

Office for Democratic Institutions and Human Rights

## REPUBLIC OF BULGARIA

# EARLY PARLIAMENTARY ELECTIONS 5 October 2014

## OSCE/ODIHR NEEDS ASSESSMENT MISSION REPORT 18-20 August 2014



Warsaw 27 August 2014

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# REPUBLIC OF BULGARIA EARLY PARLIAMENTRY ELECTIONS 5 October 2014

### OSCE/ODIHR Needs Assessment Mission Report 18-20 August 2014

#### I. INTRODUCTION

Following an invitation from the Minister of Foreign Affairs of the Republic of Bulgaria to observe the upcoming 5 October 2014 early parliamentary elections, the OSCE Office for Democratic Institutions and Human Rights (OSCE/ODIHR) undertook a Needs Assessment Mission (NAM) to Bulgaria from 18 to 20 August 2014. The NAM included Dr. Beata Martin-Rozumiłowicz, Head of the OSCE/ODIHR Election Department, Ms. Tatyana Bogussevich, OSCE/ODIHR Senior Election Adviser, and Mr. Alexey Gromov, OSCE/ODIHR Election Adviser.

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

The OSCE/ODIHR would like to thank the Ministry of Foreign Affairs for its assistance and cooperation in organizing the visit. The OSCE/ODIHR would also like to thank all of its interlocutors for having taken the time to meet with the mission and sharing their views.

#### II. EXECUTIVE SUMMARY

On 5 October, early parliamentary elections in Bulgaria will be held after the resignation of the government and the consequent dissolution of the parliament. The 240-member parliament is elected through a proportional list system from 31 multi-mandate constituencies. Following recent legal amendments, the possibility of a preferential vote for candidate lists was introduced.

In March 2014, a new Electoral Code was adopted following the parliament's overriding of the president's veto. Many OSCE/ODIHR NAM interlocutors acknowledged that the new Electoral Code addressed a number of previous OSCE/ODIHR recommendations, among others, those regarding balancing party representation in leadership positions of election commissions, simplification of the candidate registration procedure, provision of free airtime for campaigning in public media, and further regulation of the electoral dispute resolution process. However, several important recommendations remain to be addressed, in particular the disenfranchisement of imprisoned voters, or lack of a possibility to stand for individuals with dual citizenship.

The election administration for parliamentary elections operates at three levels: the Central Election Commission (CEC), 31 District Election Commissions (DECs), one in each of the 31 multi-mandate constituencies, and some 12,000 Precinct Election Commissions (PECs). The CEC, which is a permanent body, is composed of 20 members with a five-year mandate. All election administration levels are formed based on political nominations. Few OSCE/ODIHR NAM interlocutors expressed distrust in the election administration or other institutions responsible for the conduct of the elections. Some stated that DECs and PECs would benefit from additional training, especially on the rules for counting preferential votes.

Voter lists are compiled based on data from the population register and are available for public scrutiny 40 days before election day. Voters are offered several alternative voting mechanisms, such as voting at their place of stay and at special polling stations, use of absentee voting certificates, homebound voting and voting abroad. Voters can be added to voter lists on election day based on their permanent address. According to the CEC, experimental machine voting will be conducted during these elections in parallel with regular voting at up to 300 polling stations.

Candidates can be nominated by political parties, coalitions and nominating committees. Candidate lists are put forward by political parties and coalitions registered with the CEC. Such nominations should be supported by 2,500 voters' signatures and electoral deposits of BGN 2,500 (approximately EUR 1,280). Nominating committees registered with DECs can nominate independent candidates, also with support signatures from no less than one per cent but no more than 1,000 voters from the relevant constituency and a deposit of BGN 100.

The official election campaign starts on 5 September. The campaign is anticipated to focus on social welfare, employment, and the effectiveness of regulatory bodies. Alleged vote buying / controlled voting and concerns with insufficient law enforcement to counter such practices were raised by many interlocutors; minority groups, especially Roma, are perceived as most vulnerable in terms of such electoral irregularities. Although previously noted in OSCE/ODIHR recommendations, the legislation continues to prohibit campaigning in any language but Bulgarian.

The new Electoral Code provides for electoral contestants to be allocated free airtime equally on public television and radio. The distribution of financial 'media packages' to nominating committees and parties that do not qualify for state subsidies are additionally provided to cover campaign expenses in the media. All contestants are also entitled to take out paid advertisements. In implementation of a long-standing OSCE/ODIHR recommendation, all broadcasters will have to separate paid content from editorial and news reporting and to clearly mark it as such.

Parties represented in the parliament and those that garnered over one per cent of the valid votes in the last elections receive state subsidies proportional to the number of votes received. All electoral contestants may receive private donations from individuals, while contributions from legal entities and anonymous sources are prohibited. All electoral contestants should submit financial reports to the National Audit Office (NAO) within five days of the start of the campaign and continuously update them throughout the campaign. Final reports are to be submitted to NAO within 30 days after the elections. The OSCE/ODIHR NAM interlocutors expressed general satisfaction with campaign finance provisions.

Citizen and international observers as well as proxies of all contestants have access to all stages of the electoral process and are entitled to receive copies of results protocols at polling stations. Many OSCE/ODIHR NAM interlocutors expressed concerns about misuse of some non-partisan observers by political parties during the recent European Parliament elections.

All interlocutors met with during the OSCE/ODIHR NAM underscored the need for an OSCE/ODIHR election observation activity for the early parliamentary elections. In considering an observation activity, the OSCE/ODIHR NAM has taken into account the various findings outlined in this report and the concerns expressed by stakeholders. These include issues related to the implementation of the amended legal framework, potential issues in administering the elections, including in connection with machine voting and the preferential voting method, campaign and campaign finance issues, and electoral disputes resolution.

On this basis, the OSCE/ODIHR NAM recommends the deployment of a Limited Election Observation Mission (LEOM) to the Republic of Bulgaria to assess the 5 October 2014 early parliamentary elections for its compliance with OSCE commitments, other international obligations, and domestic legislation. In addition to a core team of experts, the OSCE/ODIHR NAM recommends that 14 long-term observers be seconded by participating States.

#### III. FINDINGS

#### A. BACKGROUND AND POLITICAL CONTEXT

On 24 July 2014, the parliament (National Assembly) approved the resignation of Prime Minister Plamen Oresharski and his government, following economic and political crises. As no new government was formed, President Rosen Plevneliev dissolved the parliament on 6 August, appointed an interim government, and set early parliamentary elections for 5 October. The interim government declared holding free and fair parliamentary elections as one of its primary tasks.

Following the 2013 parliamentary elections, the center-right Citizens for European Development of Bulgaria (GERB) obtained 97 of 240 seats in the parliament, but failed to form a government. The Coalition for Bulgaria (CfB), consisting of the Bulgarian Socialist Party and several smaller parties, and the Movement for Rights and Freedoms (MRF), got 84 and 36 seats, respectively. The far-right *Ataka* party won 23 seats. A minority government was formed by CfB together with MRF and remained in power since then, having endured five no-confidence votes in the parliament.

The OSCE/ODIHR has observed seven elections in Bulgaria since 1997, most recently in 2013, when the OSCE/ODIHR deployed an Election Observation Mission (EOM) for the early parliamentary elections. The EOM concluded that the elections "were held in a competitive environment and fundamental freedoms of expression, association and assembly were respected. The administration of the elections by commissions was well managed and the Central Election Commission generally worked in an open manner. The electoral process was further negatively affected by pervasive allegations of vote-buying. Media provided voters with a variety of information. Nevertheless, a significant share of the campaign information had to be paid for, creating an unequal playing field for candidates. Election day took place in a calm and orderly manner and, overall, observers evaluated the process in polling stations positively". <sup>1</sup>

#### B. LEGISLATIVE FRAMEWORK AND ELECTORAL SYSTEM

The legal framework regulating the parliamentary elections includes the Constitution, the Electoral Code, the Law on Political Parties, and other legal acts, as well as instructions and decisions of the Central Election Commission (CEC). Many OSCE/ODIHR NAM interlocutors noted that the current legislation provides a sound basis for the conduct of free and genuine elections, if implemented properly.

The parliament is a unicameral body consisting of 240 members. It is elected through a proportional representation system from 31 multi-mandate constituencies. The number of mandates in each constituency is decided by the CEC according to the population size, with a minimum of four mandates per constituency.<sup>2</sup> Political parties and coalitions that receive at least four per cent of the

All OSCE/ODIHR election observation and assessment mission reports on Bulgaria can be found at: <a href="http://www.osce.org/odihr/elections/bulgaria">http://www.osce.org/odihr/elections/bulgaria</a>.

On 6 August 2014, the CEC adopted a decision defining the number of mandates per constituency.

valid votes at the national level and independent candidates who receive valid votes no less than the constituency electoral quota, can participate in the allocation of mandates.<sup>3</sup> With the new Electoral Code, legislators introduced the possibility of a preferential vote; now voters have the possibility to vote for candidate lists in their entirety or to express preferences for individual candidates. To win a preferential seat, a candidate must be marked by at least seven per cent of the voters who voted for his or her candidate list.

Following the 2013 OSCE/ODIHR EOM, the OSCE/ODIHR provided a set of recommendations aimed at further improving the electoral legal framework and practice. On 21 February 2014, the parliament adopted the new Electoral Code, which was subsequently vetoed by the president. Among the reasons for the veto, the president expressed his concerns with regard to the new procedure for the formation of the CEC, lack of changes to the voter registration system, the suggested switch from experimental electronic to machine voting, and the rules for preferential voting in different types of elections. The veto was overridden by the parliament on 4 March, thus enacting the new Electoral Code some two months ahead of the European Parliament elections.

A number of previous recommendations made by the OSCE/ODIHR, the European Commission for Democracy through Law (Venice Commission) of the Council of Europe, and the Group of States against Corruption of the Council of Europe (GRECO) were addressed. Among others, recommendations regarding balancing party representation in leadership positions of election commissions, reducing the number of support signatures and deposits amounts required for independent candidate registration, provision of free airtime for campaigning in public media, and further regulation of the electoral dispute resolution process were taken into account. However, OSCE/ODIHR NAM interlocutors noted that some important recommendations remain to be addressed, in particular the disenfranchisement of imprisoned voters, or lack of a possibility to stand for individuals with dual citizenship.

In line with previous OSCE/ODIHR recommendations, the new Electoral Code provides the possibility to appeal all decisions of all election commissions; lower-level commissions' decisions are appealable to the higher-level commission, and CEC decisions to the Supreme Administrative Court. Despite a long-standing recommendation, the results of parliamentary elections can be challenged before the Constitutional Court only by political parties and contestants and only through the institutions stipulated in the Constitution.<sup>5</sup>

#### C. ELECTION ADMINISTRATION

Parliamentary elections are administered by a three-level structure: the CEC, which is a permanent body, 31 District Election Commissions (DECs), one in each of the 31 multi-mandate constituencies, and some 12,000 Precinct Election Commissions (PECs).

The CEC composition was changed following the adoption of the new Electoral Code and comprises 20 members nominated by political parties and coalitions. While the chairperson, deputy chairpersons and the secretary of the CEC are now elected by the parliament, the remaining CEC

The electoral quota is the ratio of the total number of the valid votes cast in the relevant constituency divided by the number of mandates in the constituency.

These include one-fifth of the members of the parliament, the president, the Council of Ministers, the Supreme Court of Cassation, the Supreme Administrative Court and the Prosecutor General.

See: <a href="http://president.bg/cat47/527/ukaz-31-za-vrushtane-za-novo-obsujdane-v-ns-na-izbornia-kodeks-priet-ot-ns-na-21-fevruari-2014-godina.html">http://president.bg/cat47/527/ukaz-31-za-vrushtane-za-novo-obsujdane-v-ns-na-izbornia-kodeks-priet-ot-ns-na-21-fevruari-2014-godina.html</a>

Eighteen members are to be nominated by parliamentary parties and coalitions in proportion to their representation in parliament. Additionally, parties and coalitions that have members in the European Parliament, but are not represented in the national parliament can nominate one CEC member each.

members are appointed by the president. The coalitions, 'Reformist Bloc' and 'Bulgaria without Censorship' are both represented in the European Parliament, but not in the national parliament. According to OSCE/ODIHR NAM interlocutors, the 'Reformist Bloc' is represented in the CEC, while the nominee of 'Bulgaria without Censorship' was suspended by the president due to lack of clear rules on parliamentary consultations for such an appointment.<sup>7</sup>

The CEC appoints DEC members and DECs in turn appoint PECs. The same parties and coalitions that form the CEC nominate members to DECs and PECs. DECs are composed of 13 or 17 members, depending on the number of mandates in the relevant constituency. The number of PEC members varies from 5 to 9, depending on the number of registered voters.

Few OSCE/ODIHR NAM interlocutors expressed distrust in the election administration or other institutions responsible for the conduct of the elections. Some OSCE/ODIHR NAM interlocutors stated that DECs and PECs would benefit from additional training on election day procedures, especially on the new rules for counting preferential votes.

#### D. VOTER REGISTRATION AND ALTERNATIVE VOTING MECHANISMS

All citizens 18 years or older on election day have the right to vote, except those serving a prison sentence, regardless of the severity of their crime. Voter registration is passive. Voter lists are extracted from the national population register maintained by the Civil Registration and Administration Services Department of the Ministry of Regional Development (GRAO), which is also responsible for printing of voter lists for each precinct. The number of voters is estimated at 6.5 million. Voter lists should be posted for public scrutiny both in hard copy and on websites of municipalities starting from 25 August. A voter can file a complaint against any mistakes no later than seven days before election day to a local administration, and the decision can be appealed to the administrative court. A voter residing abroad can appeal any mistakes via a special web application electronically to the CEC.

Voters enjoy several alternative voting mechanisms, such as voting at special polling stations, use of absentee voting certificates, homebound voting and voting abroad. A number of safeguards are provided in the law against possible multiple voting.

Any voter may request to be entered in the voter list according to the current address no later than 14 days before election day. The CEC and DEC members, candidates and observers can vote at any polling station with an absentee voting certificate. Voters with permanent disabilities have the right to request homebound voting. Voters can vote in medical and specialised social institutions, in detention facilities, and on ships if they are included into the special voter list no later than two days before election day. To be able to vote abroad, citizens should apply personally or by post to a diplomatic mission, or electronically to the CEC 25 days before election day. All such voters are to be removed from in-country voter lists in advance.

Fulltime students and voters with temporary disabilities are entitled to vote at polling stations of their choice, while PEC members and police officers may vote at the polling stations that they are assigned to on election day. A voter can be added to a voter list on election day based on a permanent address within the country or in a voter list abroad based on a residence address.

See: <a href="http://president.bg/news2113/darzhavniyat-glava-nyama-da-izdade-ukaz-za-dopalvane-sastava-na-tsentralnata-izbiratelna-komisiya.html">http://president.bg/news2113/darzhavniyat-glava-nyama-da-izdade-ukaz-za-dopalvane-sastava-na-tsentralnata-izbiratelna-komisiya.html</a>

Voter lists are compiled on the basis of voters' permanent address, which is assigned to every citizen.

According to the Ministry of Foreign Affairs, some 350 polling stations are expected to be opened for voting of Bulgarian citizens abroad.

For several years, a debate on possible introduction of Internet voting has been ongoing, but was not included in the new Electoral Code. Instead, the law now provides for experimental machine voting in parallel with regular voting. According to the CEC, machine voting will be conducted during these elections at up to 300 polling stations, although the voting results counted by machines will not be official. Several OSCE/ODIHR NAM interlocutors expressed concern over lack of transparency in defining the parameters of the hardware and software to be used.

#### E. REGISTRATION OF CANDIDATE LISTS AND INDEPENDENT CANDIDATES

To participate in the elections, political parties and coalitions should register with the CEC by submitting 2,500 support signatures and paying electoral deposits of BGN 2,500 (approximately EUR 1,280). Parties and coalitions present their candidate lists to DECs. The order of candidates on a list is set by the party, and the candidate list must contain the number of candidates no more than double the number of seats in the relevant constituency.

Nominating committees registered with DECs can nominate independent candidates in the constituencies. The nomination of an independent candidate shall be supported by support signatures from no less than one per cent but no more than 1,000 voters from the relevant constituency and a deposit of BGN 100.

Several OSCE/ODIHR NAM interlocutors noted that the new Electoral Code simplified the registration rules for contestants, as noted above, in line with previous OSCE/ODIHR recommendations. Nevertheless, each voter can sign in support of only one political party, coalition or an independent candidate, thus leaving a previous OSCE/ODIHR recommendation unaddressed. Supporting signatures are checked by the GRAO. If the same signature is identified on the applications of two or more political parties, coalitions, candidates, it is considered valid only for the application that was submitted first. Political parties, coalitions, and candidates should be given three days to correct any inaccuracies in their nomination documents. None of the OSCE/ODIHR NAM interlocutors expressed any concerns related to the implementation of candidate registration rules.

Political parties and candidates that receive more than one per cent of the valid votes nationwide and nominating committees whose independent candidate receives at least one-quarter of the constituency electoral quota are entitled to a refund of their electoral deposit.

#### F. CAMPAIGN AND MEDIA

The official election campaign starts 30 days before elections, on 5 September for these elections. Some of the topics that the OSCE/ODIHR NAM interlocutors anticipated the campaign to focus on included social welfare, employment, and the effectiveness of regulatory bodies. Alleged vote buying/controlled voting and concerns with insufficient law enforcement to counter such practices were raised by many interlocutors; minority groups, especially Roma, are perceived as the most vulnerable in terms of such electoral irregularities. Although previously noted in OSCE/ODIHR recommendations, the legislation continues to prohibit campaigning in any language but Bulgarian.

At the moment of writing of this report the exchange rate was 1 EUR: 1.95 BGN.

As of 20 August, the deadline for registration, the CEC registered 19 parties and 7 coalitions for these elections. The deadline for the registration of candidate lists with the DECs is 2 September.

The nominating committees should consist of at least three and no more than seven voters from the relevant constituency.

A number of changes were introduced in the run-up to elections to media provisions. In a significant positive step, the amended Electoral Code provides for electoral contestants to be allocated free airtime equally on public television and radio. Contestants will be entitled to air initial and closing campaign spots and to participate in debates. Private media the OSCE/ODIHR NAM met with also plan to organize debates; however, just as the public broadcaster, noted the reticence of some party leaders to engage in such debates in the past.

Election contestants are also entitled to take out paid advertisements, which according to OSCE/ODIHR NAM interlocutors are used extensively. The rates for paid ads are set by the Council of Ministers in case of the public broadcasters and are to be published by commercial broadcasters by 25 August. In implementation of a long-standing OSCE/ODIHR recommendation, the amended Election Code obliges all broadcasters to separate paid content from editorial and news reporting and to clearly mark it as such.

In an effort to provide greater opportunities to new political parties and independent candidates, as previously recommended by the OSCE/ODIHR, the Electoral Code now provides for the distribution of financial 'media packages' to nominating committees and parties that do not qualify for state subsidies to cover campaign expenses in the media.

OSCE/ODIHR NAM interlocutors welcomed the recent amendments to media regulations as providing greater and more level opportunities to contestants to present their platforms. Broadcasters met also commended the amendments as introducing greater detail and clarity as to their obligations.

Oversight of compliance with media regulations is ensured by the Council for Electronic Media (CEM), which will conduct, as of 25 August, a media monitoring of a sample of national and regional broadcasters. It is also due to publish guidelines for broadcasters on the coverage of the campaign. The CEM noted positively that following the March 2014 amendments to the Radio and Television Act, in line with a previous OSCE/ODIHR recommendation, its oversight responsibilities have been clarified. It will forward information on noted irregularities to the CEC, which will issue decisions and order sanctions for violations of the Electoral Code.

#### G. POLITICAL PARTY AND CAMPAIGN FINANCE

Political party and campaign finance provisions have not undergone significant change since the last parliamentary elections. Political parties may be funded from both public and private sources. Parties represented in the parliament and those that garnered over one per cent of the valid votes in the last elections receive state subsidies proportional to the number of votes received. Donations from private individuals may not exceed BGN 10,000 per year, while contributions from legal entities and anonymous sources are prohibited.

The National Audit Office (NAO) is vested with the authority to oversee political party and campaign finances. In line with a previous OSCE/ODIHR recommendation, an obligation was introduced in the law for all contestants to submit financial information to NAO within five days of the start of the campaign. This change was welcomed by NAO as setting a clear deadline and facilitating enforcement. The information submitted is made publicly available through a single register on NAO's website and contestants are obliged to continuously update it throughout the campaign. Final reports are to be submitted to NAO within 30 days after the elections. Audits of reports submitted are performed when campaign expenditures exceed BGN 1,000.

The OSCE/ODIHR NAM interlocutors expressed general satisfaction with campaign finance provisions. Some parties commended NAO for their professional approach. NAO noted that compliance with campaign finance provisions among parties is growing and the number of irregularities is decreasing.

#### H. CITIZEN AND INTERNATIONAL ELECTION OBSERVATION

The Electoral Code provides for citizen and international observers, who are accredited by the CEC. <sup>13</sup> Observers may not receive remuneration from political parties, coalitions, nominating committees or candidates for their activities. Political parties, coalitions and nominating committees may appoint proxies, who are registered by DECs. The number of observers nominated by any one non-governmental organization and the number of proxies registered by each electoral subject should not exceed the number of polling stations in the country. The CEC and DECs should publish the lists of observers and proxies on their webpages.

The Electoral Code contains detailed provisions on the scope of rights and responsibilities of observers and party proxies and grants them access to all stages of the electoral process. Observers and proxies are also entitled to receive copies of protocols at polling stations.

There are active civil society groups that have significant experience with election monitoring and actively participated in the recent electoral reform process. Several civic groups informed the OSCE/ODIHR NAM of their intentions to observe the forthcoming elections.

Many OSCE/ODIHR NAM interlocutors expressed concerns about the misuse of some non-partisan observers by political parties during the recent European Parliament elections. According to several citizen observer groups, such political affiliation may diminish public confidence in independent citizen observation.

#### IV. CONCLUSION AND RECOMMENDATION

All interlocutors met with during the OSCE/ODIHR NAM underscored the need for an OSCE/ODIHR election observation activity for the early parliamentary elections. In considering an observation activity, the OSCE/ODIHR NAM has taken into account the various findings outlined in this report and the concerns expressed by stakeholders. These include issues related to the implementation of the amended legal framework, potential issues in administering the elections, including in connection with machine voting and the preferential voting method, campaign and campaign finance issues, and electoral disputes resolution.

On this basis, the OSCE/ODIHR NAM recommends the deployment of a Limited Election Observation Mission (LEOM) to the Republic of Bulgaria to assess the 5 October 2014 early parliamentary elections for its compliance with OSCE commitments, other international obligations, and domestic legislation. In addition to a core team of experts, the OSCE/ODIHR NAM recommends that 14 long-term observers be seconded by participating States. While the mission would visit a limited number of polling stations on election day, systematic observation of electoral proceedings is not envisaged.

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Observers can be authorized representatives of registered Bulgarian non-governmental organizations as well as foreign representatives of the European Parliament, foreign parliaments, the OSCE, the Parliamentary Assembly of the Council of Europe and other Parliamentary Assemblies, foreign parties and movements, and foreign persons designated by the parties and coalitions running in the elections, all invited through the Ministry of Foreign Affairs.

#### **ANNEX: LIST OF MEETINGS**

#### **Ministry of Foreign Affairs**

Katya Todorova, Deputy Minister

Vladimir Milanov, Head of Cabinet to the Minister

Krassimir Bojanov, Director of Legal and Regulatory Directorate

Dimitar Philipov, Director of Human Rights Directorate

Maria Spassova, Head of Human Rights Department

Nadya Krasteva, Head of International Humanitarian Organizations Department

Dimitar Yaprakov, Adviser to the Minister

Radi Ignatov, Attaché, Human Rights Department

Svetoslav Stankov, Chief Expert, Human Rights Department

#### **National Assembly**

Petya Gladilova, Secretary General

Iva Miteva, Head of Legislative Advisers Department

Prolet Mihaylova, Head of Parliamentary Sessions Department

Peter Vitanov, State Expert, Relations with International Organizations Department

Nelly Ikonomova, State Expert, Final Legislative Text Department

#### **Central Election Commission**

Ivilina Alexieva, Chairperson

Maria Musorlieva, Deputy Chairperson

Margarita Zlatareva, Deputy Chairperson

Sevinch Solakova, Secretary

Alexander Andreev, Speaker

Kamelia Neikova, Speaker

Maria Boykinova, Member of the Commission

Erhan Chaushev, Member of the Commission

Yordanka Gancheva, Member of the Commission

Emanuil Hristov, Member of the Commission

Ivailo Ivkov, Member of the Commission

Rositza Mateva, Member of the Commission

Vladimir Penev, Member of the Commission

Rumyana Siderova, Member of the Commission

Metin Suleymanov, Member of the Commission

Rumen Tzachev, Member of the Commission

Tania Tzaneva, Member of the Commission

# <u>Civil Registration and Administrative Services Department of the Ministry of the Regional Development</u>

Ivan Getov, Chief Director

Ventsislav Hristov, Head of Department of Electronic Processing of Data

Nina Simeonova, Head of Methodology and Control Department

#### **National Audit Office**

Goritsa Grancharova-Kozhareva, Member of the Board

Dileta Kassabova-Tokatliyan, Member of the Board

Iskra Belovska, Director of Methodology and International Relations Directorate

Rada Paskova, Chief Auditor of Specific Audits Directorate

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### **Council for Electronic Media**

Anna Hadjieva, Member

Antoaneta Lozenska-Todorova, Director of Specialized Administration Department

#### Media

Aneta Milkova, Member of the Management Board, Bulgarian National Television

Tzvetan Tzvetkov, Member of the Management Board, Bulgarian National Television

Daniel Chipev, Director of Information Department, Bulgarian National Television

Yuliana Toncheva, Head of International Relations and Programs, Bulgarian National Television

Venelin Petkov, Director, News, Current Affairs and Sport Department, bTV Media Group

Gospodin Yovchev, Director of the Legal Department, bTV Media Group

Krassimira Krasteva, Deputy Head of News and Current Affairs Department, Nova Broadcasting Group

Simeon Lazov, Legal Advisor, Nova Broadcasting Group

Velina Veleva, Compliance and Regulatory Officer, Nova Broadcasting Group

#### **Political Parties**

Deniza Karadjova, former MP, Member of the Executive Bureau, Bulgarian Socialist Party

Philip Popov, former MP, Bulgarian Socialist Party

Kristian Vigenin, Campaign Manager, Bulgarian Socialist Party

Chavdar Georgiev, Campaign Manager, Bulgarian Socialist Party

Krasimir Tsipov, former MP, Campaign Manager, Citizens for European Development of Bulgaria

Dimitar Lazarov, former MP, Campaign Manager, Citizens for European Development of Bulgaria

Rushen Riza, former MP, Deputy Chairperson, Movement for Rights and Freedoms

Mustafa Karadayi, former MP, Movement for Rights and Freedoms

Meglena Kuneva, President, Bulgaria for the Citizens Movement

Dimitar Delchev, member of the Executive Council, Bulgaria for the Citizens Movement

Nikolay Vassilev, member of the National Government, Bulgarian Agrarian National Union

Stefan Kenov, Secretary General, 'Bulgaria without Censorship'

Rada Kodjabasheva, Deputy Head, 'Bulgaria without Censorship'

Nicola Mitev, Head of Press-Center, 'Bulgaria without Censorship'

Stanislava Valerieva, Administrative Secretary, 'Bulgaria without Censorship'

Alexander Dimitrov, Secretary of Sofia organization, 'Bulgaria without Censorship'

#### **Civil Society**

Kalin Slavov, Executive Director, Transparency International Bulgaria

Vanya Kashukeeva-Nusheva, Program Director, Transparency International Bulgaria

Linka Toneva, Program Coordinator, Transparency International Bulgaria

Iva Lazarova, Program Director, Institute for Public Environment Development

Katia Mihailova, Media Expert, Civil Initiative for Free and Democratic Elections

Galina Asenova, Executive Director, Institute for Social Integration

Svetozar Kolibarsky, Research Editor, All Data Processing