

INTERIM REPORT
21 October – 12 November 2025

14 November 2025

I. EXECUTIVE SUMMARY

- On 30 September, President Sadyr Japarov announced early parliamentary elections for the unicameral parliament (*Jogorku Kenesh*) to be held on 30 November, following the parliament's self-dissolution on 25 September. Several ODIHR EOM interlocutors indicated that the upcoming elections, as well as the precursory broad legislative and institutional reforms, are viewed as a further step in consolidating presidential powers.
- The legal framework for elections has undergone extensive amendments in 2025, fundamentally changing most aspects of the electoral framework, without addressing prior key ODIHR recommendations. The amendments introduced a new electoral system with a new gender quota and electoral district delineation system, restricted candidate eligibility and required a non-refundable candidate registration fee, and changed campaign financing and campaign regulations. Some ODIHR EOM interlocutors questioned the inclusiveness and transparency of the legislative process.
- The 90 members of parliament will be elected under a newly introduced majoritarian single non-transferable vote system (SNTV) across 30 three-member electoral districts. The new rules require that one of the winning candidates in each district should be of underrepresented gender, while quotas for minority and persons with disabilities were abolished. The number of voters in the newly delineated electoral districts varies significantly. Demographic data on ethnicity was not taken into account when forming electoral districts, despite ODIHR recommendations.
- The elections are administered by the Central Commission for Elections and Referenda (CEC), 30 District Election Commissions (DECs), and some 2,500 Precinct Election Commissions (PECs), 100 of which abroad. The CEC has to date administered technical preparations within the expedited deadlines for early elections. During the reporting period, the CEC held regular livestreamed sessions open to international observers and candidates and published most decisions. Training of election officials and the voter information campaigns are ongoing. The law provides for a list of measures to enhance the participation of persons with disabilities, including accessibility standards and tools, mobile and assisted voting provisions and accessible polling station mapping.
- The elections will be conducted using new voting equipment that integrates most voting procedures and enables the electronic tabulation of preliminary results; however, only manually counted results will be legally valid. Voters will have the possibility to vote at any polling station outside their electoral district with the remote voting option implemented for the first time in general elections. While most ODIHR EOM interlocutors noted that the technical aspects of remote voting have been successfully tested, some expressed concerns about the lack of transparency in the procurement process for the voting equipment and the lack of comprehensive regulation of election day procedures for remote voting, which limit clarity.
- Citizens of at least 18 years of age are eligible to vote, except those serving a prison sentence, regardless of the gravity of the crime committed, and those declared legally incompetent by a court, contrary to international standards. Voter registration is passive, based on permanent

residency, and requires mandatory biometric registration. Voter lists are generated from the Unified State Population Register administered by the State Registration Agency “Kyzmat”. Preliminary lists were available for public inspection online and at PEC premises and voters could request corrections. As of 10 November, 4,297,040 voters were registered.

- Eligible voters of at least 25 years of age, with higher education, permanently residing in the country for at least 5 years before the elections, without convictions or some terminated criminal charges, may stand as candidates. Recent legal amendments further expanded the restrictions on the right to stand, contrary to prior ODIHR recommendations to grant wider eligibility. Candidates could be nominated by registered political parties or independently up until 30 October. On 8 November, 467 candidates, including 191 women (41 per cent) and 13 minority candidates (3 per cent), were registered, of whom 458 are self-nominated, and the rest from one political party. Registration was denied for 57 nominated candidates. The majority of ODIHR EOM interlocutors considered the new non-refundable registration fee a barrier to participation.
- The election campaign began on 10 November and will last until 29 November. Early campaigning is not allowed and the CEC has examined numerous cases of alleged early campaigning, mostly online. The election law prohibits misuse of office and administrative resources, vote-buying, the dissemination of false information, and criticising opponents while campaigning on state media. The election administration is responsible for ensuring compliance with the campaign requirements. ODIHR EOM interlocutors expect the election campaign to mainly address local issues. The candidates plan to employ various campaign methods, including indoor gatherings, door-to-door canvassing and campaigning on social networks.
- Election campaigns can be financed from the candidate’s or political party’s own resources and voluntary monetary donations from citizens and legal entities, subject to specific limits of amounts and sources. Candidates and political parties shall submit interim and final reports on donations and expenditures. The CEC oversees campaign finance, acts on violations, verifies reports, and shall publish the most relevant information online, except for audit findings. Banks are mandated to check the legality of donations and limits, and regularly inform the CEC.
- The media landscape changed significantly since 2021, and, although some plurality remains, it is rapidly narrowing. The new 2025 Law on the Media has introduced registration requirements for online media, limits on foreign ownership of 35 per cent, and prohibited freelance journalistic activities. State-owned or funded media must provide free airtime or space to contestants, where criticism of other contestants is forbidden. Contestants may purchase election campaign advertising under equal conditions. On 8 November, election commissions distributed airtime among contestants, allocating 5 minutes for individual presentations and 25 minutes for participation in debates. ODIHR EOM interlocutors raised concerns that recent increases in prosecutions of journalists and closures of media outlets have led to widespread self-censorship.
- Actions, inactions and decisions of the election commissions are subject to hierarchical review and judicial appeal. According to the CEC’s online register there have been 49 cases, mostly concerning early campaign violations, including on social networks, as well as the misuse of administrative resources and office, and defamation. Complaints are not considered during CEC sessions and information is limited on cases that did not result in a sanction. The Administrative Court of Bishkek found one appeal inadmissible and rejected five on merits.
- The law provides for citizen, candidate and international election observation. Many ODIHR EOM interlocutors raised concerns about the feasibility of citizen observation due to funding limitations and recent legislative changes that may require domestic election observers to be registered as

performing the function of foreign representatives”. To date, the CEC accredited 297 international observers and no citizen observers.

II. INTRODUCTION

Following an invitation from the authorities of the Kyrgyz Republic to observe the 30 November early parliamentary election and based on the recommendation of a Needs Assessment Mission conducted from 29 September to 3 October, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) established an Election Observation Mission (EOM) on 21 October.¹ The ODIHR EOM, headed by Tamás Meszerics, consists of a 13-member core team based in Bishkek and 30 long-term observers deployed on 29 October across the country. Mission members are drawn from 26 OSCE participating States, and 49 per cent of mission members are women. ODIHR has requested participating States to second 300 short-term observers to observe election-day proceedings.

III. BACKGROUND AND POLITICAL CONTEXT

On 30 September, President Sadyr Japarov announced early parliamentary elections to be held on 30 November, following the parliament’s self-dissolution on 25 September.² The parliamentary initiative to self-dissolve was described by the authorities as an attempt to lessen the administrative and social pressures of consecutive parliamentary and presidential election campaigns under a new electoral system.³ Several ODIHR EOM interlocutors have indicated that the upcoming elections are viewed as a further step in consolidating presidential powers and were planned as part of the 2025 electoral reform.⁴

The outgoing parliament was elected in November 2021, following the cancellation of the October 2020 elections in response to large-scale and violent public protests.⁵ Women held 20 out of 90 seats in the outgoing parliament, 1 out of 23 ministerial positions, and none of the 7 governor’s positions.

The period after the 2021 referendum re-introducing the presidential system was characterised by the shift of the balance of powers. A centralised governance model was enabled through the restructuring of state institutions and redistribution of their functions, including the judiciary, anti-corruption measures and the strengthened authority of state security structures, rendering the dominant role in political life to the president.⁶ Consequently, the political landscape underwent major reconfiguration, with fragmentation and a noted weakening of the influence of political parties. The new 2025 reform

¹ See previous [ODIHR election observation reports on the Kyrgyz Republic](#).

² The proposal for parliament’s self-dissolution was initiated by 32 members and adopted with 84 votes. Under the Constitution and the Law “On the Rules of Procedure of *Jogorku Kenesh*”, such proposal can be initiated by one-third (30) of all MPs (90), and requires the support of at least two-thirds (60) of all MPs. The president’s [decree](#) set the elections for 30 November and required the CEC to carry out remote voting.

³ See the statements by the [president](#) and the chairperson of the [parliament](#).

⁴ In August 2024, President Japarov [emphasised](#) that “the vertical of power must be strong and strict” and thanked the parliament for their “support [...to] our important decisions, major projects, reforms, and legislative initiatives without delay or empty words.”

⁵ *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). Thirty-six members of parliament (MPs) were not nominated by political parties (CEC source).

⁶ Mr. Japarov was elected in the January 2021 presidential election, held simultaneously with the referendum that strengthened the presidential mandate. The Constitution adopted in April 2021 following the referendum institutionalised the presidential system.

agenda introduced by the president focuses on building a “New Kyrgyzstan” through further deep governance and economic reforms, proclaimed to aim at strengthening statehood.⁷

Recent legislative changes affecting civil society and the media, along with prosecutions of activists and journalists,⁸ faced criticism from international human rights institutions and organizations for further restricting their ability to operate independently.⁹

IV. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The legal framework for the parliamentary elections comprises the 2021 Constitution, the 2011 the Constitutional Law “On Election of the President of the Kyrgyz Republic and Deputies of the *Jogorku Kenesh* of the Kyrgyz Republic” (Election Law, last amended in October 2025), the 2021 Constitutional Law on the Central Commission for Elections and Referenda (last amended in July 2025), and the 2011 Law on Election Commissions (last amended in 2021), supplemented by the CEC regulations.¹⁰ The Kyrgyz Republic is a party to major international and regional instruments on democratic elections.¹¹

The Election Law was amended seven times in 2025, most recently in October 2025, fundamentally altering most aspects of the electoral framework, without addressing key previous ODIHR recommendations.¹² The amendments introduced a new electoral system with a new gender representation quota and electoral districts delineation, further restricted candidate eligibility, introduced a non-refundable candidate registration fee, changed campaign financing and campaign regulations, and exempted some CEC decisions from judicial review. Some ODIHR EOM interlocutors stated that changes to the key elements of the electoral system shortly prior to the elections undermine stability of the law and limit the opportunities for informed voters’ choice. The ODIHR 2025 Legal Opinion on the Draft Amendments to the Election Law noted that the amendments were adopted in a

⁷ See the [address of President Japarov](#) on 2 September 2025. The president’s [decree on the National Development Strategy for Kyrgyzstan](#) until 2030 was published in June 2025.

⁸ See the statements of the Office of the High Commissioner for Human Rights on the [situation with the freedom of expression](#) in Kyrgyzstan, in which concerns were raised about the [narrowing space](#) for civil society and independent media, increased fear and self-censorship. See also reports by [Human Rights Watch](#), [International Partnership for Human Rights](#), [Human Rights Defender](#) and [Amnesty International](#).

⁹ 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. The 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”.

¹⁰ Other election-related provisions are contained in the 1999 Law on Political Parties (last amended in 2025), the 2012 Law on Assemblies, the 2021 Criminal Code (last amended in 2025), and the 2021 Code of Administrative Offences (last amended in 2025).

¹¹ These include the [1966 International Covenant on Civil and Political Rights](#) (ICCPR), the [1975 Convention on the Elimination of All Forms of Racial Discrimination](#) (ICERD), the [1979 Convention on the Elimination of All Forms of Discrimination Against Women](#) (CEDAW) and its [Optional Protocol](#), the [2006 Convention on the Rights of Persons with Disabilities](#) (CRPD), the [2003 UN Convention Against Corruption](#) (UNCAC), and the [2002 CIS Convention on Standards of Democratic Elections, Electoral Rights and Freedoms](#).

¹² The 2025 amendments were introduced under the Constitutional Laws No [39](#) of 19 February 2025, No [73](#) of 7 April 2025, No [82](#) of 28 April 2025, No [113](#) of 9 June 2025, No [161](#) of 28 July 2025, No [194](#) of 9 August 2025 and No [220](#) of 16 October 2025. See paragraph 19 and 66 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”.

condensed timeframe, limiting opportunities for meaningful public consultation and raising concerns about the inclusiveness of the legislative process.¹³

The 90-member unicameral parliament is elected for a five-year term across 30 three-member districts under a majoritarian single non-transferable vote (SNTV) system, introduced by the 2025 amendments.¹⁴ Voters may vote for only one candidate or against all. The three top candidates in a district are elected, one of which shall be a candidate of the underrepresented gender. The thirty parliamentary mandates reserved for the candidates of the underrepresented gender are generally presented as a “women quota”.¹⁵ While ODIHR EOM interlocutors welcomed an attempt to strengthen political participation of women, some expressed concern that the current design of the gender quota may undermine the legitimacy of women parliamentarians. Other concerns about the new electoral system that interlocutors shared with ODIHR EOM include that the SNTV system could weaken political parties, lead to localized patronage networks, and undermine the development of a coherent national political agenda.

The Election Law stipulates that districts should be contiguous, preferably respecting administrative boundaries, and have approximately equal numbers of voters, with a permissible deviation of up to 20 per cent from the national average.¹⁶ The CEC is mandated to delineate the electoral districts prior to parliamentary elections, which was completed on 1 October 2025, within the legal deadline. The number of voters in the newly delineated electoral districts varies significantly.¹⁷ According to the CEC, the demographic data on ethnicity was not taken into account when forming electoral districts, despite ODIHR recommendations.¹⁸ While the CEC and the representatives of several District and Precinct Election Commissions (DECs and PECs) stated that the new district boundaries could enhance the electoral prospects of national minority candidates, other ODIHR EOM interlocutors noted that the size and configuration of some electoral districts could reduce the overall share of minority votes.

V. ELECTION ADMINISTRATION

Parliamentary elections are administered by a hierarchical three-tier system of election commissions, with the Central Commission for Elections and Referenda (CEC), 30 District Election Commissions, and some 2,500 Precinct Election Commissions.¹⁹

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 [Constitutional Law No. 113](#) of 9 June 2025 on Amendments to Certain Legislative Acts of the Kyrgyz Republic. Since 2021, the electoral system is not defined in the Constitution.

¹⁵ If there are no candidates elected of the required gender, the mandate of the third placed candidate is reserved for the candidate of the opposite gender with the most votes in that district.

¹⁶ Paragraph I.2.2.iv of the [2002 Venice Commission Code of Good Practice in Electoral Matters](#) provides that deviations should not exceed 10 per cent and certainly not more than 15 per cent, except in special circumstances.

¹⁷ [CEC Resolution No. 88](#) of 1 October 2025 determined the 30 districts with an average of 142,900 voters. The smallest, No. 9 (Uzgen), is 14 per cent below the average, while the largest, No. 5 (Aravan), is 15 per cent above, although within the legally allowed 20 per cent deviation.

¹⁸ See the 2025 [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’”, Key Recommendation (D) and paragraph 25.

¹⁹ As of 8 November, the CEC decided to establish 100 polling stations abroad in 34 countries, including 40 in the Russian Federation, 8 in Türkiye, 7 in Kazakhstan, 6 each in the United States of America and Canada, and 4 in the Republic of Korea. Territorial Election Commissions (TECs) remain part of the election administration, but do not operate for parliamentary elections.

The parliament appoints half of the 12-member CEC upon nomination of the president and half upon its own proposal for a five-year term.²⁰ Only the CEC Chairperson and the two Deputy Chairpersons work on a permanent basis. The current CEC was elected in 2021.

For parliamentary elections, the CEC forms DEC from among TEC members to conduct parliamentary elections in each electoral district.²¹ DEC comprises at least 12 members and are dissolved upon the official publication of the election results. TECs form PECs from a roster of nominees proposed in equal numbers by political parties and local self-government bodies. The size of PECs depends on the number of registered voters.²² The current PECs were formed in 2025. Registered candidates are entitled to appoint representatives to the election commissions.

Women are well represented in TECs and PECs, with some 58 and 70.5 per cent of women, respectively, unlike the CEC composition, with only 2 women of 11 CEC members.²³ National minority groups or persons with disabilities do not enjoy any legally guaranteed quota in the election administration. There have been 18 changes in the composition of the DEC, since their formation on 3 October 2025.

Technical preparations have to date proceeded within the expedited deadlines for early elections. To date, the CEC has held regular sessions, deciding, *inter alia*, on candidate registration, changes to the election administration composition, the accreditation of candidate representatives and observers, and examined complaints. CEC members participate either in person or online; sessions are livestreamed and attended by international observers and representatives of candidates. Agendas, decisions, and regular updates on the commission's work are published on the CEC website. All the 30 DEC the ODIHR EOM met were fully operational, adequately resourced, and have so far completed their tasks within the deadlines. DEC sessions are convened mainly on an *ad hoc* basis.

The CEC conducts capacity-building training for lower-level commissions. The CEC voter and candidate education and information campaigns cover various topics, including the new electoral system, candidate eligibility, and voter registration in Kyrgyz and Russian languages but not in other minority languages. The legal framework stipulates measures to enhance the participation of persons with disabilities, including mapping of accessible polling stations, accessibility standards, large-print/Braille materials, adequate lighting of the voting premises, and mobile and assisted voting. Most ODIHR EOM interlocutors expressed confidence in the election administration's capacity to execute electoral procedures.

²⁰ The CEC currently comprises 11 members, pursuant to the resignation of one commissioner for incompatibility with candidacy status under the Election Law. Both the president and the parliament can also propose the dismissal of their nominees.

²¹ The CEC appoints DEC members from the TECs membership at its discretion and may take election-related experience into account for the chairperson and secretary. Where a district lies within one TEC, DEC shall be formed from that TEC's full members and reserve; where a district spans two or more TECs, DEC shall be formed only from TEC's full members.

²² PECs shall comprise no fewer than seven members for up to 500 registered voters, no fewer than nine members and no fewer than eleven members for 501–1,200 and more than 1,200 registered voters, respectively. One polling station can be established for up to 3,000 voters. Special polling stations are established in detention centers, care institutions and hospitals. Voters can request mobile voting due to health-related issues within their electoral district.

²³ On 12 September, the parliament terminated the mandates of two other female CEC members nominated by the president, due to their voluntary resignation, substituting them with two men. Both candidacies of new CEC members were nominated by the president and were appointed by the parliament.

VI. NEW VOTING TECHNOLOGIES

The parliamentary elections are conducted using new voting equipment that integrates most voting procedures and enables the electronic tabulation of preliminary results.²⁴ The new equipment combines biometric voter identification, including facial and fingerprint scanning, with ID verification; registration of participation to prevent multiple voting; ballot printing; and results tabulation. The electronically generated results will serve as preliminary, while manual counting remains mandatory, and only manually counted results will be legally valid.

Voter identification involves electronic ID verification, complemented by biometric verification of fingerprints or facial scanning; successful identification is confirmed by a voter identification slip. Ballot papers are printed on the spot and scanned upon completion in a privacy-preserving manner. The ballot scanners are programmed to automatically reject atypical ballot papers and to separate the spoiled ones to a different compartment of the ballot scanner.²⁵ After voting, the scanner will be connected to the Internet to transmit the preliminary results and scanned paper protocols to the CEC immediately.

For the first time, remote voting will be implemented nationwide.²⁶ Voters will have the option to vote at any polling station outside the electoral district where they are registered. While voting remotely, the voter is identified upon centrally stored personal data and will receive a ballot paper with the candidates from the voter's original electoral district. The ballots cast remotely will be tabulated at the DEC where the voter is registered. If there is no connectivity to the central server or to the voter's assigned polling station, the voter will be denied the option of voting remotely. Remote identification can be used only once to prevent multiple voting.

Nationwide tests of the equipment were conducted on 10, 20 and 30 October.²⁷ Most ODIHR EOM interlocutors positively assessed the use of the new voting technologies and noted that the technical aspects of remote voting have been successfully tested. Still, some expressed concerns about the lack of transparency in the procurement process of the voting equipment and the lack of comprehensive regulation of election day procedures for remote voting, which limits clarity and the perception of integrity of remote voting.²⁸

VII. VOTER REGISTRATION

Citizens of at least 18 years of age on election day are eligible to vote, except those serving a prison sentence, regardless of the gravity of the crime committed, and those declared legally incompetent by a court, contrary to international standards.²⁹ As of 10 November, 4,297,040 voters were included on the voter lists, of whom 2,082,263 are men and 2,214,777 are women.

²⁴ The contract to supply the electronic voting systems and provide support services was granted to a foreign company without a public tender.

²⁵ The ballot papers contain a unique QR code that also serves to provide a machine-aided replacement for spoiled ballot papers. The voter is not notified if the ballot paper is considered invalid upon scanning.

²⁶ Remote voting has been tested during local elections and the by-elections of MPs in 2024.

²⁷ ODIHR EOM long-term observers observed the nationwide testing of equipment on 30 October reporting several technical and logistical challenges, including connectivity issues, especially in remote areas, and short power outages or minor technical malfunctions, which were quickly resolved.

²⁸ The procedures for counting, transferring and tabulation of election results via remote voting remained unregulated.

²⁹ 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”.

Voter registration is passive, based on permanent registration, and requires mandatory biometric registration.³⁰ Voter lists are generated from the Unified State Population Register administered by the State Registration Agency (SRA) “Kyzmat”, based on voter addresses and eligibility criteria. Voter lists are updated daily during electoral periods. Separate voter lists are generated for those in military service, medical and care facilities. Preliminary lists were made available for public inspection online and at PECs by 8 and 14 October, respectively. Voters may request corrections until 19 November. Final voter lists are compiled seven days before election day. According to ODIHR EOM interlocutors, the planned voter registration database audit looking at the safety of the new systems processing of biometric information, was postponed until after the elections.³¹

Most ODIHR EOM interlocutors generally expressed trust in the accuracy of the voter register, but some criticised the remaining legal obligation for the PECs to display the lists of voters who voted in the polling stations after the voting.

VIII. CANDIDATE REGISTRATION

Voters of at least 25 years of age by election day, with higher education and at least five years of permanent residence in the country prior to the elections may stand as candidates.³² The Constitution maintains the prohibition on public and civil service for holders of dual citizenship, despite recommendations by the ODIHR and the Venice Commission.³³ The law obliges certain categories of state and municipal officials to resign before registering as a candidate.³⁴

Recent legal amendments introduced requirements for proficiency in the Kyrgyz language, and extended restrictions on candidacy for individuals with criminal record to include expunged convictions and some criminal proceedings closed without indictment. Furthermore, individuals included in preventive registers for links with criminal or armed groups are ineligible. There is also a temporary ban on participation for former clergy.

Candidates could be nominated by registered political parties or through self-nomination until 30 October. One individual may compete in only one election district. Political parties may nominate one candidate for each electoral district; the candidate list nominated by political parties may include up to 70 per cent of candidates of the same gender. The 2025 amendments to the Election Law removed quotas for participation of persons with disabilities, youth, and national minorities. Each nominated candidate must pay a non-refundable electoral fee of EUR 3,000.³⁵ Several ODIHR EOM interlocutors noted that the fee may constitute a barrier for political participation, particularly given the limited time for fundraising in early elections. Parties and candidates may withdraw no later than 10 days before

³⁰ Biometric registration is mandatory for all citizens above the age of 16. The CEC informed that the efforts of the authorities to ensure its availability decreased the number of citizens without biometric registration to some 8,000.

³¹ The auditing is to be conducted jointly by the Cybersecurity Coordination Center under the State Committee for National Security and the State Agency for Personal Data Protection under the Cabinet of Ministers.

³² The law allows justified temporary absences of up to six months per year for work, study, official or similar reasons.

³³ The 2020 ODIHR and Venice Commission [Joint Opinion](#) on the Amendments to Some Legislative Acts Related to Sanctions for Violation of Electoral Legislation of Kyrgyzstan recommended “to give due consideration to minimizing and eventually abolishing limitations on holding public offices for citizens with dual nationalities” (paragraph 32).

³⁴ 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.

³⁵ The fee is 3,000 calculation units (c.u.), 1 c.u. equals to 100 KGS (approximately 1 EUR). The law provides reduced registration fees for candidates with disabilities, with the reduction graded according to the degree of disability.

election day.³⁶ The CEC verifies submissions and registers candidates, or issues a reasoned refusal, which can be appealed at court.³⁷

The CEC received 589 nominations, including 580 self-nominated, and 9 nominated by the political party *Yntymak*.³⁸ Of these, 65 withdrew, and 57 were denied registration, based on the failure to pay the election fee or open a campaign bank account, ineligibility (including for residency, criminal record, occupation), or incomplete registration documents. The CEC published the final list of 467 registered candidates, of which 191 are women (41 per cent), and 13 belong to national minorities (3 per cent).³⁹ The number of registered candidates significantly varies among districts.⁴⁰

IX. CAMPAIGN ENVIRONMENT

The election campaign started on 10 November and will end at 08:00 on 29 November. The law gives citizens the right to participate in campaigning, be informed, and express their will, while prohibiting candidates from criticising other contestants on state media.⁴¹ State and local authorities are required to assist candidates in organizing campaign activities, such as debates or rallies, to ensure security and access to venues, and allocate equal space for campaign materials.

Early campaign is not allowed, and the CEC has examined numerous cases of alleged early campaigning, mostly online. The law prohibits the misuse of administrative resources and public office, vote-buying, preferential media access, and dissemination of false information.⁴² Opinion polls are forbidden three days before and on election day. Campaign violations may lead to warnings and the deregistration of candidates.⁴³ The election administration is responsible for ensuring compliance with the campaign requirements and the CEC formed a working group to analyse compliance with campaign rules by all the stakeholders and act upon complaints.⁴⁴ The President announced his intention to personally oversee the election campaign, requiring fair and flawless conduct of the parliamentary elections.⁴⁵

³⁶ According to Article 46 of the Election Law, the CEC may deregister a candidate at any time before election day and an elected candidate if they have lost their eligibility or, pursuant to a final court decision, are found to have committed a serious violation, including voter bribery, misuse of administrative resources, and breaches of campaign finance rules.

³⁷ Grounds for registration refusal include missing documents, non-compliance with eligibility requirements, dual nominations, failure to establish an election fund or pay the electoral fee, dual citizenship, inclusion in registers as a person involved in an organized criminal group, criminal community, armed group.

³⁸ The political party *Kyrk Uz* withdrew from participation in the early parliamentary elections.

³⁹ On 8 November, the CEC published the [candidate list](#) disaggregated per district as a news item, without publishing the resolution finalising candidate registration. On 8 November, the candidates drew lots to determine their ballot place. On 11 November, two registered candidates withdrew.

⁴⁰ There are 29 districts with at least 10 candidates, including four that feature more than 20 candidates. The lowest number of candidates - 5 - were registered in DEC 11, while the highest number - 25 - in DEC 19.

⁴¹ ODIHR EOM observed that at least in one region (DEC 18) the CEC-led voter education training advised candidates not to comment on other candidates' programmes.

⁴² Public servants, municipal employees, and media workers must suspend their official functions when nominated as candidates, with some required to resign to stand for election. Campaigning, publication and distribution of campaign materials is prohibited for civil and public servants, and observers. Candidates and their families cannot participate in charitable activities. The use of religious themes, concerts, theatrical performances and sports events are prohibited. Proving information about the professional activities of a candidate is not considered campaigning.

⁴³ On 30 September, President Japarov, in his [address](#) to the nation, specifically urged employees of local administrations, civil servants, teachers, and doctors not to interfere in the election process, warning that any interference will result in dismissal and strict accountability. The President stated that "these elections must become the most transparent and fair in our history".

⁴⁴ The group consists of 14 members, including 4 CEC members, CEC staff and external media experts. See Election Dispute Resolution Section for the information on complaints.

⁴⁵ The President [undertook](#) to "personally monitor these elections [...] as an arbiter. If unfair actions are recorded in any district, I myself will take part in the CEC proceedings or set up a commission and send my trusted people there."

ODIHR EOM interlocutors expect the election campaign to focus on local issues and held in the districts. The candidates plan to employ various campaign methods, including indoor gatherings, door-to-door canvassing and campaigning through social networks. The contestants plan to use various social networks, including Instagram, Facebook, YouTube, and messaging platforms, often as the primary campaign tool. ODIHR EOM observed some campaign preparations, while ODIHR EOM interlocutors explained that political activity remained subdued also due to strict CEC interpretation of early campaigning prohibition, with an expected increase once the official election campaign starts.

X. CAMPAIGN FINANCE

Campaign finance is primarily regulated by the Election Law, supplemented by CEC resolutions and regulations.⁴⁶ Recent legal amendments prohibited donations through unidentifiable payment systems, stipulated the deregistration of candidates for exceeding expenditure limits, and allowed candidates nominated by political parties to manage campaign finances independently from the nominating parties, while retaining access to party resources. The amendments also included advertising on social networks to the list of permitted expenses.

Campaigns may be financed from the candidate's or political party's own resources and voluntary monetary donations from citizens and legal entities, subject to limitations on amounts and sources.⁴⁷ In-kind donations are not permitted. The total campaign fund per candidate is limited to approximately EUR 200,000. According to the published financial data, the primary sources of campaign financing are personal assets of candidates, followed by donations from individuals.⁴⁸

Registered candidates and political parties must open a dedicated campaign bank account in one of the two authorised state-owned banks.⁴⁹ Some ODIHR EOM interlocutors regretted the absence of simplified online donation tools, such as QR codes or e-wallets, and expressed concern about the exclusive use of state-owned banks. The CEC explained that the databases of both banks are linked to its system to enable real-time data exchange, and that the two state banks developed more user-friendly digital interfaces for campaign accounts.

Banks are required to submit weekly transaction reports and to provide data within 24 hours upon the CEC's request. Candidates and political parties must submit interim and final reports on donations and expenditures by 22 November and 7 December 2025, respectively, and close their accounts by 3 December 2025.⁵⁰ The CEC publishes information on income and expenditures, and financial statements for each candidate's and each political party's campaign accounts on its website.⁵¹ The CEC oversees compliance with campaign financing rules, acts on violations, verifies financial transactions

⁴⁶ This includes the CEC Regulations and Resolutions No. 56 of 15 August 2025, and No. 65 of 29 August 2025.

⁴⁷ Candidates shall establish their campaign funds from personal contributions (limited to approximately EUR 100,000), political party's funds (if nominated by a party, up to approximately EUR 10,000) and donations from individuals and legal entities (not exceeding approximately EUR 5,000). Campaign funds for political parties can include personal funds of candidates (up to approximately EUR 150,000); political party funds (not exceeding approximately EUR 1 million); individual donations (of approximately EUR 2,000 maximum); and donations from legal entities (approximately EUR 30,000). Donations from anonymous and foreign sources, the clergy, judiciary, military, public and civil servants and those with debts to the state are banned.

⁴⁸ Candidates' personal assets constitute 79.2 per cent of total aggregated campaign funds at the time of registration, and individual donations amounted to 19.7 per cent. Funding from legal entities amounted to 1 per cent, from political parties - below 0.1 per cent.

⁴⁹ [CEC Resolution No. 92](#) designated state-owned *Eldik Bank* and *Aiyl Bank* as the authorised banking institutions for servicing election campaign funds.

⁵⁰ The [CEC regulation No 65](#) establishes the reporting template and provides for the publication of financial reports.

⁵¹ As of 12 November, the [CEC published](#) consolidated bank-sourced data on campaign funds for all registered contestants, with total consolidated income of approximately EUR 7,64 million and expenditures of approximately EUR 3,17 million, disaggregated by source, expenditure category, and electoral district.

and reports during the campaign, and conducts inspections and audits.⁵² While the law requires ex-post audit of campaign-finance reports, it does not define the audit procedure or require publication of audit results, contrary to prior ODIHR recommendation.

XI. MEDIA

The media landscape changed significantly since 2021, and, although some plurality remains, it is rapidly narrowing. Social networks have become the primary source of political information, followed by television.⁵³ The National Television and Radio Broadcasting Corporation of Kyrgyzstan (NTRK), nationalised in 2022, has the biggest coverage and viewership.⁵⁴ In recent years there have been a number of prosecutions of journalists and closure of independent media outlets and many ODIHR EOM interlocutors raised concerns that these have led to widespread self-censorship.⁵⁵

While the Constitution provides for freedom of expression and prohibits censorship, the previous ODIHR and Venice Commission recommendation to remove grounds for restricting these freedoms that are unduly broad or vague, has not been addressed.⁵⁶ The new 2025 Law on Mass Media requires registration of online media, limits foreign ownership to 35 per cent, and eliminates freelance journalistic activities, which was assessed by international human rights organisations as restrictive.⁵⁷ In 2025, Code of Administrative Offences was amended to introduce fines for libel, defamation and distribution of false information. The Ministry of Culture, Information, Sports and Youth Policy (MCISY) implements the state information policy, licenses broadcasters, and monitors the legal compliance by broadcast media and may remove content or block websites without prior court decision.⁵⁸

The Election Law requires equal treatment of candidates by the media and objective and reliable information. Election-related news must be presented in a separate block, without commentary. The media bears liability for publication of information that disgraces or discredits the honour, dignity, or reputation of candidates and political parties, which is prohibited. The law requires election commissions to distribute free airtime or space by lot, but does not comprehensively regulate the procedures for the distribution, which some ODIHR EOM interlocutors responsible for implementing

⁵² Under the [CEC Regulation No. 56](#) and Article 42 of the Election Law, the CEC Audit Group comprises at least seven members, including CEC officials, law-enforcement and financial experts and other state institutions.

⁵³ See the [2023 MVector Media Consumption in Kyrgyzstan report](#). According to the [Digital 2025: Kyrgyzstan](#) report, internet penetration in 2025 stood at 88.5 per cent.

⁵⁴ The 2022 Law on the National TV and Radio Broadcasting Corporation transformed the former Public Broadcasting Corporation (OTRK) to the state-owned NTRK. The NTRK's Director General is appointed and dismissed by the president. The most recent dismissal and appointment was in October 2025, during the election campaign.

⁵⁵ See statement of the Office of the High Commissioner for Human Rights [expressed concerns over imprisonment verdicts for Kyrgyz journalists](#) for charges of "calling for mass disorder," and criticizing the prosecutions as "marred by due process and fair trial concerns." In September 2025, two former media workers from *Kloop* were [sentenced](#) to five years in prison on charges of "public calls for mass unrest". On 27 October, three media outlets (*Kloop kg*, *Temirov Live*, and *Ait Ait Dese*) were recognised as extremist and their activities in Kyrgyzstan were [banned](#) by the court. In July 2025, independent journalist and activist Kanyshai Mamyrkulova was [sentenced](#) to four years on probation and *Aprel TV* was [shut down](#) for "destructive" and "negative" coverage of the government. Earlier, Mr. Temirov, journalist and founder of *Temirov Live*, was [stripped of Kyrgyz citizenship](#) in 2022. In January 2024, eleven *Temirov Live* journalists were [arrested](#), including Makhabat Tajibek, Temirov's wife and founder of *Aik Aik Dese* media.

⁵⁶ See the [Joint Opinion of the Venice Commission and OSCE/ODIHR on the Draft Constitution of the Kyrgyz Republic](#).

⁵⁷ See statements of [Article 19](#), [Human Rights Watch](#), and [Civil Right Defenders](#) raising concerns about the effect of the new Law on Mass Media on freedom of expression in Kyrgyzstan. See also the European Parliament [Resolution P10_TA\(2025\)0171](#) related to the EU-Kyrgyz Republic Enhanced Partnership and Cooperation Agreement which states it "strongly regret[ted] the final approval of the controversial Law on Mass Media".

⁵⁸ See the 2021 Law on Protection from Inaccurate (False) Information. For example, in 2022 *Azattyk.kg* and *24.kg* websites were [blocked](#).

the law, found caused confusion.⁵⁹ Paid advertising is to be provided to contestants under equal conditions. The media need to be accredited with the CEC to offer paid campaign advertising; the CEC also oversees the legality of the campaign in the media.⁶⁰ On 8 November, election commissions distributed airtime among contestants, allocating 5 minutes for individual presentations and 25 minutes for participation in debates.

ODIHR EOM commenced qualitative media monitoring on 4 November, and quantitative and qualitative monitoring of five television channels and seven online media outlets - on 10 November.⁶¹

XII. ELECTION DISPUTE RESOLUTION

Election dispute resolution is primarily regulated by the Election Law supplemented by the CEC resolutions, as well as criminal and administrative procedures. Decisions, actions, or inaction of the election administration, public agencies and candidates may be challenged. Complaints against the election administration are subject to hierarchical review and judicial appeal. The Administrative Court of Bishkek reviews CEC decisions, while the Supreme Court conducts cassation review. However, the June 2025 amendments to the Election Law excluded some CEC decisions and resolutions from judicial review. The CEC and the judiciary have interpreted which decisions the amendment excludes differently.⁶² Prosecutorial and law enforcement agencies are responsible for handling administrative and criminal offences. Complaints and appeals, including those concerning election results, must be filed and examined under expedited early election deadlines, and immediately on election day. While complaints to the CEC can be submitted online via its website, there is no online system to initiate judicial review.

According to the CEC online complaints register, as of 12 November, there have been 49 cases, mostly originating from law-enforcement reports and the CEC's social media monitoring. Most cases concerned unlawful campaigning by nominated candidates and citizens, including early campaigning, defamation of candidates, the misuse of administrative resources, and campaign violations by the media, including dissemination of false information.⁶³ The CEC imposed administrative fines in 16 cases.⁶⁴ Complaints are not considered during CEC sessions and information is limited on cases that did not result in a sanction. In 35 cases, the law enforcement bodies declined to initiate criminal proceedings following pre-investigation checks due to the absence of elements of a criminal offence.

To date, the Administrative Court of Bishkek reviewed six appeals against CEC decisions to deny candidate registration; the Court dismissed one of the cases as the applicant missed the submission deadline, and rejected five appeals on merits.

⁵⁹ Broadcasters must provide a minimum of 30 minutes of free airtime on weekdays in the primetime to be divided equally among contestants. At least half of this airtime is to be dedicated to debates. One A4 page of space is to be provided by print and online media.

⁶⁰ On 14 October, the CEC [accredited](#) 137 media to participate in the election campaign: 41 TV channels and 19 radio stations, 37 print media newspapers and 40 online media outlets.

⁶¹ The ODIHR EOM is monitoring the primetime broadcasts of the nationwide TV channels *NTKR*, *Ala Too 24*, *ElTR*, *Channel 7* and *Region TV*, as well as politics-related content of online media *akipress.kg*, *azattyk.kg*, *Kaktus.Media*, *24.kg*, *super.kg*, *kabar.kg* and *sputnik.kg*.

⁶² The CEC interpreted the provision as only excluding additional judicial review of CEC decisions on candidate registration based on new or newly discovered evidence after all judicial remedies had been exhausted. The judiciary interprets the provision to exclude additional judicial review of all CEC decisions or resolutions on this basis.

⁶³ The [CEC Online register](#) provides public information on the stage, status, and outcome of complaints, and decisions. As of 12 November, of the 49 registered cases, 4 complaints were submitted by citizens, observers, or candidates, 22 cases were initiated by law-enforcement bodies and 22 cases originated from the CEC social media monitoring.

⁶⁴ Thirteen fines were imposed for illegal campaigning by candidates, citizens, or media outlets, four fines related to the dissemination of defamatory or false information about candidates, and one case resulted in a corrective order to remove publications that violated campaign rules.

XIII. CITIZEN AND INTERNATIONAL OBSERVERS

The law provides for citizen and international election observation. Civil society organisations (CSOs) with a statutory mandate in electoral matters or human rights may receive accreditation to observe the elections. Each organisation may accredit up to three observers per election commission; however, only one observer may be present at the polling station at a time. There is no deadline for requesting accreditation for citizen observers, and validity of the accreditation ceases upon publication of the election results. The election commissions may terminate the observer's accreditation for violations of the law. Candidates and political parties are also entitled to deploy their representatives and observers.

ODIHR EOM interlocutors raised concerns about the feasibility of citizen observation of these elections, mainly due to funding limitations and recent legislative changes that define domestic election observation as political activity and require CSOs receiving foreign funding to register as “foreign representatives”, but also due to fear of retaliation for observation activities. As of 12 November, the CEC accredited 297 international observers and no citizen observers.

XIV. ODIHR EOM ACTIVITIES

The ODIHR EOM began its activities on 21 October. It met with various interlocutors, including the Ministries of Foreign Affairs, Internal Affairs, Culture, Information, Sports, and Youth Policy, as well as candidates, media, civil society organisations, and representatives of OSCE participating states. It has established working relationships with relevant stakeholders involved in the election process. Long-term observers have engaged with interlocutors at the local level since their deployment on 29 October.

The OSCE Parliamentary Assembly (OSCE PA) and the Parliamentary Assembly of the Council of Europe (PACE) have announced their intention to deploy observer delegations for the 30 November election day. Claude Haagen (Luxembourg) has been appointed by the OSCE Chairperson-in-Office as Special Co-ordinator to lead the OSCE short-term observers. Monika Zajkova (North Macedonia) will head the delegation of the OSCE Parliamentary Assembly. Georgios Stamatis (Greece) will serve as the head of the delegation of the Parliamentary Assembly of the Council of Europe.

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