



INTERNATIONAL ELECTION OBSERVATION MISSION Republic of Poland – Presidential Election, 18 May 2025

STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS

PRELIMINARY CONCLUSIONS

The first round of the Polish 2025 presidential election was competitive, offering voters a genuine choice between distinct political alternatives, but it took place in a highly polarized political environment, which exacerbated existing societal divides and ongoing tensions over efforts to consolidate the rule of law. This also impacted the functioning of some key electoral oversight institutions, in particular judicial ones, weakening public trust in their effectiveness and independence in the lead-up to the election. Fundamental freedoms were respected throughout the vibrant campaign, but the use of intolerant rhetoric, particularly targeting vulnerable groups and often amplified online, remains of concern. Media coverage across the spectrum showed clear bias, limiting voters' access to comprehensive information, thus influencing their ability to make a fully informed choice. Campaign finance regulations and their implementation did not sufficiently ensure transparency and equitable conditions among contestants. While the relevant authorities proactively countered multiple attempts of disinformation, cyberattacks and foreign interference, questions remain about the lack of fully effective co-ordination and enforcement of applicable legislation. The election administration at all levels managed the process efficiently, but transparency of decision-making was limited. On election day, in the limited number of polling stations observed by the IEOM, the various stages of the election process were assessed as professional, well organized and calm, but the secrecy of the vote was often not adhered to.

The electoral legal framework, last amended in 2023, is comprehensive and overall forms an adequate basis for the conduct of democratic elections. However, some aspects would benefit from further revision as many prior ODIHR and Council of Europe recommendations remain unaddressed, including those related to suffrage rights of persons with intellectual or psychosocial disabilities, defamation laws, misuse of administrative resources, transparency of campaign finance, gender equality in the election administration, and detailed regulation of presidential run-offs. Several legislative initiatives, including amendments to the Election Code, introduced by the ruling coalition were either vetoed or referred to the Constitutional Tribunal by the outgoing President, effectively blocking the government's agenda and exacerbating the long-standing political divide.

The election administration at all levels efficiently managed the election and met all legal deadlines. Although the National Election Commission (NEC) published all its decisions online and a link to follow live broadcasts of its sessions could be obtained upon request, its sessions were not open to the public limiting transparency and contrary to international standards and good practice. Most IEOM interlocutors expressed confidence in the administration's technical capacity, but questioned collegiality and impartiality of the NEC's decision-making, in particular with respect to the recent decisions reducing public funding for one of the political parties. While voter education was comprehensive and inclusive, training for polling staff was not standardized and its effectiveness was diminished due to resignations of polling staff. A coalition of civil society organizations, in co-operation with the Ombudsperson's office, launched a campaign to improve accessibility of the electoral process for persons with disabilities.

Citizens of at least 18 years old by election day are eligible to vote, except those disenfranchised by court decisions for certain crimes. Court decisions on the basis of intellectual or psychosocial disability may deprive citizens of their suffrage rights, contrary to OSCE commitments and other international

standards. Voter lists were not available for public scrutiny, but voters had adequate opportunities to verify their own records and file complaints in case of omissions and inaccuracies. All IEOM interlocutors expressed confidence in the accuracy of the current register and the safeguards ensuring its integrity.

Citizens over 35 years of age by election day can stand for president, except those sentenced to imprisonment for an intentional offence or fiscal crimes, as well as those declared incapacitated by a court decision. In an inclusive process, the NEC registered 44 electoral committees and 13 candidates. Four potential candidates were rejected because, following verification, the number of valid signatures submitted dropped below the required 100,000; one rejected candidate later appealed to the Supreme Court which upheld the rejection. Overall, the signature collection and verification processes were marked by limited transparency and many IEOM interlocutors voiced concerns over its integrity stating that there is no effective mechanism to detect and investigate fraudulent entries, as also confirmed by the election administration.

The fundamental freedoms of association, assembly and expression were respected, and voters had a genuine choice between distinct political alternatives. Campaign messaging largely focused on policy issues, and while candidate interactions were mostly respectful and measured in expression, the wider campaign rhetoric at times turned personal and confrontational. Inflammatory and derogatory messaging targeting migrants, the LGBTI community, ethnic and religious groups was present in some political actors' discourse, and the Prosecutor's Office initiated several proceedings against one candidate. In the absence of a sufficiently regulated legal framework, public officials at various levels and across the political spectrum frequently campaigned on behalf of candidates, and the line between official duties and campaign activities often appeared blurred, contrary to international good practice. A strong social network presence formed an integral part of most contestants' campaign strategies. Posts dedicated to general campaigning, voter mobilization, and criticism of opponents dominated, but content also frequently mirrored the wider public debate on current events and polarizing and divisive topics, including instances of inflammatory rhetoric.

Authorities deployed several mechanisms to protect election infrastructure and the campaign from external interference, disinformation, and cyberattacks, including awareness-raising and training efforts. While this plethora of initiatives reflected a proactive and multifaceted approach, inter-institutional co-ordination did not appear fully streamlined, and public communication about protective measures employed remained limited. Attempted cyberattacks and disinformation campaigns, many of which the relevant Polish institutions linked to sources from within the Russian Federation, surged as the election neared, but these were reported to have been identified and countered in a timely manner, containing wider impact. The late designation of a Digital Services Coordinator under the EU Digital Services Act (DSA), only five days before the election day, left multiple gaps in the national implementation of the DSA, including with respect to lack of enforcement and formal user redress mechanism and reduced transparency of state interactions with Very Large Online Platforms (VLOPs). While state institutions noted improved responsiveness of VLOPs, the effectiveness of content moderation varied significantly between platforms and the lack of information on algorithms and its impact on users remain a concern.

Two out of 13 presidential candidates were women. While equality between women and men is constitutionally guaranteed and women secured a record-high 29.4 per cent of the *Sejm* seats in the 2023 parliamentary elections, authorities and political parties have thus far made insufficient efforts to enhance women's active participation and women remain underrepresented in public and political life. Contrary to prior ODIHR recommendations, there are no provisions for representation of each gender at any level of election commissions, and all NEC members are men. As observed by the ODIHR Limited Election Observation Mission (LEOM), women's involvement as speakers at campaign events and in campaign leadership remained limited.

Campaign finance regulations and their implementation do not ensure equality of opportunity for contestants, effective oversight, transparency and accountability. Most prior ODIHR and Council of Europe recommendations pertaining to campaign finance remain unaddressed. While there is no direct state funding for presidential election campaigns, state funds allocated to political parties are the primary source of campaign income. The reduction of state funding for two main political parties and delayed disbursement for others, affected the financial capacities of the candidates funded by these parties. Prior to election day, the law requires disclosure only of donations but not funds transferred by parties or incurred expenditures. A number of third parties campaigned in favour of or against one or another candidate but these were not subject to limits and disclosure requirements, undermining transparency. The NEC receives the audited financial reports of contestants three months after election day and publishes them in 30 days, but not in a searchable format and without the auditing reports and the identity of donors, which does not allow for public scrutiny. Some prescribed sanctions are disproportionate while others are not dissuasive.

The media landscape remains highly polarized, limiting voters' access to impartial information despite some recent improvements in media freedoms, including reduced litigation against journalists, mostly at the national level. The replacement of public media management, in a process that departed from legally required procedures, improved their reporting quality, but funding suspensions necessitated *ad hoc* government financing, which combined with insufficient independence safeguards undermined the editorial freedom and financial sustainability of public media. ODIHR LEOM media monitoring revealed partisan coverage patterns across outlets, with public and several private broadcasters being noticeably critical of Mr. Nawrocki, while *TV Republika* showed a clear bias in favor of Mr. Nawrocki and provided extensive negative coverage of Mr. Trzaskowski. Political divisions were evident in multiple debates, with only two featuring all candidates. Overall, the limited access of voters to comprehensive information needed for making a fully informed choice highlighted the need for systematic media reforms. The regulator for the broadcast media was widely perceived as politicized by ODIHR LEOM interlocutors, who raised concerns over selective and non-transparent process of imposing fines and allocating broadcasting licenses. The regulator's monitoring revealed a lack of balance; however, it is yet to formally act upon the media coverage of the campaign.

The law provides for expedient administrative and judicial remedies for election disputes and broad legal standing to candidates' electoral committees. Undermining transparency, Supreme Court hearings in election-related cases were closed to the public and did not provide the appealing party the opportunity to be heard, contrary to OSCE commitments and international good practice. Referencing the controversy surrounding the appointment of judges and the establishment of the Supreme Court Chamber for Extraordinary Control and Public Policy, tasked with validating election results, many IEOM interlocutors raised concerns over the lack of independence of this Chamber, which in the view of the European Court of Human Rights is not a tribunal established by law. This has led to a reduction in public trust of the judiciary, which could impact acceptance of any decision made by this chamber. Complaints against results of the first round are considered "premature" and declared inadmissible on formal grounds, not ensuring effective legal address, contrary to OSCE commitments and international standards.

The Election Code provides for domestic and international observation of the electoral process, including by citizen observers and candidate proxies. However, citizen observers are not entitled to observe the work of the NEC and have limited rights during observation of election day, at odds with international good practice and contrary to previous ODIHR recommendations. Nevertheless, several civil society organizations observed various aspects of the electoral process, including election-day proceedings, contributing to transparency.

In the limited number of polling stations observed by the IEOM, the election process was assessed as professional, well organized and orderly. Established procedures were generally adhered to, including during the count and tabulation, and while IEOM observers reported no incidents or serious procedural shortcomings or irregularities from the observed polling stations, the secrecy of the vote was often not ensured, which is of concern. The observed counting and tabulation were conducted efficiently and transparently.

PRELIMINARY FINDINGS

Background and Political Context

The 18 May presidential election was called by the Speaker of the *Sejm* (the lower house of parliament) on 15 January. The first round of the election took place amid an environment marked by pronounced political polarization, with deep societal divides reflected in identity politics, public discourse, and media coverage.¹

The outgoing president, Andrzej Duda, affiliated with the Law and Justice party (*Prawo i Sprawiedliwość*, PiS), is completing his second and final term. The October 2023 parliamentary elections marked the end of eight years of PiS-led governance, bringing to power a coalition government headed by Prime Minister Donald Tusk.² Under the Constitution, the president has the right of legislative initiative and the power to veto bills and refer them to the Constitutional Tribunal or return them to the *Sejm*. Many interlocutors of the International Election Observation Mission (IEOM) assessed this election as particularly high-stake, noting that their outcome could significantly affect the government's ability to implement its reform agenda, including legislative initiatives aimed at ensuring the effective functioning of institutions, fully restoring the rule of law, and safeguarding the independence of the judiciary and public media.

The election narrative was further shaped by the broader regional geopolitical context, in particular the war caused by the Russian Federation's invasion of Ukraine,³ border security concerns, and migration. In domestic politics, restrictive abortion legislation and the March 2025 suspension of asylum rights in response to increased irregular migration at the Belarus border drew significant attention and international criticism.⁴ In May 2024, based on initiated and planned measures to restore the rule of law

¹ The polarization has among others impacted the effective functioning of some institutions, with the government questioning the legitimacy of key judicial and media regulatory bodies due to appointments made under the previous government and a perceived lack of independence.

² The governing coalition comprises the Civic Coalition (*Koalicja Obywatelska*, KO; 157 *Sejm* seats), Third Way (*Trzecia Droga*; 65 seats), and the New Left (*Lewica*; 26 seats). PiS gained 194 seats, and the Confederation Freedom and Independence (the Confederation; *Konfederacja*) 18 seats. A total of 21 individual parties are represented in the *Sejm* and *Senat* as part of different coalitions and groupings.

³ This is referred to as "the Russian Federation's full-scale war of aggression against Ukraine" by the Parliamentary Assembly of the Council of Europe (PACE) and the European Parliament (EP) in their respective resolutions. See for example PACE [2506/2023](#) and [2285/2024](#) and EP [2024/2526/RSP](#). See also OSCE Parliamentary Assembly language since the adoption of the [2022 Birmingham Declaration](#).

⁴ In its [December 2024 report](#), the United Nations (UN) Committee on the Elimination of All Forms of Discrimination against Women (CEDAW) found Poland's abortion law in breach of several human rights, calling for urgent liberalization. In February 2025, the Representative of the UN High Commissioner for Refugees [warned](#) that the temporary suspension of asylum rights violates the 1951 Refugee Convention and EU law.

and the independence of the judiciary⁵, the European Commission closed the Article 7(1) proceedings against Poland, citing substantial progress toward compliance with European Union (EU) standards.⁶

Equality between women and men is guaranteed by the Constitution. However, women remain underrepresented overall in public and political life, particularly in leadership roles, including in political parties. Nevertheless, in the 2023 elections, women won a record-high 135 seats in the *Sejm* (29.4 per cent), but only 19 seats (19 per cent) in the Senate; 10 out of 27 ministerial posts are held by women. While there is a steady gradual upward trend in the representation of women at various levels of self-governance, on average it remains below 30 per cent.⁷ This continued underrepresentation in both elected and appointed positions is indicative of the insufficient efforts by the authorities and political parties to enhance women's active participation in political life.⁸

Legal Framework and Electoral System

Overall, the comprehensive election-related legal framework forms an adequate basis for the conduct of democratic elections.⁹ However, some legal provisions could benefit from further elaboration or revision and many prior ODIHR and Council of Europe recommendations remain unaddressed. These relate inter alia to suffrage rights of persons with intellectual or psychosocial disabilities, decriminalization of defamation, prevention of the misuse of administrative resources, transparency of campaign finance, gender equality in the election administration, and detailed regulation of the second round of presidential elections.

The election-related legislation has remained unchanged since the 2023 parliamentary elections.¹⁰ The current governing coalition has passed several bills amending the legal framework related to reforming the structure and functioning of the Constitutional Tribunal, returning to the pre-2018 selection method for the National Judiciary Council, amendments to the Election Code introducing revisions to procedures for appointing electoral officials and expanding voting by mail, and changing the method of validating election results at the Supreme Court. Nevertheless, all these bills were either vetoed or referred to the Constitutional Tribunal by the current President in 2024 for review of their constitutionality, effectively blocking the government's agenda and exacerbating the long-standing political divide.¹¹ The International Election Observation Mission (IEOM) was also informed of several plans by the relevant

⁵ In this respect, see also several recent Venice Commission opinions on draft legislative reforms regarding the Polish judicial system: Venice Commission and Directorate General of Human Rights and Rule of Law of the Council of Europe, [CDL-AD\(2024\)018](#); Urgent Joint [Opinion](#) on the draft law amending the Law on the National Council of the Judiciary of Poland; Venice Commission, [CDL-AD\(2024\)034](#), Opinion on the draft amendments to the Law on the Public Prosecutor's Office; Venice Commission and Directorate General Human Rights and Rule of Law, [CDL-AD\(2024\)029](#); Joint Opinion on European standards regulating the status of judges; Venice Commission, [CDL-AD\(2024\)035](#); Opinion on the draft constitutional amendments concerning the Constitutional Tribunal and two laws on the Constitutional Tribunal.

⁶ In its [2024 report](#), the Commission stated that "there is no longer a clear risk of a serious breach of the rule of law by Poland and [that it] withdrew its reasoned proposal of December 2017, thereby closing the Article 7(1) TEU procedure for Poland".

⁷ [Women in Local Politics: Participation of Women Candidates in 2024 Elections](#), Institute of Public Affairs.

⁸ Many ODIHR Limited Election Observation Mission (LEOM) interlocutors noted that women's full and equal participation continues to be constrained by entrenched perceptions of politics as male-dominated, unequal media treatment, gendered and demeaning references in public discourse, and disproportionate exposure to online harassment.

⁹ Presidential elections are primarily governed by the 1997 Constitution, the 2011 Election Code (last amended in 2023), the 1990 Law on Assemblies (amended in 2016), and the 1997 Political Parties Act (last amended in 2023). In addition, relevant sections of EU regulations such as the General Data Protection Regulations may apply. Poland is party to major international and regional instruments related to the holding of democratic elections.

¹⁰ The framework was significantly amended prior to the 2023 elections in a process lacking meaningful consultations as also noted in the 2023 [ODIHR opinion](#) on the Draft Act amending the Election Code.

¹¹ The Tribunal has yet to issue decisions and there is no applicable legal timeline.

authorities, as well as civil society organizations (CSOs), and professional legal associations to amend the legislation in line with prior ODIHR recommendations but none had yet been introduced.¹²

To supplement and clarify the legal framework, the National Election Commission (NEC) issued binding resolutions for lower-level election administration, as well as explanatory guidelines and clarifications for broadcasters, government administration authorities, and electoral committees.¹³ However, at times its overly legalistic interpretation of the law resulted in unreasonable restrictions, in particular with regards to the conduct and financing of the campaign (see *Campaign Finance* section).

The president is directly elected in a single, country-wide constituency for a five-year term, with a limit of two terms. If no candidate receives the absolute majority of valid votes cast in the first round, a second round is held two weeks later between the two candidates who received the most votes. The winner of the second round is determined by a simple majority of the valid votes cast.

Election Administration

The presidential election was administered by a three-tier structure comprising the permanent NEC and the National Election Office (NEO), and temporary 49 Constituency Election Commissions (CECs) and 49 regional NEO offices, and 31,627 Precinct Election Commissions (PECs).¹⁴ Contrary to international standards and prior ODIHR recommendations, there are no provisions for representation of each gender at any level of the election administration, and no such data is aggregated.¹⁵ All current members of the NEC are men, as is the newly appointed NEO chairperson.¹⁶

While all NEC decisions were published on the NEC website, NEC sessions were not public. Moreover, the NEC Rules of Procedure allow for voting via email, and to date, 25 of the 33 sessions held since the election was called were organized online.¹⁷ While a link to watch live broadcasts of NEC sessions and access the to the minutes of the sessions could be obtained upon request, including by civil society organizations (CSOs)¹⁸, this practice, combined with the lack of a publicly announced agenda and the

¹² They relate to delineation of constituency boundaries, introduction of alternative voting methods, rules regarding legal incapacitation and voting rights of persons with intellectual and psychosocial disabilities, and composition and competencies of the National Election Commission (NEC).

¹³ Including on voter registration, the conduct and financing of election campaigns, the establishment of lower-level election commissions and electoral committees, and election day procedures.

¹⁴ These include 1,812 special PECs in medical facilities, penitentiaries, detention centres, student dormitories, and social welfare facilities, and on one ship and four platforms under the Polish flag. The NEO is the executive body of the NEC, responsible for the administrative, financial and logistical organization of elections. The CECs were appointed on 31 March and the PECs by 28 April.

¹⁵ Article 7 of [CEDAW General Recommendation No. 23](#) recommends that States Parties shall “take all appropriate measures to eliminate discrimination against women in the political and public life [...] including in the formulation of government policy and the implementation thereof and to hold public office and perform all public functions at all levels of government”. Paragraph 48d recommends that States parties should provide “statistical data, disaggregated by sex, showing the percentage of women relative to men who enjoy those rights”.

¹⁶ Twenty-four of the directors of the NEO offices and some 41 per cent of CEC members are women; the ODIHR LEOM aggregated this information from the NEC website.

¹⁷ The ODIHR LEOM reviewed records of NEC sessions from 16 January until 16 April which showed that the NEC also voted via email in remote sessions, which were not broadcast. According to the NEC, decisions to conduct voting via email were taken in urgent cases with the consent of all NEC members to convene a meeting remotely.

¹⁸ Interested parties can request a link to observe NEC sessions live online, but no recordings are kept. Based on the NEC Rules of Procedures, the chairperson may invite observers to attend sessions in person, and accordingly, the ODIHR LEOM has attended the two in-person NEC sessions since the deployment of the mission. The NEC informed the ODIHR LEOM that due to limited space, candidate representatives could not observe sessions in person. During the sessions, some discussions were held internally without being broadcast.

limited information available about NEC sessions adversely impacted transparency and accountability of the NEC's decision-making process, contrary to international standards.¹⁹

The election administration at all levels managed the election efficiently and complied with all legal deadlines. The CECs were well-prepared, experienced and conducted their tasks professionally, and their decisions were published online in a timely manner.²⁰ While most IEOM interlocutors expressed confidence in the capacity of the election administration to manage the technical aspects of the election, they raised concerns about the collegiality and impartiality of NEC's decision-making, in particular with respect to the recent decisions on reducing public funding for PiS.²¹ This detracted from public trust in the work of the NEC.

Many IEOM interlocutors alleged that many electoral committees were established with the sole purpose to nominate PEC members and to obtain financial remuneration.²² While in line with the law, this practice potentially limits the representation of running candidates in the election administration.²³ As all 44 electoral committees had representation on PECs, ODIHR Limited Election Observation Mission (LEOM) long-term observers (LTOs) noted in some cases that lower-level election authorities had to draw lots due to an excess of nominees.

Mandatory PEC trainings as observed by ODIHR LEOM LTOs lacked a standardized format and differed in comprehensiveness, despite guidelines and a presentation provided by the central level.²⁴ Their impact was further reduced by the fact that a number of PEC members resigned, mostly for personal reasons, and replacements were not provided with a proper training due to lack of time.

Voter education outreach was comprehensive and inclusive with a variety of approaches and formats, including centrally produced election materials, such as NEC voter education TV spots. Local authorities and the lower-level election administration published election notices, provided information over the phone as well as through interviews and local media outlets. A number of CSOs conducted voter education initiatives targeting young and first-time voters; the ODIHR LEOM also noted several spots in sign language, including by the NEC. A coalition of 150 CSOs, together with the Ombudsperson's office, launched a campaign "Elections accessible to all", developing accessibility guidelines and

¹⁹ [Paragraph 19 General Comment on article 34 of the ICCPR](#) provides that "States parties should proactively put in the public domain Government information of public interest. States parties should make every effort to ensure easy, prompt, effective and practical access to such information". Article 10(a) of the [UNCAC](#) states: "Adopting procedures or regulations allowing members of the general public to obtain, where appropriate, information on the organization, functioning and decision-making processes of its public administration and (...) on decisions and legal acts that concern members of the public". See also Paragraph 81 of the [Council of Europe's Venice Commission Code of Good Practice in Electoral Matters](#) Explanatory Report recommends that "[t]he meetings of the central electoral commission should be open to everyone, including the media".

²⁰ The CECs had a limited role in this election as they mainly decided on PEC appointments and replacements.

²¹ On one occasion a split vote precluded the NEC from adopting a decision. The decision concerning the interpretation of [NEC decision 421/2024](#) and the subsequent letter to the Minister of Finance was discussed over six NEC sessions since 16 January 2025.

²² Electoral committees have the exclusive right to nominate candidates for the election. Twenty-seven out of 44 electoral committees did not nominate presidential candidates.

²³ For example, in Katowice, lots had to be drawn due to 30 per cent surplus of the nominations; in Kraków municipality, some 16,000 applications were submitted for 13,000 PEC member positions. Based on NEO data, the electoral committee of Rafał Trzaskowski had 31,376 PEC members, Karol Nawrocki 29,961, Szymon Hołownia 25,928, Magdalena Bieja 23,843, Sławomir Mentzen 21,348; while at the lower end, the electoral committees of unregistered candidates Dominika Jasińska had 68; Kamil Ciałek 9, and Roman Jackowski 2.

²⁴ Paragraph 84 of the Venice Commission's [Code of Good Practice in Electoral Matters](#) Explanatory Report recommends that "[m]embers of electoral commissions have to receive standardized training at all levels of the election administration. Such training should also be made available to the members of commissions appointed by political parties". PEC trainings were observed in Aleksandrów Łódzki, Bydgoszcz, Cegłów, Częstochowa, Gdańsk, Elbląg, Lublin, Olsztyn, Piła, Rzeszów, Sieradz, Sulechów, Szczecin, Warsaw, Warta, Wrocław and Zamość.

monitoring the overall accessibility for persons with disabilities of the campaign and of polling stations on election day.²⁵

Voter Registration

Citizens who are at least 18 years old by election day are eligible to vote, except for those whose voting rights have been revoked by a court decision based on a conviction for certain crimes.²⁶ Citizens declared incapacitated by a court decision on the basis of intellectual or psychosocial disability can also be deprived of their suffrage rights, contrary to OSCE commitments and other international standards.²⁷

Voter registration is passive and continuous. Introduced in 2023 in line with a prior ODIHR recommendation, the Central Register of Voters (CRV), which is maintained by the Ministry of Digital Affairs, replaced the more than 2,400 separate municipal registers and has improved the accuracy and functionality of voter registration system.²⁸ The NEC announced that the total number of voters in the CRV as of 16 May was 28,943,594. All IEOM interlocutors expressed confidence in the accuracy of the current voter registration system and positively assessed the CRV.

While voter lists were not available for public scrutiny, voters had adequate opportunities to verify their data and request a change of their voting location.²⁹ Voters could also request, in person, absentee voting certificates allowing them to cast a ballot at any polling station.³⁰ Voters with disabilities could apply to be registered, upon presenting a disability certificate, at an accessible polling station within their home municipality, or to vote via proxy or by mail.³¹

Out-of-country voting was organized by the Ministry of Foreign Affairs (MFA) in 511 polling stations within embassies and other designated locations in 92 countries, with the active involvement of diplomatic and consular staff and Polish diaspora organizations. Voters residing abroad had to actively register online, via email, or in writing, up to five days before election day. A total of 509,131 voters registered to vote.³²

²⁵ By law, a minimum of 50 per cent of polling stations per municipality must be independently accessible for voters with physical disabilities. Some 58 per cent of the PECs were listed as accessible by the NEC.

²⁶ Citizens' voting rights can be revoked in cases of intentional or fiscal crimes, or if a court decides to revoke the right to vote. Information about the deprivation of the right to vote is entered into the Central Register of Voters.

²⁷ Articles 12 and 29 of the [CRPD](#) state that "parties shall recognize that persons with disabilities enjoy legal capacity on an equal basis with others" and guarantee "political rights [...] on an equal basis with others". See also Paragraph 48 of General Comment No. 1 to Article 12 of the CRPD.

²⁸ The CRV is updated by municipalities and contains the records of all citizens over 17 years of age, including those deprived of the right to vote. The CRV is based on the central civil registry in which every resident is assigned an 11-digit unique identification number known as PESEL.

²⁹ This includes at the respective municipal authorities or via access to the [mObywatel](#) application, where citizens could check their polling station location, change their address, or request to vote at another location. Requests to change the voting location could be filed up to three days before election day; 581,535 requests were submitted. 333,984 such certificates were requested.

³⁰ The NEO informed the ODIHR LEOM that 9,705 voters with disabilities requested to use postal voting, and 28,388 applied for proxy voting.

³¹ Results protocols from out-of-country voting had to be submitted to the Warsaw CEC within 24 hours of closing of the respective polling station.

Candidate Registration

Citizens who are at least 35 years of age by election day and have suffrage rights can stand for president. Those sentenced to imprisonment for an intentional offence or fiscal crimes are deprived of this right. In addition, candidates subject to lustration law may be prohibited to stand.³³

For presidential elections, candidate registration followed a two-step process. Electoral committees formed by groups of at least 15 voters had the exclusive right to nominate candidates by 24 March, upon having collected the signatures of at least 1,000 voters. In a second step, to register a candidate, by 4 April, the electoral committee had to submit a total of 100,000 voter signatures to the NEC. While political parties do not have the right to register electoral committees, candidates affiliated with a political party must announce their affiliation.

In an inclusive process, the NEC registered 44 electoral committees and subsequently 13 candidates, 2 of whom were women. Seventeen of the 44 electoral committees submitted the required number of signatures to field candidates, but four potential candidates were rejected as the number of valid signatures submitted was below 100,000 following the verification process.³⁴ One rejected candidate appealed to the Supreme Court, which upheld the rejection due to *inter alia* mismatch between voters' address information on the signature collection sheets and the CRV. The NEC announced the final list of candidates on 23 April.³⁵

Overall, the signature collection and verification processes were marked by limited transparency. Many IEOM interlocutors voiced concerns over its integrity and opined that there is currently no effective mechanism to properly investigate fraudulent entries. The election administration lacks effective detection and investigation mechanisms as they are often unable to determine who has collected such signatures since the law does not require electoral committees to provide data of the persons collecting the signatures. Interlocutors also stated that to supply signatures, some contestants used commercially available databases of citizens, which included data of deceased voters.³⁶ Amendments to the Election Code proposing *inter alia* electronic collection of signatures, which would also allow voters to verify whether they have signed in support of any candidate, are under discussion.

³³ Candidates born before 1 August 1972 must submit to the NEC, together with their consent to run for president, a declaration on whether they collaborated with or worked for the communist state security services. All candidates subject to lustration are verified by the Institute of National Remembrance. In this election, no candidate was denied registration based on the lustration process.

³⁴ The NEO verifies whether the signature collection sheets meet legal requirements, until the required number of valid signatures is reached. Errors identified included mismatch between voters' address information on the signature collection sheets and the CRV, incorrect PESEL numbers, signatures of persons without voting rights, or the missing date of signing. In the case of the four rejected candidates, according to the NEC's decisions, 2,881 entries of deceased persons were submitted in support of candidate David Jackiewicz; 5,805 in support of Wiesław Lewicki; 4,994 in support of Romuald Starosielec; and 4,093 in support of Paweł Tanajno.

³⁵ The candidates were Arthur Bartoszewicz (independent), Magdalena Biejat (independent; endorsed by the New Left), Grzegorz Braun (endorsed by the Confederation of the Polish Crown), Szymon Hołownia, (endorsed by Poland 2050 and the Third Way), Marek Jacubiak (endorsed by the Federation for the Republic), Maciej Maciak (independent; endorsed by the Prosperity and Peace Movement), Sławomir Mentzen, (endorsed by Confederation Freedom and Independence), Karol Nawrocki (independent; endorsed by PiS), Joanna Senyszyn (independent), Krzysztof Stanisławski (independent), Rafał Trzaskowski, (endorsed by PO), Marek Woch (endorsed by Non-partisan Local Government Officials – Poland Unites Us), and Adrian Zandberg (endorsed by Together).

³⁶ Thus far, the NEC referred one of the rejected candidates to the Prosecutor's Office, on grounds that their list of support signatures included records of deceased voters. The NEO informed the ODIHR LEOM that they intended to send additional cases to the Prosecutor's Office.

Campaign Environment

The campaign began on 15 January, the day the election was called, with campaign silence starting 24 hours before election day and also applicable to the release of opinion polls and the online domain. Campaign-like activities prior to the official start of the campaign were widespread across the political spectrum, prompting concerns among many IEOM interlocutors, particularly regarding financial attribution and transparency. While not explicitly regulated or sanctioned by law, the NEC has repeatedly criticized such practices in the past as circumventing the law.³⁷

The fundamental freedoms of association, assembly and expression were respected, and freedom to campaign was guaranteed by law and in practice. Voters had a genuine choice between distinct political alternatives. Local authorities designated spaces for campaign materials and promptly processed contestants' notifications about campaign events. Contestants prioritized regional travels, meetings with voters, press conferences and social media presence for voter outreach, with billboards and posters playing a less prominent role. Campaign events, 54 of which the ODIHR LEOM observed directly, proceeded largely unobstructed, drawing supporters and interested citizens, who often interacted with candidates.³⁸ Destruction and defacing of campaign banners and posters was frequent as observed by ODIHR LEOM LTOs and reported by interlocutors, who opined that its extent was unprecedented.³⁹ Mr. Mentzen held by far the highest number of events across the country.⁴⁰

Campaign discourse was largely issue-based. National security, economic welfare, healthcare, and affordable housing emerged as key programmatic priorities, alongside divisive topics such as migration, support to Ukraine, reproductive rights, and liberal versus traditional values.⁴¹ Candidate interactions were mostly respectful and measured in expression, while the wider campaign rhetoric at times turned personal and confrontational, reflecting the entrenched political and ideological polarization.

Inflammatory and derogatory messaging targeting migrants, the LGBTI community, ethnic and religious groups, including xenophobic and anti-Ukrainian narratives, was present in some political actors' discourse, including in campaign speeches, debates, and social networks.⁴² The Prosecutor's Office initiated several proceedings against candidate Grzegorz Braun, including related to public insult and

³⁷ See the latest NEC [clarification](#) on this issue from 17 April 2023.

³⁸ On 6 May, Mr. Trzaskowski's campaign staff was verbally and physically assaulted while campaigning in Sokoły. The matter was referred to the police. Isolated instances of attempted disturbance of rallies by loud music were noted by ODIHR LEOM observers. ODIHR LEOM observed campaign events across 15 municipalities; 8 of the events observed were held by the campaign of Mr. Trzaskowski, Mr. Nawrocki, and Mr. Zandberg, 7 by the campaigns of Ms. Biejat and Mr. Mentzen, 5 events by Mr. Hołownia and Mr. Braun, 4 events by Mr. Bartoszewicz, and 1 event of Mr. Jakubiak and Ms. Senyszyn.

³⁹ These are offenses under the Criminal Code and are referred to the police or the Prosecutor's Office. The police informed the ODIHR LEOM that as of 14 May, they received 931 complaints on destruction of banners and posters. As of 12 May, Mr. Mentzen was [reported](#) to have held 326 events, followed by Mr. Nawrocki with 264, and Mr. Trzaskowski with 146 events.

⁴¹ [Representatives](#) of the Catholic Church and some [religious associations](#) appealed to believers to participate in the election and, in choosing a candidate, to be guided by the teachings of the church, including by not voting for candidates who support abortion and same-sex marriage.

⁴² One of Mr. Nawrocki's campaign [spots](#) used images of a Muslim religious activity and of migrants at a bus stop to present them as "dangerous", stating that "Poland is already flooded by immigrants from Africa and the Near East [...] We have to immediately stop this". ODIHR LEOM LTOs reported that at the 4 May event of Mr. Mentzen in Gdańsk, Confederation-affiliated politicians made multiple anti-LGBTI comments, referring to "that pathology that Brussels teaches you", and describing immigrants as "criminals by default", the reason why "children and women are scared to walk on the streets safely". ODIHR LEOM observers also reported that during a 4 May event in Ostrołęka, Mr. Braun referred to LGBTI persons as "perverts" and made multiple antisemitic comments suggesting that Jews have an undue influence in Poland.

incitement to hatred.⁴³ Some IEOM interlocutors noted that such cases tend to be lengthy and rarely lead to penalties. Amendments passed by the *Sejm* to expand protections against hate speech to include sexual orientation, gender, age, and disability, including based on past ODIHR and Council of Europe recommendations, were referred on 18 April by President Duda to the Constitutional Tribunal for review.⁴⁴

The legal framework does not sufficiently regulate the involvement of public officials in the campaign, beyond requiring impartiality and separation from official duties, as underscored in several NEC clarifications.⁴⁵ Several IEOM interlocutors noted that the line between official duties and campaign activities often appeared blurred.⁴⁶ Public officials at various levels and across the political spectrum, including members of government, parliament (MP), and local authorities, joined candidates at campaign events, delivered endorsing speeches, or promoted them on social networks.⁴⁷ This support frequently overlapped with party involvement in the campaign, including local co-ordination, events, and social network promotion, despite the limitations outlined in NEC clarifications.⁴⁸ These practices made the boundaries between campaigning, party activities, and public duties often indistinguishable to voters, contrary to international good practice.⁴⁹ Contestants with limited local organizational support and funds raised concerns to the IEOM about the unlevel playing field and the challenges of competing against candidates backed by the established political forces.

⁴³ The Criminal Code prohibits public insult and incitement to hatred based on national, ethnic, racial, or religious grounds. The 28 April candidate debate organized by *Super Express* newspaper and broadcast by several television channels and online, featured widely condemned inflammatory remarks by Mr. Braun, including antisemitic and anti-Ukrainian messaging. On 6 May, the European Parliament lifted Mr. Braun's immunity, on the [request](#) of the Polish government in relation to several incidents that took place in 2022 and 2023.

⁴⁴ In his justification for the [referral](#), the President cited concerns that the amendments could infringe on freedom of expression and lead to preventive censorship. In its [2023 report](#), the European Commission against Racism and Intolerance, welcomed existing legal protections against hate speech but recommended adding sexual orientation, gender identity, and sex characteristics as protected grounds. Similar appeals were made by the UN Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity ([29 November 2024](#)) and by 37 civil society organizations ([18 December 2024](#)).

⁴⁵ The NEC clarification of [31 March 2025](#) calls for such distinction to be ensured by all "public persons, performing public functions or, through their professional, economic, social, cultural, or other activities, significantly influencing the functioning of society".

⁴⁶ A [letter](#) sent by Mr. Trzaskowski to numerous local officials appealing to them for campaign support, which was reportedly delivered through official administration channels, [drew criticism](#) from PiS representatives as potentially amounting to prohibited campaigning on the territories of local administrations.

⁴⁷ The [Minister for EU Affairs](#) appealed for votes for Mr. Trzaskowski at his rally in Poznan, the [Minister of Sport](#) and the [Minister of Health](#) promoted his campaign events on Facebook, while the [Minister of Finance](#) encouraged others to put up Mr. Trzaskowski's banners. In similar ways, Mr. Hołownia was promoted by the [Minister of National Defense](#), the [Minister of Climate and Environment](#), and the [Minister for Civil Society](#). Ms. Biejat's campaign was supported by the [Minister of Digital Affairs](#), the [Minister of Family, Labor and Social Policy](#), the [Minister of Equality](#), and the [Minister of Education](#). Among many others, MP Łukasz Schreiber [promoted](#) Mr. Nawrocki, MP Grzegorz Płaczek campaigned with Mr. Mentzen at a 30 April event in Wrocław, MP Roman Fritz [endorsed](#) Mr. Braun, and [MP Dariusz Piontkowski](#) purchased campaign ads against Mr. Trzaskowski. Mayors and other local officials opened rallies with candidate endorsements, among others, in [Białystok](#), [Gniezno](#), [Katowice](#), [Kielce](#), and [Sopot](#) for Mr. Trzaskowski and in [Jastrzębie Zdrój](#), [Myślenice](#), and [Siedlce](#) for Mr. Nawrocki. At a campaign event in Łódź on 27 April, President Duda [stated](#) that he would be voting for Mr. Nawrocki, adding: "That is why I ask you not only to support, but to actively back Karol Nawrocki". On 11 May, Jarosław Kaczyński [campaigned](#) on behalf of PiS and as its chairperson for candidate Nawrocki at an event in Gryfino. On 16 May, Prime Minister Tusk called for votes for Mr. Trzaskowski in a [X post](#).

⁴⁸ The NEC's [18 February 2025](#) clarification stressed that political parties cannot provide in-kind support to candidates, including informational support via party social networks, beyond permitted contributions to electoral committees. Among others, [Confederation](#), [New Left](#), [PiS](#), [PO](#), and [Together](#) promoted their endorsed candidates on their social media pages, including PO-paid campaign-related ads on [Meta](#) and [Google](#) against Mr. Mentzen.

⁴⁹ Paragraph 4.2 of the [ODIHR and the Venice Commission Joint Guidelines on Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes](#) requires the law to "provide for a clear separation between the exercise of politically sensitive public positions, in particular senior management positions, and candidacy".

Campaign programmes of only six candidates addressed issues related to equality and inclusion. While women were approximately equally represented among the attendees of campaign events observed, their involvement as speakers (32 per cent) and in campaign leadership was more limited. On average, young people comprised 38 per cent of campaign events participants. Insufficient efforts were made by the contestants' campaigns to ensure the accessibility of campaign events and materials for persons with disabilities.⁵⁰ No campaign materials or events conducted in national minority languages were observed.

Campaigning on social networks is not explicitly regulated; however, several legal provisions and NEC clarifications, including those governing the campaign duration, transparency and accountability for paid advertisement, in-kind campaign support, and legally restricted speech are applicable also online. A strong social network presence formed an integral part of most contestants' campaign strategies. Posts dedicated to general campaigning, voter mobilization, and criticism of opponents dominated, but content also frequently mirrored the wider public debate on current events and polarizing and divisive topics, including instances of inflammatory and hateful rhetoric. Among accounts monitored by the ODIHR LEOM, Mr. Mentzen and Ms. Biejat led on TikTok, amassing 813,000 and 587,000 aggregate engagements over the monitoring period, respectively, outperforming other candidates. Mr. Braun (Facebook) and Mr. Stanowski (X) came close to the top performers with 501,000 and 454,000 engagements, respectively.⁵¹ Frontrunner candidates Mr. Nawrocki and Mr. Trzaskowski recorded 402,000 engagements on Facebook and 167,000 engagements on X, respectively. At the same time, Mr. Nawrocki purchased the highest number of ads and incurred the highest expenditure on Meta and Alphabet, while Mr. Trzaskowski clearly led in the number of times his ads were displayed to users.⁵²

Authorities deployed several mechanisms to detect, prevent, and protect election infrastructure and the campaign from external interference, disinformation, and cyberattacks, including awareness-raising and training efforts.⁵³ While this reflected a proactive and multifaceted approach, inter-institutional co-ordination did not appear fully streamlined, and public communication about protective measures employed remained limited. Although attempted cyberattacks and disinformation campaigns, many of which the relevant Polish institutions linked to sources from within the Russian Federation, surged as the election neared, these were reported to have been identified and countered in a timely manner,

⁵⁰ At events observed by the ODIHR LEOM, sign interpretation was noted only at events of Mr. Hołownia and those hosted by civil society. Only a few campaign materials were adjusted for persons with disabilities, including subtitled campaign spots.

⁵¹ Since 21 April, the ODIHR LEOM has been monitoring 40 accounts of candidates, selected political parties, and public figures and institutions on Facebook, TikTok, and X. The sample includes two most relevant, election-related and engaging posts per account per day. Aggregate engagements (likes on TikTok and X and total reactions on Facebook) are calculated per platform, prioritizing the one with the highest follower count.

⁵² See a Batory Foundation [analysis](#) of 14 May. Mr. Nawrocki spent over Polish Złoty (PLN) 1.4 million (approximately EUR 327,000; 1 PLN equals 0.23 EUR) for some 2,046 ads displayed approximately 110 million times. Mr. Trzaskowski spent over PLN 960,000 for some 432 ads, which were displayed over 242 million times.

⁵³ A few of the many initiatives include the MFA's "Resilience Council", the "Election Umbrella" programme by the MDA and the Science and Academic Computer Network, as well as operations of the Ministry of Internal Affairs' Internal Security Agency. Several initiatives collaborated closely with civil society. See for instance the 28 April "Resilience Council" report "[Together against Disinformation](#)". On 29 April, an [Inter-institutional Team for Countering Foreign Interference and Manipulation in the Information Environment](#) was established as an advisory body to the Council of Ministers and information sharing mechanism on FIMI.

containing wider impact.⁵⁴ The national expert community found that digital disinformation and electoral interference efforts, assessed as mostly originating from within Poland, employed the tactic of amplifying existing polarizing content with the aim of intensifying societal divisions and diminishing trust in public institutions.⁵⁵ In 2024, the government adopted the Digital Transformation of Education Policy, establishing long-term plans on incorporating media literacy in the education system.⁵⁶

Only five days before the election and over a year past the February 2024 deadline, the government appointed the head of the Office of Electronic Communications as the Digital Services Co-ordinator (DSC) under the EU Digital Services Act (DSA).⁵⁷ The European Commission previously initiated infringement procedures, and on 7 May, decided to refer Poland to the Court of Justice of the EU (CJEU) as the last EU Member State to have not designated the DSC.⁵⁸ Although multiple consultations were held, the legislation necessary for full DSA implementation is pending finalization, with adoption now expected by the end of 2025.

The late non-designation of a DSC left gaps in the national implementation of the DSA, including the lack of a formal user redress mechanism, absence of designated trusted flaggers, uncertainties about the oversight of smaller platforms, and reduced transparency regarding state interactions with Very Large Online Platforms (VLOPs). Despite these limitations, the co-operation formats between VLOPs, national institutions, and several civil society organizations were in place and operational, facilitating the tackling of inauthentic behavior, disinformation, and illegal content. The Science and Academic Computer Network (NASK), which among other tasks monitored the digital campaign environment, noted improved responsiveness of VLOPs, highlighting the appointment of country teams and dedicated communication channels, facilitating the flagging of suspected fake accounts, bot networks, and content linked to disinformation efforts and other systemic risks as understood under the DSA. At the same time, in the absence of DSA-envisaged national enforcement mechanisms, moderation measures, including content removal, remained at the discretion of the platforms.⁵⁹ The effectiveness of content moderation varied significantly between platforms and concerns persisted over the lack of algorithm transparency and its impact on user exposure to information remained a concern.⁶⁰

⁵⁴ On 10 January, the Minister of Digital Affairs [announced](#) that a disinformation campaign linked to the Russian Federation attempted to influence the upcoming election. An Alliance4Europe [report](#) from 17 April described the “Doppelganger operation” it uncovered on X, which used real news reports on polarizing issues to boost manipulated content. On 3 April, the MDA [confirmed](#) a cyberattack on information systems of the PO and the campaign office of Mr. Trzaskowski carried out by groups from the Russian Federation and Belarus, alerting contestants to the possibility of future attacks. On 16 April, the Minister of Digital Affairs [stated](#) that Poland has become the most-targeted country in the EU for cyber-attacks. On 16 May, NASK [confirmed](#) an attack by a pro-Russian hacker group on internet sites of several governing coalition parties, including PO.

⁵⁵ See 6 May 2025 [Poland: Country Election Risk Assessment, FIMI Response Team Report](#) by Alliance4Europe and Debunk.org, September 2024 [Foreign Information Manipulation and Interference Threats and Answers in Poland](#), by INFO OPS Poland Foundation. On 14 May, NASK [warned](#) about possible foreign interference through a third-party paid ads campaign on Facebook. The origin of and funding behind the ads remain under investigation.

⁵⁶ On 13 March, the Minister of Digital Affairs [announced](#) plans to allocate dedicated funds to education on digital competences, including media literacy. A number of media-literacy initiatives were also developed by the public media and civil society.

⁵⁷ See the 14 May [Resolution No. 67](#) of the Cabinet of Ministers.

⁵⁸ See the [16 December 2024](#) and [7 May 2025](#) European Commission press releases.

⁵⁹ Platforms acted on notifications from public authorities and their own monitoring, using automated tools, human moderators, and expert review to assess content against community standards and, where relevant, national law. As part of election integrity measures, platforms such as Meta and TikTok linked users to official and factual information about the electoral process.

⁶⁰ NASK informed the ODIHR LEOM that between 1 January and 11 May, it flagged 482 election-related disinformation incidents to social media platforms. Among the platforms monitored by the ODIHR LEOM, TikTok acted on 78 per cent of reported cases (159 posts), Facebook on 18 per cent (22 posts), and X on 8 per cent (10 posts).

Campaign Finance

Party and campaign finance is regulated by the Election Code and the Political Parties Act, supplemented by NEC clarifications. Despite some positive amendments in 2023, most prior ODIHR recommendations remain unaddressed.⁶¹ The campaign finance legal framework and its current implementation do not ensure equality of opportunity for contestants, effective oversight, transparency and accountability of campaign finances.

There is no state funding for presidential election campaigns. Although not formally established by political parties, electoral committees could receive unlimited funds from them, including from the state funds allocated to qualifying political parties, which gives a significant advantage to candidates supported by state-funded parties.⁶² In 2024, PiS was sanctioned by the NEC with a 40 per cent reduction of its state funding.⁶³ While the NEC's stated aim was to sanction alleged misuse of administrative resources during the 2023 parliamentary elections, this decision was perceived by several IEOM interlocutors as politically motivated.⁶⁴ In May 2025, the NEC sanctioned the Confederation Freedom and Independence with forfeiture of campaign reimbursement for submitting its campaign finance report for the 2024 European Parliament (EP) elections a day after the deadline, which is a disproportionate sanction prescribed by law, while on 10 May 2025, the NEC requested deregistration of the party New Hope on grounds of late submission of its annual report.⁶⁵ The April 2025 instalment of state funding for all qualifying parties was belatedly disbursed on 9 May.⁶⁶ Overall, the reduction of state funding for two major political parties and delayed disbursement for others, affected the financial capacities of the candidates funded by these parties.⁶⁷

Political parties are prohibited by law to campaign and provide in-kind support to candidates, including use of facilities. Moreover, the NEC repeatedly stated that political parties may not undertake information campaigns, including posting about campaign events on social media.⁶⁸ While this regulation seeks to maintain the legally mandated distinction of electoral committees from parties, these restrictions seem unreasonable.⁶⁹

⁶¹ See also the 2025 [ODIHR Opinion on the Act on Political Parties](#).

⁶² Parties and coalitions which obtained at least 3 and 6 per cent, respectively, of the votes cast in parliamentary elections receive public funding proportional to the votes obtained. Following the 2023 elections, PLN 84 million Polish Zloty (approx. EUR 19.64 million; per year were [allocated](#) to nine parties.

⁶³ State funding for PiS was reduced from PLN 26 million to PLN 15.4 million per year, and reimbursement of its 2023 campaign expenditures from PLN 38.7 million to PLN 27 million. PiS received the full reimbursement of PLN 4.5 million for the 2024 European Parliament elections.

⁶⁴ The Supreme Court granted an appeal by PiS, thus entitling it to full funding. The NEC and the Minister of Finance did not comply with the court decision, citing [concerns about the legality of its appointment](#). Prime Minister Tusk [wrote](#) on his official X account: "There is no money and there will be no money." ODIHR LEOM interlocutors noted that for the first time, a party was sanctioned for the involvement of public institutions in the campaign, and that state funding was reduced before the Supreme Court ruled on the case.

⁶⁵ Both these parties support candidate Mentzen. An appeal filed by the Confederation is pending with the Supreme Court.

⁶⁶ The NEC informed the ODIHR LEOM that its prolonged deliberations about the Confederation matter delayed the request to the Minister of Finance to disburse the April installment for nine parties.

⁶⁷ For the 2020 presidential election campaign, the electoral committees reported a total income of PLN 63.8 million, of which 83.4 per cent derived from parties.

⁶⁸ See NEC clarifications of [29 May 2023](#), [16 January 2025](#), and [18 February 2025](#).

⁶⁹ Paragraph 182 of the [ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states: "During elections, political parties often provide support, funding and campaign resources for their candidates. Legislation regulating party activities must allow for the free exercise of such support as long as it does not disturb a minimum "level playing field" among candidates and among parties." Paragraph 49 states: "Any restrictions on free association must have their basis in law in the state constitution or parliamentary act, rather than subordinate regulations Such restrictions must be clear, easy to understand and uniformly applicable to ensure that all individuals and parties are able to understand the consequences of breaching them".

Parties and electoral committees could receive bank loans and monetary and in-kind donations only from Polish citizens with permanent residence in Poland, by bank transfer and subject to limits.⁷⁰ Committees are unlikely to take out loans since their financial representatives and members would be personally accountable for reimbursement. Campaign finance regulations, including rules and limits on donations and a spending limit up to PLN 24.6 million as well as disclosure requirements, are applicable from the registration of electoral committees. From their registration, electoral committees were required to disclose donations on their websites, but not the funds transferred by parties, contracts and payments, which undermines the ability of voters to make an informed choice, including by knowing which political party funds each candidate.⁷¹ The law prescribes short deadlines for disclosure but no monitoring for compliance with the deadlines. Disclosure of donations on scattered websites with limited visibility and in a non-searchable format did not allow for public scrutiny.

At odds with international standards and prior ODIHR recommendations, the law does not regulate third-party campaigning, while in the NEC's interpretation of the law it is prohibited but not sanctioned.⁷² The NEC requested electoral committees to notify the police about individuals using their symbols to campaign without their consent and to report as in-kind donations individuals' campaigning involving any costs, lest they may face sanctions.⁷³ The ODIHR LEOM noted third parties systematically campaigning in favour of or against one candidate or another, including online.⁷⁴ Since third-party campaigning is not subject to the disclosure requirements, such activities undermine transparency of campaign finances.⁷⁵ At the same time, the 31 electoral committees without a registered candidate had the right to fundraise and campaign, provided that they open a dedicated bank account.

The NEC is mandated with party and campaign finance oversight, a function which it performs after having received the financial reports. During the campaign, the financial representatives of electoral committees are mandated to ensure compliance with the rules. Electoral committees are required to submit financial reports within three months from election day. There are no provisions for interim

⁷⁰ An individual may donate up to approximately PLN 70,000 annually to each of the following: an electoral committee, a party's election fund, and a party's regular account. Candidates may donate to their electoral committee up to PLN 210,000. While parties may receive membership fees and donations up to PLN 4,666 annually in cash, electoral committees must receive all donations by bank transfer.

⁷¹ By 13 May, 9 of the 13 candidates disclosed donations; Trzaskowski PLN [6 million](#), Nawrocki PLN [4.7 million](#), Mentzen PLN [680,000](#), Braun PLN [800,000](#), Holownia PLN [210,000](#), Zandberg PLN [110,000](#), Senyszyn PLN [55,000](#), Bartoszewicz PLN [55,000](#), and Biejat PLN [45,000](#). Candidates Jakubiak, Stanowski, Maciak, Woch did not disclose any donations.

⁷² Paragraph 256 of the [ODIHR and Venice Commission Joint Guidelines on Political Party Regulation](#) states that "third-party activities should not be unconditionally prohibited". In [Bowman v. The United Kingdom](#), the European Court of Human Rights ruled that a very low third-party spending limit set by law was a disproportionate measure, violating the right to freedom of expression.

⁷³ See NEC clarifications of [28 August 2023](#), [4 March 2024](#), [20 April 2024](#), [17 March 2025](#), and [31 March 2025](#). The NEC requested parties and electoral committees to refrain from posting their campaign materials on their websites, to prevent individuals from printing and posting them with their own funds.

⁷⁴ For instance, in favour of Mr. Nawrocki, the [Catholics for Nawrocki](#), the [Trade Union Solidarity](#); in favour of Mr. Trzaskowski, the pro-turnout actions [Głosujemy na 100%](#) (Vote on 100%) and [Fundacja Twój Głos Jest Wazny](#) (Your Vote Matters); against Nawrocki and Mentzen, the [Wiesz Jak Nie Jest](#) (You Know How It Is Not) and the [Stół Dorosłych](#) (Adults Table). See the expenditure and number of ads on the [Meta ad library](#).

⁷⁵ Article 6 of the Council of Europe Committee of Ministers' [Recommendation Rec\(2003\)4 on common rules against corruption in the funding of political parties and electoral campaigns](#) provides that "[r]ules concerning donations to political parties, with the exception of those concerning tax deductibility referred to in Article 4, should also apply, as appropriate, to all entities which are related, directly or indirectly, to a political party or are otherwise under the control of a political party". Paragraph 220 of the [Joint Guidelines on Political Party Regulation](#) states "to avoid the creation of loopholes through which unlimited funding can be channeled and financial transactions can be veiled, laws should set proportionate and reasonable limits to the amount that third parties can spend on promoting candidates or parties, ideally by applying existing ceilings for donations to political parties to these actors, as well".

reporting of campaign finances prior to election day, contrary to international good practice.⁷⁶ The reports must be audited, unless a committee notifies the NEC that it had no income and expenditure, but the law does not prescribe criteria for auditing and a transparent procedure for the selection of auditors by the NEC. The NEC publishes the reports within a 30-day deadline but not in a searchable format and without the auditing reports and the identity of donors, which does not enable public scrutiny. It has a six-month deadline to review these reports. Some of the sanctions prescribed by law are not dissuasive while others are not proportionate.⁷⁷

Media

The media landscape is characterized by significant political polarization, which undermines the plurality of views and exacerbates societal division, limiting voters' access to comprehensive information needed for making a fully informed choice. While most IEOM interlocutors acknowledge improved media freedoms in the past year, they highlight the lack of structural reforms needed to ensure full compliance with international commitments.

Despite constitutional guarantees of freedom of expression, defamation and public insult remain criminal offences, with heightened penalties for cases involving public officials or the president.⁷⁸ Although targeted litigation against journalists (strategic lawsuits against public participation, SLAPPs) has decreased nationally, with the current government withdrawing cases initiated by its predecessor, several interlocutors noted persistent issues at the regional level, highlighting the need for decriminalization and implementation of the EU anti-SLAPP directive.⁷⁹ The Ministry of Culture's 2024 consultations on aligning media legislation with the European Media Freedom Act (EMFA) addressed longstanding concerns: financial and editorial independence of public media, depoliticization of the media regulator, transparency of state advertising, and imposing restrictions on municipality-owned media. Despite the inclusivity of the consultation process, the resulting draft legislation remains unpublished, delaying implementation ahead of EMFA's August 2025 enforcement deadline.

The management of public media, *Telewizja Polska (TVP)*, *Polskie Radio*, and the Polish Press Agency (PAP), was replaced shortly after the change of government in December 2023,⁸⁰ through a process that

⁷⁶ According to Paragraph 261 of the [2020 ODIHR and Venice Commission Guidelines on Political Party Regulation](#), "It is good practice to require [...] reports providing oversight bodies and the public with preliminary information on campaign incomes and expenses of parties and candidates several days before election day".

⁷⁷ Overly strict sanctions include forfeiture of both the annual state funding and of reimbursement of campaign expenditures for submitting a financial report after the deadline and for campaign irregularities, imprisonment of the financial representative for failing to transfer in a timely manner the surplus of a fund to a public benefit organisation. Non-dissuasive sanctions include a fine of up to PLN 30,000 if parties and electoral committees do not publish their registers of contracts and donations, or one or more donations; the NEC [stated](#) that it does not monitor and will not apply sanctions for such irregularities. The law does not foresee sanctions if electoral committees do not meet their legal obligation to notify the NEC about the website on which they will disclose donations, or for third-party campaigning.

⁷⁸ Paragraph 47 of [General Comment No. 34](#) on Article 19 of the ICCPR calls on States parties to "consider the decriminalization of defamation", while paragraph 38 stresses that "laws should not provide for more severe penalties solely on the basis of the identity of the person that may have been impugned".

⁷⁹ On 25 April, Article 19 Europe, the Helsinki Foundation for Human Rights, the National Federation of Non-Governmental Organizations, and Citizens Network Watchdog Poland, while welcoming the [draft](#) on the anti-SLAPP legislation prepared by the Civil Law Codification Commission, shared their [concerns](#) that the [proposed](#) amendments to the Criminal Law only soften and narrow the definition of the defamation offence, highlighting that the effectiveness of anti-SLAPP measures should be intertwined with criminal-law reform.

⁸⁰ This prompted some 80 journalists, primarily those previously accused of systematic political bias by civil society and the professional community, to leave the public media for niche news broadcasters *TV Republika* and *wPolsce24*, significantly boosting the viewership of these broadcasters.

departed from legally required procedures.⁸¹ The subsequent suspension of public media funding by the media regulator and the President coincided with the public media being put into a state of liquidation, in order to allow for direct *ad hoc* government funding. This, combined with the insufficient safeguards against political interference in editorial decisions and funding allocation mechanisms, undermined their editorial independence and financial sustainability.⁸²

The National Broadcasting Council (KRRiT) is a five-member media regulatory body mandated to safeguard freedom of speech and public interest. The politicization of KRRiT, in the opinion of many IEOM interlocutors, manifested itself in a selective and non-transparent system of imposing fines and allocating broadcasting licenses, that favoured several conservative media outlets.⁸³ These allegations prompted parliamentary proceedings against KRRiT Chairperson over alleged administrative misconduct, which he denounced as politically motivated.⁸⁴ Since 18 March, KRRiT has been monitoring one daily news and one weekly current-affairs programme on four television channels, and published seven narrative reports, concluding that the coverage of *TVP1*, *TVN* and *Polsat* was favourable towards Mr. Trzaskowski and critical of Mr. Nawrocki, while *TV Republika* favoured Mr. Nawrocki and criticized Mr. Trzaskowski. KRRiT did not formally act upon the monitoring before election day, however the chairperson has informed ODIHR LEOM about his intentions to review the coverage of the campaign of major candidates after the election day.

TVP complied with its legal obligation to provide free airtime, which was used by all contestants except Mr. Jakubiak.⁸⁵ In line with legal requirements, *TVP* organized a debate on 12 May which featured all contestants. This debate was organized in collaboration with *TVN* and *Polsat*, whose journalists served as co-hosts.⁸⁶ On 11 April, Mr. Trzaskowski's campaign organized a debate-style discussion, facilitated and broadcast by *TVP*, *TVN* and *Polsat*. Initially only Mr. Nawrocki was invited, but upon his refusal the invitation was extended to all candidates. The involvement of select private broadcasters in the organization of the debate along with *TVP*, combined with the exclusion of other media outlets, and *TVP*'s facilitation of a campaign event organized by a contestant drew concerns of some stakeholders,

⁸¹ In December 2023, following a resolution of the *Sejm* urging the restoration of the “constitutional order and impartiality of public media” due to the alleged political control of the previous government, the Minister of Culture dismissed the management of the three public media, bypassing the National Media Council, which has the authority to do so. On 18 January 2024, the Constitutional Tribunal [ruled](#) that using commercial law to implement changes in the management of public media or to liquidate them is unconstitutional; however, the decision was [not published](#) in the Official Gazette by the current government in order to become legally binding, due to the disputed composition of the Tribunal.

⁸² Paragraph 5 of Section III.5 of the Council of Europe Committee of Ministers [Recommendation CM/Rec\(96\)10](#) recommends that “payment of the contribution or license fee should be made in a way which guarantees the continuity of the activities of the public service broadcasting organization and which allows it to engage in long-term planning”.

⁸³ The 2024 European Commission Rule of Law [Report](#) raised concerns “regarding the regulatory impartiality of the media regulator”. For example, news radio [TOK FM](#) and [TVN Style](#) each waited for 11 months and [Stopklatka TV](#) for 14 months for a decision extending their broadcasting license. However, in June 2024, two conservative televisions, *TV Republika* and *wPolsce24*, [received](#) the license to broadcast on Poland's digital terrestrial television multiplex in 1.5 months. On 9 April 2025, the Warsaw Administrative Court [overturned](#) KRRiT's decision on these licenses. The KRRiT chairperson has informed ODIHR LEOM about their intention to appeal.

⁸⁴ In May 2024, a group of 185 *Sejm* members initiated a parliamentary investigation into KRRiT Chairperson accusing him of financial obstruction of public media, preferential treatment and discrimination against private broadcasters in licensing and imposing sanctions, as well as neglect of statutory obligations. Although the Parliamentary Commission on Constitutional Accountability concluded hearings of witnesses and gathering evidence on 23 April, it is yet to formally approve the findings and present them to the *Sejm*.

⁸⁵ *TVP* provided free airtime during the morning and afternoon, outside of primetime.

⁸⁶ *TVP* informed ODIHR LEOM, that co-operation with *TVN* and *Polsat* in organizing and facilitating debates was an established practice until the change of the management in 2016.

including the KRRiT chairperson.⁸⁷ Several debates were also organized by private broadcasters, although only one of them featured all contestants.⁸⁸

The media polarization was evident in the results of ODIHR LEOM media monitoring.⁸⁹ All monitored outlets, except *TV Republika*, devoted the largest share of coverage to Mr. Nawrocki, ranging from 31 to 37 per cent of overall news about contestants, with the tone varying from largely neutral on *Interia* and *Polsat* to negative and neutral on public *TVP1*, *TVP-Info* and private *TVN* and *Onet*. Mr. Trzaskowski received between 18 and 20 per cent of coverage that was mainly neutral on *TVP-Info*, *Interia*, *Onet*, *TVN* and *Polsat*, and neutral and to a lesser extent positive on *TVP1*.⁹⁰ Mr. Hołownia received between 10 and 14 per cent of coverage that was mainly positive and neutral on *TVP-Info*, or mainly neutral on *Polsat*, *Interia*, *Onet*, *TVN* and *TVP1*. By contrast, *TV Republika* allocated some 42 per cent of coverage to Mr. Trzaskowski, almost entirely negative in tone, 34 per cent to Mr. Nawrocki, predominantly positive in tone, and 6 per cent to Mr. Hołownia, mainly negative and neutral in tone.⁹¹

The monitored media provided a considerable amount of mainly neutral coverage to Ms. Biejat (between 5 and 11 per cent), Mr. Zandberg (between 4 and 6 per cent), and neutral to negative coverage to Mr. Mentzen (between 5 and 9 per cent). *TV Republika* allocated 4 per cent of coverage to Mr. Zandberg, 3 per cent to Ms. Biejat, and 2 per cent to Mr. Mentzen, mainly neutral or negative in tone. Mr. Braun received between 4 and 5 per cent of predominantly negative coverage on all media except *TV Republika*, which provided him with only 1 per cent of neutral coverage.

Election Dispute Resolution

The law provides for expedient administrative and judicial remedies for election disputes and broad legal standing to candidates' electoral committees. Decisions of election commissions may be appealed to higher-level commissions. Decisions related to voter registration can be challenged to the respective municipal authorities, whereas rejection of the registration of electoral committees and of candidates by the NEC can be appealed to the Supreme Court. The deadline for adjudication is two days, and all decisions are published online. Contrary to international good practice, challenges to NEC guidelines and clarifications can be made to the Supreme Court within seven days of their publication only by the

⁸⁷ On 30 April the KRRiT chairperson in his communication [letter](#) called the co-operation of *TVP* with private broadcasters a “media cartel collusion” that violates “both citizens’ right to equal access to information and the right of journalists to report”. Previously, on 14 April, he had requested the NEC’s opinion whether the involvement of *TVP* in the 11 April event was in line with the legislation. The NEC [stated](#) it may review the case as part of its post-electoral scrutiny. Apart from other legal requirements, the NEC [clarification](#) of 31 March 2025 prohibits contestants from organizing joint appearances, broadcasts, or meetings to avoid mutual support and financial obfuscation.

⁸⁸ The debates organized by *TV Republika* in Końskie on 11 April, as their response to not being included in the organization of debate on the same day by Trzaskowski’s campaign featured 5 candidates, while the latter featured 8 candidates. Two other debates on *TV Republika* on 14 April and 9 May featured 10 candidates, as Mr. Trzaskowski and Ms. Biejat chose not to participate. Mr. Maciak attempted to participate in all debates on *TV Republika* but was refused entry. His electoral committee was also [not invited](#) to the debate among the electoral committees on 5 May on *Polsat*, due to his support of the Russian Federation’s president. The debate organized by tabloid *Super Express* on 28 April was the only one organized by private media to feature all contestants.

⁸⁹ Between 23 April and 16 May, the ODIHR LEOM monitored the primetime broadcasts (18:00–23:00 hrs.) of *TVP1*, *TVN* and *Polsat*, as well as two-hour slots of news channels *TV Republika* (19:00–21:00 hrs.) and *TVP-Info* (21:00–23:00 hrs.). The mission also monitored the political and election-related sections of [onet.pl](#) and [interia.pl](#).

⁹⁰ Council of Europe Committee of Ministers [Recommendation CM/Rec\(2007\) 15](#) calls on member states to “adopt measures whereby the media which are owned by public authorities, when covering election campaigns, should do so in a fair, balanced and impartial manner, without discriminating against or supporting a specific political party or candidate”.

⁹¹ *TV Republika* has informed the ODIHR LEOM about several cases of their journalists being prevented from covering the events organized by the Prime Minister, as well as several campaign events organized by Mr. Trzaskowski. Several national and regional media informed the ODIHR LEOM of cases of intimidation of their journalists by supporters of Mr. Nawrocki or PiS and, in one case, by a *TV Republika* journalist.

legal representative of an electoral committee.⁹² The rejection of campaign finance reports by the NEC is appealable to the Supreme Court, which has 60 days to decide.

Any registered voter, chairperson of an election commission, or representative of an electoral committee can file a challenge against the election of the president with the Supreme Court. Challenges are heard by three-judge panels of the Chamber for Extraordinary Control and Public Policy, within 14 days of the announcement of results. The NEC submits a report on the election results to the Supreme Court no later than 14 days after the election. Based on the NEC's report, as well as the panels' opinions on any complaints, the Chamber rules on the validity of the election results, within 30 days of their publication. Complaints on election results may be filed only after the announcement of the final election results. Complaints against results of the first round are thus considered "premature" and declared inadmissible on formal grounds, not ensuring effective legal address, contrary to OSCE commitments.⁹³

Referencing the controversy surrounding the appointment of judges and the establishment of the Supreme Court Chamber for Extraordinary Control and Public Policy, tasked with validating election results, Many IEOM interlocutors raised concerns over the lack of independence of this Chamber, which in the view of the European Court of Human Rights is not a tribunal established by law.⁹⁴ On 10 March, the President vetoed a bill that would have switched the authority to validate elections from this chamber to the 15 longest-tenured Supreme Court judges. The controversy appears to have led to a reduction in public trust in the judiciary, which could impact acceptance of any decision made by this chamber.⁹⁵

The Supreme Court heard two challenges on candidate registration, one concerning the denial by the NEC to register an electoral committee, and another against a decision not to register a candidate; the NEC decisions were upheld in both cases.⁹⁶ The Court also heard complaints against the NEC guidelines regarding election-day procedures.⁹⁷ One provision which allowed domestic observers to present a digital scan of the authorization certificate to observe on election day, was overturned based on the possibility that the certificates could be duplicated and lead to unauthorized persons taking part in the election process.⁹⁸ The affected CSOs informed the ODIHR LEOM that this posed additional organizational and financial challenges, as they were obliged to send the originals of the nominating letters to all their observers. Another provision, allowing people waiting in line at 21:00 hrs. when polling stations close, was upheld on the grounds that citizens cannot be deprived of their right to vote based on the inability of the election administration to process all voters before the time of closing. Undermining transparency, the Supreme Court hearings were closed to the public and did not provide the appealing party the opportunity to be heard, in violation of OSCE commitments and international good practice, which are

⁹² Guideline II.3.3.f of the Venice Commission's [Code of Good Practice in Electoral Matters](#) provides that "all candidates and all 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".

⁹³ Paragraph 5.10 of the 1990 [OSCE Copenhagen Document](#) states that everyone shall have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity. Article 2.3(a) of the ICCPR states that "any person whose rights or freedoms as herein recognized are violated shall have an effective remedy...".

⁹⁴ The European Parliament (Resolution adopted by the European Parliament on 11 July 2023), the European Court of Human Rights (ECtHR, case of *Dolińska-Ficek and Ozimek v. Poland*, application nos. 49868/19 and 57511/19, judgment of 8 November 2021) and the European Court of Justice (Case C-718/21, *Krajowa Rada Sądownictwa - Continued holding of a judicial office -*, 21 December 2023) have stated that the Extraordinary Review Chamber cannot be considered a court established by law.

⁹⁵ See a 2022 report on [Social Assessments of the Justice System](#) by the Public Opinion Research Center, according to which 55 per cent of Polish citizens have negative opinions about the judiciary, with only 28 per cent voicing positive opinions.

⁹⁶ Both challenges involved the number and validity of support signatures.

⁹⁷ The complaints were filed by the electoral committees of candidates Biejat, Jakubiak and Nawrocki.

⁹⁸ Candidate proxies and citizen observers do not need accreditation, but they need to provide a letter by their nominating organization in a NEC-approved format.

particularly relevant in situations where, as in this case, an appeal to the Supreme Court is the only available legal remedy.⁹⁹

The ODIHR LEOM was not informed of any complaints filed with the district courts, which hear complaints concerning campaign material which contains false information. The Supreme Administrative Court, which hears challenges to the delineation of electoral precincts and districts, did not receive any complaints.

Election Observation

The Election Code provides for domestic and international observation of the electoral process. Associations and foundations registered in Poland which according to their founding documents are active in the fields of democracy, civil rights, and civil society development have the right to observe the work of CECs and PECs, but not of the NEC, contrary to previous ODIHR recommendations. Moreover, citizen observers are not entitled to enter comments on PEC minutes or protocols, or to follow the transportation and handover of results protocols to the higher-level commissions. Such restrictions to the work of citizen observers negatively impact transparency of the process and are contrary to international good practice.¹⁰⁰

Electoral committees which have fielded presidential candidates can nominate one representative to each commission, including PECs.¹⁰¹ International observers were accredited by the NEC, following consultation with the MFA, and had access to all stages of the electoral process at all levels.

On election day, citizen observers and candidate proxies may record the voting process, in addition to the counting stage, provided that they notify the election authorities and the MDA in advance and upload the footage from their devices to a specifically designed application or hand it to the election authorities, with the obligation to delete it from their personal devices.¹⁰² Contributing to transparency, several CSOs observed various aspects of the electoral process.¹⁰³ The electoral committee of Mr. Nawrocki launched an ‘election protection movement’ mobilizing PEC members and proxies to monitor election day and verify election results.

⁹⁹ Paragraph 12 of the 1990 [OSCE Copenhagen Document](#) provides that “proceedings may only be held in camera in the circumstances prescribed by law and consistent with obligations under international law and international commitments”. Paragraph 100 of the Explanatory Report of the Venice Commission’s [Code of Good Practice in Electoral Matters](#) states: “The appeal procedure should be of a judicial nature, in the sense that the right of the appellants to proceedings in which both parties are heard should be safeguarded”.

¹⁰⁰ Section II.3.2.a of the [Venice Commission’s Code of Good Practice in Electoral Matters](#) recommends that “[b]oth national and international observers should be given the widest possible opportunity to participate in an election observation exercise”. Paragraph 93 of the Venice Commission’s 2024 [Report on Election Observers as Human Rights Defenders](#) states: “Election observers have the right to participate in meetings of the election administration. Observers should have the possibility to follow the meetings of EMBs at all levels to assess the independence of these institutions and their activities”.

¹⁰¹ Candidate proxies were paid 40 per cent of the PEC member remuneration, provided that the PEC chair confirmed that they observed for at least five hours on election day, as well as the vote count and the filling in and signing of the results protocol.

¹⁰² Based on data from the MDA, the application to upload footage is used in limited numbers. The footage is considered election material and is stored until the publication and validation of the election results.

¹⁰³ Among others, the Committee for the Defence of Elections (KOD) deployed some 3,000 observers on election day and conducted a parallel vote count in a representative sample of 500 polling stations. The Election Observatory also observed election day proceedings. The Political Accountability Foundation conducted monitoring of the training of PEC members, campaign finance, and in particular online expenditures. The Institute for Public Affairs, the CEC Digital Democracy Watch and the Batory Foundation monitored campaign on social media. The Helsinki Foundation for Human Rights focused on analysis of the legislative framework and providing legal aid.

Election Day

The IEOM observed opening, voting, counting and tabulation in a limited number of polling stations across the country; however, in line with the methodology for limited election observation missions, it did not undertake a systematic or comprehensive assessment of election day proceedings.

In the polling stations where opening was observed, voting started on time, with procedures generally followed. Throughout the day, voting was assessed as professional, well-organized and orderly, with occasional queues inside polling premises noted during the morning. Established procedures, including with regards to voter identification, were generally respected, and IEOM observers reported no incidents or serious procedural shortcomings or irregularities from the observed polling stations. However, contrary to international standards, observers noted that the secrecy of the vote was often not ensured, due to the polling station layout or placement of voting screens, but also because voters did not always fold their marked ballot before placing it in the transparent ballot box.¹⁰⁴ In addition, cases of group voting were also observed. Not all voting premises categorized by the NEC as accessible for persons with disabilities were assessed as such by IEOM observers.

Women were well-represented among the polling staff in the polling stations observed. IEOM observers noted only a limited presence of candidate proxies and citizen observers. The IEOM did not observe cases of interference in the work of PECs in polling stations visited.

The vote counts observed by the IEOM were conducted transparently and generally in line with prescribed procedures, although a few instances of minor deviations such as PEC members counting ballots cast for individual contestants in parallel rather than consecutively were noted. The PECs observed had no problems completing the results protocols. The early stages of tabulation, where observed, were assessed as well organized and transparent, with efficient intake of election materials and verification of protocols, and were conducted in line with established procedures.

The NEC announced a final turnout of 67.3 per cent. It started posting preliminary election results from abroad shortly after 21:00 hrs., and from within Poland at around 21:45 hrs. on election night, contributing to transparency. Preliminary results indicate that a second round will take place on 1 June.

The NEC informed that police had reported over 300 offenses and misdemeanours related to election day, including disturbance of public order, damage of banners, cases of intoxicated PEC members and attempts by voters to remove ballots from polling stations. In addition, numerous violations of the campaign silence were reported.

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

¹⁰⁴

See [the Venice Commission's Code of Good Practice in Electoral Matters](#) and PACE [Resolution 1590](#) (2007).

MISSION INFORMATION & ACKNOWLEDGEMENTS

Warsaw, 19 May 2025 – This Statement of Preliminary Findings and Conclusions is the result of a common endeavour involving the OSCE Office for Democratic Institutions and Human Rights (ODIHR) and the Parliamentary Assembly of the Council of Europe (PACE). The assessment was made to determine whether the election complied with OSCE commitments, Council of Europe standards, other international obligations and standards for democratic elections, and with national legislation. Each of the institutions involved in this International Election Observation Mission has endorsed the 2005 Declaration of Principles for International Election Observation.

Dunja Mijatović is the Head of the ODIHR LEOM, deployed from 11 April. The Acting Head of the PACE delegation was Liliana Tanguy.

This Statement of Preliminary Findings and Conclusions is delivered prior to the completion of the electoral process. The final assessment of the election will depend, in part, on the conduct of the remaining stages of the electoral process, including the count, tabulation and announcement of results, the handling of possible post-election day complaints or appeals, and the second round of the presidential election. ODIHR will issue a comprehensive final report, including recommendations for potential improvements, some months after the completion of the electoral process. The PACE will present its report in its fourth part-session on 29 September.

The ODIHR LEOM includes 13 experts in the capital and 16 long-term observers deployed throughout the country. On election day, 67 observers from 30 countries were deployed across the country, including 34 observers deployed by ODIHR, as well as a 33-member delegation from the PACE. There were 55 per cent of women among observers.

The IEOM wishes to thank the authorities of the Republic of Poland for the invitation to observe the elections, and the National Election Commission, the National Election Office and the Ministry of Foreign Affairs for their assistance. The IEOM wishes to also express their appreciation to other state institutions, candidates, political parties, media and civil society organizations, and international community representatives for their co-operation.

For further information, please contact:

- Dunja Mijatović, Head of the ODIHR LEOM, in Warsaw (+48 724 530 146), until 10 June;
- Katya Andrusz, ODIHR Spokesperson (+48 609 522 266), or Martina Barker-Ciganikova, ODIHR Election Adviser, in Warsaw (+48 695 654 060);
- Ivi-Triin Odrats, PACE Deputy Head of Elections Division (+33 607067773).

ODIHR LEOM Address:

Postępu 17A, Adgar Plaza A, 2nd floor, Brain Embassy
02-676 Warsaw, Republic of Poland
telephone: +48-724-530 146; email: office@odihr-leom.pl