

SPECIAL ELECTION ASSESSMENT MISSION Bosnia and Herzegovina – Early Election of the President of Republika Srpska, 23 November 2025

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

PRELIMINARY CONCLUSIONS

In the 23 November early election of the president of Republika Srpska, candidates campaigned freely but the undue advantages enjoyed by the ruling party left contestants with unequal opportunities. The election featured polarising narratives about the functions of state institutions and the role of international actors in the governance of the country and generated limited engagement. Notwithstanding discriminative candidate eligibility requirements, candidate registration was inclusive. Election preparations were managed in an overall professional manner despite serious organisational and budgetary challenges that further strained the limited operational capacity of the election administration. While the campaign environment was open, the combined impact of the misuse of public resources, the advantage of incumbency and the abolishment of public funding created an uneven playing field. Limited paid advertising and editorial coverage by private media, along with the lack of debates and disproportionate coverage of the ruling party candidate on the Republika Srpska public broadcaster, hindered voters' ability to make an informed voting choice. In the limited number of polling stations visited, the voting process was professional, well administered and orderly.

Background and Political Context

Under the Constitution, established by the 1995 General Framework Agreement for Peace, commonly known as the Dayton Peace Agreement (DPA), Bosnia and Herzegovina consists of two entities: the Federation of Bosnia and Herzegovina and Republika Srpska.¹ The Constitution grants the status of “constituent peoples” to Bosniaks, Croats, and Serbs. Citizens may also declare themselves as “others”, either by identifying with another ethnic group or by choosing not to affiliate with any group.² The DPA also established the Office of the High Representative (OHR), an international body charged with overseeing the implementation of civilian aspects of the peace settlement. In 1997, the OHR was granted the power “to make binding decisions” and “take measures against public officials to ensure the effective functioning of state institutions”.³

In the 2022 general elections, Milorad Dodik, leader of the Alliance of Independent Social Democrats (SNSD), was re-elected president of the RS. Following allegations of election fraud, the Central Election Commission of Bosnia and Herzegovina (CEC) conducted a control count of all the votes for the election of the RS president; the results of control count did not impact the outcome of the elections. Since 2023, the Republika Srpska National Assembly (RSNA) has consistently adopted laws, decisions and conclusions that contest the authority of state institutions and the OHR, which were repealed by the OHR and the BiH Constitutional Court.⁴

¹ In addition, the Brčko District holds special status under direct state sovereignty. Each of the two entities has its own distinctive ethnic composition and a wide degree of autonomy, including its own constitution, political structure, governing institutions, administrative, and judicial bodies.

² The Law on the Protection of the Rights of Members of National Minorities recognizes 18 national minorities.

³ See the [Conclusions of the Bonn Peace Implementation Conference](#).

⁴ These include laws on the non-publication of the OHR decisions and non-application of the BiH Constitutional Court decisions, the Law on the Non-Application of Laws and the Ban on the Operation of Extra-Constitutional Institutions of BiH, the Law on High Judicial and Prosecutorial Council of the RS, the Law Amending the Criminal Code of the RS, and the Decision on Measures and Tasks Arising from Unconstitutional Decisions and Actions of Extra-Constitutional Institutions of BiH.

On 28 August 2025, the CEC announced an early election of the president of RS for 23 November, following the conviction of the former RS President Milorad Dodik by the Court of BiH and the subsequent revocation of his mandate by the CEC.⁵ The election took place against a backdrop of deepening institutional standoff between entity and state-level authorities, amid sustained challenges to state institutions and the OHR.⁶ The election was widely perceived as a dual test for the resilience of BiH constitutional framework as well as for the ruling SNSD and Mr. Dodik in maintaining leadership ahead of the 2026 general elections.

Shortly after the verdict, the RSNA adopted conclusions rejecting the conviction of Mr. Dodik and the call of early election, and instructed RS institutions and political stakeholders to refrain from actions related to the conduct of the election.⁷ Following the resignation of the RS prime minister (PM), the RSNA also confirmed the PM appointment of Mr. Savo Minić, nominated by Mr. Dodik.⁸ Lastly, the RSNA called for a referendum to be held on 25 October which did not take place to date.⁹ Subsequently, the BiH Constitutional Court issued an interim measure suspending the legal effect of certain parts of the RSNA conclusions, as potentially incompatible with the BiH Constitution, thereby prohibiting RS institutions and officials from acting on those items pending a final decision.¹⁰ The suspended items of the conclusions were eventually repealed by the RSNA on 24 September.

Mr. Dodik initially announced that his party would boycott the election. Notwithstanding this, on 24 September the RSNA called on political parties to decide individually on their participation in the election. On 18 October, the RSNA repealed several laws that were found unconstitutional by the BiH Constitutional Court,¹¹ and confirmed the appointment of Ms. Ana Trišić-Babić, as acting RS president.¹² Shortly after the revocation of the disputed laws, the USA lifted sanctions against Mr. Dodik and other public officials and legal entities of the RS.¹³ Subsequently, the Prosecutor's Office of BiH suspended the investigation against Mr. Dodik for 'attacking the constitutional order'.¹⁴ Mr. Dodik's

⁵ On 26 February 2025, Mr. Dodik was sentenced to one year of imprisonment and a six-year ban on holding public office, for defying OHR decisions, based on a criminal offence (Article 203a of the Criminal Code) introduced by the OHR in July 2023. The verdict was upheld by the Appellate Division of the Court of BiH on 12 June. The Court later converted the prison sentence into a fine.

⁶ See the [statement of the EU Delegation to BiH](#) strongly condemning Košarac's gesture towards the HR as "tasteless and inflammatory".

⁷ See the [22 August 2025 RSNA Conclusions](#) Regarding the Information on the Decision of the Central Election Commission on the Termination of the Mandate of the President of RS Milorad Dodik.

⁸ The appointments of the PM and government are currently pending with the BiH Constitutional Court. The Court's next session is scheduled for 27-28 November.

⁹ The question of the referendum would be: "Do you accept the decisions of the non-elected foreigner Christian Schmidt and the judgments of the unconstitutional Court of BiH pronounced against the RS President, as well as the CEC decision to revoke the mandate of the RS President Milorad Dodik?" On 6 October, Mr. Dodik publicly announced the postponement to 9 January 2026.

¹⁰ The interim measure was pursuant to a request filed by 14 members of the House of Representatives of the Parliamentary Assembly of BiH. The final decision of the Court is expected on 27-28 November.

¹¹ See the list of [repealed laws](#) on the RSNA website.

¹² The RS Constitution does not prescribe how an acting president is nominated and appointed, except in cases of temporary prevention when the president may designate a vice-president. Ms. Trišić-Babic was proposed by a group of members of the RSNA. A challenge on the constitutionality of the appointment of the acting RS president is reportedly pending with the RS Constitutional Court.

¹³ See the [statement of 29 October 2025 of the US Department of the Treasury's Office of Foreign Assets Control \(OFAC\)](#).

¹⁴ See the [decision of 30 October 2025](#) to suspend the investigation against Mr. Dodik.

appeals challenging his conviction and the revocation of his mandate have been dismissed by the BiH Constitutional Court.¹⁵

Electoral System and Legal Framework

The president of RS is directly elected for a four-year term. The candidate who receives the highest number of votes is elected while the two candidates from the other two constituent peoples who receive the most votes are elected vice-presidents.¹⁶ In this election, only the president was elected and the mandate will last until October 2026 when the scheduled general elections will be held.

The legal framework provides a sufficient basis for the conduct of democratic elections.¹⁷ A number of prior ODIHR recommendations were addressed through extensive amendments to the BiH Election Law imposed in March 2024 by the OHR,¹⁸ such as reviewing the system of appointment of Polling Station Committees (PSCs) to enhance their impartiality, enhancing regulation on the misuse of public resources by executive office holders and campaign violations, prolonging the timeframes for submission and review of complaints, and enhancing reporting of campaign finances. However, several other prior ODIHR and Congress recommendations remain unaddressed, including those related to active and passive suffrage rights, comprehensive regulation on the misuse of public resources, women's participation, transparency of the election dispute resolution process, dissuasive sanctions for campaign finance violations and effective oversight.

Election Administration

The election was administered by a three-tiered structure led by the CEC and comprising 64 municipal election commissions (MECs) and 2,350 polling station committees (PSCs).¹⁹ By law, the composition of the election bodies at all levels must reflect the ethnic composition of their respective constituencies. The CEC is a permanent body, composed of seven members, mandated to oversee and regulate the electoral process.²⁰ MECs are appointed by the respective municipal and city authorities for a seven-year term, subject to approval by the CEC.²¹ While women were well-represented in MECs, accounting

¹⁵ See the [announcement of the BiH Constitutional court](#). The CC dismissed the appeal against the verdict as unfounded, noting that there has been no violation of the appellant's right to fair trial, and the conviction was based on lawful and clearly formulated legal grounds; the court also noted that security measures meet the accessibility and foreseeability requirements. The court rejected the appeal regarding the revocation of the mandate as inadmissible, noting that the allegations were not compatible with the Constitution.

¹⁶ The law does not explicitly regulate early election for a single vacancy of the president and vice-presidents of RS.

¹⁷ The early election of the RS president is primarily regulated by the 2001 BiH Election Law and the 2012 BiH Law on Financing of Political Parties. In addition, the RS Constitution contains provisions on the electoral system. The legal framework is supplemented by CEC regulations. Bosnia and Herzegovina is party to the main international and regional instruments related to democratic elections.

¹⁸ The amendments gradually introduced information and communication technologies (ICTs) in the electoral process and digitalized certain aspects of election administration; however, no ICTs were used in this election. In response to the imposition, in April 2024, the RSNA adopted an election law granting the RS Election Commission exclusive competence over elections in the RS, which was subsequently repealed by the BiH Constitutional Court.

¹⁹ This includes 139 mobile teams to manage voting for homebound voters and those in social, health care and penitentiary institutions. In addition, four PSCs for out-of-country voting in Austria, Germany, and Serbia were established. Additional staff was engaged in the Main Counting Centre for the counting of mobile, tendered, absentee and postal ballots.

²⁰ Following an open recruitment process, the CEC members are nominated by the *ad hoc* Commission for Selection and Nomination, composed of two representatives each from the High Judicial and Prosecutorial Council, the Joint Administrative Committee of the BiH House of Representatives (HoR) of the Parliamentary Assembly (PA) and the CEC. Subsequently, the CEC members are appointed by the BiH PA HoR. The seven CEC members include two Bosniaks, two Croats, two Serbs and one member representing "other" communities.

²¹ The size of each MEC depends on the size of the constituency and numbers of registered voters, with composition of either three, five or seven members.

for 46 per cent of their members, only 2 of the 7 CEC members are women, which falls short of the legally required gender quota.²²

The PSCs, composed of three or five members, are appointed prior to each election. While the chairpersons and their deputies are appointed by the CEC from among non-partisan applicants, the members and their deputies are appointed in equal numbers by the contesting parties represented in the RSNA. Provided that only SNSD and the Serb Democratic Party (SDS) had the right to nominate PSC members, the remaining two members in the five-member PSCs as well as in those where the parties failed to nominate members were selected from MEC reserve lists of PSC members from past elections. Most PSC chairpersons and members and deputies were appointed in a timely manner, although some MECs experienced difficulties with staffing polling stations citing low remuneration, past issues with payments and lack of motivation. However, shortly before election day, the CEC replaced several appointed chairpersons after determining they are ineligible due to past political activities. Some members and chairpersons were replaced following their resignations. As this was after completion of the training, the resignations diminished the trainings' value and impact. Positively, some MECs reported efforts to continue trainings up to election day.

The election administration carried out its duties professionally; however, it encountered challenges. The delayed disbursement of the CEC's budget allocation deferred the start of election preparations by a few weeks, while legal disputes in the procurement process hampered technical preparations.²³ The CEC adopted new regulations and reinstated some previous ones related to voter and candidate registration, PSC appointment, and election campaign, adjusting the deadlines and rules to the early election. The operational capacity of the election administration and its ability to fulfil its mandate independently was further strained by a longstanding lack of permanent personnel in many crucial positions within the CEC Secretariat.²⁴

The CEC held regular sessions, which were open to observers and live-streamed online, with recordings also made available on the CEC's online platforms. However, CEC sessions were not announced in advance as legally required and not all acts adopted by the CEC were published on its website in a consistent and comprehensive manner, which reduced the overall transparency. MECs visited by the ODIHR SEAM held public sessions, published their decisions and informed on their activities via municipal websites and noticeboards. Overall, stakeholders' confidence in the independence and impartiality of the election administration varied, and was particularly low for PSCs due to poor prior performance and proven malpractices in past elections.

The CEC provided mandatory training including online sessions for PSC chairpersons and their deputies as well as in-person sessions for all PSC members and training manuals were available online. Due to time constraints, video materials produced for the 2024 local elections were used with additional explanation on specificities of this election, which did not ensure clarity over filling of PSC documents and protocols. The CEC did not launch a voter education campaign for this election, citing lack of allocated financial resources. The limited outreach efforts to inform voters relied on visual materials on the CEC website and social media platforms, focusing on general information on elections, registration for out-of-country voting and CEC activities.

²² By law, the state bodies at all levels of organization shall include at least 40 per cent of members of each gender. Based on established practice, some MECs whose composition did not comply with the gender requirement were granted exemption, if necessary, as the overall gender representation across the country was taken into consideration rather than of the individual commissions.

²³ The CEC was required by law to receive the requested funds the latest 15 days after the call of the early election, i.e., by 12 September. However, the Ministry of Finance and Treasury of BiH released them only on 22 September, enabling the CEC to adopt the Instruction on Deadlines for Election Activities, effective as of 25 September.

²⁴ Based on the new CEC rulebook on internal organisation, the CEC staff is short of 120 employees.

Voter Registration

Citizens aged 18 or older have the right to vote. Those declared legally incapacitated by a court decision, including on the grounds of intellectual and psychosocial disabilities, are disenfranchised, at odds with international standards and despite prior ODIHR recommendations.²⁵ Individuals serving an active sentence or under indictment for serious crimes, including war crimes and crimes against humanity, are also disenfranchised. Only citizens with registered permanent residence in Republika Srpska and Brčko District and those who opted for voting for the RS entity institutions were entitled to vote in this election.²⁶

The Central Voter Register (CVR) is permanent and centralised. It is maintained by the CEC, based on passive and continuous voter registration. However, since the voter's data is extracted from the civil register and other pertinent public databases, the accuracy of the CVR depends on the efforts of other institutions responsible for updating the civil register. Eligible voters residing in the country are automatically included in the voter register, based on their permanent address. Citizens temporarily residing abroad may actively register to vote by post or at diplomatic representations prior to each election; otherwise, they may vote in the country according to their last place of residence. Pursuant to a CEC regulation, voters registered to vote abroad in the 2024 local elections were automatically registered for out-of-country voting while new voters could also apply until 14 October. Special voter lists were also compiled for voters who requested voting by a mobile ballot box.²⁷

Throughout the year, voters have ample opportunities to verify their data on the voter lists and request corrections, either online or at municipal registration centres. The CEC made the preliminary voter lists available for public scrutiny in hard copies at municipal voter registration centres and other specified places prior to elections. At odds with the BiH Election Law, the CEC did not make available the preliminary voter list online. The CEC considers that this format does not safeguard personal data and is inconsistent with the provisions of the Law on Protection of Personal Data.²⁸ As prescribed by law, the CEC shared an electronic copy of the register with two political parties upon their request.

The final voter register, closed on 3 November, included 1,264,364 eligible voters, including 20,531 registered for out-of-country voting.²⁹ While the ODIHR SEAM interlocutors did not raise concerns over the inclusiveness of the CVR, some noted that it contains a significant number of deceased people and citizens who maintain official residence in the country despite living abroad.³⁰

²⁵ See Articles 12 and 29 of the 2006 [Convention on the Rights of Persons with Disabilities](#) (CRPD). Paragraph 9.4 of the 2013 CRPD [Committee's Communication No. 4/2011](#) states that "an exclusion of the right to vote on the basis of a perceived or actual psychosocial or intellectual disability, including a restriction pursuant to an individualized assessment, constitutes discrimination on the basis of disability, within the meaning of article 2 of the Convention".

²⁶ Residents of Brčko District must be citizens of Republika Srpska in order to be eligible voters in the entity elections. Persons with dual citizenship can vote only if Bosnia and Herzegovina is their registered country of residence.

²⁷ This option is available for homebound voters, including due to disability, and those in in-patient, retirement or detention facilities.

²⁸ The CEC's standpoint is based on a prior notice sent by the Personal Data Protection Agency on the online publishing of the voter list for out-of-country voting; however, this notice had been issued before the BiH Election Law amendments stipulating the public nature of the CVR and requiring the publication of the preliminary voter lists entered into effect.

²⁹ The CEC rejected 82 applications for out-of-country voting due to incomplete or incorrect documentation.

³⁰ Entries in the civil registries may be updated upon official request of relatives of deceased persons, including those living abroad, or upon deregistration of the permanent residence in the country. See also Congress Recommendation [369\(2015\)](#) on electoral lists and voters residing *de facto* abroad.

Candidate Registration

The right to stand as candidate for RS president is granted to voters belonging to the three constituent peoples, on the grounds of candidate's self-declaration of affiliation.³¹ Such discriminative eligibility requirements towards citizens not self-declaring as belonging to any of the three constituent peoples run contrary to OSCE commitments and international standards, including European Court of Human Rights case law.³² Prospective candidates are also required to permanently reside on the territory of the entity. The law disqualifies persons convicted or under indictment by an international or domestic court of the crime of genocide, crimes against humanity, or war crimes. Some categories of state officials and civil servants, including members of the police, armed forces and diplomatic staff, may only stand as candidates if they resign or step down temporarily.

Presidential candidates could be nominated by political parties and coalitions, or they could run as independents. From 25 until 29 September, prior to nomination, the nominating political parties and those who wanted to run independently had to apply to be certified by the CEC. Applicants were required to pay a certification fee,³³ and submit at least 3,000 signatures of voters registered to vote for the RS elections;³⁴ however, in line with the law, all that applied for this election were exempted from these requirements given that they had been certified for the previous entity-level elections. Contrary to international good practice, voters were allowed to sign in support of only one contestant.³⁵ The limited five-day certification period coupled with the right of voters to sign in support of only one candidate posed unnecessary burdens for new entrants to the contest.

The candidate registration process was inclusive. All seven applicants were certified and six of them nominated candidates to contest this election, including four party nominated and two independents.³⁶ No woman ran for the office. The SNSD certification was disputed in court, with the appellant arguing that the application was signed by an unauthorized person due to Mr. Dodik's conviction.³⁷

³¹ The [CEC Decision](#) refers to the "election of the RS President from among the Serb people". Provided that the two RS vice presidents in office are from the Bosniak and Croat constituent peoples, the RS president is elected from among the non-represented constituent people, i.e., the Serbs.

³² Paragraph 7.3 of the 1990 [OSCE Copenhagen Document](#) states that the participating States will "guarantee universal and equal suffrage to adult citizens". Paragraph 7.5 obliges the participating States to "respect the right of citizens to seek political or public office [...] without discrimination". See also Article 21.3 of the United Nations (UN) [Universal Declaration of Human Rights](#) and Articles 2 and 25 of the [International Covenant on Civil and Political Rights](#) (ICCPR). See, among others, European Court of Human Rights judgements in [Sejdić and Finci v. Bosnia and Herzegovina](#), [Zorić v. Bosnia and Herzegovina](#), [Pilav v. Bosnia and Herzegovina](#), [Šlaku v. Bosnia and Herzegovina](#) and [Kovačević v. Bosnia and Herzegovina](#).

³³ The fee is refundable to the political subjects whose candidate either wins the mandate or secures one-third of the votes received by the elected candidate.

³⁴ The supporting signatures must be physically collected on a prescribed form by applicants and submitted via the CEC electronic application which allows for verification of the voters' data against the CVR upon their manual entry.

³⁵ Paragraph 196 of the 2020 [ODIHR and Venice Commission Guidelines on Political Party Regulation](#) recommends that "a requirement that a citizen be allowed to sign in support of only one party should be avoided, as such a regulation would affect his/her right to freedom of association and could easily disqualify parties".

³⁶ Of the five certified political parties, four subsequently nominated candidates. The registered candidates were: Branko Blanuša – SDS, Dragan Đokanović – Alliance for New Politics (SNP), Igor Gašević – independent, Siniša Karan – SNSD, Slavko Dragičević – independent, Nikola Lazarević – Ecological Party of the Republic of Srpska (EP).

³⁷ The party For Justice and Order (ZPR) filed a complaint to the Court of BiH against the CEC certification of SNSD, alleging that Mr. Dodik was not authorized to apply for certification due to his conviction. The Court rejected the complaint, noting that at the time of certification Mr. Dodik was registered as the party's authorized representative. In a letter, the Court also instructed the CEC to record and enforce the legal consequences of the conviction, which prevent him from performing official duties, including serving as party chair. On 19 November, the BiH Constitutional Court rejected the appeal as inadmissible, finding that the appellant failed to demonstrate that the CEC's certification of SNSD for the 2025 RS early presidential election affected any of its constitutionally protected rights.

Election Campaign

The shortened 15-day campaign period began on 8 November and concluded on 22 November. Overall, the campaign was competitive, and contestants were able to campaign freely, with fundamental freedoms of expression and assembly respected. SNSD and the Serb Democratic Party (SDS) campaigned online before the official period, prompting several complaints and subsequent fines from the CEC.³⁸

There was general reluctance across the political spectrum to participate in the early election, which many political actors viewed as imposed by the BiH authorities and the OHR, and as a significant strain on financial resources ahead of the 2026 elections. The campaign focused on issues related to national identity and state structure, and did not address broader social and economic issues. The frontrunners, Siniša Karan of SNSD and Branko Blanuša of SDS, opted for a restrained campaign, while the other four contestants remained inactive and less visible. Both front-running candidates drew support from their respective coalition partners from the RSNA and employed polarising rhetoric.³⁹ The SNSD candidate's campaign emphasised the protection of the RS statehood against state-level institutions and the interference of the international community and the OHR. It also showcased strong support for the former RS president and SNSD leader, Mr. Dodik, who featured prominently in the campaign materials and events as the main figure. Other campaign messages underlined the RS government's achievements and included promises of economic development and infrastructure projects. In contrast, the SDS candidate centred his campaign on accusations of corruption and abuse of power by the ruling party, promoting equality, justice, restoration of dignity, anti-corruption measures, and the equitable management of state resources for all citizens of the entity.

Candidates communicated their platforms and engaged voters by utilising social networks, organising rallies, community meetings, placing billboards, distributing flyers and other campaign materials. They also relied on their party bases and regional strongholds to mobilise the electorate. The SDS campaign, however, was more modest, constrained by financial limitations stemming from the US sanctions on the party's bank accounts and the abolition of public funding for political parties (*see Campaign Finance*). In two instances, the CEC sanctioned SNSD for unlawful misuse of children in a campaign event.⁴⁰

Besides polarising narratives, the campaign was marred by inflammatory language despite the CEC urging all parties to refrain from making statements that might provoke tensions.⁴¹ On 10 November, during a rally in East Sarajevo, Mr. Dodik made inflammatory statements about Bosniaks, alleging threats of "Islamisation of BiH" by the Muslim community.⁴² The Islamic Community of BiH, the Interreligious Council of BiH, along with several high-ranked officials and politicians, condemned the statements and filed complaints for hate speech with the BiH Prosecutor and the CEC (*see Election Dispute Resolution*).⁴³

³⁸ The CEC received 22 complaints: 15 against SDS, 5 against SNSD, and 1 against the Socialist Party (SP) and ZPR. It imposed 5 sanctions, including BAM 17,000 fine on SDS, BAM 3,000 on Mr. Blanuša, and BAM 6,500 on SNSD.

³⁹ The ruling coalition consists of SNSD, SP, Democratic National Alliance, the Democratic People's Alliance, the Socialist Party of Srpska, United Srpska, and the People's Party of Srpska. The opposition faction includes: SDS, the Party of Democratic Progress, People's Front, and ZPR, the Social Democratic Party, the Party of Democratic Action, and BiH Greens.

⁴⁰ SNSD and its candidate were fined for a total of BAM 12,000 and 4,000 respectively.

⁴¹ See [the CEC statement](#) published on 7 November.

⁴² See [article of 12 November](#) from Radio Free Europe. Videos from the rally posted on the party and Mr. Dodik's social network accounts were later deleted.

⁴³ On 14 November, the Prosecutor's Office of BiH transferred the case to the District Public Prosecutor's Office in East Sarajevo. See also [the statement](#) of the Interreligious Council of BiH.

Several government members, along with the RS member of the BiH Presidency Željka Cvijanović, were actively involved in the SNSD campaign activities.⁴⁴ While the law prohibits holders of high executive office from using public resources, including transportation, communication, and equipment for campaign purposes, it does not prevent them from participating in campaign activities or publicly supporting certain candidates while in office. On a number of occasions during the campaign SNSD officials, representatives and its presidential candidate announced new financial support programmes, funding of development projects and increases in social benefits.⁴⁵ Although such practices do not violate the law, they blurred the line between the state and the party providing an undue electoral advantage, which is at odds with OSCE commitments.⁴⁶ Many ODIHR SEAM interlocutors also raised concerns over the misuse of public resources and pressure on public sector employees to influence their choices. The depleted financial resources available to candidates nominated by opposition parties, coupled with the advantage of incumbency, created an uneven playing field favouring the ruling party.

No female candidate ran in this election and women's participation in the campaign was limited. Only very few prominent female political figures, such as Željka Cvijanović, the RS member of the BiH Presidency, Jelena Trivić, leader of FN, and Alexandra Pandurević of SDS, were visibly active, supporting their respective candidates at public events and online.

The BiH Election Law does not adequately regulate online campaigning on the internet and social networks. The two front-running candidates made use of platforms to present their campaign messages and activities. The SNSD candidate through personal and party accounts led the most active online campaign, posting up to 25 times daily on Facebook, Instagram, and X, mirrored by similar activity from his key supporters, Mr. Dodik and the RS member of the BiH Presidency, and other prominent party officials. Posts often depicted achievements and framed the election as a choice between the SNSD candidate and the danger of political instability. Some messages included negative rhetoric against the OHR. The SDS candidate's online campaign was less intense, consisting primarily of posts from rallies and meetings with voters that echoed their campaign messages. Overall, the tone of the online campaign was mainly neutral, but SNSD resorted to inflammatory language in some instances.⁴⁷ Candidates launched a number of campaign advertisements on YouTube, Facebook and pop-up banners on the internet.⁴⁸

⁴⁴ For instance, on 12 November, the Minister of Finance and Treasury of BiH in a SNSD rally in Čelinac. On 10 November, East Sarajevo Mayor and Minister of Foreign Trade of BiH in a SNSD rally in East Sarajevo.

⁴⁵ On 9 November, the SNSD candidate and Mr. Dodik [promised to assist](#) the Saint Mary Magdalene organisation running a charity kindergarten with EUR 10,000. On the same day, they visited a parish house under construction in Teslić and [promised](#) EUR 125,000 by the end of the month and EUR 1 million from the RS budget next year. On 14 November, the SNSD president [reportedly pledged](#) BAM 1 million to build a residential building in Milići, while the SNSD candidate [promised](#) to increase police officers' salaries. On 20 November, at the SNSD campaign event, Mr. Dodik [promised](#) a 6.25 per cent pension increase, with payments starting before December.

⁴⁶ Paragraph 5.4 of the [1990 OSCE Copenhagen Document](#) committed participating States to ensure “a clear separation between the State and political parties; in particular, political parties will not be merged with the State.” See also Congress Recommendation (CG31(2016)7) on the misuse of administrative resources during electoral processes: the role of local and regional elected representatives and public officials. See also Paragraph II. B. 1.1 of the 2016 ODIHR and Venice Commission's [Joint Guidelines](#) for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes, which states, the “legal framework should provide effective mechanisms for prohibiting public authorities from taking unfair advantage of their positions by...the use of specific funds (state or local budget) as well as institutional resources.”

⁴⁷ On 14 November, an SNSD [X account post](#) accused Bosniaks of intending to abolish the RS and adopt the Sharia law.

⁴⁸ SDS candidate had 11 paid posts on Facebook for approximately EUR 1,500 and 25 Google ads of which 2 on YouTube. The SNSD candidate had 6 paid Facebook posts for approximately EUR 850 and ran a total of 34 paid Google ads, including 7 video ads on YouTube.

Campaign Finance

Party and campaign finance are primarily regulated by the BiH Election Law and the BiH Law on Financing of Political Parties. These two laws are not fully harmonized;⁴⁹ in addition, the provisions of the 2025 RS Law on Financing of Political Organisations differs from the state laws. The legal framework is supplemented by CEC regulations.⁵⁰ Despite the 2024 amendments, the campaign finance regulatory framework does not ensure transparency and accountability and long-standing previous ODIHR and Congress recommendations remain unaddressed.⁵¹

By law, political parties are entitled to annual public funding from state, entity and municipal budgets, which may also be used for campaign purposes. In April 2025, the OHR suspended all public funding of SNSD and its coalition partner United Srpska (US), conditioning its reinstatement upon their compliance with the Dayton Agreement.⁵² In response, the RSNA abolished party funding from entity and local budgets, citing a need for budgetary savings, while it retained funding for parliamentary clubs.⁵³ Most ODIHR SEAM and Congress interlocutors assessed these decisions effectively benefited SNSD as they left the RS opposition parties without funding, and they do not receive significant private donations. Further, opposition parties found that the early election constituted an additional financial burden ahead of the 2026 general elections.

Parties and independent candidates may receive private donations and use their own funds for the campaign, while donations from public entities, anonymous and most foreign sources are prohibited. There is a ban on donations from holders of public contracts but this is only limited to contracts with executive institutions.⁵⁴ For this election, the expenditure limit was approximately BAM 380,000 and exceeding it was subject to sanctions of up to BAM 30,000, which was not a dissuasive sanction.⁵⁵ At odds with international good practice, the law does not regulate third-party campaigning.⁵⁶ The ODIHR SEAM was informed by some parties which did not nominate candidates that they incurred campaign expenditures in favour of candidates.

⁴⁹ For instance, the BiH Election Law authorizes credits and loans as valid campaign resources while the Law on Financing Political Parties prohibits taking loans from banks and only recognizes contributions through the party headquarter's regular accounts. In May 2025, the RSNA adopted a Law on Financing of Political Organizations, which is not fully harmonized with the BiH law; the donation limits differ between the two laws while, unlike the BiH law, the RS law does not define prohibited sources of party funding. In addition, the RS law gives competences to the entity-level commission. The CEC informed the ODIHR SEAM that it only considers state laws when overseeing campaign finances.

⁵⁰ In 2024 the CEC issued instructions on opening and using special bank accounts; rulebooks on annual financial reports by parties and pre-election and post-election financial reporting by contestants.

⁵¹ The 2024 amendments obliged contestants to open a special bank account for campaign incomes and expenditures, introduced interim campaign finance reporting, and required contestants to account for cash donations and transactions and expenses for distributing materials online in their final report.

⁵² See the [OHR decision on April 2025](#).

⁵³ In May 2025, the RSNA abolished the RS Law on Financing of Political Parties from the Budgets of the Republic, Cities, and Municipalities. The For Justice and Order Party challenged the abolishment of public funding at the RS Constitutional Court, citing inconsistency with the BiH law; the appeal is still pending.

⁵⁴ For example, public enterprises and institutions are not subject of such prohibition. The CEC verifies contracts on an online commercial platform [Akta.ba](#) whether a donor has a procurement contract.

⁵⁵ Spending is capped at BAM 0.30 per registered voter. 1 BAM= 0.51 EUR. Sanctions for not-submitting the reports is up to BAM 10,000.

⁵⁶ Article 6 of the Council of Europe (CoE) Committee of Ministers' [Recommendation Rec\(2003\)4](#) on common rules against corruption in the funding of political parties and electoral campaigns states that "rules concerning donations to political parties, with the exception of those concerning tax deductibility referred to in Article 4, should also apply, as appropriate, to all entities which are related, directly or indirectly, to a political party or are otherwise under the control of a political party". Paragraph 256 of the ODIHR and Venice Commission Joint Guidelines on Political Party Regulation states that "third-party activities should not be unconditionally prohibited".

Contestants are required to open dedicated bank accounts for campaign transactions. As required by law, on 20 November, all candidates submitted their interim financial reports, which were promptly published by the CEC on 21 November, enhancing transparency.⁵⁷ Final reports are due within 30 days of the publication of final election results. While the CEC is mandated with campaign finance oversight, review of the financial reports and investigation of violations, it has no deadline for the completion of this review and informed the ODIHR SEAM that it lacks necessary resources.⁵⁸ As a result, the effectiveness of the oversight mechanism and sanctions is reduced. This, combined with the lack of regulation of third-party campaigning, limited the transparency, accountability and integrity of campaign finances.

Media

The media landscape is vibrant with a significant number of media outlets registered and operating in RS, often with a prominent readership throughout BiH and the wider region. Online media and social networks, especially Facebook, keep growing in their importance, largely shaping public opinion. The vast majority of RS media are divided in their editorial policies and content along party lines, with many promoting the ruling SNSD and others criticising it. The lack of transparency on media ownership, at odds with international good practice and previous ODIHR recommendations, enables subjective reporting.⁵⁹

Both the BiH and the RS Constitutions guarantee freedom of expression. At odds with international standards, defamation and libel were recriminalized in the RS in 2023, with prescribed fines.⁶⁰ While complaints were reportedly filed against 38 journalists, to date no one has been indicted or convicted.⁶¹ These legal restrictions, combined with threats to media and isolated physical attacks, negatively affect the media environment, resulting in self-censorship of media professionals.⁶² Moreover, high-ranking SNSD politicians often verbally insult and label journalists connected with critical media.⁶³ In 2025, the RSNA adopted a law on transparency of non-profit organisations, applicable also to the many media outlets registered as non-profit organisations, which made many independent outlets fear for their financial sustainability and longevity.⁶⁴ The law was annulled by the BiH Constitutional Court in May 2025.

⁵⁷ According to contestants' reports, five contestants declared zero campaign spending while the SNSD reported BAM 190,347. SNSD also reported BAM 129,000 in donations, SDS reported BAM 20 and all others reported none.

⁵⁸ According to the CEC, it is currently conducting a review of the 2022 election campaign finance reports.

⁵⁹ *Alternativna TV* is reportedly connected to Igor Dodik, Milorad Dodik's son, which, according to several ODIHR SEAM interlocutors, influences its coverage of SNSD. According to the [Media Ownership Monitor](#), in BiH, the eight major media owners including public broadcasters have a market share of 89.29 per cent while their market share without the public broadcasters is 80.14 per cent, which represents a high risk. See article 6.d. of the [UN, OSCE, OAS and ACHPR Joint Declaration on Media Independence and Diversity in Digital Age](#) and [CoE Recommendation of the Committee of Ministers to member States on media pluralism and transparency of media ownership](#).

⁶⁰ Paragraph 47 of the [General Comment No. 34 to the ICCPR](#) calls States to "consider the decriminalization of defamation".

⁶¹ [Article 208a of the Criminal Code](#) prescribes fines from BAM 1,000 to BAM 3,000. *BH Novinari*, the largest journalist association of BiH, reported that from 2023 until November 2025, 218 criminal defamation complaints were filed, including 38 against journalists.

⁶² In [October 2024](#), the Editor-in-Chief of *Spin Info* Sanja Vasković was questioned by the RS Police following a defamation complaint; in August 2025, investigative journalist employed with RTRS Nataša Miljanović-Zubac was detained by the BiH Border Police, see [Statement of the OSCE Representative on Media Freedom and OSCE Mission to BiH on the legal proceedings against Nataša Miljanović Zubac](#); in [September 2025](#), the Head of the Zvornik Police filed a complaint for defamation against the news portal *Drina Media*.

⁶³ See [Media Freedom Rapid Response Monitor](#); [Safe Journalists Reports](#); [Statement by Media Freedom Representative Ribeiro & Head of the OSCE Mission to BiH Aggeler on threats to media by President of Republika Srpska Dodik](#).

⁶⁴ See the [Law on Special Registry and Transparency of the Work of Non-profit Organisations](#). Several SEAM interlocutors argued that excessive reporting requirements as well as additional financial obligations had a chilling effect for the media and civil society in RS. See [Statement of the CoE Commissioner for Human Rights](#) and [the Statement by the Media Freedom Rapid Response](#).

In line with the BiH Election Law and the Communication Law, the state Bosnia and Herzegovina Radio and Television (BHRT) and entity Radio and Television of Republika Srpska (RTRS) public broadcasters were required to provide equal access to free airtime and equal paid advertising conditions to all candidates.⁶⁵ The CRA Rulebook for 2024 local elections remained applicable, foreseeing for the six candidates the same amount of free airtime as the local election candidates.⁶⁶ While both BHRT and RTRS adhered to the requirement to provide candidates with free airtime during the short 14-day campaign, not all contestants made use of this opportunity. Only SNSD placed paid political advertisement on RTRS. Moreover, ODIHR SEAM interlocutors noted that RTRS news coverage of the election was mostly devoted to SNSD rallies and events featuring Mr. Dodik, which negatively affected stakeholders' confidence in the impartiality of the broadcaster. This, combined with the limited number of paid political advertising aired by private media, offered limited independent information to voters. Moreover, no debates took place among contestants, depriving voters of the chance to directly compare their positions.

The Communication Regulation Agency (CRA) is mandated with overseeing compliance of the broadcast media with the election and communication laws, reviewing complaints and applying sanctions. Its effectiveness and impartiality have been questioned by several ODIHR SEAM interlocutors.⁶⁷ At odds with international good practice and despite previous ODIHR recommendations, the CRA did not conduct media monitoring of the election-related content, citing a lack of capacity and human resources. The CRA reviews complaints related to the election campaign coverage by broadcast media, whereas the Press and Online Council reviews complaints on the electoral content published by print and online media. In the absence of a legal requirement, these bodies did not publish any information about the complaints they may have received.

Election Dispute Resolution

The CEC reviews complaints on certain campaign violations, including hate speech and misuse of administrative resources, violations of media rules by political subjects as well as appeals against MEC decisions, while the MECs handle complaints on voter registration and other campaign matters.⁶⁸ While legal standing is limited to voters and contestants whose rights are affected, the CEC is obliged to act *ex officio* upon receiving information on violations.⁶⁹ CEC decisions may be appealed to the Appellate Division of the Court of BiH as the final instance; however, not all CEC decisions are subject to judicial review, contrary to OSCE commitments.⁷⁰ While the law prescribes an expedient dispute resolution,

⁶⁵ The ODIHR SEAM did not conduct media monitoring and is not in a position to assess the compliance of the public broadcasters with the legal requirements. The two public broadcasters have legal disputes against each other about their financial obligations, with the BHRT accusing the RTRS of not paying its RTV tax share to the joint BiH public broadcaster budget, and the RTRS accusing the BHRT of not sharing its marketing income with RTRS.

⁶⁶ The [2024 CRA Rulebook](#) mandated three minutes of free airtime for each candidate on all broadcasters operating in the RS, as well as 15 and 30 minutes of paid political advertising time per candidate on public and private broadcasters respectively.

⁶⁷ The current CRA Head is Draško Milinović, who was previously the head of RTRS and in 2006 – 2014 under the supervision of Mr. Dodik and his government. The 2024 [CRA annual report](#) noted only nine overall violations, six of which breached the Programme Standards and License Conditions and three the Code of Program Content, without any details. The Chapter on the 2024 Local Elections mentioned only the number of complaints received, not specifying their nature.

⁶⁸ Complaints to election commissions and appeals to the CEC must be filed within 72 hours; MECs and the CEC decide within 48 hours after the 24-hour response period, with the CEC able to extend the deadline by up to five days in complex cases. The Court of BiH resolves appeals within three days.

⁶⁹ A CEC communication declining to initiate or continue *ex officio* proceedings does not constitute a formal decision and therefore is not appealable, as confirmed by the Appellate Division of the Court of BiH in its decision of 19 February 2025, which held that Transparency International lacked standing under the Election Law.

⁷⁰ See paragraph 18 of the 1991 [OSCE Moscow Document](#).

there have been insufficient efforts to build the independence and impartiality of the judiciary, impacting public trust.⁷¹

The CEC reviewed complaints in an open manner and deadlines were generally respected. Although it maintains a public database of complaints, this was not comprehensive and not regularly updated. Moreover, the text of complaints and decisions were not published, limiting transparency and contrary to prior ODIHR recommendations.⁷² Before election day, the CEC received some 60 complaints and information upon which the CEC launched *ex officio* procedures. Most disputes related to campaigning before the official start of the campaign, appointments of the PSC leadership, hate speech and misuse of public resources. The CEC issued financial sanctions in five cases against SNSD and SDS for early campaigning,⁷³ one against SNSD for Mr. Dodik's alleged use of hate speech, for which the CEC also opened an *ex officio* case, and two against SNSD for publishing campaign materials featuring children. The CEC also reviewed one appeal against a MEC decision, which was rejected as unfounded,⁷⁴ and seven complaints on the appointment of the PSC presidents, dismissing five on merits and upholding one.⁷⁵ The Appellate division of the Court of BiH reviewed five appeals against CEC decisions and upheld all of them; several appeals remain pending.⁷⁶ In line with the law, Court decisions were published, though not always in a timely manner. Contrary to previous ODIHR recommendations, court sessions on election disputes were not public.

The BiH Constitutional Court adjudicates cases concerning violations of individuals' fundamental rights once all other remedies have been exhausted. It is currently not functioning at full capacity due to the refusal of RS authorities to appoint judges.⁷⁷ Before the election, the BiH Constitutional Court received several complaints pertaining to certain matters related to the election, including challenging the CEC's certification of the SNSD, which was dismissed, and the appointment of the RS interim government.⁷⁸

Citizen and International Observers

The law provides for election observation both in-country and abroad by citizen and international organizations, as well as by observers appointed by contestants. Contributing to transparency, the law grants access for observers to the entire electoral process and ensures their rights, including the right to request information and documents, attend sessions of election commissions at all levels, have access to all electoral premises, and notify election commissions of irregularities. In an inclusive manner, the

⁷¹ According to the 2025 European Commission's [Working Document](#), further efforts are needed to build public trust and in improve the independence and impartiality of the judiciary.

⁷² Following the decision of October 2025 of the Personal Data Protection Agency, the CEC does not publish the names of complainants when these are individuals.

⁷³ These cases concerned early campaigning in social and traditional media. In one case, the SDS presidential candidate and the party were sanctioned for publishing a video on the party's Facebook page. In two other cases, the SNSD was sanctioned for early campaigning by its members in support of the SNSD presidential candidate. The CEC also sanctioned SDS with BAM 7,000 for campaigning on social media, acting *ex officio* upon information received from *Pod Lupom*.

⁷⁴ The MEC rejected the complaint, noting that the applicant does not have the right to vote in the RS elections and therefore cannot be placed on the reserve list of the PSC.

⁷⁵ The CEC accepted a complaint alleging that the three appointed PSC presidents were affiliated with SNSD.

⁷⁶ Several appeals, including those challenging the CEC's sanctions against the SNSD for alleged hate speech and for publishing campaign materials featuring children, remain pending.

⁷⁷ In 2023, the Court amended its rules to allow decision-making in the absence of RS or FBiH judges. Following the 2024 Venice Commission's [Opinion](#), it further amended the rules to allow judges who reach retirement age to remain in office until their successors are appointed. Currently, court has 13,500 pending cases. ODIHR SEAM interlocutors assessed the RSNA's continued refusal to appoint Constitutional Court judges as politically motivated, linked to the RS authorities stated non-recognition of the Court. In October 2025, the RSNA repealed the Law on Non-Implementation of Constitutional Court Decisions.

⁷⁸ Delegates from the BiH House of Peoples and the House of Representatives filed appeals on the legality of the appointments of the RS PM and government.

CEC accredited 529 citizen observers, 100 international observers and 25 observers nominated by contestants. MECs accredited some 4,243 observers from political entities.

Election Day

The joint observation effort observed opening, voting, and counting in a limited number of polling stations across Republika Srpska; however, in line with the methodology for election assessment missions, it did not conduct a systematic or comprehensive assessment of election day proceedings.

Throughout the day, in the limited number of polling stations visited, the process was assessed as professional, well organized and orderly. All PSCs observed were fully staffed, despite initial concerns about possible staff shortage. Most PSC chairpersons and members had experience from previous elections and had received training, thereby appearing to be aware of procedures. Women were well represented among the polling staff in the few polling stations observed and SEAM members noted the presence of party observers, while citizen observers were only present in a limited number of cases. Most voting premises visited were not accessible for persons with disabilities.

In line with the regulations, voting screens were placed with the open side facing the room, to safeguard against any attempts to control voters. However, in polling stations visited, often this placement of voting screens could not safeguard secrecy of the vote. SEAM members noted that in some polling stations visited the ballot boxes were not properly sealed.

Throughout the day, the CEC provided regular updates on the voting process.⁷⁹ According to these reports, opening was delayed in some PSCs due to the snowfall and power cuts while voting was rescheduled in one polling station which failed to open.⁸⁰ The CEC also provided regular updates on the voter turnout, contributing to transparency.⁸¹ At the press conference at 21.00, the CEC informed about three complaints (resolved without interrupting the election process).⁸² The CEC published on its website the first preliminary results at 23.00, disaggregated by polling station, enabling public scrutiny. The turnout was announced at 35.78 per cent.⁸³

The Coalition for Free and Fair Elections ‘*Pod Lupom*’ deployed over 400 observers covering almost 20 per cent of the polling stations across the RS. It operated a call centre for reporting irregularities and published press releases.⁸⁴

***The English version of this report is the only official document.
Unofficial translations are available in in Bosnian, Croatian, and Serbian.***

⁷⁹ The CEC announced that a few polling stations did not open on time, as they were inaccessible due to the snowfall or power cuts or election materials were not delivered on time.

⁸⁰ Additionally, voting at PSC 068B005 "Korićani" in the Kneževio municipality was rescheduled for 30 November.

⁸¹ The CEC collected data from MECs and announced turnout at regular polling stations. This was 9.76 per cent at 11.00; 25.49 per cent at 15.00; and 35.78 at 19.00.

⁸² The complaints were filed in polling stations in Laktaši, Bijeljina and Banja Luka.

⁸³ See the [CEC website](#).

⁸⁴ See the [Press Releases issued by Pod Lupom](#).

MISSION INFORMATION & ACKNOWLEDGEMENTS

Banja Luka, 24 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 Congress of Local and Regional Authorities of the Council of Europe (the Congress), and the European Parliament (EP). The assessment was made to determine whether the elections complied with OSCE commitments, Council of Europe standards, other international obligations and standards for democratic elections, and with national legislation. Each of the institutions involved in this joint effort has endorsed the 2005 Declaration of Principles for International Election Observation.

Mátyás Eörsi is the Head of the ODIHR SEAM, deployed from 28 October. The ODIHR SEAM includes 11 experts in Banja Luka and four regional analysts deployed in teams of two across Republika Srpska. The 21 mission members were drawn from 11 OSCE participating States. For election day the ODIHR SEAM was joined by a 16-member delegation from the Congress led by Bernd Vohringer and a 6-member delegation from the EP led by Sérgio Humberto. There were 49 per cent of women among observers.

In line with ODIHR's methodology for election assessment missions, mission members visited a limited number of polling stations on election day, however, did not carry out systematic or comprehensive observation of the voting, counting and tabulation processes.

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 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 months after the completion of the electoral process. The Head of the Congress delegation will present recommendations at the 50th Congress Session, in March 2026. The EP Head of Election Observation Delegation will present the report at the next meeting of the EP Delegation to the EU-Bosnia and Herzegovina Stabilisation and Association Parliamentary Committee in Strasbourg on Thursday, 18 December 2025.

ODIHR, the Congress, and EP wish to thank the authorities of Bosnia and Herzegovina for the invitation to observe the elections, and the Central Election Commission for their assistance. Mission members also wish to express their appreciation to other state, entity and local institutions, political parties, media and civil society organizations, and international community representatives for their co-operation.

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