

## INTERNATIONAL ELECTION OBSERVATION MISSION Kyrgyz Republic – Early Parliamentary Elections, 30 November 2025

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### STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

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#### PRELIMINARY CONCLUSIONS

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The November 30 early parliamentary elections were administered efficiently but the restrictive campaign environment stifled candidate and voter engagement. Fundamental freedoms of expression, association, and peaceful assembly, while constitutionally protected, are increasingly limited in practice by new restrictive legislation and its enforcement. Recent fundamental changes to the legal framework introduced a new majoritarian electoral system and new constituency delineation as well as additional restrictions on candidate eligibility, resulting in significantly diminished political party involvement. Positively, the new system provides for 30 mandates, one per district, reserved for the underrepresented gender, and 41 per cent of the candidates were women. The election administration enjoyed confidence in its technical capacity and introduced measures to enhance transparency of its decision-making, but for other key aspects of the process transparency was insufficient, in particular on the new voting technologies, campaign finances and its decisions on election-related cases. The nationwide new remote voting option provided greater opportunities for voter participation. While there were competitive campaign activities in some districts, significant financial disparities between candidates affected their ability to compete on a level playing field. Numerous allegations of vote-buying continued throughout the campaign. Media refrained from covering candidates in their news coverage or editorial programmes, citing strict interpretation of the requirements for equal coverage and liability for content, limiting voters' ability to make an informed choice. Funding limitations and recent legal amendments impacting civil society organizations have significantly restricted participation in public life and election observation. Election day was assessed overall positively, new voting technologies functioned reliably, and voting procedures were largely followed, however, widespread issues with adherence to counting and tabulation procedures were observed.

The elections were conducted under a fundamentally reformed legal framework that, while providing a technical basis for conducting elections, falls short of a number of international standards for democratic elections, and does not address almost all previous ODIHR and the Council of Europe's Venice Commission recommendations. The 2025 legal amendments *inter alia* created a new majoritarian electoral system with new electoral district delineation, and changed candidate eligibility requirements. The short timeframe between the adoption of the amendments to the law and the early elections limited opportunities for meaningful public consultation, raised concerns about the inclusiveness of the legislative process, hindered implementation of some provisions, and undermined the stability of the electoral law, at odds with international standards and good practice.

The 90-member parliament is elected for a five-year term across 30 three-member districts under a new majoritarian single non-transferable vote system. According to the Electoral Law, each political party can nominate only one candidate per electoral district and thus cannot officially obtain more than 30 seats out of 90. The new electoral districts delineation rules and their implementation are not in line with international good practice with respect to the composition of the institution in charge of the delineation, the permissible deviation from the average number of voters, and lack of legal requirements to consider national minority interests.

The Central Commission for Elections and Referenda (CEC) managed technical preparations efficiently and within the expedited deadlines for early elections, and enhanced transparency in its decision-making, but the work of lower-level election commissions was less transparent. Publication of CEC decisions and regulations was sometimes delayed, which in case of election day procedures for counting and tabulation,

limited legal certainty and affected the trainings for lower-level commissions and their capacity to implement them consistently. The CEC provided extensive support to the District Election Commissions (DECs), at times being actively involved in their tasks, especially in the vast districts, where DECs experienced difficulties to assemble regularly. Voter information campaigns were extensive but not accessible in the languages of national minorities. The election administration enjoyed the confidence of most stakeholders in its technical capacity to conduct elections.

Electronic devices were used at all polling stations for voter biometric identification and for the establishment and transmission of preliminary results. The CEC sufficiently prepared election officials for the use of the new equipment through trainings and practice exercises and took steps to address electricity and connectivity problems. Voters were also given the opportunity to participate in mock exercises and there was general trust in the use of the equipment. Despite these efforts the perception of integrity of the technology was diminished by the lack of a public procurement process, independent verification or certification and public information on the audit. For the first time, voters had the opportunity to vote remotely at any polling station outside their electoral district of registration.

The final voter list, published on 23 November, included 4,294,243 voters, of whom about 52 per cent are women. Voters were given sufficient opportunity to check the lists and there was high stakeholder confidence in the register's accuracy and inclusiveness. Despite a long-standing ODIHR and Venice Commission recommendation and contrary to international standards, those declared legally incompetent by a court are not eligible to vote.

The CEC conducted the candidate registration transparently and efficiently, registering 465 candidates, of whom 189 were women (41 per cent) and 10 self-identified as national minorities (2 per cent). Most candidates were self-nominated; only one political party fielded candidates, demonstrating how the new electoral system may have impacted the participation of political parties. The legal requirements to the right to stand are unduly restrictive, contrary to international standards and prior ODIHR and Venice Commission recommendations. A total of 57 nominees were rejected due to not meeting eligibility requirements, not paying the non-refundable electoral fee or opening a dedicated bank account in one of the two authorized state-owned banks as required, limiting more inclusive political participation.

Due to the short campaign period from 10 to 29 November, candidates' opportunities to reach voters were limited, which along with the space for public debate were further restricted by strict campaign regulations and their enforcement. The campaign was generally low-key and generated limited voter engagement; this was linked to fears of retribution for political activity. Despite this campaign environment, competitive activities were observed in many districts. The legal framework provides for equal campaign opportunities for all contestants and grants citizens the right to participate in campaigning. However, there were significant financial disparities between candidates that affected their ability to compete on a level playing field. Numerous allegations of vote-buying continued throughout the campaign but only nine cases were officially initiated. The week before the elections was marked by arrests of prominent politicians on charges of organizing mass riots.

Women are underrepresented in political life which International Election Observation Mission (IEOM) interlocutors attribute to ingrained patriarchal stereotypes, financial barriers, social stigma, and intolerant rhetoric and the lack of additional measures to promote participation. The new electoral system provides for 30 mandates, one per district, reserved for the underrepresented gender, and 41 per cent of the candidates were women.

The legal framework for campaign finance provides a sufficiently structured basis for financial regulation during the campaign. However, candidates can be deregistered for nominally exceeding spending limits, which is disproportionate. Understaffing, technical difficulties, insufficient regulation of the audit, and the lack of capacity to investigate actual spending makes campaign finance oversight ineffective.

Financial information was consistently published by the CEC throughout the campaign, and showed that candidates mainly relied on personal assets and private donations. Interim reports remained unpublished due to technical issues, which limited transparency and voters' access to information. The overall legal framework for campaign finance violations along with the CEC's authority to decide if a candidate can or cannot be investigated for violations limits the foreseeability and proportionality of enforcement.

While the Constitution provides for freedom of expression, it also includes unduly broad and vague grounds for restricting these rights, which, along with the increase in prosecution of journalists, has led to widespread self-censorship. New legislation requiring media registration, limiting foreign ownership, and providing a wide basis for the deregistration of media outlets and the recent nationalization of the public broadcaster has impacted media pluralism. The candidates were not covered in news and current affairs programmes, except for the limited coverage of campaign violations. This was partly due to the media's liability for the airing of content that disgraces or discredits candidates, which is prohibited and the narrow interpretation the CEC applies for equal coverage. Although state-funded broadcasters provided free airtime in line with the law, news coverage in all broadcasters focused almost completely on procedural aspects of the elections and coverage of the authorities limiting voters' ability to make an informed choice. Contrary to previous ODIHR recommendations, paid candidate content in the news segments also featured in the campaign.

Legislation provides for election dispute resolution with judicial review and expedited deadlines. However, recent amendments have limited political parties' access to this remedy when challenging election results, and the early election timelines do not provide sufficient time for the submission and adjudication of complaints. While CEC sessions on disputes provided transparency and the opportunity for the parties to present their cases, procedural guarantees were diminished as a notable number of cases were examined *in camera*. The CEC received 142 complaints and incident notifications, mostly on campaign violations by candidates, voters, and the media, and decided on 102, imposing administrative fines in 48 cases. Most election-related court judgments and some CEC decisions were published with delay, limiting transparency. The decisions available to the ODIHR Election Observation Mission (ODIHR EOM) were mostly characterized by insufficient reasoning and substantiation of conclusions, and the CEC decisions did not specify avenues for appeals.

The law provides for citizen and international election observation. Funding limitations, along with the recent amendments which define observation as a political activity - meaning civil society with foreign funding have to register as "foreign representatives" - have substantially diminished civil society's ability to participate in public life. Some ODIHR EOM interlocutors further noted a fear of retribution among civil society for engaging in election observation activities. Candidates may field observers to election commissions, but due to limited resources this opportunity was largely inaccessible for most candidates. The CEC accredited 788 international observers and only 2 citizen organizations, each appointing 1 observer.

Election day was calm, orderly, and procedures were largely followed. IEOM observers assessed voting positively in 96 per cent of polling stations observed, but reported procedural shortcomings, including issues related to the secrecy of the vote, and unauthorised persons, mainly police and local officials, frequently present and at times interfering with the work of the commissions at the polling stations observed. A small number of serious procedural shortcomings were observed, including group voting, multiple voting, proxy voting. In a few cases, observers saw indications of vote-buying around polling stations. IEOM observers found the new voting technologies to be fully operational and functioning properly in almost all polling stations observed, despite some connectivity issues. The counting and tabulation processes were assessed negatively in more than one-third of the polling stations and DEC's observed, mainly due to significant procedural errors and omissions that compromised the transparency of the process and some instances of unauthorized persons interfering in the count. Regrettably, almost

half of the polling stations observed did not provide independent access for voters with physical disabilities. Women were well represented among election officials in the polling stations observed.

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## PRELIMINARY FINDINGS

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### Background

On 30 September, President Sadyr Japarov announced early parliamentary elections to be held on 30 November, following the parliament's self-dissolution on 25 September.<sup>1</sup> The parliamentary initiative to self-dissolve was described by the authorities as an attempt to lessen the administrative and social pressures of consecutive parliamentary and presidential election campaigns under a new electoral system.<sup>2</sup> The elections were widely seen as a further step in consolidating presidential power.<sup>3</sup>

The outgoing parliament was elected in November 2021,<sup>4</sup> following the cancellation of the October 2020 elections in response to extensive and violent public protests. Women held 20 out of 90 seats in the outgoing parliament, 1 out of 23 ministerial positions, and none of the 7 governor's positions. Interlocutors informed the ODIHR IEOM that the underrepresentation of women in politics results from ingrained patriarchal stereotypes, financial barriers, social stigma, and intolerant speech, as well as a lack of capacity building measures to encourage greater participation as called for according to international standards.<sup>5</sup>

The period after the 2021 referendum reintroducing the presidential system was characterised by a shift in the balance of powers. A centralised governance model was enabled through the restructuring of state institutions and the redistribution of their functions, including those related to the judiciary and anti-corruption efforts, as well as the strengthening of state security structures, reinforcing the president's central role in political life.<sup>6</sup> Consequently, the political landscape underwent major fragmentation and diminished the influence of political parties.

New legislation has introduced restrictions on the constitutionally protected fundamental freedoms of expression, association, and peaceful assembly. These restrictions and the manner in which they are enforced has been criticized by international human rights organizations along with the recent prosecutions and detentions of activists, journalists, and politicians.<sup>7</sup>

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<sup>1</sup> The proposal for self-dissolution was initiated by 32 members of parliament (MPs) and adopted with 84 votes. Under the Constitution and the Law "On the Rules of Procedure of *Jogorku Kenesh*", such proposal can be initiated by one-third (30) of all MPs (90), and requires the support of at least two-thirds (60) of all MPs.

<sup>2</sup> See the statements by the [president](#) and the chairperson of the [parliament](#).

<sup>3</sup> In August 2024, President Japarov [emphasised](#) that "the vertical of power must be strong and strict" and thanked the parliament for their "support [...] to] our important decisions, major projects, reforms, and legislative initiatives without delay or empty words."

<sup>4</sup> *Ata-Jurt* Kyrgyzstan won 15 seats; *Ishenim* – 12 seats; *Yntymak* – 9 seats; *Aliance* – 7 seats; *Butun* Kyrgyzstan – 6 seats; *Yjman Nuru* – 5 seats. Thirty-six members of parliament were not nominated by political parties.

<sup>5</sup> Article 4 of the [CEDAW](#) and [General Recommendation No. 25](#) highlight the need for temporary special measures to be supported by practical steps that facilitate equal participation in political and public life; see also [CEDAW General Recommendation No. 23](#); CEDAW [General Recommendation No. 40](#) on Equal and inclusive representation of women in decision-making systems; see also the 2024 CESCR [Concluding Observations](#) on the fourth periodic report of Kyrgyzstan and the 2021 CEDAW [Concluding Observations](#) on the fifth periodic report of Kyrgyzstan.

<sup>6</sup> Mr. Japarov was elected in the January 2021 presidential election, held simultaneously with the referendum that introduced the presidential system.

<sup>7</sup> See statements of the UN Office of the High Commissioner for Human Rights (OHCHR) on the [situation with the freedom of expression](#) in Kyrgyzstan, including on the [narrowing space](#) for civil society and independent media. See also reports by [Human Rights Watch](#), [International Partnership for Human Rights](#), [Human Rights Defender](#) and [Amnesty International](#). See the [statement](#) of the ODIHR Director and the OSCE Representative on Freedom of the Media calling for the repeal of the "foreign representative" law, which the UN OHCHR [assessed](#) as threatening the work of civil society and violating fundamental rights.

## Legal Framework and Electoral System

The elections were conducted under a fundamentally reformed legal framework that, while providing a technical basis for conducting elections, falls short of a number international standards for democratic elections. Some aspects of the electoral process lacked comprehensive and timely subsidiary regulation, which did not ensure legal clarity and foreseeability, contrary to international good practice.<sup>8</sup>

The Constitutional Law “On Election of the President of the Kyrgyz Republic and Deputies of the *Jogorku Kenesh* of the Kyrgyz Republic” (the Election Law) was amended seven times in 2025, most recently in October, altering most aspects of the electoral framework, without addressing almost all previous ODIHR and Venice Commission recommendations, and commitments inherent to the Parliamentary Assembly of the Council of Europe Partner for Democracy status. The amendments introduced, *inter alia*, a new majoritarian electoral system with a new gender representation quota and electoral districts delineation, further restricted candidate eligibility, introduced a non-refundable candidate registration fee, changed campaign financing and campaign regulations, and abolished by-elections.

The ODIHR 2025 Legal Opinion on the Draft Amendments to the Election Law noted that the amendments were adopted in a condensed timeframe, limiting opportunities for meaningful public consultation and raising concerns about the inclusiveness of the legislative process.<sup>9</sup> The holding of elections so soon after the electoral legal framework was fundamentally amended is at odds with international good practice, and compromised legal certainty and stability for these elections.<sup>10</sup>

The 90-member parliament is elected for a five-year term under a new majoritarian single non-transferable vote (SNTV) system across 30 three-member districts. Some IEOM interlocutors opined that the SNTV system could weaken political parties, lead to localized patronage networks, and hinder the development of a coherent national political agenda. Voters may vote for only one candidate or against all. The three top candidates are elected, one of which shall be of the underrepresented gender.

The 30 mandates reserved for candidates of the underrepresented gender are presented by the authorities as a “women quota”.<sup>11</sup> While the measures to strengthen political participation are laudable, many IEOM interlocutors expressed concerns that the quota system might undermine the legitimacy of women parliamentarians. The law does not provide other measures to enhance the capabilities and representation

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<sup>8</sup> Those included the lack or late adoption of the subsidiary regulation on the election day procedures for remote voting, candidate eligibility requirements, appointment of district election commissions (DECs), transmission of election materials and results tabulation, and distribution of free campaign airtime, in particular with respect to online versions of traditional media. The short interval between the legal amendment introducing the language proficiency requirement and the elections did not allow to develop subsidiary legislation and standards, which led to the decision not to implement it for the 30 November early parliamentary elections. Paragraph II.2 of the 2016 Council of Europe’s European Commission for Democracy through Law (Venice Commission) [Rule of Law Checklist](#) requires adoption of the regulation without delay when required by legislation, while section B3, paragraphs 58 provides that “the law must, where possible, be proclaimed in advance of implementation and be foreseeable as to its effects; it must also be formulated with sufficient precision and clarity to enable legal subjects to regulate their conduct in conformity with it”.

<sup>9</sup> See paragraph 21 and paragraphs 19-25 of the [ODIHR Legal Opinion](#) on the draft Constitutional Law “On amendments to the Constitutional Law ‘On elections of the President of the Kyrgyz Republic and Members of *Jogorku Kenesh* of the Kyrgyz Republic’”. Paragraph 5.8 of the [1990 OSCE Copenhagen Document](#) states that “legislation [shall be] adopted at the end of a public procedure [...] that being the condition for their applicability”. See paragraph 23 of the [2024 ODIHR Guidelines on Democratic Lawmaking for Better Laws](#) and paragraph 60 of the 2016 Venice Commission [Rule of Law Checklist](#).

<sup>10</sup> Paragraph II.2.b of the 2002 [Venice Commission Code of Good Practice in Electoral Matters](#) states that “[t]he fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendment less than one year before an election”.

<sup>11</sup> If there are no candidates elected of the required gender, the mandate of the third placed candidate is reserved for the candidate of the opposite gender with the most votes in that district.

of women in politics, such as capacity building trainings or financial subsidies, contrary to international standards and commitments.<sup>12</sup>

The law prescribes that the CEC delineates electoral districts prior to each parliamentary elections; this is at odds with international good practice that recommends that an impartial and inclusive specialized committee handles delineation.<sup>13</sup> The law requires contiguity of electoral districts and recommends compliance with administrative boundaries.<sup>14</sup> Districts are supposed to have an approximately equal number of voters, with a permissible deviation of up to 20 per cent from the national average, which is above the threshold recommended by international good practice.<sup>15</sup> The CEC delineated the 30 new electoral districts on 1 October 2025 within the legal deadline. The number of voters in the new electoral districts varied significantly.<sup>16</sup> The law does not require consideration of the ethnic composition of electoral districts, and its implementation created an artificial division of geographically concentrated communities, which impeded the opportunities of the candidates representing national minorities to mobilize their community electorate.<sup>17</sup>

## Election Administration

Parliamentary elections were administered by a hierarchical three-tier system<sup>18</sup> of election commissions, with the CEC, 30 District Election Commissions (DECs), and some 2,500 Precinct Election Commissions (PECs).<sup>19</sup> The CEC is a permanent institution, appointed by the parliament based on parliamentary and presidential nominations, with only the Chairperson and the two Deputy Chairpersons working on a permanent basis.

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<sup>12</sup> [CEDAW Article 4](#) and [General Recommendation No. 25](#) highlight the need for temporary special measures, including electoral quotas, to be supported by practical steps that facilitate equal participation in political and public life. See also [CEDAW General Recommendation No. 23](#) on Political and Public Life; [CEDAW General Recommendation No. 40](#).

<sup>13</sup> Paragraph I.2.2.vii. of the [2002 Venice Commission Code of Good Practice](#) states that the process must be conducted “impartially, and [...] taking account of the opinion of a committee, the majority of whose members are independent, [and] should preferably include a geographer, a sociologist and a balanced representation of the parties and, if necessary, representatives of national minorities”

<sup>14</sup> Despite the recommendation in the law, administrative boundaries are not always respected. For example, the city of Uzgen was divided between two electoral districts, splitting a compact national minority settlement.

<sup>15</sup> Paragraph 7.3 of the [1990 OSCE Copenhagen Document](#), stipulates that the participating States will “guarantee universal and equal suffrage to adult citizens”. Paragraph I.2.2.iv of the [2002 Venice Commission Code of Good Practice](#) provides that deviations should not exceed 10 per cent and certainly not more than 15 per cent, except in special circumstances”.

<sup>16</sup> [CEC Resolution No. 88](#) of 1 October 2025 determined the 30 districts with an average of 142,900 voters. Eight constituencies (26.7 per cent of the total) exceed the internationally recommended 10 per cent threshold: constituencies No. 9 (-14.10 per cent), No. 15 (+12.11 per cent), No. 28 (+12.09 per cent), No. 13 (+11.9 per cent), No. 27 (+10.37 per cent), No. 20 (-10.6 per cent), and No. 4 (-10.24 per cent). Furthermore, constituency No. 5 exceeds the 15 per cent threshold. Paragraph 21 of the [1996 UN HRC General Comment No. 25](#) states “[t]he drawing of electoral boundaries and the method of allocating votes should not distort the distribution of votes”.

<sup>17</sup> This pertains to the division of Uzgen between electoral districts No. 9 and No. 11, the districts Nos. 5,7,8 in Osh and the division of Suzak between districts No. 11 and No. 12, affecting the Uzbek communities, while the delineation of districts No. 7 and No. 9 have likely affected the Tajik community. [The OSCE HCNM’s Lund Recommendations on the Effective Participation of National Minorities in Public Life](#) (recommendation 10), states that “[t]he geographic boundaries of electoral districts should facilitate the equitable representation of national minorities.” Paragraph I.2.2.vii of the [2002 Venice Commission Code of Good Practice](#) states that “when constituency boundaries are redefined [...] it must be done without detriment to national minorities.”

<sup>18</sup> The Territorial Election Commissions (TECs) are permanent election administration bodies. They do not operate for parliamentary elections.

<sup>19</sup> For these elections, the CEC established 100 polling stations in 34 countries, including 40 in the Russian Federation, 8 in Türkiye, 7 in Kazakhstan, 6 each in the United States of America and Canada, and 4 in the Republic of Korea for out-of-country voting. The CEC established 27 polling stations exclusively for remote voting, which are regulated by CEC resolutions on remote voting and are not tied to any specific electoral district.

The CEC forms 12-member DEC members in each district from the TECs membership.<sup>20</sup> There are no legal criteria for the selection of DEC members, but the CEC must take election-related experience into account for the chairperson and secretary. As of 30 November, there were some 30 changes in the composition of DEC members, in most cases due to self-resignation. PECs are composed from nominees proposed by political parties and local self-government bodies in equal numbers. Several ODIHR EOM interlocutors noted that political parties did not exercise this right, reducing the intended level of political pluralism in the commissions.

The creation of transmission hubs at TECs for the transmission of election materials from distant PECs offers an operational solution, but lacks a clear definition of their functions, responsibilities for tabulation with DEC members, and the number of the affected PECs. This results in the insufficient clarity on the process.

Women were well represented in DEC members and PECs, with 57 and 70.5 per cent respectively, unlike the CEC, which has only 2 women among 11 members.<sup>21</sup> National minority groups or persons with disabilities do not benefit from any legally guaranteed quota in the election administration.

The CEC carried out technical preparations efficiently and within the expedited deadlines for early elections. The CEC held regular sessions, and improved transparency in the decision-making process by streaming and publishing the recording of its sessions online. However, these efforts were diminished by agendas, regulations and decisions not always being published in a timely manner. The DEC members were sufficiently resourced and carried out their duties professionally, often with the active involvement of CEC representatives in their administrative duties. Some DEC members convened on an *ad hoc* basis, often at short notice, and agendas and minutes of the sessions were frequently not published, limiting transparency and the opportunity for observation.<sup>22</sup> The work of some DEC members was affected by the vast territory of their electoral districts and problematic communication.<sup>23</sup> The election administration enjoyed most stakeholders' confidence in its technical capacity to conduct the elections.

The late adoption of the new election day procedures, including on remote voting (voting at a polling station outside ones' electoral district), some two weeks before election day, did not provide sufficient time for trainers to fully understand the process and effectively communicate the information to DEC and PEC members.<sup>24</sup> Some PEC trainings were cancelled, some were conducted on short notice. The quality of the PEC trainings, observed by ODIHR EOM Long-Term Observers (LTOs), varied from structured and practical sessions with quality presentations to lectures with no supplementary materials. Extensive media voter information campaigns in Kyrgyz and Russian were conducted through televised spots, social media platforms, and public gatherings, covering various aspects of the electoral process. Voter information, including on candidates, was not accessible in the languages of national minorities.<sup>25</sup>

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<sup>20</sup> TECs do not have a mandated role in the administration of parliamentary elections.

<sup>21</sup> On 12 September 2025, parliament terminated the mandates of two of the four women CEC members nominated by the president, due to their voluntary resignation, substituting them with two men. Article 2 of the Election Law requires that "[...] no more than seventy per cent of the (CEC) members [shall be] of the same gender".

<sup>22</sup> Such practices were observed in Balykchy, Tokmok, Kochkor, Uzgen, Kara Kuldja, Kyzyl-Kyya, Nookat, Toktogul Massy, and Kerben; unpublished decisions reported in Bishkek, Manas and Suzak.

<sup>23</sup> Based on observations in Bishkek, Kent, Balykchy, Tokmok, Cholpon-Ata, Kyzyl-Suu, Osh, Aravan, Kara-Suu, Kyzyl-Kyya, Nookat, Manas, Suzak, and Talas.

<sup>24</sup> On 21 November, the CEC published the two regulations they adopted a week earlier: on voter identification and on the procedure for organizing, conducting and summarizing the results of remote voting.

<sup>25</sup> The Constitution provides that Kyrgyz is the state language and Russian is the official language, and guarantees conditions for ethnic groups to preserve and develop their native languages. Paragraph I.3.1.b of the [2002 Venice Commission Code of Good Practice](#) states that "The public authorities have a number of positive obligations; *inter alia*, they must ii. enable voters to know the lists and candidates standing for election [...]. iii. The above information must also be available in the languages of the national minorities."

## New Voting Technologies

The elections were conducted using new voting equipment that integrates most voting procedures into one system and enables the electronic tabulation of preliminary results. The Voter Identification Device with Ballot Printing (VID-BP) combined ID verification, biometric authentication, including fingerprint and facial scanning, and the printing of both voter identification slip and the ballot paper. The device also enables the regular transmission of turnout data to the CEC during voting. Ballots are completed manually by voters and inserted into the ballot scanner while upholding the secrecy of the vote. After the polls close, the scanner is connected to the internet to immediately transmit the preliminary results and subsequently forward the scanned paper protocols. The electronically generated results are to serve as preliminary, while manual counting remains mandatory, and only manually counted results are to be considered legally valid.

CEC trainings sufficiently prepared election officials for the use of the new equipment and trainings were reinforced with ample practice exercising. The authorities undertook measures to address the instability of electricity and Internet connection, which was the most commonly identified challenge; however a few delays in the delivery of the additional equipment were noted in remote areas.<sup>26</sup> Most ODIHR EOM interlocutors from the election administration assessed positively the introduction of the new equipment, underlining its overall user-friendliness and the positive effect on the facilitation of election day procedures, expressing trust in its technical aspects. However, contrary to international good practice, the contract to supply the electronic voting systems and provide support services was granted without an open public tender process, which does not ensure transparency and accountability and along with the lack of access to scrutinize the technology affected the perception of its integrity.<sup>27</sup>

The ballot paper, issued by the VID-BP incorporates a unique Quick Response (QR) code.<sup>28</sup> The simultaneous processing of the identified voter's data and the generation of a QR code linked to the corresponding ballot creates a significant potential vulnerability that may compromise the secrecy of the vote.<sup>29</sup> The law does not provide for the independent verification and certification of electronic technologies, limiting public scrutiny of the systems. According to the CEC, the last system audit was carried out in 2020 by the State Enterprise "Infocom", but the findings remain unpublished, limiting transparency and public accountability. Further, key stakeholders, such as political parties and observers, were not granted access to the relevant documentation and equipment setup procedures, at odds with international good practice, and some expressed concerns about the integrity of its use.<sup>30</sup>

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<sup>26</sup> ODIHR observers reported that trained technicians were assigned to each DEC, and that power and connectivity vulnerabilities were addressed with cable networks and mobile internet, as well as spare generators. Issues with the delivery of power generators were observed in Aravan, and there were reports that no technical specialist was assigned for the Batken region.

<sup>27</sup> In 2024, the contract was granted by orders of the President and Cabinet of Ministers to a foreign company without a public tender. The 2024 [ODIHR Handbook on New Voting Technologies](#) (ICT) states that "An integral part of the assessment of the use of ICT and NVT is the transparency of the system which is also a crucial element for building public confidence. Transparency can be affected by different factors. Where any component or process of the system is secret or protected by law from disclosure, overall transparency decreases. As elections are a public process exercised collectively by and for voters to realize their basic human rights, the technology used should not be kept secret by a private agreement between a vendor and the state authorities" (p.p. 54-55).

<sup>28</sup> The QR code enables the ballot scanner to validate the locality and time origin of the ballot paper and facilitates the secure issuance of replacement ballots for voters surrendering spoiled ones.

<sup>29</sup> The absence of publicly available source code and comprehensive technical documentation prevents assessment regarding the potential link or assignment between QR codes and individual voters.

<sup>30</sup> The [2002 Venice Commission Code of Good Practice](#), paragraph I.3.2.iv and paragraph 3.2.2.3 of the Explanatory Report calls for transparency of e-voting systems. Among other concerns, there was a question about whether safeguards are in place to prevent the same voters' entries from being replicated across multiple voter lists uploaded in several identification devices.

For the first time nationwide, remote voting was implemented.<sup>31</sup> Voters could vote at any polling station outside their electoral district of registration, potentially opening voting to more students and labour migrants. While voting remotely, the voter is identified using centrally stored personal data and receives a ballot paper listing the candidates from the voter's original electoral district. To prevent multiple voting, remote identification can only be used once. The CEC organized several mock exercises of remote voting, aiming to ensure voters' familiarity with the process and improve public trust, along with three nationwide tests in October. The testing sessions did not gain wide attendance but allowed the election administration to identify some operational risks related to connectivity and data transfer. The lack of clear procedures on the tabulation of remotely cast votes and on the verification of its results undermines legal certainty.<sup>32</sup>

## Voter Registration

Citizens of at least 18 years of age on election day are eligible to vote, except those serving a prison sentence, regardless of the gravity of the crime committed, and those declared legally incompetent by a court, which is contrary to international standards, OSCE commitments, and prior ODIHR recommendations.<sup>33</sup>

Voter registration is passive, based on permanent civil registration, and requires biometric data.<sup>34</sup> Voter lists are generated from the Unified State Population Register administered by the State Registration Agency (SRA) "Kyzmat", based on voter addresses and eligibility criteria. Voter lists are updated daily during electoral periods. ODIHR EOM observers reported that the lists were publicly displayed at all polling stations visited and were generally accessible for voters. Voters had sufficient opportunities to request corrections until 19 November. The final voter list, published on 23 November, included 4,294,243 voters, of whom 51.5 per cent are women. According to ODIHR EOM interlocutors, the planned voter registration database audit looking at the safety of the processing of biometric information, was postponed until after the elections.

The voter list scrutiny and the verification process did not raise concerns as to the accuracy of the voter register, and most IEOM interlocutors expressed high confidence in its accuracy and inclusiveness. However, the legal requirement for PECs to display lists of voters who have voted at polling stations and the publication of these lists on the CEC website undermines secrecy of the vote.<sup>35</sup>

## Registration of Candidates

Voters who are at least 25 years old by election day, have a higher education, and have resided permanently in the country for at least five years prior to the elections may stand as candidates. The

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<sup>31</sup> Remote voting was implemented several times in the 2024 local and parliamentary by-elections. According to the Election Law, the decision to conduct remote voting shall be adopted, when the elections are scheduled. For the 2025 early parliamentary elections, conducting of remote voting was determined in the 30 September presidential decree.

<sup>32</sup> The provisions of Articles 36<sup>1</sup> and 37 paragraph 5 of the Election Law on tabulating, counting and invalidating of remotely cast votes lack clarity, which was not addressed in the respective regulation of 14 November.

<sup>33</sup> Article 25(b) of the [1966 ICCPR](#) in conjunction with Article 2 guarantees the right to vote "without unreasonable restrictions" and discrimination. See also the [1996 UN HRC General Comment No. 25](#) paragraph 4. See Articles 12 and 29 of the [2006 UN CRPD](#) and paragraph 48 of the [General Comment No. 1](#) that state that "a person's decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising [...] the right to vote [and] the right to stand for election". See also paragraphs 7.3 and 24 of the [1990 OSCE Copenhagen Document](#).

<sup>34</sup> Biometric registration is mandatory for all citizens above the age of 16. According to the CEC, only some 8,000 citizens have not been biometric registered.

<sup>35</sup> Article 25 of the [1966 ICCPR](#) and paragraph 5.1 of the [1990 OSCE Copenhagen Document](#) provide for respect of the secrecy of the vote. Paragraph I.4.54 of the Explanatory Report to the [2002 Venice Commission Code of Good Practice](#) states that: "since abstention may indicate a political choice, lists of persons voting should not be published. See also the 2016 Venice Commission [Interpretative Declaration](#) to the Code of Good Practice in Electoral Matters on the Publication of Lists of Voters Having Participated in Elections

Election law establishes undue limitations on the right to stand, contrary to international standards and national legislation, as well as prior ODIHR recommendations.<sup>36</sup> The Constitution maintains the prohibition on holders of dual citizenship from holding public or civil service positions, despite recommendations by ODIHR and the Venice Commission.<sup>37</sup>

Recent legal amendments further expanded the restrictions on candidacy by adding a requirement for proficiency in the Kyrgyz language (which was subsequently suspended from implementation in this campaign due to the lack of necessary standards because of the late introduction of the requirement),<sup>38</sup> and providing for ineligibility based on criminal record, including expunged convictions and some terminated criminal proceedings.<sup>39</sup> A lifetime blanket ban due to any conviction, especially those expunged, or a terminated criminal prosecution, raises concerns about proportionality and denies the right to rehabilitation. Furthermore, individuals included in preventive administrative registers for links to criminal or armed groups are ineligible even in the absence of a court decision,<sup>40</sup> undermining the presumption of innocence and legal certainty.<sup>41</sup> There is also a ban on participation for former clergy for a limited time, contrary to international standards.<sup>42</sup> The candidate eligibility requirements include undue limitations on the right to stand and do not provide for equal opportunities.

Candidates could be nominated by registered political parties and by self-nomination until 30 October, subject to a non-refundable electoral fee of KGS 300,000.<sup>43</sup> The IEOM observed that the electoral fee constituted a barrier for participation, particularly given the limited time for fundraising in early elections. The 2025 amendments to the Election Law removed quotas for participation of persons with disabilities, youth, and national minorities, weakening opportunities for inclusive representation.

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<sup>36</sup> Article 25(b) of the [1966 ICCPR](#) in conjunction with Article 2 guarantees the right to be elected “without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status”. See Paragraph 7.3 of the [1990 OSCE Copenhagen Document](#). Paragraph I.1.1.d of the [2002 Venice Commission Code of Good Practice](#) provides that the residence requirements shall be permissible only for local/regional elections and should not exceed six months. Article 24(1) of the Constitution of the Kyrgyz Republic prohibits discrimination, including based on education. Paragraph 15 of the [1996 UN HRC General Comment No. 25](#) states that “persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent”.

<sup>37</sup> The 2020 ODIHR and Venice Commission [Joint Opinion](#) on Amendments to Some Legislative Acts Related to Sanctions for Violations of Electoral Legislation recommended “to give due consideration to minimizing and eventually abolishing limitations on holding public offices for citizens with dual nationalities” (paragraph 32).

<sup>38</sup> Under its [Resolution No. 211](#) the Cabinet of Ministers postponed the implementation of requirement for the proficiency in the Kyrgyz language for representatives of ethnic minorities until 2028.

<sup>39</sup> Article 25 of the [1966 ICCPR](#) guarantees the right to stand for election without unreasonable restrictions, and 1996 UN HRC [General Comment No. 25](#) underlines that limitations based on language ability or criminal convictions must rely on objective and reasonable criteria and must not create disproportionate barriers to participation in public life. See paragraph I.1.1.d.iv. of the [2002 Venice Commission Code of Good Practice](#).

<sup>40</sup> Court cases reviewed by the ODIHR EOM confirmed that some individuals only learned of their inclusion on preventive–operative lists upon receiving the CEC’s decision denying registration. As courts maintained that they had no jurisdiction to review or annul such listings, their examination was limited to the CEC’s procedural compliance with the law. As a result, those concerned were left without an effective remedy to contest the basis of their disqualification, contrary to OSCE Commitments and international standards. Article 2.3 of the [1966 ICCPR](#) on effective remedy. See also paragraph 5.10 of the [1990 OSCE Copenhagen Document](#).

<sup>41</sup> The 2025 Law on Combating Organised Crime provides the basis for the preventive register, the operative preventive register is maintained by the security services without judicial review. Article 57(1) of the Constitution guarantees the presumption of innocence. Article 14 of the [1966 ICCPR](#) provides a requirement of judicial determination for criminal responsibility. Paragraphs 5.12 and 5.13 of the [1990 OSCE Copenhagen Document](#) provide that restrictions on the rights must meet standards of legality, foreseeability, and non-arbitrariness.

<sup>42</sup> See Article 25 in conjunction with Article 2 of the [1966 ICCPR](#). Paragraph 3 of the 1996 UN HRC [General Comment No. 25](#) prohibits any distinction in political rights on the grounds of religion.

<sup>43</sup> EUR 1 equals approximately KGS 100. The fee is 3,000 calculation units (c.u.), 1 c.u. equals to KGS 100 . The law provides reduced registration fees for candidates with disabilities, with the reduction graded according to the degree of disability.

The registration process was overall transparent. The CEC efficiently conducted compliance checks through inter-agency data exchange, and held several sessions to decide on nominations. The CEC verified submissions on a rolling basis, registering candidates or issuing motivated rejections. The IEOM found that the denial of registration close to the registration deadline rendered appeals ineffective. By the legal deadline, the CEC registered 465 candidates, of whom 189 were women (41 per cent) and 10 self-identified to national minorities (2 per cent); 67 candidates had withdrawn,<sup>44</sup> and 57 had been denied registration.<sup>45</sup> The number of registered candidates varies significantly across districts.<sup>46</sup> Nearly all candidates were self-nominated (98 per cent); only one political party fielded nine candidates, demonstrating how the new electoral system may have impacted the participation of political parties. Of the 90-member outgoing parliament, 79 MPs competed.

## Campaign Environment

The election campaign was short, lasting from 10 to 29 November, effectively hindering the ability of many candidates to reach voters. The legal framework ensures equal campaign opportunities for all contestants and grants citizens the right to participate in campaigning. However, regulations include strict definitions of what can and cannot be said in a campaign,<sup>47</sup> and prescribe specific forms of campaigning for candidates<sup>48</sup> and voters which together with the election administration's formalistic interpretation of these rules and extensive sanctioning, unduly limited the candidates' opportunities and hampered free public political discourse.<sup>49</sup> In some regions, the judiciary restricted the right to assembly.<sup>50</sup> The week prior to the elections was marked by arrests of prominent political figures on suspicion of organizing mass riots.<sup>51</sup>

The law prohibits the misuse of administrative resources and public office, vote-buying, preferential media access, dissemination of false information and criticism of other contestants during free time on state media.<sup>52</sup> Public authorities, including the president, repeatedly addressed voters, discouraging

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<sup>44</sup> By law for early elections parties and candidates could withdraw no later than 7 days before election day.

<sup>45</sup> Of those denied registration, 14 failed to pay the electoral fee, 20 failed to open a campaign bank account and 23 for ineligibility reasons, including two on criminal records.

<sup>46</sup> There were 29 districts with at least 10 candidates, including four that feature more than 20 candidates. The lowest number of candidates - 5 - were registered in DEC 11, while the highest number - 25 - in DEC 19.

<sup>47</sup> The 2021 Law on Inaccurate (False) Information, as well as the Election Law that in Article 28(5) prohibits publications based on knowingly false information and damaging honor, dignity, or business reputation of candidates or political parties. At the same time, the latter in its Article 28(6) prohibits in free airtime dissemination of "calls to vote against the candidate (candidates)", "of information about any candidate (any candidates), the political party that nominated the registered candidate, with negative comments" and "dissemination of information that contributes to the creation of a negative attitude of voters towards the candidate or the political party that nominated the registered candidate".

<sup>48</sup> The Election Law in Article 22(10) prescribes four forms of election campaigning - (1) calls to vote for certain candidates or against them; (2) expression of preference in relation to individual candidates; (3) a description of the possible consequences of the election or non-election of candidates; (4) dissemination of information about the activities of candidates that are not related to their professional activities or the performance of their official duties.

<sup>49</sup> The Election Law in Article 1 defines campaigning as "activities of citizens [...], candidates, authorized representatives and trustees of candidates, political parties in the preparation and dissemination of information during the election campaign, aimed at encouraging voters to vote for certain candidates (list of candidates) or against them". However, the CEC adopted a wide interpretation that any explicit expression of the citizens' political stance or commentary constitutes campaigning and as such should be allowed only on a contractual basis with a candidate.

<sup>50</sup> Since 2024, temporary judicial measures requested by local administrations render central areas in Bishkek and Osh as areas where public assemblies are prohibited.

<sup>51</sup> On 22 November, a number of politicians and journalists, including representatives of two opposition parties, two former MPs and the former Chief of the Financial Police were detained for questioning, and 10 of them, including the leader of Social Democrats party were further detained until 17 January on suspicion of organizing mass riots, (under Article 278 of the Criminal Code, that provides a sanction of up to a 10- year imprisonment), Multiple searches and interrogations were conducted including of family members of the detained individuals.

<sup>52</sup> Campaign violations of an administrative nature may lead to warnings, fines, and deregistration of candidates, while campaign-related criminal offences entail fines, correction labour, or imprisonment of up to eight years.

unlawful practices and calling for fair campaign.<sup>53</sup> Contestants signed a non-binding memorandum pledging not to misuse administrative resources or engage in vote-buying.<sup>54</sup> ODIHR EOM observers received information on allegations of vote-buying that remained widespread across numerous districts throughout the campaign, but only three criminal cases were initiated.<sup>55</sup> A number of IEOM interlocutors noted that the new election campaign rule, which enabled contestants to hire up to 1,000 people to campaign for them, disproportionately favoured affluent candidates, while some considered its reintroduction to be legitimized vote-buying.

The President announced his intention to personally oversee the election campaign to ensure its fair conduct.<sup>56</sup> The law mandates the CEC to ensure compliance with campaign requirements. Its Working Group on Campaigning reviewed over 220 cases related to the campaign, many of which concerned materials posted or mentioned on social networks or in closed messaging groups, both before and during the official campaign.<sup>57</sup>

While the intensity of the campaign gained momentum in the last week, it generally unfolded in a subdued atmosphere, with largely low-key activities. Observation of campaign activities, demonstrated a level of caution in campaign narratives and voter engagement and an apparent acceptance by voters and candidates alike of a certain degree of control of the campaign environment along with a fear of repercussions for any activities or statements that could be considered as criticism; this was a concern also raised by several IEOM interlocutors.<sup>58</sup> Further, a number of IEOM interlocutors noted a high level of voter apathy, which they attributed to a lack of trust and disillusionment in the political process.

Despite this campaign environment, competitive electoral activities were observed in many districts and included gatherings, a number of which were co-organised by the CEC and the DEC, door-to-door canvassing, and activity on the social media, mostly conducted in their individual capacity.<sup>59</sup> While the campaign was mostly personality-driven, candidates addressed a range of primary local issues, such as rising living costs, social development, including education and healthcare, local infrastructure; and women's rights.

Most candidates largely relied on social media platforms such as Instagram, Facebook, YouTube, and messaging apps as one of their main campaigning tools. Ten candidates had over 100,000 followers on their Instagram accounts. The campaign-related posts generally presented the candidates' campaign activities and were personality-focused, rarely featuring programmatic issues, including those that

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<sup>53</sup> On 30 September, President Japarov, in his [address](#) to the nation, specifically urged employees of local administrations, civil servants, teachers, and doctors not to interfere in the election process, warning that any interference will result in dismissal and strict accountability. The President stated that “these elections must become the most transparent and fair in our history”. The [CEC chairperson](#) called on candidates to abstain from vote-buying and the [Ministry of Education](#) called on education professionals to abstain from campaigning.

<sup>54</sup> The candidates signed the [memoranda](#) on 8 November in each respective DEC (for Bishkek-based DEC - at the CEC), after the lottery on ballot order and the allocation of free airtime in the state media were conducted.

<sup>55</sup> ODIHR EOM received information on allegations in various districts, including in Bishkek, Gulczo, Kadamjai, Kant, Kara-Suu, Kerben, Lebedinovka, Naryn, Nookat, and Tokmok. The Prosecutor's Office informed ODIHR EOM that as of 25 November, 18 cases of alleged vote-buying were under investigation.

<sup>56</sup> The President [undertook](#) to “personally monitor these elections [...] as an arbiter. If unfair actions are recorded in any district, I myself will take part in the CEC proceedings or set up a commission and send my trusted people there.”

<sup>57</sup> The Working Group has reportedly held 18 sessions, including 16 working ones. See Election Dispute Resolution section for the information on complaints that reached the CEC level.

<sup>58</sup> In paragraph 7.7 of the [1990 OSCE Copenhagen Document](#) the OSCE participating States committed to “ensure that law and public policy work to permit political campaigning to be conducted in a fair and free atmosphere in which neither administrative action, violence nor intimidation bars the parties and the candidates from freely presenting their views and qualifications, or prevents the voters from learning and discussing them or from casting their vote free of fear of retribution”.

<sup>59</sup> ODIHR EOM observed 106 campaign events in all districts, most in DEC 15, DEC 26 and DEC 29. In some 40 per cent (42 events) up to 100 people participated and in 22 per cent up to 50 participants (23 events).. Some 17 per cent attracted larger audience up to 1000 participants.

generated higher interactions. The social media platforms monitored by the ODIHR EOM did not contain posts with discrediting or derogatory content against other candidates or authorities.<sup>60</sup> There is no specific regulation of the online campaign and general campaign regulations apply.

Some ODIHR EOM interlocutors reported a pattern of concern and caution towards participating in the election among candidates and potential candidates belonging to national minorities and communities. Discussions on minority-specific topics were almost absent from public campaigning. Moreover, the availability of electoral information and campaigning in minority languages is severely limited.<sup>61</sup> The campaign environment for ethnic minority communities is further challenged by the overall lack of media in languages other than Kyrgyz and Russian.<sup>62</sup>

## Campaign Finance

The legal framework for campaign finance provides a sufficiently structured basis for financial regulation during the campaign. However, candidates can be deregistered for nominally exceeding spending limits, which is disproportionate. Recent amendments *inter alia* restricted the methods by which candidates can receive donations, extended deregistration of candidates for the overspending of their nominating political party, a disproportionate sanction depending on the gravity of the case, and incorporated social network advertising as a permitted campaign expense.

Campaigns may be financed from the candidate's or political party's own resources and voluntary donations from citizens and legal entities, subject to limitations on amounts and sources.<sup>63</sup> In-kind donations are still not permitted, despite prior ODIHR and Venice Commission recommendations.<sup>64</sup> The total campaign fund per candidate is limited to approximately KGS 20,000,000. As per published financial data, the main sources of campaign financing are the candidates' personal assets, followed by donations from individuals. Financial disparities affected the ability of candidates to campaign on a level playing field.

All contestants opened a dedicated campaign account at one of two authorized state-owned banks. Some ODIHR EOM interlocutors regretted the lack of simplified online donation tools, such as QR codes or e-wallets, which discouraged small contributions. Some IEOM interlocutors expressed concern about the exclusive use of state-owned banks and reported delays in transaction processing and limited branch access in rural areas.

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<sup>60</sup> Similarly, in 71 per cent of the observed campaign events (75 out of 106 events) there were no negative remarks or comments by the candidate or other speakers.

<sup>61</sup> The 2023 State Language Law mandates campaign activities to be conducted in Kyrgyz or Russian only. Out of 106 meetings observed by the ODIHR EOM long-term observers, 86 (81 per cent) were conducted exclusively in Kyrgyz, 15 meetings (14 per cent) - in Kyrgyz and Russian, two events were held in both Kyrgyz and Uzbek, one event in more languages besides Kyrgyz, and one - only in Uzbek. No campaign materials in national minority languages were observed.

<sup>62</sup> There are no television stations consistently broadcasting in other languages other than Kyrgyz or Russian, and no Kyrgyzstan-based online news outlets publishing regularly in languages other than Kyrgyz, Russian or English. According to ODIHR EOM interlocutors, there is only one remaining minority-language print media.

<sup>63</sup> Campaigns can be financed via personal funds of up to approximately KGS 10,000,000, party contributions of up to KGS 1,000,000, and donations from individuals and legal entities capped at about KGS 500,000. Political party campaign funds may include candidate contributions of up to KGS 15,000,000, party resources of up to KGS 100 million, individual donations of up to KGS 200,000, and legal-entity donations of up to KGS 3,000,000. Donations from anonymous and foreign sources, clergy, judiciary, military, public and civil servants and those with debts to the state are banned.

<sup>64</sup> Paragraph 170 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that "...all individuals should have the right to freely express their support of a political party of their choice through financial and in-kind contributions" within reasonable limits.

The CEC published income, expenditure, and financial statements for each contestant throughout the campaign on its website,<sup>65</sup> but donor identities are not disclosed, which falls short of the international standards for transparency.<sup>66</sup> In the absence of an online campaign finance report submission system, the interim reports due on 22 November were submitted in hard copies, and were not published due to the lack of technical capacity. The CEC could not account for the exact number of the received reports, as some of them were submitted to the DEC. The CEC explained to the ODIHR EOM that due to limited human resources and short timeframe, the verification of the reports was limited, and that it primarily relied on the banks servicing the campaign accounts to have rejected unlawful or excessive donations.<sup>67</sup> Final reports are due by 7 December 2025.

The CEC oversees compliance with campaign finance rules, acts on violations, verifies financial transactions, reports on campaign finances during the campaign, and conducts inspections and audits.<sup>68</sup> The absence of clear procedures for audits and limited public disclosure diminishes the effectiveness of campaign finance oversight.<sup>69</sup> The CEC also expressed its concern that electronic payment applications or cash could be used to bypass the requirements for electoral funds. Several IEOM interlocutors referred to possible unreported volunteer labour and operational expenses that could fall under prohibited in-kind contributions and noted the limited verification capacity at the district level, together indicating gaps in oversight system. The law requires an ex-post audit, but it does not regulate the audit methodology or require publication of its results.<sup>70</sup>

Sanctions for violations of campaign finance rules are predominantly criminal, while the administrative measures remain limited and unclear and do not provide a proportionate, graduated system to address omissions during the campaign.<sup>71</sup> The Election Law grants the CEC the mandate to allow or prohibit prosecution of candidates for campaign finance violations.<sup>72</sup> In the absence of sufficient administrative measures, this framework leaves moderate violations either subject to potentially severe consequences or not pursued, limiting proportionate and predictable enforcement, despite prior ODIHR and Venice Commission recommendations, and at odds with international good practice.<sup>73</sup> In particular the provision

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<sup>65</sup> As of 29 November, the [CEC published](#) consolidated bank data showing total income of about KGS 1.76 billion and expenditures of about KGS 1.55 billion, disaggregated by source, spending type and district.

<sup>66</sup> Article 7.3 of the 2003 [UNCAC](#) and [the 2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) call for publication of the origin and allocation of campaign funds.

<sup>67</sup> The CEC only verifies the consistency of the data in the reports with the bank statements, without any attempt to identify the use of unreported funds or other malpractices.

<sup>68</sup> Under the [CEC Regulation No. 56](#) and Article 42 of the Election Law, the CEC Audit Group comprises at least seven members, including CEC officials, law-enforcement and financial experts and other state institutions, responsible for the oversight of campaign finance.

<sup>69</sup> Paragraph 278 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that “[...] legislation should clearly outline the different steps of the audit process”. See also Section 6 of the 2015 [ODIHR Handbook for the Observation on Campaign Finance](#).

<sup>70</sup> At the time of reporting, the CEC Audit Group was still considering the approach for the upcoming audit.

<sup>71</sup> The Code on Administrative Offences does not establish specific administrative sanctions for routine campaign finance irregularities, instead relying on broad or indirect provisions. While Article 62 addresses the submission of false information, there are no explicit administrative penalties for late reporting, minor accounting discrepancies or technical non-compliance with banking procedures. In practice, oversight bodies must rely on Article 61 on failure to provide information or Article 65 on campaigning rule violations to address finance-related issues. As these provisions do not expressly refer to campaign funds, their application to financial violations remains legally uncertain and unforeseeable for the stakeholders. Article 46(2) of the Election Law provides for deregistration of candidates when resources additional to campaign funds are used or for excessive spending. Serious offences fall under Articles 197 and 198 of the Criminal Code, which foresee penalties up to a five-year imprisonment.

<sup>72</sup> For example, on 24 November, the CEC denied the police’s request to initiate criminal proceedings against candidate Nurdinov in district No. 30 on suspicion of vote-buying.

<sup>73</sup> Paragraph 281 of the [2020 ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that “while criminal sanctions are reserved for serious violations that undermine public integrity or may threaten national security (e.g. in the case of foreign funding), there should be a range of administrative sanctions available not only for the improper acquisition or use of funds by parties [...] but also for individual wrongdoing.

for the deregistration of candidates for exceeding spending limits by 0.5 per cent, which is disproportionate.<sup>74</sup>

## Media

The media landscape has changed significantly since 2021, and, although some plurality remains, it is rapidly narrowing. Social networks have become the primary source of political information, followed by television.<sup>75</sup> In 2022, the public broadcaster was nationalized, contrary to international good practice, and rebranded as the National Television and Radio Broadcasting Corporation of Kyrgyzstan (*NTRK*).<sup>76</sup>

While the Constitution provides for freedom of expression and prohibits censorship, it also includes unduly broad or vague grounds for restricting these freedoms. Further, the Criminal Code provides a broad basis for prosecution on vague grounds, and journalists are increasingly being prosecuted under them.<sup>77</sup> The 2025 Law on Mass Media requires mandatory registration for all media, including online media, limits foreign ownership to 35 per cent, and failed to address some key recommendations from the OSCE Representative on Freedom of the Media and ODIHR.<sup>78</sup> The new fines introduced in 2025 into the Code of Administrative Offences for libel, defamation and distribution of false information are disproportionately high.<sup>79</sup> There is no independent media regulator in Kyrgyzstan, and the Ministry of Culture, Information, Sports and Youth Policy (MCISY) is mandated to license and delicense media outlets. Contrary to international standards, the Law on Protection of Inaccurate (False) Information allows the MCISY to remove content or block websites without prior court decision.<sup>80</sup> Overall, the legal framework for the media falls short of meeting international obligations.<sup>81</sup>

<sup>74</sup> As per the current expenditure limit, deregistration can potentially be initiated for a KGS 50,000 overspent.

<sup>75</sup> See the 2023 [MVector Media Consumption in Kyrgyzstan report](#). According to the [Digital 2025: Kyrgyzstan report](#), internet penetration in 2025 stood at 88.5 per cent. Other recent developments in the media sphere concerned a change of format of some media, for example, the shift from generalist to entertainment format by the *NTS*, and the opening of new media, the *Nomad TV*, a joint Kyrgyz-Russian project, to feature *inter alia* “the joint historical and cultural ties of Russia and Kyrgyzstan, their development and shared role on the international arena” the channel will re-broadcast programmes of the Russian *NTV*; high-level Russian officials attended its [opening ceremony](#).

<sup>76</sup> In [2023 Joint Declaration](#), International Mandate-Holders on Freedom of Expression emphasized that “All government or State media should be transformed into public service media without further delay.”

<sup>77</sup> The UN CERD in its [July 2025 Concluding Observations](#) expressed concerns about “overly broad and vague provisions of the Criminal Code” and recommended to “[r]eview the Criminal Code, particularly articles 278(3), 330, 326 and 327 to prevent arbitrary interpretations and disproportionate restrictions imposed on the right to freedom of opinion and expression” and “to ensure that the legislative framework is not used to intimidate, harass, arrest or prosecute journalists”. According to the [Media Policy Institute](#), in 2024 there were 13 criminal charges against journalists on the basis of articles 330 (Incitement to racial, ethnic, religious and other forms of hostility), 278 (Calls for mass unrest) and 327 (Calls for violent seizure of power). In 2025, Kanyshai Mamyrkulova was [sentenced](#) for four years of probation charged on Article 278 and 330; Aleksandr Aleksandrov and Joormart Duulatov (Kloop) were both [sentenced](#) to five years of imprisonment on the basis of Article 278 of Criminal code, and on 25 November, the sentence was [reviewed](#) to a three-year probation.

<sup>78</sup> See the [OSCE RFoM/ODIHR Joint Opinion](#) on the Draft Media Law. Paragraph 39 of the 2011 UN HRC [General Comment No. 34 to the ICCPR](#) recommends necessary criteria of independence of a media regulatory body.

<sup>79</sup> The fines range from KGS 20,000 for individuals to KGS 65,000 for legal entities, and the [2025](#) estimated average salary is KGS 42,757, and in [2024](#) was KGS 36,000.

<sup>80</sup> Paragraph 43 of the 2011 UN HRC [General Comment No. 34](#) states that “[a]ny restrictions on the operation of websites, blogs or any other internet-based, electronic or other such information dissemination system” are only permissible to the extent they do not violate Article 19 of the [ICCPR](#), clearly concluding, that generic bans on the operation of websites are not in line with Article 19 of the [ICCPR](#).

<sup>81</sup> [OSCE Ministerial Council Decision No 3, Safety of Journalists](#) calls on States to bring their laws, policies and practices, pertaining to media freedom, fully in compliance with their international obligations and commitments.

The prosecution of media workers, the closure of independent media outlets, and an overly restrictive legal framework have collectively produced a pronounced chilling effect on media freedom, resulting in widespread self-censorship and a substantial curtailment of independent journalism.<sup>82</sup>

Campaign-related news must be presented in a separate block, without commentary. The media bears liability for the publication of information that disgraces or discredits the honour, dignity, or reputation of candidates and political parties, which is prohibited. Despite a previous ODIHR recommendation, the legal provisions were not amended to prevent a narrow interpretation of the rules, which, in effect, led to the lack of news and editorial coverage of contestants' campaigns. As a result, beyond coverage of procedural aspects and election-related violations, the campaign was mainly or solely paid coverage of candidates in news segments, limiting voters' ability to make an informed choice.

The state-funded broadcasters provided free airtime for registered candidates, in line with the law, but the candidates, in particular more affluent ones, opted not to use it, allegedly due to limited viewership and impact.<sup>83</sup> Due to the high number of candidates, the airtime was shared between two state broadcasters, *NTRK* and *EITR*, and their regional branches.<sup>84</sup> Despite prior ODIHR recommendations, the media still had to be accredited in order to provide paid advertising, which must be supplied to contestants under equal conditions. Due to the absence of a media regulatory body, the CEC oversees the legality of the campaign in the media and has the right to revoke media accreditation for violations.<sup>85</sup>

ODIHR EOM media monitoring established that the candidates were not covered in news and current affairs programmes, except for the limited coverage of campaign violations.<sup>86</sup> The monitored broadcasters extensively covered the state authorities, predominantly the President and his administration, the Cabinet of Ministers, the State Committee for National Security (SCNS), as well as

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<sup>82</sup> The Office of the High Commissioner for Human Rights [expressed concerns over imprisonment verdicts for Kyrgyz journalists](#) for charges of “calling for mass disorder,” and criticizing the prosecutions as “marred by due process and fair trial concerns.” On 27 October, three media outlets (*Kloop kg*, *Temirov Live*, and *Ait Ait Dese*) were recognised as extremist and their activities in Kyrgyzstan were [banned](#) by the court. In July 2025, *April TV* was [shut down](#) for “destructive” and “negative” coverage of the government. Earlier in 2022, Mr. Temirov, journalist and founder of *Temirov Live*, was [stripped of Kyrgyz citizenship](#). In January 2024, eleven *Temirov Live* journalists were [arrested](#), including Makhabat Tajibek, Temirov’s wife and founder of *Aik Aik Dese* media. Several IEOM interlocutors reported on direct censorship of sensitive topics as well.

<sup>83</sup> Legal provisions are unclear in relation to provision of free space by online state funded outlets. The state-owned agency *kabar.kg* did not provide free space to contestants, explaining this by the lack of the regulation by the CEC and the lack of interest from candidates. The law does not explicitly regulate this, and the CEC informed the ODIHR EOM that the schedule is to be prepared by the media outlet in case candidates express interest. The uncertainty with the implementation of the obligation by state-owned print media was attributed to the discrepancy between the statutory ownership and financing models of the print media outlets. Several candidates informed the ODIHR EOM that they were not aware of possibility to use the free space on *kabar.kg*.

<sup>84</sup> On 8 November, in a joint draw for order on the ballot and free airtime distribution, election commissions distributed airtime among contestants, allocating 5 minutes for individual presentations and 25 minutes for participation in debates. The ODIHR EOM observed different approaches in free airtime distribution: in some instances, a separate draw was conducted per each candidate, as prescribed by the regulation, while in other cases differing procedures were developed (e.g. based on the candidates’ order on the ballot).

<sup>85</sup> The CEC did not conduct systemic monitoring of media coverage of the campaign. The CEC Working Group on campaigning oversaw the campaign in the media on the basis of notifications. In total 5 media outlets were sanctioned: on October 22, *NTRK Talas* was fined with KGS 28,000 for violation of the rules in relation to early campaigning; on November 13, *Asia News* newspaper and *Aryba* online outlet were each fined with KGS 17,500 for publication of information that disgraces or discredits the honour, dignity, or reputation of candidates; on November 20, LLC *Jash FM (T-Media TV channel)* was fined for KGS 28,000 for violation of equal access provisions for candidates as a banner of one candidate appeared in the background of a newscast. On 29 November, *new.kg* was fined KGS 7,500 for publishing paid campaign materials of a candidate that used images of foreign political figures.

<sup>86</sup> The ODIHR EOM monitored the primetime broadcasts of the nationwide TV channels *NTRK*, *Ala Too 24*, *EITR*, *Channel 7* and *Region TV*, as well as politics-related content of online media *akipress.kg*, *azattyk.kg*, *Kaktus.Media*, *24.kg*, *super.kg*, *kabar.kg* and *sputnik.kg*. During the campaign, the coverage of candidates in the news and current affairs programmes constituted 0.21 per cent, resulting from a few reports on campaign violations.

the activities of the CEC, in a positive or neutral tone.<sup>87</sup> Similarly, online portals mainly covered the authorities and the CEC on procedural aspects of the process, either in a positive or neutral tone.<sup>88</sup> The CEC's voter information campaign was extensively disseminated in the media. IEOM interlocutors stated that the media received instructions to avoid negative news on the country's development and certain other controversial issues in the coverage, including newscasts.<sup>89</sup>

Candidates were covered within free and paid airtime, including paid candidate coverage in news segments, despite previous ODIHR recommendations to prohibit paid news coverage.<sup>90</sup> Debate programmes on *EITR* and *NTRK* and their local branches were the only platforms where candidates could present themselves and interact with each other, however, some candidates considered the format ineffective, leading to a general reluctance to participate.<sup>91</sup> Women candidates received 33 per cent of the free airtime. Sign language translation was not provided during the debates. Paid content on websites amounted to less than 1 per cent.

### Election Dispute Resolution

Decisions, actions, or inaction by the election administration, public agencies, and candidates may be challenged by candidates, political parties, observers, and voters. Complaints against the election administration are subject to a hierarchical review and may be appealed to the Administrative Court of Bishkek, with further cassation available before the Supreme Court. Complaints and appeals must be filed and examined under expedited early election deadlines and immediately on election day. These deadlines are insufficient for submission of a complaint, and run contrary to international good practice.<sup>92</sup> While complaints to the CEC can be submitted online via its website, there is no online system to initiate judicial review.

The 2025 amendments further limited access to effective remedy, as the standing of political parties to challenge election results was abolished, leaving such challenges to candidates, their representatives and

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<sup>87</sup> For example, all monitored media dedicated between 33 and 54 per cent to the President. *Region TV* dedicated 30 per cent of time to *SCNS* and *Channel 7* dedicated most coverage to Cabinet of Ministers 45 per cent.

<sup>88</sup> The only exception monitored, where the candidates were covered beyond procedural matters, were three articles on *Akipress* mapping candidates' ties with officials. On the last day of the campaign *Kaktus.Media* published an article on candidates' campaign expenditures.

<sup>89</sup> These instructions were reinforced by occasional but wide-spread "prophylactic phone calls" from some authorities to the journalists and editors to ensure compliance with the unwritten directives, including during the campaign.

<sup>90</sup> Coverage of candidates in paid programmes amounted to 8 per cent, including paid news and paid interviews. Paid news programmes were monitored on *Region TV*. Paid advertising was not always easily recognizable. For example, on 25 November, *Region TV* broadcasted a 45-minute paid interview with a candidate which was not clearly indicated as such.

<sup>91</sup> Debates amounted to 23 per cent of the overall monitored programmes; the ODIHR EOM monitored 14 debates. Some candidates informed the IEOM that the format was not conducive for a meaningful exchange of opinions as the law prohibits criticism of other contestants in free airtime and the candidates were advised not to ask provocative questions. In monitored debates, less than half of registered candidates participated. On *NTRK*, debates were aired late in the evening including one debate aired 28 minutes past midnight, against the provisions of the law requiring that free airtime be between 8 pm and midnight.

<sup>92</sup> Under the Election Law, the timeframes for all electoral actions in early elections are reduced by one-third, which shortens the regular 3-day deadline to submit and decide on complaints to 2 days, and the 5-day cassation deadline to 3 days. Paragraph II.3.3.g of the 2002 [Venice Commission's Code of Good Practice](#) and its Interpretative Declaration recommend that "[t]ime limits must [...] be long enough to make an appeal possible, to guarantee the exercise of rights of defence and a reflected decision. A time limit of three to five days at first instance (both for lodging appeals and making rulings) seems reasonable for decisions to be taken before the elections".

observers.<sup>93</sup> Voters cannot contest results, not even with a reasonable quorum, contrary to international good practice that supports broad standing in electoral disputes and prior ODIHR recommendations.<sup>94</sup>

The CEC maintained an online register of complaints and incident reports, which contributed to transparency; however, some decisions were uploaded with a delay. Of the 142 complaints registered as of 29 November, 102 were resolved by the CEC.<sup>95</sup> The CEC imposed administrative fines in 48 cases.<sup>96</sup> While the CEC sessions on disputes provided transparency and opportunity for the parties to present their cases, procedural guarantees were diminished as the high number of cases were examined *in camera*, in particular those not resulting in sanctions.<sup>97</sup>

The CEC's interpretation of campaign rules in decisions on complaints was not uniform<sup>98</sup> and - in some instances - narrow, restrictive and formalistic, particularly in cases concerning the freedom of expression on election-related matters, including in private correspondence.<sup>99</sup> The CEC decisions mainly relied on its Dispute Resolution working group's recommendations, offering limited factual and legal reasoning and omitting substantiation on the relevance of cited legal provisions to the merits of the case, which undermined legal clarity and the possibility of an effective appeal.<sup>100</sup> Overall, the CEC applied campaign rules in a manner that expanded the scope of prohibited conduct and did not consistently reflect the need to balance campaign regulation with the protection of fundamental freedoms, contrary to international

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<sup>93</sup> Paragraph 5.10 of the [1990 OSCE Copenhagen Document](#) states that “everyone will have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity”.

<sup>94</sup> Article 25 of the [1966 ICCPR](#) and paragraph 5.10 of the 1990 [OSCE Copenhagen Document](#) guarantee the right to an effective remedy for violations of political rights. Paragraph II.3.3f of the [Venice Commission Code of Good Practice](#) recommends that “[a]ll candidates and voters registered in the constituency concerned must be entitled to appeal. A reasonable quorum may be imposed for appeals by voters on the results of elections.”.

<sup>95</sup> Reports registered in the [CEC Online register](#) originated largely from law enforcement agencies, social media monitoring, CEC hotline and candidates, and concerned a wide range of issues, including violations of campaign rules (70), dissemination of false or defamatory information against candidates (24), possible voter bribery (15), abuse of administrative resources (6) and other violations (27).

<sup>96</sup> As of 28 November a total of 53 administrative fines were imposed, including 35 fines against candidates and citizens for violations of campaigning conditions, 11 fines for disseminating knowingly false information that damaged a candidate's reputation, 2 fines for conducting campaign in religious facilities, 4 fines against media outlets (two for violations of campaigning conditions and two for discrediting the honor, dignity, or business reputation of candidates), and 1 fine for failure to comply with a CEC decision. The CEC also issued 6 warnings.

<sup>97</sup> The CEC established internal Working Groups on complaints and campaign to prepare advisory opinions on complaints and violations for consideration at plenary session. The ODIHR EOM was not always informed of the Working Groups' meetings. The CEC coordinated a Rapid Response Coordination Group with law enforcement bodies at central and district level.

<sup>98</sup> While the CEC in its Decision No. 1404 issued a warning for the violation where information related to the professional activity or performance of the candidate's official duties was disseminated, in other decisions for similar violations the CEC imposed administrative fines, without providing clear justification for the differential treatment.

<sup>99</sup> These concerned the instances where private online communication was treated as campaigning, despite the absence of explicit link to electoral promotion. In numerous instances, the CEC interpreted social media posts on personal Facebook or Instagram accounts as supporting a candidate and were classified as unlawful campaigning and resulted in order of removal or fines. For example, the CEC fined an individual after she forwarded an audio message in local WhatsApp groups about a candidate's meeting. She denied intention to campaign, and had deleted the message. The CEC considered the forwarded message as unlawful campaigning.

<sup>100</sup> For example, in criminal-immunity matters concerning alleged vote-buying, the CEC authorized prosecution of three candidates without presenting the grounds for its decision, whereas its denial of a similar request relied solely on a short note regarding the available evidence.

standards.<sup>101</sup> No CEC decisions on campaign violations referenced the avenues for appeals, and the ODIHR EOM could not identify any such appeals.<sup>102</sup>

The Administrative Court received 12 appeals on candidate registration, dismissing 9 of them on merits and 2 were deemed inadmissible.<sup>103</sup> The eight challenged judgments were upheld by the Supreme Court. Hearing schedules were often not updated, and the election-related decisions by the Administrative Court were not timely published, while those by the Supreme Court remained unpublished before election day, limiting transparency. The decisions available to the ODIHR EOM were structured and provided legal references, but assessed the facts formalistically and abstained from analysing the legality and proportionality of the contested administrative measures.<sup>104</sup>

The Criminal Code outlines five election-related criminal offences, which fall under the jurisdiction of the Prosecutor General.<sup>105</sup> To date, law enforcement agencies have initiated nine criminal procedures regarding alleged vote-buying.<sup>106</sup>

### Citizen and International Observers

The law provides for citizen and international election observation. Civil society organizations with a statutory mandate in electoral matters or human rights may receive accreditation to observe the elections. There is no deadline for requesting accreditation for citizen observers. Candidates and political parties are also entitled to deploy their representatives and observers.

Several IEOM interlocutors raised concerns about the feasibility of citizen observation for these elections, mainly due to funding limitations and recent legislative changes that define domestic election observation as political activity and require CSOs receiving foreign funding to register as “foreign representatives”. Some interlocutors also informed the IEOM that CSOs may fear retribution for engaging in observation activities. As a result, citizen observation has been largely absent from these elections, and civil society’s capacity to participate in public life has substantially diminished.<sup>107</sup> The CEC accredited 788 international observers and only 2 citizen organizations, each appointing 1 observer.

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<sup>101</sup> Article 19 of the ICCPR; the 1996 UN HRC [General Comment No. 25](#) and the 2011 [General Comment No. 34](#) requires States to guarantee freedom of expression and to ensure that any restrictions are lawful, legitimate and proportionate. The free exchange of information and ideas on public and political matters between voters, candidates and elected representatives must be respected.

<sup>102</sup> Paragraph 5.11 of the [1990 OSCE Copenhagen Document](#) states that “administrative decisions against a person must be fully justifiable and must as a rule indicate the usual remedies available”.

<sup>103</sup> The remaining one was divided into two matters, one being rejected and in the other the court requested the CEC to correct its decision.

<sup>104</sup> Article 2.3 of the [1966 ICCPR](#) requires each State to ensure that “any person whose rights or freedoms ... are violated shall have an effective remedy” and that “the competent authorities shall enforce such remedies when granted”. Paragraph 5.10 of the [1990 OSCE Copenhagen Document](#) states that “everyone will have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity”.

<sup>105</sup> The five election-related criminal offences outlined in the Criminal Code are: obstruction of the exercise of electoral rights (Article 195), bribery of voters (Article 196), violation of the procedure for financing an election campaign (Article 197), illegal use of funds during elections or referenda (Article 198), and falsification of election documents (Article 199).

<sup>106</sup> In three cases, the CEC consented to prosecute a registered candidate, who subsequently withdrew. The other concerned a nominee who has not yet been registered.

<sup>107</sup> Paragraph 8 of the [1990 OSCE Copenhagen Document](#) states that “participating States consider that the presence of observers, both foreign and domestic, can enhance the electoral process for States in which elections are taking place”. Paragraph 3.2.a of the [2002 Venice Commission Code of Good Practice](#) states that “both national and international observers should be given the widest possible opportunity to participate in an election observation exercise”.

## Election Day

Election day was generally calm and orderly. The IEOM observed the opening process in 142 polling stations, voting in 1,199 polling stations, and counting in 118. Women were well represented in the PECs observed by the IEOM and chaired in 79 per cent. Despite constitutional guarantees to equal rights, regrettably, 42 per cent of the polling stations observed did not provide independent access for voters with physical disabilities, while in 21 per cent, the layout was not suitable for such voters.<sup>108</sup> Additionally, 21 per cent of polling stations observed were not equipped with assistive tools for visually impaired voters.

The opening was assessed positively in 131 of 142 polling stations observed. Delays, which occurred in more than a third of the polling stations observed, were attributed to difficulties in preparing the new voting equipment; in 3 cases, the delay was over half an hour. IEOM observers noted some procedural errors, including 13 instances where the ballot boxes were not shown to be empty before being sealed, 45 cases where lots were not drawn for PEC assignments and 6 instances where the PECs did not print a zero-count protocol. Difficulties in setting up the voter identification device and the ballot scanner were reported in 16 and 37 cases, respectively, while in 13 instances, the ballot scanner was not operational at the opening of the polls.

IEOM observers assessed voting overall positively in 96 per cent of the 1,323 observations, describing the voting process as transparent. Negative assessments were largely due to issues of secrecy of the vote and procedural issues related to the use of technology. Observers nominated by contestants were present in 95 per cent of the polling stations observed. In 40 per cent of polling stations observed, unauthorised persons, mainly police and local officials, were present and interfered with the work of PECs in 4 per cent of the observed polling stations.

Procedures were mostly followed in the majority of polling stations observed. However, IEOM observers reported that in 18 per cent of the polling stations observed, the ballot box was not sealed properly. When identification devices failed to identify a voter, in 78 per cent of these instances PEC members did not fill in the correct form. IEOM observers reported that in 27 per cent of the polling stations observed, some voters were not allowed to vote, mainly because they were not on the voter list. Serious procedural shortcomings reported by IEOM observers included 16 cases of group voting, 13 cases of multiple voting, and 7 cases of proxy voting in the polling stations observed. IEOM observers noted indications of vote-buying in 9 cases around polling stations.

IEOM observers found voting technologies to be fully operational and functioning properly in almost all polling stations observed. However, connectivity issues were noted in 8 per cent of the polling stations observed while in 2 per cent the ballot scanner was not operational. Observers found that the operators and PEC members consistently checked voter's biometric data and it was sufficient to identify voters in the vast majority of observations.

IEOM observers reported some issues related to the secrecy of the vote. In 36 per cent of polling stations observed, the design and positioning of booths compromised the secrecy of the vote, and in 5 per cent, the layout was not adequate to conduct voting. In 4 per cent, not all voters marked their ballots in secret

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<sup>108</sup> The Constitution (Article 24) stipulates that no one will be subjected to discrimination based on disability. In addition, the 2025 [Law on the rights and guarantees of persons with disabilities](#) provides equal rights for persons with disabilities, including accessible polling stations, materials and information on elections. The [Convention on the Rights of Persons with Disabilities](#) in Article 9 states "To enable persons with disabilities to live independently and participate fully in all aspects of life, States Parties shall take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.

and overcrowding was noted in 5 per cent. The IEOM observers reported campaign materials around 2 per cent of the observed polling stations.

The vote count was assessed negatively in 44 of the 118 polling stations observed by the IEOM, mainly due to non-compliance with established procedures and substantial procedural errors and omissions that negatively impacted the transparency of the process. Unauthorised persons, mostly police officers and local officials, were present in 73 polling stations, while in 14 cases they were observed directing or interfering with the commission's work and in 13 polling stations they were directly participating in the count.

IEOM observers noted that key procedural safeguards before and during the manual count were often not fully implemented, and concerning in 30 cases the manual count was not conducted and the results were entered based solely on the electronically generated protocol. In 26 cases, the number of voters who voted was not determined by counting voter signatures on the voter list. In 13 cases, the number of voter signatures did not match the number of confirmation slips. In 23 cases, the PECs did not produce and sign an act recording the number of ballot papers issued to voters. All persons present were not shown the ballot box seals before they were opened or control sheets in 27 and 29 observations respectively.

During the manual count, ballots were not counted one by one, and the choice on each ballot was not announced and shown to all present in 73 polling stations, while the protocols were not completed based on the manual count in 30 polling stations observed. The validity of ballots was not determined in a reasonable manner in 26 cases, of these observers also found in 17 cases PECs were not consistent in their determination. IEOM observers reported discrepancies between the manual count and printed results slips in 21 polling stations, and in 5 cases the figures in the protocols did not reconcile. In 55 cases, the protocols were not posted for public display, as required by law. In 21 cases, the official protocols were found to have been pre-signed by PEC members. At the same time, observers did not report indications of intentional falsification of voter list entries, results or protocols.

By law, tabulation is conducted at the 30 DEC. Ahead of election day, the CEC informed the IEOM that there would be a two-tiered reception system, using TEC premises as sub-DEC hubs, to facilitate the delivery of election materials from PECs.<sup>109</sup> However, contrary to the CEC's explanation, IEOM observers reported that in nearly half of the sub-DECs, DEC members performed a range of tabulation-related tasks in addition to receiving materials, including checking figures in the protocols and entering and aggregating data in the electronic system.

The IEOM observed all 30 DEC and 26 sub-DEC hubs assessing the initial stages of tabulation negatively in almost half of the cases, mainly due to procedural shortcomings and inadequate conditions, such as insufficient space and poor organisation for receiving and tabulating PEC protocols, which negatively impacted the transparency of the tabulation process. IEOM observers reported being able to follow the process without restriction in most DEC; however, in roughly half of the observations, not all those present had a clear view of the tabulation procedures. Tabulation was still ongoing at the time of writing this Statement.

On election day, the CEC received 67 notifications and complaints. Of these 28 alleged breaches of campaigning rules, such as campaigning during the silence period and candidate representatives wearing clothing displaying candidate names or images. Four related to the malfunctioning of vote count technology. Eighteen notifications concerned alleged vote buying, and according to the CEC, all of these

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<sup>109</sup> Of the 56 TECs, 30 coincided with the 30 DEC. According to the CEC, the remaining 26 TECs would operate on election day as hubs where DEC members would receive election materials delivered by PECs and then transported them to the respective DEC for tabulation. PECs would deliver election material either directly to DEC or to these sub-DEC hubs, depending on distance and travel requirements.

were forwarded to law enforcement agencies for further verification through the Rapid Response mechanism.

The CEC announced the preliminary turnout at 34.31 per cent and started posting the electronically generated preliminary results disaggregated by polling station on its website, immediately after the end of voting, contributing to transparency.

*The English version of this report is the only official document.  
An unofficial translation is available in Kyrgyz and Russian.*

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### **MISSION INFORMATION & ACKNOWLEDGEMENTS**

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Bishkek, 30 November 2025 – This Statement of Preliminary Findings and Conclusions is the result of a common endeavour involving the OSCE Office for Democratic Institutions and Human Rights (ODIHR), the OSCE Parliamentary Assembly (OSCE PA) and the Parliamentary Assembly of the Council of Europe (PACE). The assessment was made to determine whether the elections complied with OSCE commitments and other international obligations and standards for democratic elections and with national legislation, and should be read in conjunction with the Interim Report published on 14 November 2025.

Claude Haagen (Luxembourg) was appointed by the OSCE Chairperson-in-Office as Special Co-ordinator to lead the OSCE short-term observers. Monika Zajkova (North Macedonia) headed the delegation of the OSCE Parliamentary Assembly. Georgios Stamatis (Greece) served as the head of the delegation of the Parliamentary Assembly of the Council of Europe. Head of Mission: Tamás Meszerics (Hungary) headed the ODIHR EOM, deployed from 21 October.

Each institution involved in this International Election Observation Mission (IEOM) has endorsed the 2005 Declaration of Principles for International Election Observation. This Statement of Preliminary Findings and Conclusions is delivered prior to the completion of the electoral process. The final assessment of the elections will depend, in part, on the conduct of the remaining stages of the electoral process, including the count, tabulation and announcement of results, and the handling of possible post-election day complaints or appeals. ODIHR will issue a comprehensive final report, including recommendations for potential improvements, some eight weeks after the completion of the electoral process. The OSCE PA will present its report at its 25<sup>th</sup> Winter Meeting in Vienna. PACE will present its report at the January 2026 part-session in Strasbourg.

The ODIHR EOM includes 16 experts in the capital and 30 long-term observers deployed throughout the country. On election day, 359 observers from 45 countries were deployed, including long-term and short-term observers deployed by ODIHR, as well as a 72-member delegation from the OSCE PA, and an 18-member delegation from the PACE. Opening was observed in 142 polling stations and voting was observed in 1,199 polling stations across the country. Counting was observed in 118 polling stations, and the tabulation in 30 DEC and 26 sub-DECs.

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

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