



Paid political advertising in elections

A Report on Media Access and Political Advertising in Europe with Recommendations for North Macedonia

May 2026

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1. The focus of this report

This report reviews regulations and practical use of media in relation to election campaigns in European countries, including jurisdictions where paid political advertising is prohibited, restricted, or publicly subsidized. The two main areas that will be addressed are:

A. Regulations of paid advertising in relation to elections campaigns. This entails a focus not only on electoral contestants, but also on non-contestant campaigners (formerly known as third parties) and on influencers on social media. Given its potentially substantial impact on this issue in European Union member states, the European Union 2024 Regulation on the transparency and targeting of political advertising will be analysed in particular, though given that it only came into force in late 2025, the practical impact is not yet known.

B. The provision of free or subsidised access to media by electoral contestants. In nearly three out of four European countries are political parties provided with free or subsidised access to media (television and in some cases also radio) in relation to elections. This report will analyse approaches to the allocation of such media access, and how recent changes in how Europeans consume media has arguably come to undermine the value of existing forms of media access provided to electoral contestants in most European countries.

Having reviewed the regulations in European countries and in the European Union from the perspective of recent developments, this report considers the different regulatory approaches that are available, and makes recommendations to the parliament of North Macedonia on legal reform, and to public institutions about other important reforms and activities.

2. The impact of recent societal developments on media access and paid advertising in elections

Advertising has been a part of political processes and elections for a long time. European countries have introduced various regulations, from explicit bans on advertising to restrictions of spending (as part of overall spending limits), and transparency requirements ensuring transparency in spending on political advertising.

In addition, many European countries have introduced provisions for access to media by all relevant political actors, as it is argued that such provisions can reduce the advantages of having access to large amounts of money, level the playing field and help give emerging political actors a voice in electoral process.

Developments during recent years have changed various situations drastically, and regulatory systems have become less relevant due to an incapacity to change with these developments. To give some examples:

Online and social media advertising has increased significantly as a part of election campaigns. Some countries that have carefully regulated broadcast advertising have failed to apply these

regulations to online advertising. This includes the UK, where a total ban on political broadcast advertising does not apply to advertising online, and online political advertising has as a result been referred to as the “Wild West” of election campaigning.¹ In other countries, such as France, regulations (in this case a total ban) on political advertising also applies to online advertising. However, there are arguments that such bans may lead to political actors seeking alternative (opaque) ways of reaching voters online.² The case of Germany, where political advertising is largely unregulated, is telling – research indicates that political parties spent close to EUR 10 million on online electoral advertising in each of the 2021 and 2025 elections.³

Increased role of non-contestant campaigners.

Although hard data is generally absent due to limited transparency provisions, non-contestant campaigners are playing an increasing role in election campaigns in many countries. These can be organisations, groups of people or even individuals who engage in election campaigning in some way (explicitly supporting a political contestant or paying for advertising with a content that can be seen as implicitly supporting or undermining a particular electoral constant or contestants).⁴ Non-contestant campaigners can have some connection to electoral contestants (organisationally or through collaboration) or they may be entirely independent of electoral contestants. Only in a handful of European countries are there provisions on non-contestants reporting on their spending on political advertising.⁵

The rise of the social media influencer

Accompanying the rise of social media is the increased role of online influencers. Most of these normally post content that is unrelated to politics, and many have followings that wildly exceed the reach of political parties or politicians. Given their potential hold over the views and voting intentions of citizens, influencers are increasingly of interest for political actors.⁶ One challenge in the role of influencers in election campaigns is the risk of blurring between organic and paid content. In the context of this report, only the campaign finance aspects connected to the involvement of influencers in election campaigns will be considered.

¹ TaylorWessing (2024). In this report “online political advertising” refers both to advertising on websites and online portals and to social media platforms.

² For example, this can include paid for content that seems organic (posted personally by persons or by bots). One 2024 study showed that the French far right has become significantly more present in online campaigning. VoxPop (2024).

³ FavStats.EU (2025). There are certainly exceptions – one study into the May 2026 by-elections in parts of Ireland indicated that only 0.3 per cent of advertising costs were spent on online advertising. Briefing, the (2026). As noted in the next section, advertising in broadcast media is prohibited in Ireland.

⁴ This can include a group of friends having a banner printed supporting a candidate, or an environmental organisation taking out online adverts criticising the government party’s environment policies and calling for voters to reject them. A borderline example would be an individual having leaflets printed showing the stance of different candidates on a particular issue, not explicitly calling for voters to support or reject any candidate, but urging them to take the stance of the candidates on this issue into account when voting.

⁵ IFES (2026).

⁶ Conversation, the (2025).

Decreased relevance of public media reduces the importance of providing media access for campaigning.

The government provision of free or subsidised access to public media relies on voters depending on such media in informing their voting decisions. The importance of such provisions are gradually decreasing since voters rely less on direct broadcast media, compared to online media (which is primarily privately owned). In addition, many who do watch television replace watching live TV with use media on demand (in North Macedonia for example using services such as MagentaTV or A1 Xplore TV), which normally allows users to skip ads. As a result, the levelling effect of providing access to media for campaigns is reduced, and the advantages of some contestants having access to large amounts of money is increased.

3. Comparative experiences

3.1. Regulations on paid political advertising in European countries

The two main regulatory approaches to paid political advertising across Europe is to prohibit it entirely (at least on broadcast media), or to permit advertising, often with no particular regulations other than requiring reporting on spending on advertising, and in some cases requiring that advertisers publish their advertising rates.

Bans on political advertising exist in most West and South-Western European countries, while they are almost entirely lacking in Central, East and South-Eastern Europe, as seen in Figure 1.⁷ In almost all of the countries that ban political advertising in broadcast media, these bans do not apply to political advertising in other forms of media (traditionally print media, today increasingly important online media).⁸ xx

⁷ Figure 1 is based on ongoing author research, with a caveat that some recent changes in legislation may not be reflected, in particular in relation to smaller states.

⁸ Some other countries ban political advertising on public television only, as in Latvia and in Sweden.

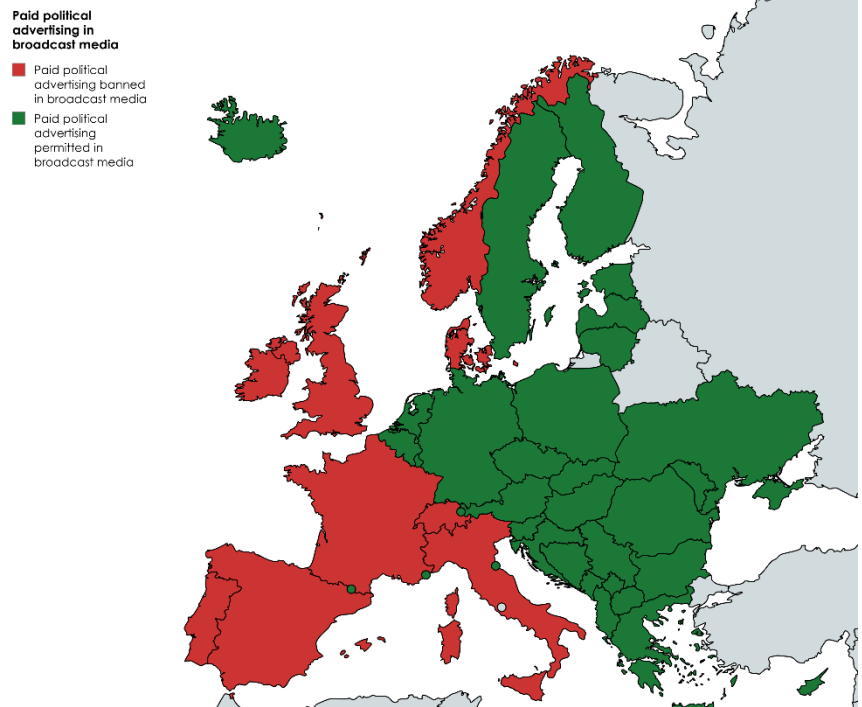
One example is the **United Kingdom**, where political advertising has been prohibited on television and radio since 2003.⁹ This ban was the subject of a European Court of Human Rights ruling in 2013, which found that this ban does not constitute a violation of Article 10 on the Freedom of Expression in the European Convention of Human Rights.¹⁰

Political advertising on media other than television or radio is largely unregulated in the UK. Traditionally, this mainly meant leaflets and advertising in print media, though while online advertising has become increasingly important in recent years, such advertising is also exempt from regulations. The main regulation on online advertising by electoral contestants comes from spending on such advertising being part of the overall spending limits and reporting requirements that are in place.

The Advertising Standards Authority in the UK is generally responsible for advertising in the country. Non-broadcast advertising was however removed from their legal remit after the 1997 elections,¹¹ and since broadcast political advertising is prohibited, this means that no institution in the UK has a legal mandate to monitor political advertising in the UK.

In **France**, the ban on political advertising is not limited to broadcast media. This ban is in place for a six month period before each election.¹² The ban goes beyond simply paid online advertising, including also payments for search engine optimisation and sponsored links.¹³ In compliance with this ban, French political parties have generally spent very little money on online advertising, with one study finding that between 2019 and 2024, French parties only spent around EUR 300,000 in total on

Figure 1, Paid political advertising in broadcast media



advertising on Facebook.¹⁴ For comparison, the main French political parties spent around EUR 80 million on campaigning overall in the 2022 presidential elections alone.¹⁵

Most European countries that permit paid political advertising do not have specific regulations on this topic, beyond general requirements that spending on advertising should be included in financial reporting by electoral contestants and by political parties in-between elections. Spending limits exist in about half of European countries for political parties participating in elections, and for close to two third of European countries regarding candidate spending, and these limits also restrict the amounts that these actors can spend on advertising.¹⁶ Such spending limits also exist for non-contestants carrying out election campaigns in the Czech Republic, Latvia and the United Kingdom.¹⁷

Bosnia and Herzegovina bans paid advertising in electronic and print media between the call of an election and the start of the election campaign. Once the campaign has started, “public electronic media” is required to allow political entities paid advertising under the same conditions at maximum 30 minutes per week.¹⁸

In **Moldova**, each “audiovisual media service” should offer each electoral competitor a maximum of two minutes airtime per day in paid advertising, during campaign periods. The rates must not be higher than what was in place during the six months ahead of an election. Legislation specifies that advertising providers that do not participate in covering the elections are not allowed to accept paid electoral advertising.¹⁹

The **Czech Republic** has no restriction on online political advertising, but does (since 2016) require labelling of online political adverts.²⁰

In **Italy**, no political entity is permitted to broadcast more than one message per day on the same broadcasting unit.²¹

In **Iceland**, there are no legal provisions specifically on political advertising, but political parties reached an agreement in 2007 to limit the spending on political advertising.²² xx

3.2. The European Union Regulation on Political Advertising

3.2.1. Background and content of the Regulation

Traditionally, the European Union has been reluctant to take a stand on issues related to political finance in EU member states. While both the Council of Europe and OSCE/ODIHR have adopted standard documents on the raising and spending of funds by political parties and election campaigns,

¹⁴ Freshfields (2025).

¹⁵ VoxPublic (2024) page 8.

¹⁶ International IDEA (2026).

¹⁷ And indirectly also in Montenegro.

¹⁸ International IDEA (2026).

¹⁹ International IDEA (2026).

²⁰ AMO (2020).

²¹ Council of Europe (2012) page 6.

²² Council of Europe (2008) page 6. The limit set in 2007 was the equivalent of EUR 230,000.

there has never been any regulations on this issue from the European Union (with the exception of rules for political parties operating in the European Parliament).²³ In 2020, for example, the Venice Commission (the Council of Europe’s advisory body on constitutional matters) adopted a resolution on *Principles For a Fundamental Rights-Compliant Use of Digital Technologies in Electoral Processes*, in which they argued that political advertising may seriously endanger “...the free expression of the opinion of the people in the choice of the legislature as provided for in Article 3 of Protocol No. 1 to the ECHR”, and that “...[b]anning paid political advertising on social media may therefore be considered an option in order to ensure a fair electoral process”.²⁴

A major change came in 2024, when the European Union adopted *Regulation 2024/900 on the transparency and targeting of political advertising*, which aims to “ensure that the provision of political advertising is in full respect of fundamental rights”.²⁵ The Regulation does not focus specifically on advertising by political entities, but focuses on the concept of “political advertising”, which it defines as a message “liable and designed to influence the outcome of an election or referendum, voting behaviour or a legislative or regulatory process, at Union, national, regional or local level”.²⁶ This means that advertising also by non-contestant campaigners are covered by the provisions.

This document cannot detail all the provisions in the Regulation, but in short it determines that:²⁷

- Political adverts must be labelled (bear an imprint) showing who paid for them and how much was paid
- Actors from non-EU countries are prohibited from taking out political advertising during the three months before an election (actors in EU countries are permitted to take out advertising in any other country)
- The European Commission should create a repository of political adverts and transparency notices²⁸
- Report information about political advertisements to the European Commission repository for online political advertising, and to national authorities (these requirements only apply to those publishing political advertising, not to those for example designing adverts).²⁹
- Online targeting is only permitted under strict conditions (mainly requiring consent)

²³ CoE and OSCE/ODIHR.

²⁴ Venice Commission (2020) page 18f.

²⁵ EUR-Lex (2024). Quote from Preamble, Article 5.

²⁶ Ibid Article 3.2.C.

²⁷ Freshfields (2025), Bird & Bird (2025)

²⁸ A study by the European Parliament published on 4 May 2026 described the “timely and effective establishment of the European repository for online political advertisements” as a “challenge” – it has not yet been created. European Parliament (2026) page 1.

²⁹ The reporting requirements to the European Commission came into effect on 9 April 2026.

3.2.2. The decision by international social media companies to stop accepting political advertisements and further developments

Ahead of the European Regulation coming into force, international social media companies such as Meta and Google announced that they would no longer accept political advertising in European Union member states. They argued that the regulation “...effectively remove popular products and services from the market, reducing choice and competition” and that the Regulation defines “...political advertising so broadly that it could cover ads related to an extremely wide range of issues that would be difficult to reliably identify at scale”.³⁰ This means that until further notice, political advertising will not be permitted on popular platforms such as Facebook, WhatsApp, Google and YouTube.

Some have presented the view that the decision by the large social media companies to not accept political advertising means that the risks connected to such advertising have been reduced.³¹ However, this view has been challenged. For example, the European Partnership for Democracy has stated that this decision:

“...effectively [leaves] the Regulation without a meaningful field of application. If no one is offering regulated services, the new rules risk becoming largely symbolic, with little real-world impact in the best-case scenario and negative impact in the worst... political campaigning itself will not disappear; it will simply move elsewhere. Instead of transparent, regulated advertising, political campaigns are likely to become more opaque and harder to monitor, shifting offline or taking subtler forms through influencers, bots, or new, less visible tactics. In this scenario, the Regulation risks achieving the opposite of its original goal: reducing transparency instead of enhancing it”.³²

Others have identified several challenges with the Regulation, including the definition of the concept of political advertising, the administrative burden on those selling political advertising, as well as the competency of national entities in enforcing the regulations.³³ There have also been concerns that the concept of political advertising may negatively impact civil society actors in European Union member states.³⁴

³⁰ Meta (2025) and Google (2024).

³¹ See <https://www.techpolicy.press/meta-and-googles-ad-ban-upends-political-campaigning-in-europe/>

³² European Partnership for Democracy (2025), emphasis removed.

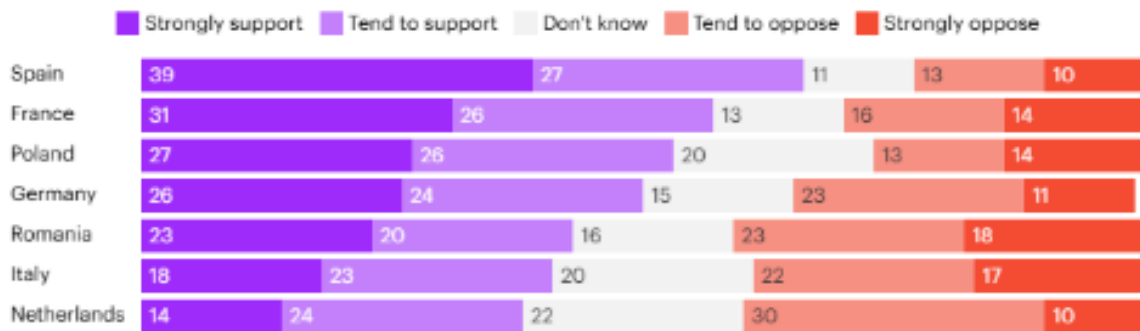
³³ Freshfields (2025). Regarding the engagement of member states, one control would concern the requirement of states to provide a list of “all legal representatives of providers of political advertising services established in a third country that offer services in the EU, which are registered in their territory”. Although this requirement came into force in October 2025; as of early May 2026, only six EU member states have provided such information to be published by the European Commission. European Commission (2026).

³⁴ Politico (2025).

There are indications that European popular opinion is in favour of regulating online political advertising in most European countries. In a survey in seven EU member states carried out by the marketing firm YouGov in September-October 2025, it was found that many welcome stricter

Would Europeans support banning political adverts on social media?

To what extent, if at all, would you support or oppose banning political adverts from being shown on social media platforms? %



YouGov

23 September - 3 October 2025

regulations of social media companies. More specifically, the share of respondents in favour of a ban on political advertising on social media was larger than the share opposing such a move in all countries apart from Italy and the Netherlands.³⁵

3.2.3. The impact of the EU Regulation?

Few elections have been held in European countries since the ban came into force, and since the decision by social media companies to stop accepting political advertising in EU member states. In the April 2026 elections in Hungary, the imprint provisions were not universally applied.³⁶ In the April 2026 elections in Hungary, the OSCE/ODIHR election observation preliminary report noted that “online political advertising is not subject to comprehensive disclosure”, and while the report stated that “[c]ontestants were affected by Meta’s and Google’s paid political advertising bans”, it also discussed various ways that campaigning was carried out online.³⁷ According to the Needs Assessment report from the OSCE/ODIHR observation of the March 2026 elections in Slovenia, the country has “no provisions addressing political advertising on social networks”, and that “Slovenia has no designated authority responsible for the implementation of the EU transparency and targeting of political advertising regulation...”.³⁸

³⁵ YouGov (2025).

³⁶ Observations by the author.

³⁷ OSCE/ODIHR (2026a) page 3.

³⁸ OSCE/ODIHR (2025) pages 9-10. The second quote continues “... but Ministry of Public Administration takes part in the meetings of the national contact point and publishes the dates of elections and referendums on the web portal of the European Commission.” The needs assessment report into the March 2026 elections in Denmark included limited information on this topic. OCE/ODIHR (2026b).

There are also indications that the decision by social media companies to stop accepting political advertising is not fully enforced. Monitoring relating to the March 2026 local elections in the Netherlands indicated that Meta was de facto allowing political adverts.³⁹

For European countries outside the European Union, introducing provisions following the EU Regulation is likely to assist their EU accession aspirations. It is very difficult to anticipate how the international social media companies may respond to such reforms.

3.3. The provision of free or subsidised media access for political parties

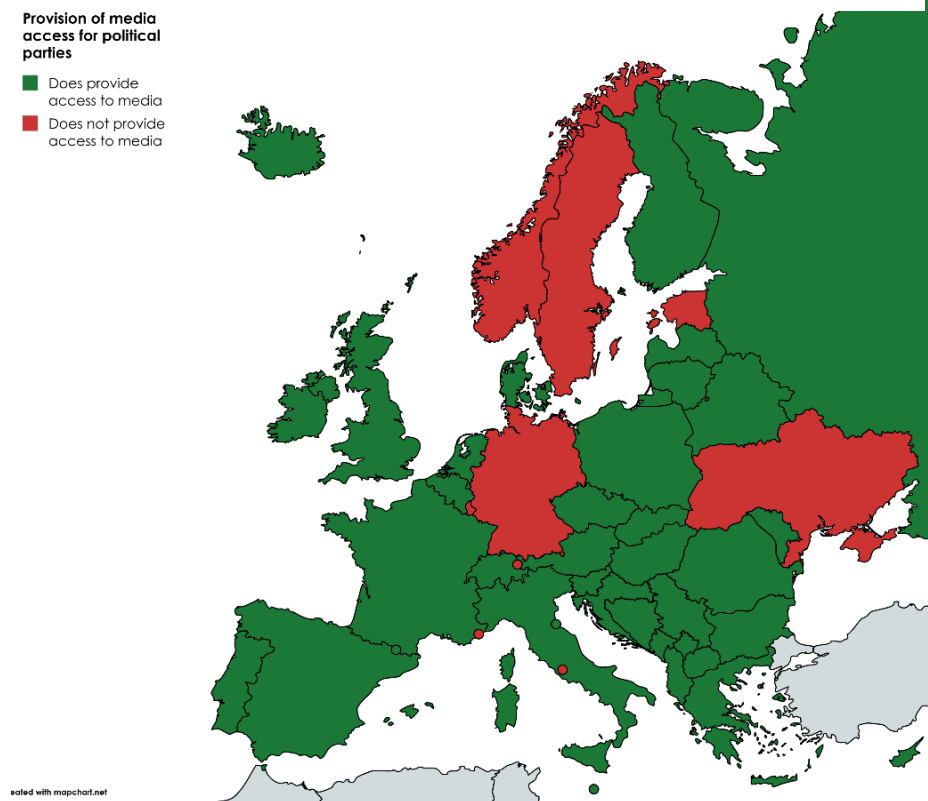
So far, the focus of this report has been on advertising that political parties and candidates pay for as part of their campaign expenses. We now turn to a second issue regarding media and elections – the provision of free or subsidised access to media by governments, which can be seen as a form of public funding.

Public funding of political parties is intended to reduce the advantages of those with significant access to resources, to level the electoral playing field and to help new and emerging political actors to make their voices heard.

In Europe, around 75 per cent of countries have provisions for free access to media for political parties, normally in relation to election campaigns.⁴⁰ In some countries

(such as France and the UK), such provision is meant to provide media access where paid advertising

Figure 2, Provision of media access for political parties



³⁹ DutchNews (2026).

⁴⁰ The source for Figure 2 is International IDEA (2026).

is prohibited, while in other countries, the free media access is intended to complement advertising that political parties may pay for themselves.⁴¹

The regulations used in European countries vary significantly, though most provide access to all political parties with parliamentary representation, and in some cases also to all contestants in an election. The legislation in most cases does not specify exactly the forms of media access that should be provided, though in most cases public television (and often radio) is indicated. Only in a small number of countries (Greece, Kosovo and Slovakia) are there indications that also private media outlets would be required to provide free airtime for political campaigns in certain situations (as separate from requirements to give equal access to contestants or to respect neutrality in election coverage).

A key question is how access to media is allocated between political parties. In European countries, the allocation of time is often equal (as in Bulgaria, Denmark and Italy), while in others access is provided in proportion to seats won in the most recent elections, or sometimes to the number of candidates fielded (proportional allocation is for example used in Belgium, Greece and Spain).⁴²

Examples of allocation of media access to political parties in European countries

Country	Eligibility	Allocation	Media	Comment
Albania	Parliamentary representation (some allocation to other parties)	Relative to the share of seats held	Television and radio	Non-parliamentary parties each receive 10 min on television and radio
Belgium	Parliamentary representation (some allocation to other parties)	Relative to the share of seats held	Public service broadcaster	Non-parliamentary parties get minor allocation based on candidates fielded
Denmark	All parties participating in elections	Equal	Public television and radio	Media is largely unregulated
Moldova	All parties participating in elections	Equal to all political parties	Public television and radio	Parties are each provided 5 minutes on TV and 10 on radio

⁴¹ You can compare Figures 1 and 2 in this report to see where free access to media is combined with a ban on paid advertising.

⁴² International IDEA (2026), which is also the source for the table.

In judging the value of media access provided to electoral contestants, it is important to understand how European voters access media. At a first look, the situation seems positive, as television is still considered the prime news source for citizens in European Union countries, with 71 per cent agreeing with this statement in a 2023 union-wide survey, compared to 42 per cent for online platforms.⁴³ In addition, the same survey indicated that citizens see public media outlets as the most trustworthy (apart from in Hungary and Poland).

However, while television remains a main source of information for many Europeans, the way that they access this information may significantly undermine the value of providing free or subsidised airtime. One 2024 study of EU member states showed that significantly more people watch video on demand than live television (78 per cent as compared to 21 per cent).⁴⁴ The potential impact of this on free allocation of media time to electoral contestants is substantial. While viewers of live television have to actively switch the channel or stop watching when electoral adverts are broadcast in order to avoid consuming campaign messages, viewers of video on demand can (in most cases) simply decide not to watch electoral broadcasts.

The situation is even more different for young citizens, who will play a determining role in future elections in European countries. A 2025 study of youth between 15 and 24 year olds in European Union member states showed that 65 per cent indicated social media platforms as their most used news source.⁴⁵ When these individuals become a major part of the electorate, the value of providing free time on broadcast media is likely to be reduced significantly.

4. Regulatory considerations and approaches

4.1. Regulations of private paid advertising

In the current situation, political advertising is prohibited in many West European countries, while it is permitted in other parts of Europe (see Figure 1 above). The European Union Regulation states that member states should not “maintain or introduce, in their national laws, provisions on the transparency of political advertising that diverge from those laid down in this Regulation, in particular more or less stringent provisions to ensure a different level of transparency in political advertising”.⁴⁶ The impact of the Regulation on existing bans on political advertising in EU member states remains to be seen.

4.1.1. Non-contestant campaigners

Since the 2024 European Union Regulation on political advertising focuses on advertising seeking to influence voters, rather than on who paid for the advertising, it will have a similar impact on non-contestant advertisers as on contestants.⁴⁷ This means that all political advertising by such entities will need to bear imprints showing who paid for them, and while the Regulation does not create reporting

⁴³ European Parliament (2023).

⁴⁴ ICF (2024).

⁴⁵ European Union (2025).

⁴⁶ Regulation preamble Article 12.

⁴⁷ For more on the topic of non-contestant (third party) campaigning, see IFES (2026).

requirements for the non-contestants themselves, those selling advertising space to non-contestants will be required to report this information, and the European Commission will include these adverts in its repository. This is one of largest regulatory changes on non-contestant campaigning across Europe in many years.

It is difficult to predict the practical impact of the Regulation on non-contestant campaigning in European Union member states. Apart from the few European countries that require non-contestants to register with an oversight institution (the Czech Republic and Ireland and indirectly Montenegro and the United Kingdom), there will be no list of non-contestants with which to compare the data on advertising reported to have been paid for by others than electoral contestants. The Regulation does also not impose any restrictions on non-contestant advertising, so in countries where spending limits exist for contestants but not for non-contestants, advertising by non-contestants will remain a potential loophole in spending restrictions. Perhaps most importantly, the EU regulation will not necessarily lead to increased transparency around the funding of non-contestant campaigners. While their advertising activities will need to be reported, these reports will not include any information about where they originally received the money used to pay for advertising.

In Europe, only the Czech Republic, Ireland, and the UK require that non-contestant campaigners submit financial reports in relation to election campaigns, including on their spending on political advertising.⁴⁸ Given the increasing role of non-contestant campaigners in election campaigns, countries should consider comprehensive regulations of their involvement in elections, in line with Resolution 11/7 from the United Nation Convention Against Corruption Conference of States Parties in 2025.⁴⁹

4.1.2. Influencers

In the last few years, the involvement of social media influencers in election campaigns has become discussed increasingly. Their role in election campaigns is increasing in many countries, although dedicated research is often limited.⁵⁰ In the context of political finance, their role is normally not regulated, and this can have a significant impact on electoral processes.

The 2024 presidential elections in Romania is a case in point, as it was argued that unreported payments to influencers had a significant impact on the election outcome, and the elections were subsequently annulled.⁵¹ No European country has regulations specifically related to the involvement of social media influencers in election campaigns, nor is the involvement of influencers in election campaigns directly covered in the new EU Regulation. Existing regulations may have an indirect impact, such as spending limits restricting the amounts that electoral actors may pay influencers to campaign

⁴⁸ IFES (2026). In Monaco, the Campaign Accounts Audit Commission may request non-contestant campaigners to submit financial reports.

⁴⁹ UNODC (2026) Resolution 11/7, Operative Paragraph 9.

⁵⁰ See Humboldt GOV-LAB (2024) and Frontiers (2026). The provisions discussed in this section are the same across all social media platforms, though different platforms have various branding provisions relating to paid advertising.

⁵¹ Table (2024).

on their behalf. In many European countries, influencers are also required to report on funds received for advertising – such provisions are often included in tax legislation.⁵²

If an influencer expresses a personal view about particular political parties or candidates, this is seen as a freedom of expression issue, regardless of how many followers the influencer may have.⁵³ The situation is different if the influencer is paid to carry messages related to election campaigns, either in favour of or against any contestant. In this regard, the influencer is not seen as a non-contestant campaigner, but rather as an advertising service provider, similar to a television station or a social media company.

There are two main considerations regarding influencers being funded in relation to election campaigns. If their output is considered as paid political advertising, the European Union Regulation discussed above requires that their messages carry imprint on who paid for them and how much, and these messages will also need to be included in the repository of political advertisements to be created by the European Commission.⁵⁴ The ban on actors from outside the European Union paying for such advertisements during the last three months before an election would also apply, and influencers are responsible for ensuring that potential sponsors declare that they are not barred from political advertising through this provision.⁵⁵ It may not always be clear whether a payment made to an influencer constitutes political advertising, and the Regulation requires the influencer to ask the sponsor whether the service requested constitutes political advertising (it is not clear if a negative response would absolve the influencer from responsibility).⁵⁶

Even if the activity of the influencer is not regarded as carrying political advertisements, however, this does not mean that their activity is unregulated. In most countries, if electoral contestants give influencers money to support their electoral activities, this will qualify as an election campaign expense (compare the situation where an electoral contestant pays an artist to perform at their campaign rally). This means that the spending should be reported by the electoral contestant as part of their regular reporting requirements (regardless of the fact that the reporting requirements do not explicitly refer to payments to influencers).

In the same way that States may require that advertising service providers selling political advertising must report this to designated public institutions (see above), States may also require that influencers carrying paid electoral advertising should report this in. Such regulations would have to be carefully

⁵² As an illustration, the tax implications for influencers in the Czech Republic are discussed at Arrows (2025).

⁵³ A discussion could be had whether an endorsement by an influencer should count as an in-kind donation, and as such be required to be reported by political contestants. In practice, however, if an influencer (like an artist) appear on stage during a campaign rally or participate in an election advert by a contestant, this could be seen as an in-kind donation, but an endorsement by the same influencer or artist on their social media stream would not be seen as providing a service to an electoral contestant.

⁵⁴ While online platforms may provide services for imprints, the provision of such services does not mean that the platform should be provided as the publisher of advertising instead of the influencer. EUR-Lex (2024) Article 3.3.6.

⁵⁵ Ibid, Article 3.3.6.

⁵⁶ Ibid.

designed since online influencers may not have the same administrative capacity as online platforms or traditional publishers of advertising.

As a first step, one option may be to reach out to influencers to agree on a voluntary Code of Conduct (or ethics) regarding their involvement in election campaigns and other political activities. In such an endeavour, the first challenge would be to identify the influencers to contact. In this, the registration or submission of financial reports by influencers to tax authorities could be a valuable tool (where this is required), as it could indicate that the influencer has a certain level of involvement in advertising activities. Where a register of influencers exist (as in North Macedonia), this can of course also be a valuable starting point.

One example of such a Code of Conduct would be the one created in early 2026 by the self-regulating “Association for Internet Development” in the Czech Republic.⁵⁷ In the section on political advertising, the Code of Conduct states:

- “Label the collaboration with the text “Political collaboration / paid political advertising”, indicate the sponsor, intermediary, creator and publication date.
- Use platform tags such as “paid partnership”.
- Do not target audiences under 18 and do not use sensitive personal data in targeting.
- Verify facts, cite sources and describe the research methodology.
- Label AI or artificially created content (#AIcontent); deepfake is prohibited.
- Admit conflicts of interest (party membership, work or financial ties)
- Archive content and supporting documents for at least 24 months, including reach and targeting data.”⁵⁸

4.2. Provision of access to media for campaign purposes

Global and regional standards documents generally allow for the provision of free or subsidised access to media, but does not require this.⁵⁹ As noted in the OSCE/ODIHR and Venice Commission *Guidelines on Political Party Regulation*;

...allocation of media airtime is integral to ensuring that all political parties, including small parties, are able to present their programmes to the electorate, both before and in between elections. While the allocation of free airtime on public media is not mandated through international law, such a provision can be a critical means of ensuring an informed electorate. Where the state allocates media space, the regulation concerned should provide that free airtime and print space be allocated to all parties on a reasonable basis, consistent with the principle of equal treatment before the law.⁶⁰

⁵⁷ See Férfuencer (2026a).

⁵⁸ Férfuencer (2026b), section 3. Translation by author. For other examples of Codes of Conduct for influencers, in these cases from Italy and Spain, although they does not mention political advertising, see Autorità per le garanzie nelle comunicazioni (2025) and Anunciantes (2025).

⁵⁹ See for example OSCE/ODIHR & Venice Commission (2020) and UNODC (2026) pages 28-32.

⁶⁰ OSCE/ODIHR & Venice Commission (2020) Article 199. See also Article 235.

To ensure that all relevant voices are heard, it should be considered to allocate at least some media time to political parties that have not participated in previous elections. The risk of allocating media access to frivolous political parties could be avoided by determining that only parties nominating candidates or lists covering a certain share of the country should be provided media access.

Allocating time equally to all participating political parties would provide the same access to all voices without discrimination. However, where many political parties participate in elections, such an allocation approach could mean that either the total time allocated would be too long for voters to pay attention, or that also parties that have proven popular support are allocated too little time to get their message across. Some form of proportional allocation (in relation to seats held or votes obtained in the previous election) may therefore be reasonable. However, to fully allocate media access on this principle risks significantly disadvantaging smaller political parties, and especially those that have not participated in previous elections. Therefore, combining equal and proportional allocation of media access may best serve the interests of sharing relevant information with voters in a non-discriminatory manner.

It was discussed above how recent changes in media consumption across Europe have potentially reduced the value of states providing free or subsidised media access to electoral contestants. Alternative or complementary solutions to providing access to broadcast media should therefore be considered. One alternative could be to (partially or fully) replace the provision of free access to broadcast media with additional direct public funding to political parties, which they could use to purchase advertising (as permitted) in forms that they see fit (including online advertising). The allocation of such funds should be designed to ensure that smaller political forces can make their voices heard, and the funding should be conditional on compliance with regulations such as imprint requirements.

A similar alternative could be to use a model similar to what is in existence in North Macedonia today, whereby media outlets can get paid directly by the state for paid advertising taken out by electoral actors, in line with existing legislation. For such a system to be effective, political parties would need to be given significant leeway in deciding in which types of media they would place advertising, although certain restrictions may be necessary to ensure equality of opportunity.

5. Recommendations for North Macedonia

Based on the discussion above, this section discusses recommendations for legal reform to be considered in North Macedonia (including reform of the electoral and media regulatory system). In addition, recommendations are made to relevant public institutions about actions that can be taken ahead of any legal reforms being taken.

A first, essential, step is to analyse media consumption in North Macedonia, including both the current situation and trends for the future. This includes not only how citizens access media, but also what forms of media that they rely on particularly for political information, and which can influence their voting intentions. This also includes political advertising practices in both broadcast and in online media.

5.1. Recommendations for the parliament of North Macedonia

There are various legal reforms that can help increase the transparency around political advertising in North Macedonia. While North Macedonia is not subject to European Union regulations, introducing regulations in line with *Regulation 2024/900 on the transparency and targeting of political advertising* would be consistent with the EU accession plans of the country.

- Require that if an entity sells advertising to electoral contestants, this is done on a fair basis. Discounts on advertising outside of commercial practice offered to only some electoral contestants should either be prohibited or required to be reported as in-kind donations.
- Consider regulating the financial activities of non-contestant campaigners in electoral processes, requiring them to submit reports about their income and expenditure, and, as appropriate, including restrictions on income and spending that reflects those for electoral contestants.⁶¹
- Ensure that any provision of media access to political parties during election periods is allocated in a manner that does not disadvantage smaller and new political parties.
- Debate with political parties and other stakeholders if the current system for providing access to media serves the intended purposes, and whether alternative or complementary approaches may be more suitable.
- Clarify the role and responsibilities of involved institutions, and ensure that these have adequate resources.

5.2. Recommendations for public institutions

Legal reform can significantly increase transparency around political advertising and access to media for electoral contestants in North Macedonia. Ahead of legal reform, public institutions including regulatory and oversight bodies can themselves take different steps.

- Monitor that those intending to accept political advertising in relation to an election campaign publishes lists of advertising costs ahead of elections; that these costs are not different from preceding periods; and that they are not changed during the campaign period.
- Monitor political advertising in all forms of media ahead of elections, to ensure that they are accurately reflected in the financial reporting by electoral contestants.
- Monitor that advertising selling providers (such as television and radio stations and online platforms) report on sold advertising to a designated public institution. Such reporting creates a parallel information flow about campaign spending, which can be valuable in analysing the accuracy of reporting by electoral contestants.

⁶¹ A useful example to study would be Articles 49 and 50 in the *Law on Financing of Political Entities and Election Campaigns* of Montenegro. These articles about third party campaigning were introduced through an amendment of the law in July 2025. Natlex (2025).

- Monitor that all political adverts carry an imprint showing who paid for them, and how much was paid. Media outlets should be prohibited from publishing adverts that do not carry such imprints.
- Cooperate with civil society entities that monitors media and electoral processes, for further information about political advertising.
- Consider creating a repository for paid political advertisements placed in North Macedonian media ahead of elections.
- Provide detailed guidance to political actors and non-contestant campaigners on rules around political advertising, including reporting of spending on such advertising.
- Provide detailed guidance to companies carrying political advertisements on existing legal requirements.
- Consider reaching out to influencers in North Macedonia to create a voluntary Code of Conduct, through which transparency regarding their involvement in campaign finance can be increased.
- Establish mechanisms for inter-institutional coordination to ensure effective oversight of political advertising
- Raise public awareness including digital literacy and how to identify sponsored political content

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References

AMO (2020) *Digital political advertising in the Czech Republic*. Available at https://www.amo.cz/wp-content/uploads/2020/02/AMO_Digital-political-advertising-in-the-Czech-Republic_final.pdf.

Anunciantes (2025) *Código de conducta de publicidad a través de influencers*. Available at <https://www.autocontrol.es/app/uploads/codigo-de-conducta-de-publicidad-a-traves-de-influencers-2025.pdf>

Arrows (2025) *Legal and Tax Obligations of Influencers – Complete Guide*. Available at <https://arws.cz/news-at-arrows/legal-and-tax-obligations-of-influencers>

Autorità per le garanzie nelle comunicazioni (2025) *Codice Di Condotta Per Gli Influencer*. Available at https://www.agcom.it/sites/default/files/media/allegato/2025/197_25_cons_allegato%20B_codice.pdf

Bird & Bird (2025) *The EU Political Advertising Regulation: What You Need to Know*. Available at <https://www.twobirds.com/en/insights/2025/the-eu-political-advertising-regulation-what-you-need-to-know>.

Briefing, the (2026) *By-elections spending: new data from parties*. Available at <https://www.thebriefing.ie/parties-are-spending-big-now-we-know-how-big-in-real-time/>.

Conversation, the (2025) *Social media influencers blur the lines between political content and campaigning, potentially affecting elections*. Available at <https://theconversation.com/social-media-influencers-blur-the-lines-between-political-content-and-campaigning-potentially-affecting-elections-255382>.

Council of Europe (2008) *Third Evaluation Round, Evaluation Report on Iceland Transparency of Party Funding (Theme II)*. Available at <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806c6778>.

Council of Europe (2012) *Third Evaluation Round, Evaluation Report on Italy Transparency of Party Funding (Theme II)*. Available at <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016806c6956>.

DutchNews (2026) *Meta's own ban on political advertising "is not working"*. Available at <https://www.dutchnews.nl/2026/03/metas-own-ban-on-political-advertising-is-not-working/>

EUR-Lex (2024) *Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising (Text with EEA relevance)*. Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R0900>.

European Commission (2026) *Legal Representatives in Member States*. Available at <https://political-advertising.ec.europa.eu/representative/list>.

European Court of Human Rights (2008) *Case of TV Vest as & Rogaland Pensjonistparti v. Norway*. Available at <https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%5B%22001-90235%22%5D%7D>.

European Court of Human Rights (2013) *Case Of Animal Defenders International V. The United Kingdom*. Available at <https://hudoc.echr.coe.int/eng#%7B%22itemid%22:%5B%22001-119244%22%5D%7D>.

European Parliament (2023) *TV still main source for news but social media is gaining ground*. Available at <https://www.europarl.europa.eu/news/en/press-room/20231115IPR11303/tv-still-main-source-for-news-but-social-media-is-gaining-ground>.

European Parliament (2026) *Challenges of implementation of the regulation on political advertising, Briefing requested by the EUDS Special Committee*. Available at [https://www.europarl.europa.eu/RegData/etudes/BRIE/2026/787212/IUST_BRI\(2026\)787212_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2026/787212/IUST_BRI(2026)787212_EN.pdf)

European Partnership for Democracy (2025) *A Regulation Without a Market: How can the EU's Political Ads Regulation Still be Relevant?*. Available at <https://epd.eu/news-publications/a-regulation-without-a-market-how-can-the-eus-political-ads-regulation-still-be-relevant/>.

European Union (2025) *Social Media Survey 2025*. Available at <https://europa.eu/eurobarometer/surveys/detail/3592>.

FavStatsEU (2025) *Digital Campaign Trail: Unpacking Germany's Political Ad Spending*. Available at <https://www.favstats.eu/post/btws/>.

Fér_fluencer (2026a) *Spolupráce značek a influencerů je reklama, která by měla být označená*. Available at <https://ferovyinfluencer.cz/>

Fér_fluencer (2026b) *Etický kodex férového influencera*. Available at <https://ferovyinfluencer.cz/kodex>

France (2026) *Code électoral, Version à la date d'aujourd'hui*. Available at https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000023883001.

Freshfields (2025) *Political Advertising Regulation (PAR)*. Available at <https://www.freshfields.com/en/our-thinking/campaigns/tech-data-and-ai-the-digital-frontier/eu-digital-strategy/political-advertising-regulation-par>.

Frontiers (2026) *The Role of Political Influencers in Electoral Campaigns*. Available at <https://www.frontiersin.org/research-topics/67828/the-role-of-political-influencers-in-electoral-campaigns/magazine>.

Google (2024) *An update on political advertising in the European Union*. Available at <https://blog.google/company-news/inside-google/around-the-globe/google-europe/political-advertising-in-eu/>.

House of Commons Library (2019) *Insight - Who regulates political advertising?* Available at <https://commonslibrary.parliament.uk/who-regulates-political->

[advertising/#:~:text=regulates%20political%20advertising?-,The%20answer%20isn't%20straightforward.,is%20largely%20exempt%20from%20regulation.](#)

Humboldt GOV.LAB (2024) *Can social media influencers affect elections?*. Available at <https://hugovlab.de/en/influencer-elections/>

ICF (2024) *How EU citizens consume content in the new media landscape*. Available at <https://www.icf.com/insights/engagement/how-eu-citizens-consume-content-new-media-landscape#:~:text=And%20AI%20systems%20engage%20users,%2C%20at%20times%2C%20surprising%20ways.>

IFES (2026) *Third party (non-contestant) campaigning – comparison and recommendations for North Macedonia*. IFES, Skopje, February 2026.

International IDEA (2026) *Political Finance Database*. Available at <https://www.idea.int/data-tools/data/political-finance-database>.

Meta (2025) *Ending Political, Electoral and Social Issue Advertising in the EU in Response to Incoming European Regulation*. Available at <https://about.fb.com/news/2025/07/ending-political-electoral-and-social-issue-advertising-in-the-eu/#:~:text=Meta%20Horizon-,Ending%20Political%2C%20Electoral%20and%20Social%20Issue%20Advertising%20in%20the%20EU,operational%20challenges%20and%20legal%20uncertainties.>

Natlex (2025) *Law on Financing of Political Entities and Election Campaigns August 6, 2025*. Available at [https://natlex.ilo.org/dyn/natlex2/natlex2/files/download/118481/MNE-118481%20\(EN\).pdf](https://natlex.ilo.org/dyn/natlex2/natlex2/files/download/118481/MNE-118481%20(EN).pdf)

OSCE/ODIHR & Venice Commission (2020) *Guidelines on Political Party Regulation, Second Edition*. Available at <https://odihr.osce.org/odihr/538473>.

OSCE/ODIHR (2025) *Republic of Slovenia Parliamentary Elections, 22 March 2026 ODIHR Needs Assessment Mission Report*. Available at https://odihr.osce.org/sites/default/files/documents/official_documents/2026/01/SLO%20parliamentary%202025%20NAM%20report_26.01.2026.pdf

OSCE/ODIHR (2026a) *International Election Observation Mission Republic of Bulgaria, Early Parliamentary Elections, 19 April 2026 Statement of Preliminary Findings and Conclusions*. Available at https://odihr.osce.org/sites/default/files/documents/official_documents/2026/04/EOM%20BGR%202026%20PSFC%20Final%2020%20April.pdf

OSCE/ODIHR (2026b) *Denmark, Early General Elections, 24 March 2026 ODIHR Needs Assessment Mission Report*. Available at https://odihr.osce.org/sites/default/files/documents/official_documents/2026/03/Denmark_early%20general%202026%20NAM_report_17.03.2026.pdf

Politico (2025) *Backlash as new EU political ad rules kick in*. Available at <https://www.politico.eu/article/eu-political-ad-rules-google-meta-microsoft-big-tech-kick-in/>.

Table (2024) *Präsidentenwahl in Rumänien: Verdacht russischer Einflussnahme*. Available at <https://table.media/europe/analyse/presidentenwahl-in-rumänien-verdacht-russischer-einflussnahme>

TaylorWessing (2024) *Online Political Advertising in the UK*. Available at <https://www.taylorwessing.com/en/interface/2024/democracy-in-the-digital-age/online-political-advertising-in-the-uk>.

Touteurope.eu (2026) *Élections municipales 2026 : tout savoir sur les règles qui encadrent la campagne électorale*. Available at <https://www.touteurope.eu/vie-politique-des-etats-membres/elections-municipales-2026-tout-savoir-sur-les-regles-qui-encadrent-la-campagne-electorale/>.

UNODC (2026) *Report of the Conference of the States Parties to the United Nations Convention against Corruption on its eleventh session, held in Doha from 15 to 19 December 2025*. Available at <https://track.unodc.org/uploads/documents/UNCAC/COSP/session11/CAC-COSP-2025-22/2600800E.pdf>.

Venice Commission (2020) *Principles For a Fundamental Rights-Compliant Use of Digital Technologies in Electoral Processes*. Available at https://www.te.gob.mx/vota_elections/media/files/0d62ba98dc9aa36.pdf.

VoxPublic (2024) *Elections Monitoring 2024: FRANCE Electoral Integrity and Political Microtargeting in the European Parliament Elections: An Evidence-Based Analysis*. Available at https://dq4n3btxmr8c9.cloudfront.net/files/hstorx/Elections_monitoring_2024_France.pdf.

YouGov (2025) *European Political Monthly: Where do Europeans stand on social media regulation?*. Available at <https://yougov.com/en-gb/articles/53241-european-political-monthly-where-do-europeans-stand-on-social-media-regulation>.