



Office for Democratic Institutions and Human Rights

KYRGYZSTAN

EARLY PARLIAMENTARY ELECTIONS

30 November 2025

ODIHR NEEDS ASSESSMENT MISSION REPORT

29 September - 3 October 2025



Warsaw
9 October 2025

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**KYRGYZSTAN
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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

In anticipation of an official invitation to observe the 30 November 2025 early parliamentary elections in the Kyrgyz Republic, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 29 September to 3 October.¹ The NAM included Lusine Badalyan, ODIHR Senior Election Adviser, and Yelena Kovalyova, ODIHR Election Adviser.

The purpose of the mission was to assess the pre-election environment and preparations for the early parliamentary elections. Based on this assessment, the NAM should recommend whether to deploy an ODIHR election-related activity for the forthcoming elections and, if so, what type of activity best meets the identified needs. Meetings were held with officials from state institutions as well as with representatives of candidates, media, civil society and diplomatic community. A list of meetings is annexed to this report.

ODIHR would like to thank the Central Commission for Elections and Referenda for its assistance and co-operation in organizing the NAM and the Ministry of Foreign Affairs for facilitating the visit. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and for sharing their views.

II. EXECUTIVE SUMMARY

Kyrgyzstan is a semi-presidential republic, with legislative powers vested in the 90-member unicameral *Jogorku Kenesh* (parliament) with a five-year mandate. The president called the early parliamentary elections on 30 September, following the self-dissolution of the parliament on 25 September. The parliamentary initiative to dissolve was explained as an effort to diminish the administrative and social pressure of consecutive parliamentary and presidential election campaigns under a new electoral system. Some ODIHR NAM interlocutors opined that the dissolution was intended to solidify the transfer from a parliamentary to a presidential system. Legislative changes in recent years impacting civil society and the media have been met by criticism from international human rights institutions and organizations as further limiting their ability to function independently.

The election law was amended five times in 2025, changing almost all aspects of the electoral framework, including the fundamental elements, such as the electoral system, formation of electoral districts, representation of various population groups, gender quota, candidate eligibility, distribution of mandates, and campaign financing and campaign rules. No prior ODIHR recommendations were addressed by the reform, and some ODIHR NAM interlocutors questioned the inclusiveness of the consultation process.

The parliament is directly elected for a five-year term. The mixed electoral system was substituted with a majoritarian single non-transferable vote system, under which 90 MPs are elected across 30 three-member districts. One seat per district is reserved for a candidate of the underrepresented gender. ODIHR NAM interlocutors expressed mixed opinions regarding the gender quota, praising an attempt to ensure diversity, but criticising the lack of wider capacity-building support and measures to facilitate

¹ ODIHR received an invitation to observe the upcoming elections during the NAM on 2 October.

the participation of other groups. Women are underrepresented in politics, with 21 members of parliament (MPs) in the outgoing parliament, 1 of 23 ministerial portfolios in the government, and none of the 7 local governor seats.

The parliamentary elections are administered by a hierarchical three-tier structure of the Central Commission for Elections and Referenda (CEC), 30 District Election Commissions (DECs) and 2,492 Precinct Election Commissions (PECs), including 59 PECs abroad. The CEC has begun preparations for the elections and initiated a large-scale voter information campaign and trainings for the lower-level commissions. These elections will be administered with new voting equipment introduced to combine most voting procedures and enable the electronic tabulation of preliminary results. Voters will have the possibility to vote at any polling station, including outside of their electoral district, with the so-called remote voting option. Most ODIHR NAM interlocutors expressed a high degree of confidence in the capacity of election administration to conduct electoral procedures, but some expressed uncertainty regarding its technical preparedness and the integrity of remote voting.

Citizens who are at least 18 years of age on election day are eligible to vote, except those serving a prison sentence, irrespective of the gravity of the crime, and those whose legal capacity was withdrawn by a judicial decision, contrary to international standards. The voter list is generated from the Unified State Population Register. ODIHR NAM interlocutors generally expressed trust in the voter registration system, but some expressed reservations about the reliability of electronic voter identification and the scope of personal data to be displayed upon identification at the polling station. On 26 September, the CEC announced that the preliminary number of voters is 4,237,000.

Eligible voters of at least 25 years of age with a higher education, permanent residence in Kyrgyzstan for at least 5 years prior to elections, and proficiency in the Kyrgyz language, have the right to stand. ODIHR has previously recommended lifting some of the candidacy restrictions; however, recent amendments further expanded the restrictions on the right to stand to those with expunged convictions and criminal charges on certain grounds, even if they have not resulted in indictment. Candidates can be nominated by registered political parties or independently. The majority of ODIHR NAM interlocutors raised concerns about the non-refundable registration fee as a potential barrier for participation. According to ODIHR NAM interlocutors, most candidates will run independently. Candidate registration will be finalized by 10 November.

The campaign period for early elections is shorter than for normally scheduled elections; for these elections 10 to 29 November. Candidates are entitled to state-sponsored airtime, print space and venues on equal conditions. Most ODIHR NAM interlocutors expect a subdued campaign, mainly through social media and door-to-door canvassing, and stated that the main campaign topics have not yet emerged. The law requires campaign-related information to be available in accessible formats for persons with disabilities. The election law provides for measures against misuse of administrative resources, vote-buying and unethical campaigning.

Election campaigns may be financed from monetary donations and candidates' and parties' funds, subject to limitations on amounts and sources. Banks will check the legality of donations and limits. The ODIHR NAM interlocutors stated that for the early elections, the campaigns will be financed primarily from personal funds of candidates or bank loans. The CEC regulates and oversees campaign finance, auditing two campaign reports from candidates.

The media environment, while still offering some plurality, is narrowing, and some ODIHR NAM interlocutors cited difficulties in accessing funding and advertising revenue, increased pressure on independent media and self-censorship as contributing to this. The new Law on Media requires state registration, including for online media, and limits the share of foreign ownership. Social media has

become the primary source of information. Registration with the CEC is required for media outlets to cover an election campaign and publish or broadcast political advertising. Candidates are entitled to ten minutes of free airtime and one page of free space in print media. The state-owned National TV and Radio Corporation of Kyrgyzstan (NTRK) plans to organise debates and provide informative, expert and entertainment programmes on elections..

Actions and decisions of the election administration are subject to hierarchical review and judicial appeal. The Administrative Court of Bishkek reviews CEC decisions, while the Supreme Court decides on cassation. The deadlines to submit and decide on complaints are generally three days. Following recent amendments, some types of CEC decisions will not be subject to judicial review, but the circumstances for this are not specified. Despite a prior ODIHR recommendation, legal standing for voters has not been expanded.

The election law provides for observation of all stages of the electoral process by candidates, civil society and international observers. Accreditation of observers can be terminated by the election commissions in case of violations of the law, including for violations of the scope of their functions. Most ODIHR NAM interlocutors stressed the limited space for civil society and expressed concerns about the feasibility of independent citizen observation of the upcoming elections.

All ODIHR NAM interlocutors expressed a high degree of confidence in the ability of the election administration to professionally administer early parliamentary elections, despite the condensed timelines. At the same time, all ODIHR NAM interlocutors stressed a strong need for an election observation activity and requested ODIHR to deploy a high number of observers to cover all stages of the electoral process. In particular, ODIHR NAM interlocutors highlighted the need to assess the legal framework and its implementation, candidate registration, the conduct of the campaign, campaign finance, election dispute resolution, the use of new technologies and election day procedures. Numerous ODIHR NAM interlocutors stressed the importance of observing the participation of women, persons with disabilities, and members of national minorities throughout the electoral process.

Based on the findings of this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming 30 November 2025 early parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 30 long-term observers to follow the electoral process countrywide, as well as 300 short-term observers to follow election day procedures. In line with ODIHR's standard methodology, the EOM will include a media monitoring element.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

Kyrgyzstan is a semi-presidential republic, with legislative powers vested in the 90-member unicameral *Jogorku Kenesh* (parliament) with a five-year mandate. The president holds vast executive powers. The outgoing parliament was elected in November 2021 when six parties entered the parliament.²

² According to the [CEC](#), *Ata-Jurt* Kyrgyzstan won 17.32 per cent (15 seats); *Ishenim* – 13.61 per cent (12 seats); *Yntymak* – 11 per cent (9 seats); *Aliance* – 8.35 per cent (7 seats); *Butun* Kyrgyzstan – 7.04 per cent (6 seats); *Yjman Nuru* – 6.17 per cent (5 seats); other 15 contesting parties did not surpass the threshold. Others were not nominated by political parties. There were six factions, two groups, and six members of the parliament (MPs) without group affiliation in the outgoing parliament.

The president called the early parliamentary elections on 30 September, following the self-dissolution of the parliament on 25 September, initiated by 32 members of parliament (MPs) and adopted with 84 votes.³ The parliamentary initiative to dissolve was explained as an effort to diminish the administrative and social pressure of consecutive parliamentary and presidential election campaigns under a new electoral system. Some ODIHR NAM interlocutors opined that the dissolution was intended to solidify the transfer from a parliamentary to a presidential system.⁴ The initiative was expeditiously passed through all parliamentary procedures and gained vocal support from some high-level officials, who underlined the independent nature of the process.⁵

The period between the elections was marked by extensive changes in the government structure and regulation, among others, the parliament, the judiciary, corruption prevention, restructuring and redistribution of functions of the state apparatus, digitalisation and the administrative-territorial division of the country. Some ODIHR NAM interlocutors positively assessed the large-scale initiatives on legal harmonisation.

Legislative changes in recent years impacting civil society and the media, and recent prosecutions of activists and journalists⁶ have been met by criticism from international human rights institutions and organizations as further limiting their ability to function independently.⁷ Further, recent judicial

³ Under the Constitution and the Law “On the Rules of Procedure of *Jogorku Kenesh*”, self-dissolution of the parliament can be initiated by one third of all MPs (30 of total 90 MPs), and requires the support of at least two thirds (60) of all MPs. The president’s [decree](#) scheduled the elections for 30 November, in line with the legal requirements, and obliged the CEC to conduct remote voting.

⁴ Regular parliamentary elections were expected in November 2026, while the next presidential election is scheduled for 24 January 2027. The date of the latter was rescheduled from October 2026 to January 2027 with the incumbent’s legislative initiative, which prevented expiration of his mandate by force of law. By the 2020 constitutional reform initiated by the president, he received an entitlement to the second presidential mandate.

⁵ On 23 September, a day after submission, the specialised parliamentary committee approved the initiative; the plenary discussion was scheduled in a day, leading to adoption after few remarks. The [chairpersons of the parliament](#) and the CEC expressed their support to the initiative, qualifying it as a “state-level thinking”. The chairperson of the parliament [emphasized](#) that “this decision is solely the decision of parliament. No external forces, neither the President nor the Cabinet of Ministers, interfered.” Scheduling the elections, the president [addressed](#) the nation, thanking the initiators of dissolution and underlining the public interest the MPs pursued to guarantee political stability. The president denied his role in the dissolution, praised the new electoral system and remote voting.

⁶ On 17 September, four employees of the de-registered media Kloop were found guilty for their alleged involvement in production of materials aimed at incitement to mass riots, and were sentenced to five-year imprisonment, two of which are conditional. Human rights defender, Rita Karasartova was sentenced to a 10-year imprisonment conditionally for incitement to violent seizure of state power and for mass riots; activists Kamil Ruziev and Tilekmat Kudaybergenov are under arrest for suspected extortion and for alleged incitement to mass riots. The Office of the UN Commissioner on Human Rights [stated](#) that the cases against the Kloop, Ms. Karasartova and Mr. Ruziyev “may have chilling effects on human rights and independent media work”. In July, independent April TV was deregistered by court’s order upon charges of broadcasting unobjective content.

⁷ The 2024 amendments to the Law on Non-Profit Organisations categorised local non-profit organisations with foreign funding as “performing functions of a foreign representative”, entailing extended registration requirements, reporting, state control and oversight. ODIHR Director and the OSCE Representative on Freedom of the Media [called](#) the national authorities to repeal the “foreign representative” law, due to its expected “overwhelmingly negative impact on civil society”. See the 2022 ODIHR [Urgent Interim Opinion](#) on the earlier draft of the law. The UN High Commissioner for Human Rights [stated](#) that the “foreign representative law” threatens the work of civil society and broadly violates “fundamental rights to freedom of expression, association, peaceful assembly and the right to take part in public affairs”. In its [Opinion](#) on the law “On non-profit organizations”, the Council of Europe’s European Commission for Democracy through Law (Venice Commission) stressed that the law is “incompatible with the right to freedom of association and the principle of non-discrimination”. The recently adopted Law on Mass Media received [criticism](#) from the United Nations Office of the High Commissioner for Human Rights for the measures allowing the state to shape media environment through registration, and restrictions on media ownership.

restrictions on organising public assemblies initiated by local administrations raise concerns about the exercise of the right to peaceful assembly.⁸

Women are underrepresented in politics, with 21 seats in the 90-seat outgoing parliament. Only one minister in the 23-member government is a woman, and no women are among the 7 governors.⁹ Interlocutors informed the ODIHR NAM that this is the result of social stigma, ingrained stereotypes and violence against women politicians, especially intolerant speech online, as well as a lack of measures to encourage greater participation. ODIHR NAM interlocutors praised plans to create a roster of women qualified for public service, but underlined the need for wider educational and capacity-building outreach to increase competitiveness, especially in the regions.

ODIHR has previously observed fourteen elections and referenda in the Kyrgyz Republic. Most recently, ODIHR deployed an Election Observation Mission (EOM) for the 2021 parliamentary elections. Its final report, issued on 26 May 2022, contains 22 recommendations, including 7 priority recommendations, for the authorities to improve the electoral process and bring it closer in line with OSCE commitments.¹⁰

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The legal framework for parliamentary elections primarily consists of the 2021 Constitution, the 2011 Constitutional Law “On Election of the President of the Kyrgyz Republic and Deputies of the *Jogorku Kenesh* of the Kyrgyz Republic” (the election law, last amended on 25 September 2025), the 2021 Constitutional Law on CEC, and the 2011 Law on Election Commissions (last amended in 2021). The CEC regulations supplement the law. The Kyrgyz Republic is a party to the main international treaties related to holding democratic elections.¹¹

In 2025, the election law was amended five times, changing almost all aspects of the electoral framework, including the fundamental elements, such as the electoral system, formation of electoral districts, representation of various population groups, gender quota, candidate eligibility, distribution of mandates, and campaign financing and campaign rules.¹² No prior ODIHR recommendations were addressed by the reform. The April 2025 ODIHR Legal Opinion on the amendments noted that the

⁸ Since 2024, temporary judicial measures requested by local administrations render central areas in Bishkek and some regional centers as areas where public assemblies are prohibited. On 2 October, the State Committee on National Defence (KNB) published for public discussion a draft governmental [decree](#) it elaborated, which proposes to subject public assemblies to a “notification” procedure, which entitles state agencies to prohibit the assembly.

⁹ The UN Committee on the Elimination of Discrimination against Women expressed concern about the low participation of women in public and political life in its [Concluding observations on the fourth periodic report of Kyrgyzstan](#) (11 March 2015), CEDAW/C/KGZ/CO/4, paragraphs 23 and 24.

¹⁰ See all previous [ODIHR election-related reports on Kyrgyzstan](#).

¹¹ These include the [1966 International Covenant on Civil and Political Rights](#) (ICCPR), the 1965 [Convention on the Elimination of All Forms of Racial Discrimination](#), the 1979 [Convention on the Elimination of All Forms of Discrimination Against Women](#) and its optional protocol, the 2002 [CIS Convention on Standards of Democratic Elections, Electoral Rights and Freedoms](#), the 2003 [UN Convention Against Corruption](#) (UN CAC), and [the 2006 Convention on the Rights of Persons with Disabilities](#) (CRPD).

¹² The comprehensive electoral legal reform was enacted by the [Constitutional Law No 113](#) of 9 June 2025. The amendments of April 2025, initiated by the president, altered the date for presidential election from October to the third Sunday in January. The change prevented shortening of the mandate of the incumbent, who was elected at early election held in January, and was therefore facing a four-month shorter term.

parliamentary procedures prior to the adoption of the bill “raise[d] concerns about whether the public had a genuine opportunity to contribute meaningfully to the process or receive adequate feedback.”¹³

The parliament is directly elected for a five-year term. The electoral system was changed in June 2025, when the mixed electoral system was substituted with the majoritarian single non-transferable vote system, under which 90 MPs are elected across 30 three-member districts. The three candidates who obtain the most votes are elected in each district as long as at least one is of the underrepresented gender. Under a gender quota, 30 mandates are reserved for the least represented gender. However, the mandate would be transferred to candidates regardless of the quota in case there is an insufficient number of candidates. The voters are granted the possibility to vote against all candidates. Some ODIHR NAM interlocutors criticized the recent changes to the electoral system because, in their view, they minimize the role of political parties in the elections, and therefore in the country’s political life.

ODIHR NAM interlocutors praised the quota as an effort to ensure diversity, but regretted its limited effectiveness and the lack of wider capacity building support to prepare women candidates, as well as the lack of measures to promote the political participation of other groups.

The CEC is in charge of the delineation of the district boundaries for the 30 majoritarian electoral districts. The election law requires that the number of eligible voters across districts be approximately equal, with a possible deviation of up to 20 per cent from the nationwide average.¹⁴ The law requires the electoral districts to be contiguous, which, as a rule, shall take into consideration the borders of administrative territorial units. The electoral districts are established for a 10-year period. The CEC announced the electoral districts on 1 October, in line with the legal deadline.¹⁵

C. ELECTION ADMINISTRATION

The parliamentary elections are administered by a hierarchical three-tier structure of the Central Commission for Elections and Referenda (CEC), 30 District Election Commissions (DECs) and 2,492 Precinct Election Commissions (PECs), including 59 PECs abroad.¹⁶ The CEC and PECs are permanent bodies appointed for five years. The DECs are temporary bodies formed for the duration of parliamentary elections out of the permanent Territorial Election Commissions (TECs).¹⁷ Following the 2025 legal amendments, individuals with criminal records, including expunged convictions, cannot become election commission members. While most election commissions were re-established in 2025, their composition alters continuously.¹⁸

¹³ 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, adopted at the end of a public procedure [...] that being the condition for their applicability”. See [2024 ODIHR Guidelines on Democratic Lawmaking for Better Laws](#), para. 23; paragraph 60 of the 2016 Venice Commission [Rule of Law Checklist](#).

¹⁴ Paragraph I.2.2.iv of the 2002 Venice Commission [Code of Good Practice in Electoral Matters](#) states that “The permissible departure from the norm should not be more than 10%, and should certainly not exceed 15 percent except in special circumstances (protection of a concentrated minority, sparsely populated administrative entity).”

¹⁵ The CEC [announcement](#) about the borders of the [30 multi-mandate districts](#). Considering the total number of voters an average number of voters per electoral district shall be about 142,900.

¹⁶ The number of polling stations was under consideration at the time of the report drafting. On 8 October, the CEC [informed](#) that voting will be organized in 34 countries abroad, and 41 additional PSs abroad were to be opened. Of the PSs abroad, 40 will be opened in the Russian Federation, 8 in Türkiye, 7 in Kazakhstan, 6 in the USA, 4 in South Korea, 3 in Italy, and 2 in Germany, China, UAE, and 1 PS in 24 other countries.

¹⁷ TECs lost relevance for parliamentary elections upon the 2025 electoral system reform, but exist for other elections. The CEC [formed](#) the DECs on 3 October, and shall be dissolved after the announcement of the results.

¹⁸ On 25 and 30 September respectively, two president’s nominees at the CEC, and two municipality nominees in both Alay and Chon-Alay [TECs](#) were substituted.

The parliament appoints half of the 12-member CEC upon nomination of the president and half upon its own proposal.¹⁹ The CEC elects its chairperson by a simple majority of voting members.²⁰ The DEC and PECs consist, respectively, of at least 12 members and at least 7 members, depending on the size of each electoral district or precinct. The CEC forms DEC, and the DEC forms PEC, appointing commissioners from the roster formed based on an equal number of nominations by political parties and local self-government bodies. Registered candidates are entitled to have their representatives on the election commissions.

Women are well represented in DEC and PEC, with 52 and 65 per cent of women, respectively, unlike the CEC composition, with only 2 women of 12 CEC members.²¹ National minority groups or persons with disabilities do not enjoy any legally guaranteed quota in the election administration.

The CEC has already begun actively preparing for the elections, with some regulatory acts pending adoption.²² In anticipation of an early election, the CEC initiated a large-scale voter information campaign through interviews and media on the new electoral system, electoral procedures, remote and homebound voting modalities, ballot scanning equipment and biometric recognition devices. The CEC also conducted trainings on new electoral procedures and voting equipment for the lower-level election administration.

These elections will be administered with new voting equipment introduced to combine most voting procedures and enable electronic tabulation of preliminary results.²³ The voters will have the possibility to vote at any polling station, including outside of their electoral district, with the so-called remote voting option.²⁴ All machines in-country and abroad are programmed to generate ballots with the candidates for the district where the voter is registered, regardless of the place s/he choose to vote. While most ODIHR NAM interlocutors stated that technical aspects of remote voting have been tested and are ready for use, some raised concerns about the lack of comprehensive regulation and clarity on how the tabulation and transfer of the remote voting results will be organized. Concerns about potential connectivity interruption were also raised.²⁵ A nationwide test of equipment in all PECs was scheduled for 6 October.

Most ODIHR NAM interlocutors expressed high confidence in the capacity of election administration to conduct electoral procedures, but expressed uncertainty as to its technical preparedness and the integrity of remote voting.

¹⁹ The parliament may return the proposed candidacy to the president with a motivated objection, but the president may re-nominate the same individual.

²⁰ The Law on the CEC requires the CEC chairperson and the deputy to be trained lawyers or be experienced in elections as candidates or election commission members.

²¹ On 12 September, the parliament [terminated](#) the mandates of two other women CEC members nominated by the president (explained by their resignation), substituting them with two men. Both candidacies of new CEC members were nominated by the president and were appointed by the parliament.

²² For example, subsidiary legislation on processing of remote voting election results and methodology on free campaign airtime distribution among the candidates.

²³ The new machines combine biometric voter identification, including face and fingerprint scanning with ID checks; registration of participation to prevent multiple voting; ballot printing, and results tabulation. The electronically generated results will serve as preliminary, while manual counting remains obligatory and only manually counted results will be legally valid.

²⁴ The election law prescribes that remote voting shall be requested upon scheduling of every election, and for the 2025 early elections were required by the president in his 30 September decree.

²⁵ In case of interruption, the respective polling station will be disconnected from the central unified database, and will not be allowed to generate ballot papers for other electoral districts.

D. VOTER REGISTRATION

Citizens who are at least 18 years of age on election day are eligible to vote, except those serving a prison sentence, irrespective of the gravity of the crime, and those whose legal capacity was withdrawn by a judicial decision, contrary to international standards.²⁶ On 26 September, the CEC announced that the preliminary number of voters for the 2025 early elections is 4,237,000.

Voter registration is passive. For parliamentary elections, inclusion into the voter list is conditional to biometric registration and permanent residency registration at least 60 days prior to election day.²⁷ The voter list is generated from the Unified State Population Register administered by the State Registration Agency (SRA “Kyzmat”) 53 days prior to elections.²⁸ Voter list scrutiny is conducted online and in PECs, corrections can be requested up to 10 days prior to elections. Voter lists are finalised seven days prior to elections and transferred for the preparation of voting equipment. The CEC initiated the voter registration database audit with the National Personal Data Protection Agency to assess the safety of the biometric information processing with the new voting equipment.²⁹

A copy of the finalised voter list will be displayed at polling stations. ODIHR NAM interlocutors generally expressed trust in the voter registration system, but expressed reservations as to the reliability of voter identification at the polling stations.

E. CANDIDATE REGISTRATION

The right to be elected is granted to voters of at least 25 years of age with a higher education, permanently residing in Kyrgyzstan for at least 5 years prior to elections.³⁰ The Constitution maintains the prohibition on public and civil service for holders of dual citizenship, contrary to the ODIHR and Venice Commission recommendations.³¹ The law obliges certain categories of state and municipal officials to resign to be registered as a candidate.³²

Furthermore, recent legal amendments introduced requirements for proficiency in the Kyrgyz language, extended limitations on candidacy for those with criminal convictions to include expunged convictions, and criminal charges on certain grounds even if the case was closed without indictment. The amendments rendered candidate registration conditional on a 300,000 KGS non-refundable fee, which the majority of the ODIHR NAM interlocutors considered a potential barrier for participation.³³

²⁶ Paragraph 7.3 of the 1990 OSCE Copenhagen Document provides that participating States will “guarantee universal and equal suffrage to adult citizens”, while Paragraph 24 provides that restrictions on rights and freedoms must be “strictly proportionate to the aim of the law”. See Article 29 of the UN [CRPD](#) and paragraph 48 of [General Comment No. 1 to Article 12 of the CRPD](#) states 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”.

²⁷ Biometric registration is mandatory for all citizens above the age of 16. The CEC informed that the efforts of the authorities to ensure availability of biometric registration resulted in a minimisation to some 8,000 citizens without biometric registration.

²⁸ There are separate lists of voters residing abroad, in military service, in detention, medical and care institutions.

²⁹ The Agency stated that the audit would be conducted prior to the elections and would tentatively assess the technical standards’ compliance of the new equipment and the legal compliance of the scope of stored and shared data.

³⁰ The law allows justified temporary absence from the country for up to six months per year due to professional or scientific reasons.

³¹ The [ODIHR](#) and Venice Commission [2020 Joint Opinion on the Amendments to Some Legislative Acts Related to Sanctions for Violation 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).

³² Political officials (except for MPs) as well as heads of state and municipal enterprises and their affiliated entities should resign from the moment they are nominated as candidates.

³³ The fee is 3,000 calculation units (c.u.), 1 c.u. equals to 100 KGS. 1 EUR equals to KGS 98. The election law provides for a decreased registration fee for candidates with disabilities; there are several grades of the decrease, depending on the severity of disability.

Candidates can be nominated by registered political parties or independently. An individual can compete in only one electoral district. Political parties may nominate one candidate per electoral district.³⁴ There are no quotas for national minorities or for persons with disability. According to ODIHR NAM interlocutors, political parties are not likely going to nominate candidates and most will run independently.

The CEC registers candidates in all electoral districts under expedited deadlines. The deadline for candidate nomination is 30 October; the CEC has 7 days to verify and register candidacies or issue motivated decisions on denials.³⁵ The registration is finalised by 10 November, when the election campaign starts.³⁶ The digital tool for candidate registration developed by the CEC allows online submission of registration documents and their verification due to synchronization with the centralised database of registries from various institutions.

F. ELECTION CAMPAIGN

Election campaign for early elections is shorter than for regularly held elections, for these elections from 10 to 29 November. The election administration ensures compliance with the campaign requirements prescribed by the law, including equality of campaign opportunities, truthful and objective campaign information, and non-discriminatory and impartial media coverage. Campaigning against all is allowed.

The election law provides for measures against misuse of office and administrative resources, vote-buying and unethical campaigning, which may also lead to deregistration of candidates.³⁷ Most ODIHR NAM interlocutors raised concerns about new provisions that allow contestants to recruit 1,000 activists, referring to past experiences when similar measures provoked vote-buying schemes. Under the recent amendments, the candidates are exempt from the responsibility for third-party violations or damage.

Most ODIHR NAM interlocutors expect a subdued campaign, mainly on social media or via door-to-door canvassing, and stated that the main campaign topics have not yet emerged. Candidates are entitled to state-sponsored airtime, print space and venues offered on equal conditions. The law requires campaign-related information to be available in accessible formats for persons with disabilities, including in audio and video formats with sign language translation or subtitles, printed in large readable font, or in Braille.

G. CAMPAIGN FINANCE

Campaign finance is primarily regulated by the election law and subsidiary acts of the CEC. The recent legal amendments clarified some rules of campaign financing, including individual donations, stipulated the deregistration of candidates for 0.5 per cent excess over the campaign spending limit and explicitly prohibited donations via anonymized payment services.

³⁴ Party nominees cannot hold membership in other political parties, but may be without party affiliation.

³⁵ Decisions to deny registration can be contested at court within two days.

³⁶ Registered candidates may withdraw by 23 November. If none or less than 3 candidates are registered per electoral district, the elections shall be postponed for 17 days.

³⁷ Public servants, municipal employees or media workers suspend the exercise of official or office powers from the moment they are nominated as candidates, while some office holders have to resign to compete. Campaigning, publication and distribution of campaign materials is prohibited for civil and public servants, and observes. Candidates and their families are prohibited to engage in charitable activities. The use of religious themes, concerts, theatrical performances and sport events are prohibited. However, distribution of information about professional activities of candidates is excluded from the notion of campaigning.

Election campaigns can be financed from monetary donations and candidates' and parties' funds, subject to limitations on amounts and sources.³⁸ The CEC informed the ODIHR NAM that banks will check the legality of donations and limits compliance. ODIHR NAM interlocutors anticipated that for these early elections the campaigns will primarily be financed from personal funds of candidates or bank loans. The total amount of campaign expenses is limited to KGS 20,000,000 per candidate.

Candidates must open a dedicated bank account for all campaign-related transactions.³⁹ Some ODIHR NAM interlocutors regretted that campaign donations cannot be transferred with simplified banking tools, such as QR codes, fundraising platforms or cyber wallets. The CEC explained that their use was limited due to a lack of transparency and control over the lawfulness of such transfers. It was also mentioned that the two state banks conventionally accredited for election campaigns are to develop user-friendly interfaces for campaign accounts.

The CEC regulates and oversees campaign finance and created a specialized inter-agency working group. Candidates shall submit an interim and a final campaign finance reports five days before and after election day, respectively, covering all financial sources, their amounts and campaign expenditure. The CEC will audit the reports based on financial data from the banks and its campaign monitoring findings.

H. MEDIA ENVIRONMENT

The media environment, while still offering some plurality, is narrowing. Some ODIHR NAM interlocutors cited limited access to funding and advertisement revenues, increased pressure on independent media and self-censorship as contributing to this. Social media became the primary source of information, including for political information and the news. Since 2025, Kyrgyzstan has introduced a state monopoly on internet traffic, with exclusive rights of the ElKat company.

The media coverage of election campaigns is primarily regulated by the election law. The legal regulation on media changed with the adoption of the new Law on Media in 2025, which requires state registration, including for online media, and limits the share of foreign ownership to 35 per cent, which ODIHR NAM interlocutors assessed as restrictive. Furthermore, the Code of Administrative Offences was amended to prescribe fines for libel, defamation and distribution of false information of some EUR 750 for a legal entity and EUR 470 for individuals.

The state-owned National TV and Radio Corporation of Kyrgyzstan (NTRK) comprises six nationwide central TV stations, four national radio stations and seven regional channels, including 24/7 news channels.⁴⁰

Registration with the CEC is required for media outlets to cover the election campaign and publish or broadcast political advertising. In line with the legal amendments, state-funded media will provide free airtime only for contesting candidates, not political parties. The candidates will be entitled to ten minutes of free airtime, part of which shall be spent on the debates and one-page free space for

³⁸ Candidates shall establish their campaign funds from personal contributions (up to KGS 10,000,000), political party's funds (if nominated by a party, KGS 1,000,000) and donations from individuals and legal entities (up to KGS 500,000). Campaign funds of political parties can include the personal funds of candidates (limited to KGS 1,500,000); political party funds (up to KGS 100,000,000); individual donations (up to KGS 200,000); donations from legal entities (up to KGS 3,000,000). Donations from anonymous and foreign sources, the clergy, judiciary, military, public and civil servants and those with debts to the state are prohibited.

³⁹ While the law does not limit bank's participation in campaign, the two state banks, Eldik Bank and Aiyyal Bank, are always chosen to work on campaigns. On 3 October, the CEC accredited these two banks to service the 2025 election campaign. The CEC stated that to date no private banks applied or were competitive for that purpose.

⁴⁰ In 2022, the president [reformed](#) the system of national and regional TV and radio channels, merging them into one NTVR corporation, exercising executive control over the policy and content, with the management appointed by the executive.

campaigning in print media. Public and private media may provide paid campaign space on an equal basis at a price not exceeding the six-month average. It is prohibited to broadcast programmes disgracing or discrediting the honour, dignity and reputation of candidates and political parties, and the publishing media bears liability for the content it airs. Publication of opinion polls is allowed up to five days prior to elections.

The national broadcaster plans to organize debates and provide informative, expert, and entertainment programmes on elections adjusted for various target groups. NTRK informed that all election-related programmes contain measures to ensure accessibility for persons with disability, including sign language and subtitles.

The CEC is in charge of the oversight over the legality of the election campaign in the media and plans to conduct media monitoring to identify violations. The CEC informed the ODIHR NAM about methodological and administrative constraints in social media monitoring. The CEC may initiate administrative sanctions or exclude media outlets from participation in the election campaign coverage. The Committee of National Security (KNB) is in charge of the prevention of the dissemination of false information and all aspects of cybersecurity and oversight.

I. ELECTION DISPUTE RESOLUTION

Actions and decisions of the election administration are subject to hierarchical review and judicial appeal. Upper election commissions shall decide on the merits of annulled decisions of lower commissions. The CEC may initiate and examine administrative offences, issue warnings, impose fines and revoke candidate's registration for a vast variety of violations. ODIHR NAM interlocutors stated that the sanctions for most campaign violations were dissuasive.

The Administrative Court of Bishkek reviews CEC decisions, while the Supreme Court decides on cassation. I Following recent amendments, some types of CEC decisions will not be subject to judicial review, but the circumstances for this are not specified.⁴¹ The courts shall review election-related disputes in public hearings and adopt motivated decisions. The system for online submission of administrative complaints is currently under development.

The right to contest election-related decisions, actions or inactions of public agencies and candidates is granted to voters, contestants, their proxies, political parties, non-governmental organisations (NGOs) and election observers. Despite a prior ODIHR recommendation, legal standing for voters has not been expanded.⁴² Election-related complaints can be lodge within three days, and reviewed within three to five days; the Supreme Court has five days. Prosecution and law-enforcement have two to three days to review a complaint, with immediate review of those submitted on election day.

As per established practice, the CEC will maintain an online complaint register, indicating the stage, status and outcome of the review. It has formed a working group on complaints and participated in the Rapid Reaction Task-Force composed of the election administration, the prosecution, the law enforcement and state security forces established to decide on the processing of election-related issues.

⁴¹ During the ODIHR NAM, members of the judiciary interpreted the norm to imply the CEC decisions and acts cannot be subject to judicial review under new or newly disclosed circumstances, however, as the matter is not regulated in the election law it is to be discussed by the Supreme Court plenum.

⁴² Article 2.3 of the [ICCPR](#) requires 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: "everyone will have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity". Section II.3.3f of the 2002 Venice Commission [Code of Good Practice in Electoral Matters](#) recommends that "All 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".

J. ELECTION OBSERVATION

The election law provides for observation of all stages of the electoral process by candidates, civil society organisations (CSOs) and international observers. Candidates may accredit two observers per election commission, CSOs up to three observers per commission, but only one of each group is allowed to observe at a time. Observers are entitled to submit complaints about the actions and inactions of election commissions. Observers can be accredited up to election day, and their accreditation ceases with the publication of election results. Accreditation of observers can be terminated by the election commissions in case of violations of the law, including for violations of the scope of their functions.

Election observation of the early parliamentary elections will be severely limited for the civil society groups, due to the lack of funding and changes following recent legislation impacting civil society that categorizes citizen election observation as a “political activity”, which for CSOs with foreign funding would necessitate registration as “a foreign representative”. Most ODIHR NAM interlocutors stressed the decreasing space for civil society and expressed concerns about the feasibility of independent citizen observation of the upcoming elections.

IV. CONCLUSIONS AND RECOMMENDATIONS

All ODIHR NAM interlocutors expressed a high degree of confidence in the ability of the election administration to professionally administer early parliamentary elections, despite the condensed timelines. At the same time, all ODIHR NAM interlocutors stressed a strong need for an election observation activity and requested ODIHR to deploy a high number of observers to cover all stages of the electoral process. In particular, ODIHR NAM interlocutors highlighted the need to observe the legal framework and its implementation, candidate registration, the conduct of the campaign, campaign finance, election dispute resolution, the use of new technologies and election day procedures. In addition, numerous ODIHR NAM interlocutors stressed the importance of observing the participation of women, persons with disabilities, and representatives of national minorities.

Based on the findings of this report, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the upcoming 30 November 2025 early parliamentary elections. In addition to a core team of analysts, ODIHR will request the secondment by OSCE participating States of 30 long-term observers to follow the electoral process countrywide, as well as 300 short-term observers to follow election day procedures. In line with ODIHR’s standard methodology, the EOM will include a media monitoring element.

ANNEX: LIST OF MEETINGS

Central Commission for Elections and Referenda

Tanchtyk Shainazarov, Chairman
Ainara Zhupuieva, Deputy Chairperson
Aisuluu Bukambaieva, Director, Center for Civic Education and Electoral Technologies
Askar Akimbaev, Head of the Department of Information and Communication Technologies
Mahabat Kozhokeeva, Head of the Department of Organisation of Electoral Process
Bakyt Sheripbayev, Commissioner for Corruption Prevention
Munara kzy Amangeldi, Head of Sector, Coordination Task-Force

Jogorku Kenesh of the Kyrgyz Republic⁴³

Dastan Bekeshev, Member of Parliament
Aisuluu Mamashova, Member of Parliament, Chairperson, Forum of Women Parliamentarians of Jogorku Kenesh
Nurzhan Bardinova, Head of Secretariat, Council on the rights of women, children, and gender equality of the *Toraga* of Jogorku Kenesh

Supreme Court

Elmira Baytikova, Acting Deputy Chairperson of the Supreme Court

Administrative Court of Bishkek

Azis Eshaliyev, President of the Court
Ermek Imanaliyev, Judge
Akylbek Dosaliyev, Judge

Ministry of Digital Development and Innovative Technologies

Aibek Mambetkulov, Head of Department of Corporate Security and Corruption Prevention
Azamat Saadakbetayev, Head of Department of Cyber Policy Development
Nazima Baktiyarova, Chair of Analytical Center of the Department of Inter-institutional Coordination and Project Implementation

State Agency on Personal Data Protection under the Cabinet of Ministers

Almazbek Usenov, Director
Zhybek Abdullaeva, Deputy Director
Kylym Madalbekov, Director, Training Center
Tursun Mambetakunova, Head, Department of Legislative Expertise and Legal Support

State Agency “Kyzmat” under the Office of the President of the Kyrgyz Republic

Azamat Dolubaiev, Coordinator, Analyst
Ainura Zamirbekova, Project Manager

Office of the Ombusperson

Zhanibek Zhorobaev, Deputy Akyikatchy (Ombudsman) of the Kyrgyz Republic
Akzhol Abdukerimov, Head, Department of Consolidated Analysis, Planning and Cooperation
Chingiz Doronbekov, Head, Department for Monitoring the Compliance with Civil and Political Rights
Akbar Amanov, Expert, Department for Monitoring the Compliance with Civil and Political Rights
Amanbek Adylov, Expert, Department of Consolidated Analysis, Planning and Cooperation

⁴³ Meetings were requested with all parliamentary factions and groups.

Abdylkazym Doolotov, Inspector, Department for Monitoring the Compliance with Civil and Political Rights

Media and Civil Society

National TV and Radio Broadcasting Corporation

Bolotbek Tillebayev, Director General

Ulan Satiyev, Deputy Director General for Information

Suita Sourbayeva, Deputy Director General for Content

Chynar Kapayeva, Manager of Affairs

Bakytbek Sakybayev, Producer, Studio ‘*Maalymat*’

Kalyinur Saliev, Head, Department of External Affairs

Aijan Diysheeva, Leading Specialist, Legal Department

Other representatives of media and civil society organisations

International Organizations and Diplomatic Community

Volker Frobarth, Head, OSCE Programme Office in Bishkek

Antje Grawe, the UN Resident Coordinator in Kyrgyzstan

Representatives of diplomatic missions of the Czech Republic, the Federal Republic of Germany, the French Republic, the Hellenic Republic, the Republic of Portugal, the Russian Federation, Swiss Confederation, the Republic of Türkiye, the United Kingdom of Great Britain and Northern Ireland, the United States of America.⁴⁴

⁴⁴ The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in Kyrgyzstan.