for the monitors was in determining whether communications made via public officials' private accounts constituted private expression or *de facto* official messaging, especially where these accounts were regularly used to disseminate information about public functions and achievements. Overall, while such practices were recorded across many municipalities, more sustained patterns were observed in Tetovo, Kochani, Gostivar, Ohrid, Kumanovo, and Bitola, underscoring the role of individual officeholders as key vectors through which advantages associated with holding public office were translated into campaign visibility.

3. MAR During Campaign Silence Periods and Election Day(s)

Election days took place on Sundays, 19 October and 2 November. By law, campaign-silence period starts 24 hours before each election day, and lasts until the closure of polls.

Observation of election day(s) during the first and second rounds and of campaign silence periods was envisaged as a limited effort, with a focus on MAR manifestations. The overall objective was to form a picture of whether the neutrality of public actors, the separation of state

and party, and the fairness of electoral competition during this part of the process were upheld. Comprehensive coverage of election day procedures such as opening, counting, or tabulation, or the observation of higher-level commissions was not envisaged.

A. Campaign silence

With regard to the campaign silence period, approximately 80 per cent of monitors' responses indicated that no MAR-related activities were observed. Of the remaining cases where some issues were noted, residual campaigning or activities of promotional character by public institutions, entities, public officials or third parties was the most common observation. These were predominantly related to online promotion, including continued posting or sharing of campaign-related content on social media platforms, sponsored or boosted posts, indirect messaging perceived as favoring electoral contestants, or providing misleading information about potential electoral outcomes. Reports of continued social media use for electoral promotion were made from 10 municipalities, including Butel, Chair, Debar, Delchevo, Dolneni, Makedonski Brod, Struga, Strumica, Tearce and Tetovo. At the same time, the majority of these instances was described as having occurred *seldom*, while only isolated responses (around 3 per cent) reported that such activities were observed *sometimes* or *frequently*.

By contrast, observations of campaign materials being displayed at public premises and vote buying or pressure on voters during the campaign silence period were limited, with only a small number of isolated responses indicating that such practices were noted beyond a *seldom* basis.

B. Election day(s)

Election day(s) were characterized by monitors as orderly and professionally administered. In their overall assessment, approximately 72 per cent of reports described the process as fully free from practices that could be deemed as undermining the neutrality of public officials, separation of state and party, and fairness of competition, while further 16 per cent assessed it as mostly free, noting only isolated concerns. No differences in assessments of the first and second rounds of voting were noted.

When assessing the environment outside the immediate premises of polling stations, the overwhelming majority of monitors' reports described it as calm and largely without MAR-relevant irregularities. No cases were noted of polling stations being located in buildings also used by contestants or of public vehicles being used for partisan election-day transport. In a small number of municipalities (Debar, Dolneni, Ohrid), monitors referred to groups of presumably employees of public institutions occasionally arriving in a coordinated manner and remaining gathered near polling station entrances - practices that were flagged as a potential indicator of organized mobilization. In some municipalities (Tetovo, Debar, Ohrid, Dolneni, Saraj), monitors also noted instances of party-linked individuals in the vicinity of polling stations who were reportedly keeping informal records of voters entering to vote - a practice viewed as suggestive of possible coordination, pressure, or undue monitoring. These two types of observations were among the most frequently flagged.

Further, more isolated comments referred to campaign materials remaining visible around polling stations (Bitola, Centar Zhupa, Debar, Tetovo). Also, a small number of observations referred to suspected vote buying or pressure, including in Debar and Ohrid, where monitors referenced information in the public domain related to vote-buying allegations. Overall, the above observations represented instances rather than consistent patterns and did not point to systematic practices or coordinated attempts of public resource misuse.

The observed process inside polling premises was also described as orderly, run by election officials who acted professionally overall. The overwhelming majority of observations did not reveal any MAR-related irregularities. Observed instances involving public officials seemingly interfering in the work of election boards (Debar), partisan conduct by election board members (Tetovo), or attempts to influence voters (Shuto Orizari) were rare and isolated. Taken together, these observations also did not point to systemic deficiencies or patterns of malpractice.

Overall, election-day observations did not reveal any MAR manifestations that were specific to election day itself. Where isolated concerns were noted, these appeared to reflect or echo broader dynamics and vulnerabilities already observed during the pre-electoral and campaign periods, rather than constituting new or distinct patterns emerging on election day.

4. Impact of MAR on Underrepresented and/or Vulnerable Groups

In line with the monitoring methodology, observers assessed the potential impact of MAR on vulnerable and/or underrepresented groups as a cross-cutting consideration throughout the observation. This approach reflected an understanding that MAR-related practices may have differentiated effects across society, depending on existing inequalities or vulnerabilities, access to resources, and levels of participation and representation.

While a wide range of societal groups may be affected by MAR manifestations, the monitoring maintained a targeted analytical focus on three groups: women, persons with disabilities (PwD), and non-ethnic Macedonian communities. This focus was guided by considerations of inclusiveness, relevance to the electoral context, as well as capacity limitations. The findings presented below highlight how MAR-related practices intersected with gender, disability, and ethnicity, without implying that other groups were unaffected or excluded from consideration.

A. Women

Monitors' reports indicate that the involvement of women in the electoral context was primarily seen through their roles and visibility during campaign activities. There appeared to be no indications of administrative pressure or inducements specifically targeting women and hence no discernable MAR impact on this group. At the same time, the monitoring revealed a pronounced gender imbalance both in prominent campaign-related roles and in the role gender appeared to play in cases of non-neutral conduct by public officials.

Across all observed municipalities, monitors noted 104 municipally or publicly initiated events with clear campaign elements that featured women in prominent or speaking roles, compared to 405 such events featuring men. Women therefore accounted for some 20 per cent of prominent roles at events with a potential MAR dimension, with men accounting for the large majority.

Quantitative data provide further insight into the gender distribution of public officials who were observed as campaigning or contributing in other ways to the promotion of electoral contestants while acting in official capacity. In 61 reports, such perceived departures from neutrality were attributed mostly to men, compared to one report identifying mostly women; 12 reports described balanced involvement, while 16 stated that the gender of the actors could not be reliably assessed. Overall, where official functions appeared to have been mixed with campaigning, they were predominantly associated with male public officials.

This quantitative imbalance corroborates monitors' qualitative observations that campaign-related visibility in contexts involving public institutions, officials and other prominent figures was predominantly male. Women more frequently appeared in supportive or presentational roles, including coordinators, introducers and moderators, rather than as leading political actors or speakers. Such patterns were noted in several municipalities, including Butel, Saraj, Studenichani, Tetovo, and Tearce, where monitors described male-led campaign dynamics and limited female visibility.

In some municipalities, monitors further reported that structural and traditional factors shaped women's electoral participation. In Saraj, observers described gender-segregated campaign activities and limited female presence at main campaign events, while in Butel, monitors contrasted gender-balanced rallies organized by certain parties with predominantly male-dominated campaigning by others. In several municipalities, including Tetovo, Lipkovo, Bogovinje, and Studenichani, monitors noted that the fact that campaign events were mostly held in the evening hours seemed to have limited women's participation, particularly in more traditional settings where late attendance posed social or practical constraints. While these patterns were not directly linked to MAR-related practices, they influenced the visibility and participation of women in the campaign environment within which MAR risks were assessed.

Some events addressing wider issues of relevance to women were frequently used as campaign platforms for reaching female voters, with explicit campaign messaging and appearances woven in. This included women's health and breast cancer awareness-linked activities observed in Chair (VLEN), Tetovo (SDSM, VLEN, AKI), Tearce (VLEN, AKI), Butel (SDSM), Bogovinje (by VLEN), Chair (VLEN), Saraj (VLEN, AKI). Such events often had predominantly women in attendance. In Lipkovo, monitors documented a large gathering of women formally presented as a social or cultural event but assessed as having a clear campaign character, illustrating how women's participation was at times mobilized in ways bordering on instrumentalization of civic engagement for campaign purposes.

Positively, monitors' reports highlighted the role of women-led CSOs in Delchevo, Makedonski Brod, Saraj, and Valandovo in facilitating women's engagement in electoral oversight and reporting as a way of raising women's capacity and awareness.

B. *Persons with Disabilities*

Issues related to PwD participation appeared to feature only to a very limited extent in campaign activities, including a limited number of events with a PwD dimension, such as, for instance, an AKI candidate's meeting with an association of persons with permanently damaged or impaired hearing in Tetovo.

Infrastructural and administrative barriers were seen as a more significant concern than any undue campaign-related practices. Across several municipalities, the most consistent issue raised was related to the physical accessibility of polling stations on election day(s). In Delchevo and Kisela Voda, for example, observers reported that while polling stations were often equipped with designated voting booths for PwDs, the buildings themselves lacked adequate physical access, such as ramps or step-free entry. This often undermined the ability of PwDs to access polling premises independently. In contrast, in Kumanovo, monitors noted inclusive and tolerant institutional conduct towards all citizens, including vulnerable groups, while in Ohrid, monitors welcomed efforts to cater to voters with disabilities through home voting.

With regard to MAR, observations did not document specific cases of campaigns positively or negatively targeting PwDs. For instance, although various infrastructural projects were widely promoted, no cases of explicit targeting of PwDs were noted in any related communications. In general, references to vulnerable groups in campaign narratives were only occasional and generic.

C.   Non-Macedonian Ethnic Communities

Issues related to non-ethnic Macedonian communities featured with some regularity in observed campaign activities, reflecting the demographic and political salience of ethnicity in a number of municipalities. These observations primarily concerned patterns of campaign outreach and visibility in areas inhabited by, or directed at, specific ethnic communities, as well as instances where ethnicity appeared to intersect indirectly with campaign practices involving public institutions or resources.

In several municipalities, ethnicity functioned as an additional fault line shaping campaign competition and outreach strategies. Campaign activities included visits, neighborhood walk-throughs, use of minority languages in campaign messaging, and events directed at specific communities. Such practices were mostly seen by monitors as efforts to demonstrate proximity, responsiveness to specific needs, or representation.

At the same time, observations suggested that communities and areas with ethnically mixed populations were often characterized by a higher degree of social and economic dependence on municipal structures and services, which shaped expectations of interaction with those in positions of authority. In some contexts, campaign-related gestures, visits by office holders, or the visibility of public officials were normalized, viewed as customary or anticipated elements of political engagement. While such dynamics pointed to contextual vulnerability and the potential for clientelist relationships, monitors did not record systematic or overt patterns of pressure, coercion, or inducement directed at minority communities.

The observations most closely associated with potential MAR-related effects concerned the timing and visibility of public works, infrastructure projects, and official announcements in minority-inhabited areas during the campaign period. In Kochani, for example, increased street paving and repair works were observed in Roma neighborhoods shortly before the elections. In Butel, public project announcements were incorporated into campaign messaging directed at the Albanian community, including in predominantly Albanian settlements such as Ljuboten. While these cases did not involve direct inducements or the provision of new benefits tied explicitly to voting behavior, they illustrated how public interventions in ethnically defined settings could acquire heightened political significance during the campaign period.

5.   MAR in Connection with the Role of Third Parties

The role of third parties in the campaign and in the context of MAR was monitored within a targeted and limited scope, focusing on overall patterns and observable campaign-related activities by actors other than electoral contestants and public institutions, officials and entities. Given the pilot and exploratory nature of the MAR monitoring methodology, this component aimed primarily to raise awareness and map potential areas of third-party involvement, rather than to conduct systematic or exhaustive monitoring. In combination with the inherent complexity of third-party relations and interconnections, which are often informal, opaque, or difficult to substantiate, the monitoring yielded a limited base of findings in this area. In the large majority of cases, monitors either did not identify third-party involvement or were unable to

reliably establish the nature and extent of links between different actors. At the same time, the experience and lessons learned helped identify areas of vulnerability and methodological gaps and may serve as a basis for expanding the MAR methodology and strengthening future third-party monitoring efforts in this complex area.

Where third-party involvement was observed, it encompassed a diverse set of actors, including local media outlets, informal community groups, local businesses, CSOs, and, more sporadically, religious or cultural venues. For instance, in Dolneni, a local business owner announced a EUR 9-million investment in local infrastructure and development conditioned on a candidate's victory. In Kumanovo, multiple private and commercial venues, including cafes and restaurants, hosted candidates' campaign events, suggesting potential third-party affiliations.

However, local media, especially online portals, emerged as the most frequently referenced third-party actor. In Bitola, local outlets *Setaliste* and *Apla* promoted campaign events, indirectly boosting candidate visibility. Similarly, in Ohrid, monitors noted that several local portals provided disproportionately favorable and frequent coverage of the incumbent mayor and of the ruling party, while opposition actors received limited visibility. This imbalance was linked to the dependence of local media on municipal support and advertising. Similar patterns of selective reporting and unequal access were observed in Strumica and Gostivar, where media coverage amplified campaign messages of certain contestants. In Tetovo, concerns were raised locally that multiple online portals, such as *Gjurmët*, *Nentoka*, *Busulla Politike*, and *Albvizion,* which were perceived as affiliated with and actively promoting the VLEN candidate, were also alleged to have links to public institutions and their employees. These claims, however, could not be independently verified within the scope of the monitoring.

At the same time, third-party involvement was generally reported as isolated or infrequent, with only a handful of cases indicating repeated or continuous campaign support. Third-party support was also primarily framed as general campaign promotion and messaging, with only singular cases where formal connections, coordination, or clear affiliations between third parties and local public institutions and entities were suspected. Most of third-party involvement therefore did not carry clear or substantiated MAR markers.

Conversely, in several cases, observers noted that third parties, particularly independent media, such as *Portalb* and *Nistori,* and CSOs, also played a constructive and corrective role in the electoral process. In several municipalities, including Ohrid, Shuto Orizari, and Kumanovo, media reporting and civic scrutiny were credited for the deterrent effect through exposing questionable practices, increasing public awareness, and exerting reputational pressure on political and institutional actors.

Despite repeated international observer recommendations, the activities of third parties during elections remain largely unregulated. Based on the above findings, introducing appropriate and proportionate regulation of third-party campaign activities remains essential for safeguarding electoral integrity.

Observed Effects of MAR Monitoring as Civic Oversight

Beyond documenting manifestations of MAR, the monitoring also functioned as a form of civic oversight. While the project was not designed to intervene, sanction, or enforce compliance, its presence, visibility, reporting and subsequent advocacy were anticipated to also have some impact on stakeholders' conduct, awareness of MAR and related risks, as well as perceptions

and attitudes towards such form of civic engagement. This section summarizes monitors' assessments of these effects, based on observations, stakeholder interactions, and public responses across the monitored municipalities.

Behavioral Effects: Across a number of municipalities, the presence of monitors and the prospect of public reporting were assessed as having a positive deterrent effect on potential problematic practices. Contestants, public officials and local institutions were generally reported to have acted with greater caution and restraint when aware that their conduct was being observed and documented. In municipalities where a baseline culture of accountability and administrative professionalism already existed, monitoring was perceived as reinforcing existing norms of neutrality and compliance.

At the same time, deterrence effects were uneven. In contexts where MAR-related practices were normalized, tolerated, or perceived as low-risk, monitoring appeared to have a more limited influence on behavior. In such settings, some actors demonstrated only superficial compliance or continued practices that blurred the boundary between governance and campaigning, particularly when no prompt enforcement, sanctions, or other credible accountability responses were expected. These variations underscore that civic monitoring and reporting alone cannot substitute for effective institutional accountability mechanisms, but can contribute to restraint where conducive conditions and supporting regulatory environments exist.

Stakeholder Attitudes and Responsiveness: Institutional and political responses to monitoring ranged from constructive engagement to skepticism or disregard, often reflecting local political dynamics and power configurations. In municipalities with lower MAR prevalence, institutions and contestants were generally receptive to monitoring, demonstrated openness to dialogue, and cooperated with observers. In other contexts, particularly in highly competitive races and contests involving incumbents or contestants affiliated with positions of power, cooperation tended to be more limited, with monitoring sometimes viewed with suspicion or treated as a procedural burden rather than an accountability mechanism. This also included instances where engagement declined following the communication of MAR-related concerns by monitors. In some cases, differences in responsiveness between local- and central-level actors were observed, with some local interlocutors showing greater willingness to engage with monitors, while some central-level actors appeared more inclined to downplay MAR-related concerns.

Against this backdrop, the monitoring also contributed to reinforcing the legitimacy of civil society as a constructive oversight actor and to opening space for dialogue on the use of public resources in the electoral context. While such effects are incremental and not always immediately visible, the monitoring helped normalize civic scrutiny and cooperation with civil society as part of a constructive democratic process, planting foundations for more substantive engagement and accountability beyond the electoral period.

Public Awareness, Understanding and Attitudes Towards MAR: Levels of awareness and understanding of what constitutes MAR varied significantly across municipalities and stakeholder groups. In more urbanized or civically active contexts, the monitoring and CSO-led local outreach and advocacy were seen as making an important contribution to clearer recognition of MAR as a practice that undermines electoral fairness and public trust. Contestants, institutional actors, and members of the public in these settings were more likely to engage with the issue and to view civic oversight as legitimate. In contrast, in several smaller or traditionally dominated municipalities, MAR-related practices were more frequently normalized or tolerated, with awareness of MAR as a problem and levels of related public concern remaining more limited. Overall, while changes in awareness and attitudes are gradual

and uneven, the monitoring helped initiate and reinforce longer-term processes of reflection, reassessment and learning about MAR, it's possible forms, and associated risks, strengthening the knowledge base available for future analysis, dialogue, and reform efforts.

Democratic Ecosystem Effects: The monitoring contributed to broader democratic dynamics by supporting media scrutiny, public discussion, and reputational accountability. In several municipalities, independent media and civic actors amplified monitoring findings, increasing transparency and exerting informal pressure on political and institutional actors. While such effects were not uniform or systematic, they illustrate how structured civic observation can strengthen the broader accountability ecosystem.

Overall, the monitoring contributed to a set of reinforcing effects, including increased awareness and understanding of MAR, greater exposure of political and institutional actors to dialogue and scrutiny, and incremental strengthening of wider accountability frameworks. Through structured engagement and local advocacy, it underscored the value of multi-actor collaboration and highlighted the constructive role civil society can play as a partner in democratic oversight.

Recommendations

Based on the findings of the monitoring, the following recommendations are provided with the aim of supporting the review of MAR-related regulations and practice, informing further advocacy efforts, and contributing to broader reform and accountability efforts.

Improvements to the legal framework:

- **Use of public premises:** Clarify provisions on access to public premises for campaign purposes, in particular regarding the granting of exceptions and the possibility of paid use. Clear procedures, criteria, and requirements for making related decisions publicly accessible would strengthen transparency, enable oversight, and help ensure equal conditions for all electoral contestants, reducing the risk of perceived or actual preferential treatment.
- **Campaign involvement of public officials:** Clarify permissible and prohibited activities by different categories of public officials, in particular on making a distinction between official capacity and public duties. Such clarification would support legal certainty, strengthen oversight, and reduce the risk of undue advantage arising from the blurring of official functions and electoral campaigning.
- **Temporal restrictions on campaigning by officials:** Consider introducing clearer legal provisions or practical guidance encouraging public officials engaged in campaigning to take leave from official duties or to transparently communicate about working schedules. Such measures could help support the effective separation of official responsibilities from campaign activities.
- **Launch and promotion of publicly funded projects:** Strengthen safeguards against the electoral use of publicly funded projects by applying relevant restrictions earlier in the pre-electoral period. In addition, while safeguarding freedom of expression and the right of candidates and officials to respond to legitimate inquiries, the scope of the current exception allowing for commentary on such projects should be clarified or refined to prevent its use for *de facto* unrestricted promotional campaigning.

- **Campaign support online:** Address campaign-related activity in the online environment more comprehensively, including the use of websites, social media, and communication channels associated with public institutions and officials. Clarifying the applicability of existing principles of institutional neutrality and public resource use to online spaces would reduce legal uncertainty and help prevent undue advantage in digital campaigning.
- **Third party campaigning:** Introduce proportionate regulation of third-party campaign activities, in line with longstanding international recommendations. While this monitoring did not establish direct links between third-party campaigning and the misuse of public resources, the current lack of regulation allows potential financial flows, indirect support, and misuse of administrative resources to remain opaque, undermining transparency and electoral integrity.

Measures to support implementation:

- **Guidance and training:** Provide practical guidance and targeted training to political parties, public officials and their teams, including communications staff, on neutrality obligations, ethical standards, and the distinction between official duties and campaign activities. Such measures can strengthen understanding of what constitutes MAR and improve the ability to recognize and avoid problematic practices.
- **Internal Reporting and Leadership:** Encourage the establishment and use of internal channels within public institutions for flagging undue conduct or pressure during elections. Visible endorsement by institutional leadership and clear messaging on expectations of neutrality can help foster a culture of integrity and proactive compliance.
- **Transparency Tools and Registries:** Consider establishing, maintaining, and mandating the use of transparency tools and public registries relevant to elections. Building on existing mechanisms, such as the vehicles register, public institutions or municipalities could be required to proactively disclose information on the availability and use of public premises during electoral periods to support oversight and equality of opportunity.
- **Codes of Conduct for Public Administration:** Review existing codes of conduct applicable to public officials and public administrations to ensure their clear relevance and applicability during electoral periods. Actively promote these standards in the electoral context can help reinforce expectations of neutrality and ethical conduct as a preventive complement to existing legal obligations.

Enforcement-related visibility and communications:

- **Communication on Restrictions and Enforcement:** Oversight bodies could strengthen public and institutional communication on MAR-related legal restrictions, enforcement powers, and measures taken during electoral periods. Clear and timely communication can help address perceptions that violations are unlikely to be sanctioned, which were noted during these elections.
- **Use of Official Vehicles:** Strengthen the enforcement and communication of existing requirements related to the use of official vehicles during elections, including red license plating and the timely submission of data on public vehicle use to the SCPC. Clear communication on measures taken in cases of delay or non-compliance can help reinforce expectations and deterrence. In addition, guidance could clarify that prohibitions apply not only to the use of public vehicles, but also to the use of public funds to finance rented or privately owned vehicles used for campaign purposes.
- **Local Reporting and Rapid-Response Arrangements:** Consider establishing local mechanisms to facilitate timely reporting and preliminary review of alleged MAR-related concerns during elections. Such arrangements, potentially including designated contact

points or rapid-response mechanisms, could support early clarification of issues and the application of proportionate interim measures, where appropriate, without prejudging outcomes or replacing formal enforcement procedures.

Support to civic oversight and public awareness

- **Observer capacity and networks:** Strengthen and expand networks of local, impartial civil society observers, who bring contextual knowledge of relevant issues, institutions and community dynamics. Experience highlights the value of viewing monitoring as a continuous process rather than a one-off project, contributing to the gradual institutionalization of citizen oversight as a regular and constructive feature of local democratic life and to building a culture of transparency and civic responsibility.
- **Integrating underrepresented groups into MAR awareness and monitoring efforts:** While the monitoring did not identify MAR-related practices directly targeting underrepresented or vulnerable groups, future MAR awareness-raising and civic monitoring initiatives should factor in how existing inequalities related to gender, disability, ethnicity, or social position may intersect with MAR-related risks. Strengthening the capacity of CSOs and observers to recognize and contextualize such intersections can help ensure that potential disproportionate impacts are identified early and that monitoring and advocacy efforts remain inclusive and responsive.
- **Role of Media:** Explore collaboration with media outlets as partners in promoting transparency and accountability related to the use of public resources during elections. Such cooperation can support informed public reporting, increase awareness of integrity safeguards, and reinforce expectations of responsible governance.
- **Public Awareness and Civic Education:** Support public sensitization about MAR, including through education and communication initiatives between elections. Public campaigns, including in accessible formats and targeting different audiences, can help raise awareness and counter the normalization of improper practices.

Lessons Learnt from the Implementation of the Monitoring Project

This section summarizes key lessons from the implementation of this pilot MAR monitoring project. It highlights practical insights on methodological design, scope, resourcing, and implementation, intended to inform future MAR monitoring initiatives, support realistic expectation-setting, and help calibrate the level of effort in comparable contexts.

Methodological Design - Ambition vs. Realism: A tailored, context-specific methodology grounded in the national legal framework and past electoral experience was essential for conducting a structured, consistent, and comprehensive monitoring. While broader thematic coverage enhanced analytical depth, some MAR-related practices, particularly more informal, indirect, or concealed ones, remained inherently difficult to observe and verify through time and resources-limited civic monitoring. Experience therefore underscored the importance of calibrating methodological ambition to operational feasibility and capacity - an area where also earlier input from experienced CSO partners could be useful. In this context, also methodological guidance materials should strike a balance between comprehensiveness and manageable volume and ease of use. Overall, explicitly recognizing methodological and operational limitations at the design stage, prioritizing key MAR risk areas, setting realistic evidentiary thresholds, and managing expectations about what monitoring can and cannot deliver are all critical to maintaining analytical value and credibility.

Scope, Coverage, and Timing: The selection of municipalities to be monitored, guided by representativeness considerations, enabled coverage of diverse political, geographic, and socio-economic contexts and supported a more nuanced understanding of how MAR-related practices vary across settings. In addition, the extended monitoring timeframe covering all key stages of the electoral process proved important in capturing shifts in campaign intensity and MAR prominence. At the same time, experience showed that choices related to geographic scope and partner CSO selection and assignment influenced in some cases the depth and consistency of reporting, reflecting differences in local familiarity and capacity. Future initiatives may therefore benefit from more explicit alignment between coverage ambitions, partner capacity profiles, and expected outputs, with these trade-offs clearly considered at the design stage.

Early and Timely Planning: Experience highlighted the importance of early and timely planning for MAR monitoring, encompassing administrative, methodological, and substantive preparation. Early investment in planning supported smoother implementation, clearer task allocation, and more effective coordination once monitoring began. Building on this, future initiatives may explore extending preparatory work to include earlier desk-based analysis of publicly available data on public spending, asset declarations, official vehicle ownership, public projects, and procurement at the central level, as well as considering a limited and clearly defined post-election follow-up phase. Subject to resources, such preparatory and follow-up elements may strengthen analytical readiness and support a more rounded assessment of MAR practices without expanding the scope of field observation.

Level of effort and resources: The monitoring demonstrated that effective MAR observation is a resource-intensive undertaking, requiring sustained coordination, technical support, and analytical capacity. In practice, implementation required the equivalent of several staff members with nearly full-time involvement during key phases at the project team level, complemented by additional administrative support and external expertise. This level of effort was essential to ensure continuous guidance to monitoring teams, quality control, and timely consolidation of findings. This underscores the importance of realistically planning and budgeting for the full scope of human and financial resources required for comparable MAR monitoring initiatives.

Reporting Tools and Processes: The use of electronic reporting and centralized qualitative and quantitative data aggregation using KoboToolbox proved to be a significant facilitator for managing the volume and complexity of information gathered. Structured digital reporting supported consistency, enabled timely oversight, and simplified data consolidation and analysis across municipalities. At the same time, experience showed that such tools are most effective when accompanied by focused practical training and continuous guidance, particularly during the initial stages of implementation. Future initiatives may therefore benefit from prioritizing simplicity and usability in reporting design, including regarding evidence collection, allocating sufficient time for hands-on familiarization, and planning for ongoing support to ensure that reporting processes remain intuitive, proportionate, and analytically meaningful.

External Engagement and Communication: The monitoring underscored the relevance of carefully considering how civic observation engages with institutional stakeholders, oversight bodies, and the wider public. While this pilot, by design, maintained a clear distinction between observation and investigation or enforcement, experience suggests that choices related to the level, timing, and form of communication about the monitoring effort and MAR-related risks can influence access to information and relevant documentation, stakeholder responsiveness, and the reach of findings. Future initiatives may therefore benefit from reflecting in advance on calibrated engagement strategies, including how and when to communicate with oversight institutions and the public, in order to further support awareness and engagement.

Capacity Development: Beyond its analytical outputs, the monitoring also contributed to strengthening the capacity of participating CSOs to engage in observation and with complex MAR-related issues. Through hands-on implementation, repeated reporting cycles, and sustained guidance, CSOs enhanced their understanding of legal and procedural boundaries, improved skills in documentation, verification, and analysis, and gained experience in applying structured and replicable tools and methodologies in a sensitive oversight area. This learning-by-doing dimension underscores that MAR monitoring can serve not only as an accountability tool, but also as a means of developing durable expertise applicable both during future electoral periods and, where relevant, to monitoring and advocacy efforts related to government actions and potential MAR manifestations beyond elections.

Taken together, these lessons illustrate that MAR monitoring as piloted can be successfully implemented and deliver meaningful analytical and capacity-building value when underpinned by well-calibrated methodological design, sufficient resourcing, and sustained coordination and support to implementing partners. The experience provides a solid foundation for similar future initiatives seeking to monitor and address MAR through structured and credible civic oversight.

Annex I: Composition of coalitions in observed municipalities

1. Coalition "Your Macedonia" - VMRO-DPMNE (VMRO-Democratic Party for Macedonian National Unity), Socialist Party of Macedonia, Democratic Party of Serbs in Macedonia - DPSM, Democratic Union - DS, Serbian Progressive Party in Macedonia - SNSM, Bosniak National Party - BNP, Democratic Forces of the Roma - DSR, Party of United Democrats of Macedonia - PODEM, Party of the Vlachs of Macedonia, GLAS for Macedonia - GLAS, New Liberal Party - NLP, Social Democratic Union - SDU, "Roma United from Macedonia" - ROM, Workers and Peasants Party of the Republic of Macedonia, United Party for Equality of the Roma - OPER, Dignity, Macedonian Concept - MConcept, Party of the Croats in Macedonia - PHM, Macedonian Action - MAAK, led by VMRO-DPMNE (VMRO Democratic Party for Macedonian National Unity).

2. "Coalition for Local Elections 2025" – Social Democratic Union of Macedonia - SDSM, New Social Democratic Party - NSDP, VMRO-People's Party - VMRO-NP, Party of the Movement of Turks in Macedonia - PDT, Right (Desnica), Party for Social and Economic Progress - POEN, Party of Democratic Action of Macedonia, Party for Democratic Prosperity of the Roma - PDPR, Central Democratic Union - CDU.

3. Coalition VLEN (Besa Movement, Democratic Movement, Alternativa).

4. Coalition National Coalition for Integration – AKI (DUI –Democratic Union for Integration, ASH – Alliance for Albanians wing of Zijadin Sela, ASH – Alliance for Albanians wing of Arben Taravari, LP - People's Movement of Skender Rexhepi - Zejd).