



Office for Democratic Institutions and Human Rights

# GREECE

## EARLY PARLIAMENTARY ELECTIONS

21 May 2023

### ODIHR NEEDS ASSESSMENT MISSION REPORT

1- 3 March 2023



Warsaw  
27 April 2023

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**GREECE**  
**EARLY PARLIAMENTARY ELECTIONS**  
**21 MAY 2023**

**ODIHR Needs Assessment Mission Report**

## **I. INTRODUCTION**

In accordance with its mandate and in anticipation of an official invitation to observe the upcoming parliamentary elections in Greece, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) between 1 and 3 March 2023. The NAM was composed of Ana Rusu, ODIHR Senior Election Adviser, and Hamadziripi Munyikwa, ODIHR Election Adviser.

The purpose of the mission was to assess the pre-election environment and preparations for the parliamentary elections. Based on this assessment, the NAM recommends whether to deploy an ODIHR election-related activity for the forthcoming elections, and if so, what type of activity best meets the identified needs. Meetings were held with officials from the Ministry of Interior, Ministry of Foreign Affairs, Supreme Court, Audit Committee for Political Party Finance as well as with representatives of political parties, media, civil society and the international community. A list of meetings is in annex to this report.

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

## **II. EXECUTIVE SUMMARY**

Greece is a republic with legislative powers vested in the 300 member unicameral parliament serving a four-year term. The Prime Minister serves as the head of the government, while the president, appointed by the parliament for a five-year term, is the head of state with mostly ceremonial and regulatory powers. Women remain underrepresented in government making up only 56 of the 300 current members of parliament and two of a cabinet of 19 ministers, notwithstanding that the current President, Katerina Sakellaropoulou, is the first woman to serve in the office.

The legal framework is comprehensive and a number of amendments have been made since the 2019 early parliamentary elections, including introducing voting from abroad, prohibiting political parties whose leaders have been convicted of certain serious crimes to compete in elections and the application for these elections of a simple proportional system without the apportionment of bonus seats. Some ODIHR NAM interlocutors criticised the amendments related to the prohibition of certain political parties as creating potential precedents which may have the effect of silencing opposition parties in the future, while others were concerned about difficulties in interpreting the provisions related to *de jure and de facto* leadership of the party. Some prior ODIHR recommendations remain unaddressed, including those related to the need for further regulation of timelines for early elections, lifting certain restrictions on candidacy rights, and ensuring the appellate rights of rejected candidatures.

The Ministry of Interior (MoI) and the Supreme Courts are the highest election administration bodies with the former performing key logistical and administrative functions while the latter is responsible for the registration of contestants and the appointment of chairpersons and members of some of the Polling Station Committees (PSCs). Most ODIHR NAM interlocutors expressed overall trust in the election management, including the conduct of election day procedures. The election law does not expressly provide for citizen or international observers, although the MoI informed the ODIHR NAM that it would accommodate potential requests by national or international organizations to accredit observers.

Voting is compulsory for all citizens over the 17 years of age in an election year, though penalties for non-participation are not enforced. Most ODIHR NAM interlocutors were confident in the thoroughness and integrity of the voter register.

Citizens of at least 25 years of age who have the right to vote are eligible to stand as candidates. Registered candidates not included in a party or coalition list may run independently. The legal framework restricts the candidacy rights of certain professions, contrary to prior ODIHR recommendations. All ODIHR NAM interlocutors noted the overall inclusivity of the candidate registration process, though none of the parties with which the ODIHR NAM met referenced initiatives to recruit women, young candidates or candidates with disabilities.

Measures to facilitate the independent participation of voters with disabilities are limited in scope with some ODIHR NAM interlocutors highlighting the lack of adequate physical infrastructure of public buildings and insufficient means to facilitate autonomous voting, contrary to prior ODIHR recommendations and commitments made under the Convention on the Rights of Persons with Disabilities (CRPD).

The Constitution guarantees the freedom of peaceful assembly. Political parties that the ODIHR NAM met with noted that they would rely on traditional forms of in-person campaigning which would be supplemented on social networks such as Facebook and Twitter. The most prevalent campaign themes are expected to be the economy and the cost of living, and immigration. Although most interlocutors expect the campaign environment to be peaceful, some noted the potential instances of intolerant speech and inflammatory rhetoric.

Election campaigns are financed by public funds, as well as private donations. Previously dispersed laws regulating party and campaign funding were consolidated under a presidential decree issued in March 2022, though no major substantive changes were introduced since the last elections. Some previous ODIHR recommendations on campaign finance issues, including those related to requiring the submission of financial reports by all candidates and the publication of campaign finance audits.

The Constitution provides for freedom of expression and the media environment is diverse, but fragmented. The election law governs the allocation of public and private media airtime during campaigns, which envisages proportional coverage based on the parties' representation in parliament. Paid political advertisement is prohibited. Most ODIHR NAM interlocutors expressed overall confidence in the protection of media freedoms, but some noted instances of hostility towards journalists and a fear of reprisals among people working in the media.

Most ODIHR NAM interlocutors welcomed a potential ODIHR activity for the upcoming elections, emphasizing the benefits of an external review of some aspects of the electoral process. Among the areas identified that would benefit from an ODIHR observation activity were recent amendments to the legal framework, including regarding the candidate registration process, election administration and campaigning with particular respect to the participation of persons with disabilities, women and youth, as well as of the implementation of campaign finance and media regulations.

The ODIHR NAM recommends the deployment of an Election Assessment Mission (EAM) for the upcoming parliamentary elections to focus on recent legal changes, the election administration, the registration of candidates, the election campaign, and campaign finance as well as the media environment.

### III. FINDINGS

#### A. BACKGROUND AND POLITICAL CONTEXT

Greece is a republic with legislative powers vested in the 300 member unicameral parliament. The Prime Minister serves as the head of the government, while the president, appointed by the parliament for a five-year term, is the head of state with mostly ceremonial and regulatory powers. In the upcoming elections, voters will elect 300 members of parliament for a four-year term.

The last parliamentary elections were held on 7 July 2019. Six parties gained representation in parliament with New Democracy garnering a majority of seats.<sup>1</sup> The current President, Katerina Sakellariopoulou, is the first woman to serve in the office, but women make up only 56 of the 300 current members of parliament and two of a cabinet of 19 ministers.

These elections will be held in a context in which inflation, and increases in the cost of living are set against the country's recovery from a protracted debt crisis.

ODIHR has observed three previous elections in Greece.<sup>2</sup> Most recently, the ODIHR Election Assessment Mission to the 2019 early parliamentary elections concluded: "The elections were competitive and offered voters a wide choice of political alternatives, with fundamental freedoms largely respected. The media provided broad and varied coverage and created conditions for citizens to make an informed choice. Although aspects of electoral legislation could be improved, the elections were effectively administered and enjoyed a high level of public confidence."

#### B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Parliamentary elections are primarily regulated by the 1975 Constitution (last amended in 2008), the 2007 Law on Parliamentary Elections ("election law", last amended in 2018) and the 1994 Law on Financing Political Parties (last amended in 2022).<sup>3</sup> The Ministry of Interior issues supplementary instructions and regulations. Greece is party to major international and regional instruments related to democratic elections, but has not ratified the Council of Europe's Framework Convention for the Protection of National Minorities.<sup>4</sup>

A number of substantive amendments to the legal framework have taken effect since the previous parliamentary elections. In December 2019, the Greek Parliament passed a law to facilitate voting from outside the Greek territory.<sup>5</sup> In February 2023, the Greek Parliament voted to ban political parties, whose leaders have been convicted of certain crimes against the state, from competing in

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<sup>1</sup> New Democracy (ND, 158), the Coalition of the Radical Left (SYRIZA, 86), Movement for Change KINAL (22), the Communist Party of Greece (KKE, 15), Greek Solution (10), MeRA25 (9).

<sup>2</sup> See [previous ODIHR observation reports on Greece](#).

<sup>3</sup> Other relevant legislation includes the 2001 Law on Outdoor Advertising, the 1976 Law on the Supreme Electoral Court, and the 1951 Criminal Code (last amended in 2014).

<sup>4</sup> Greece is signatory to the 1966 International Covenant on Civil and Political Rights (ICCPR), 1979 Convention for the Elimination of All Forms of Discrimination against Women (CEDAW), 1965 Convention on the Elimination of All Forms of Racial Discrimination (CERD), and the 2006 Convention on the Rights of Persons with Disabilities (CRPD). Greece is also a member of the Council of Europe's European Commission for Democracy through Law (Venice Commission) and Group of States against Corruption (GRECO), and is a party to the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR).

<sup>5</sup> Law [4648/2019](#) (hyperlinked in Greek) grants the right to vote from abroad and elaborates on procedures for registration and voting from outside the Greek territory.

elections.<sup>6</sup> Some ODIHR NAM interlocutors criticised this amendment as creating potential precedent aimed at silencing opposition parties in the future, while others were concerned about difficulties in interpreting the provisions related to *de jure and de facto* leadership of the party during the candidate registration process.

An open-list proportional system, for the apportionment of all 300 seats, aggregated in multimember constituencies, will take effect for these elections only.<sup>7</sup> To be eligible for seat allocation, a party or independent candidate must obtain at least three per cent of valid votes nationwide. Some ODIHR NAM interlocutors noted that this threshold effectively precludes independent candidates from entering parliament.

Some prior ODIHR recommendations remain unaddressed, including those related to the electoral threshold for independent candidates, lifting of certain restrictions on candidacy, and ensuring the appellate rights of rejected candidatures. As ODIHR has previously noted, many legal deadlines are calculated from the day on which elections are announced, rather than from the election day, rendering regulatory timelines inapplicable. However, most ODIHR NAM interlocutors expressed overall satisfaction with the electoral legal framework.

### C. ELECTION ADMINISTRATION

There is no central election commission in place and key facets of election management are shared between several institutions. The Ministry of Interior (MoI) performs essential logistical and administrative functions, including compiling voter lists, distributing election materials to polling station committees (PSCs), providing ballots to the eligible political parties, and the announcing of results. The Supreme Court is responsible for the registration of contestants and the appointment of chairpersons and members of some 22,000 PSCs. An *ad hoc* Supreme Electoral Court, composed of 11 judges and Council of State members, chaired by the president of the Supreme Court, certifies the final election results. The law further provides for the convocation of an inter-party working committee, comprised of one representative of each parliamentary party or coalition during election years.<sup>8</sup> This committee has no regulatory authority but provides a forum for cross-party dialogue and consultations with institutions on campaign regulations. All ODIHR NAM interlocutors voiced a high degree of trust in the overall system of election management, including how election day procedures are conducted.

PSCs are made up of a chairperson, a secretary, four members and their alternates. PSC chairpersons must be judges or lawyers and are appointed by the Supreme Court, while other members and alternates are randomly selected by the first instance courts from the list of registered voters. The chairperson appoints a secretary. The chairpersons are paid for their services and receive standardized training on polling procedures, while other members receive no formal training or compensation, despite service

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<sup>6</sup> The fulfillment of the relevant legal conditions is verified by the Supreme Civil and Criminal Court (Areios Pagos). The ban allegedly prevents Golden Dawn and Ellhnes, the first of which held seats in previous parliaments, from contesting elections after their respective leaders were charged with [running a criminal organization](#) and for hate crimes. The bill, put forward by New Democracy, passed with the support of the SYRIZA party. Some parties which supported the legislation diverged on the definition of parties subject to the ban, with the scope widened in April 2023 to include the *de facto* leadership of such parties.

<sup>7</sup> Following a parliamentary vote in January 2020, the system of allocating 50 bonus seats to the party with the most votes above 25 per cent, which had been in place for previous elections will be reintroduced for subsequent elections. Both these changes only take effect for the second elections following their passing, in keeping with constitutional provisions stipulating that changes to the election law not adopted via a qualified majority should not apply to the elections immediately following the passing of those changes.

<sup>8</sup> Parties registered to contest the elections in at least 70 per cent of constituencies may also appoint a representative to the committee.

being mandatory. There are no requirements for gender representation in election administration and no data is maintained on the gender composition of PSCs.

For the first time, Greek citizens residing abroad will be able to register and vote in polling stations situated in embassies and consulates. The decision on opening a polling station abroad and how many will be based on the number of potential voters. The Ministry of Foreign Affairs had not completed the list of embassies at which voting would take place at the time of the NAM, though ODIHR NAM interlocutors noted that diaspora registration had been notably low. The MoI created a software for the registration of voters abroad and initiated an important awareness-raising campaign for them to register.

Political parties are responsible for printing and distributing ballots to PSCs, or directly to voters. Parties nominating candidates in at least one third of constituencies are provided blank ballot papers for printing free of charge from the MoI; all other contestants including independent candidates must produce their own ballots.

The law does not provide for persons with disabilities to request assistance in voting from a person of their choice, but obliges PSC chairpersons to provide assistance by entering the voting booth or bringing election materials outside the polling station if the person cannot enter due to accessibility barriers. There is no provision for homebound voting, effectively disenfranchising voters with reduced mobility or in hospitals who cannot travel to polling stations. Likewise, no practices are in place to facilitate autonomous voting for persons with visual impairments, although voter information is available on the MoI website in some accessible formats. Several ODIHR NAM interlocutors described an overall lack of progress in remedying the exclusion of persons with disabilities in the electoral process, including inadequate physical infrastructure of public buildings and a lack of autonomous voting opportunities, contrary to prior ODIHR recommendations and the country's CRPD commitments.

#### **D. VOTER REGISTRATION**

Voting is compulsory for all citizens who reach 17 years of age in an election year, though penalties for not voting are not enforced. Persons with disabilities or those declared under guardianship can be deprived of their legal capacity to vote by a court decision. Suffrage restrictions based on mental disability are at odds with OSCE commitments and other international standards. Citizens can also have their voting rights temporarily or permanently denied due to a conviction for certain crimes.

Voter registration is passive. Voter lists are compiled by the MoI using data from the national population register, which is updated twice per month by municipalities. To be eligible to vote from abroad, the law imposes a requirement that the voter has resided in Greece for at least two years over the last 35 years and that the voter has submitted in the current or in the previous year a tax declaration to the Revenue Authority.<sup>9</sup> Many ODIHR NAM interlocutors considered these restrictions as reasonable and particularly favoring the participation of young voters who emigrated abroad after the 2009 economic crisis.

Voter lists are posted at PSCs during the pre-election period and individual voters' data can be checked online throughout the year. The law does not provide a deadline for voters to request changes to their records prior to election day, and voters incorrectly excluded from lists may request inclusion on election day by acquiring a special notice from their municipality. According to the MoI, there are currently approximately 9.5 million eligible voters. Most ODIHR NAM interlocutors were convinced of the accuracy of voter lists and did not see any particular difficulties in proving compliance with the residency requirements for voting abroad.

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<sup>9</sup> The two years will be calculated from the date of the application for registration in the special electoral rolls

## E. CANDIDATE REGISTRATION

Citizens of at least 25 years of age who have the right to vote are eligible to stand as candidates. Contrary to prior ODIHR recommendations, the legal framework restricts the candidacy rights of certain professions, including all salaried public employees, members of the armed forces, governors and mayors, and chairpersons of boards of public corporations. The Constitution further lists public and private capacities, such as commercial relations with the state or ownership of a national media outlet that carry an obligation to resign if elected to parliamentary office.

In order to register, candidates must be nominated by at least 12 voters in the same constituency. Prospective candidates apply directly for registration as an electoral subject with the basic courts of first instance, by filing a declaration of candidacy and paying a deposit. Following this registration process, political parties and coalitions form candidate lists, with a requirement of 40 per cent representation of either gender, and apply to the Supreme Court for registration as electoral contestants. Registered candidates not included in a party or coalition list may run independently. Candidates may stand in only one constituency, except for leaders of registered parties, who may stand in two constituencies. All ODIHR NAM interlocutors noted the overall inclusivity of the candidate registration process, though none of the parties with which the ODIHR NAM met referenced initiatives to recruit women, young candidates or candidates with disabilities.

## F. ELECTION CAMPAIGN

The campaign period commences 12 days before the end of the outgoing parliamentary term, or upon the dissolution of parliament. The law does not regulate campaigning prior to the candidate registration process. Municipalities determine the allocation of public sites for campaign materials, which by law must be “proportionate and equal”, and must be provided free of charge to contestants. The MoI informed the ODIHR NAM that precise allocation rules are generally agreed upon by the inter-party working committee once the elections are announced. Campaign rallies may not be held next to schools or hospitals, and are not permitted during hours of public rest. All stakeholders approved of the current regulatory framework for the election campaign.

Political parties that the ODIHR NAM met with noted that they would rely on traditional forms of in-person campaigning such as rallies, canvassing and leafleting as well as through social networks such as Facebook and Twitter. The most prevalent campaign themes are expected to be the economy and the cost of living, and immigration.

Most ODIHR NAM interlocutors anticipated a peaceful campaign environment but expressed concern about the persistence of inflammatory rhetoric, particularly on social media and the potential for incidents of political violence.

Greece recognizes only one minority, the Muslim religious minority in Thrace, which is protected by the terms of the Lausanne Peace Treaty of 1923.<sup>10</sup> Although certain associations have historically been unable to register under names that reference ethnic or religious groups, according to ODIHR NAM interlocutors, such associations still form in practice and parties claiming to represent ethnic communities have previously contested elections.<sup>11</sup> The country does not recognize a minority status of any ethnic or

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<sup>10</sup> Three members of the Muslim Minority in Thrace hold seats in the current parliament.

<sup>11</sup> See *Sidiropoulos and Others v. Greece* (no. 26695/95), *Tourkiki Enosi Xanthis and Others v. Greece* (no. 26698/05), *Emin and Others v. Greece* (no. 34144/05), *Bekir-Ousta and Others v. Greece* (no. 35151/05), *Macedonian House of Civilization v. Greece* (no. 1295/10), in which the European Court of Human Rights found Greece in contravention of Article 11 of the ECHR.



linguistic communities and does not collect statistical data on these populations.<sup>12</sup> The political parties with which the ODIHR NAM met did not plan to target voters from these communities in their campaign activities.

Several ODIHR NAM interlocutors highlighted prevailing sexist attitudes and gender stereotypes as hurdles towards the participation of women voters and candidates, including women from minority communities.<sup>13</sup> Although most parties informed the ODIHR NAM that they would seek the support of women voters, none identified specific issues related to women's rights or gender equality as priorities in their campaign programmes. In addition, some ODIHR NAM interlocutors noted that issues related to the social inclusion and rights of persons with disabilities do not take precedence in political campaigns discourse.

## G. CAMPAIGN FINANCE

The Law on Financing Political Parties regulates campaign finance, including public funding, sources of private income, and reporting requirements. Previously dispersed laws regulating party and campaign funding were consolidated under a presidential decree issued in March 2022, though no major substantive changes were introduced since the last elections. Some previous ODIHR recommendations on campaign finance issues, including those related to requiring the submission of financial reports by all candidates and the publication of campaign finance audits..

Most party funding comes from public funding. In order to qualify for public funding, parties must be represented in the national parliament or the European Parliament, or must have obtained at least 1.5 per cent of the vote in at least 70 per cent of constituencies in the last election. Public funds are distributed proportionally based on the number of votes received. In addition to annual funding for operational expenses, these parties are entitled to additional funding for electoral expenses, as well as supplementary funding for research and training purposes for party staff.

Private donations by natural persons are limited to EUR 20,000 per year to a political party and EUR 5,000 per year to a candidate. Parties can take out loans from credit institutions. The law prohibits cash donations and candidates are required to issue receipts identifying the donor for amounts up to EUR 500 and donations over EUR 500 are only permitted via bank transfer. Parties receiving public funding can issue anonymous coupons (receipts) for donations up to an amount determined based on the public funding received and those without public funding for donations up to EUR 20,000.<sup>14</sup> Foreign donations and donations from state institutions, legal entities and owners of media outlets are prohibited. Expenditure limits are calculated based on the size of each constituency, with cash expenditures limited to EUR 1,000 euros per year for candidates or members of the Parliament with the obligation to disclose the relevant receipts. All candidates, including party candidates, are subject to these limits and must report finances separately.

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<sup>12</sup> Paragraphs 10 and 11 of the [2016 CERD concluding observations](#) noted that “Notwithstanding the explanation provided by the State party that ethnic groups are not considered as minorities, the Committee believes that, in a multi-ethnic society, recognition of ethnic groups of smaller size may help them to protect their existence and their identity. The Committee also notes that the Treaty of Lausanne neither prohibits the consideration of other groups as minorities nor prevents persons belonging to various ethnic groups to exercise their right to self-identification”.

<sup>13</sup> See also paragraph 18 of the [2013 CEDAW concluding observations](#): “The Committee continues to be seriously concerned about patriarchal attitudes and deep-rooted stereotypes regarding the roles and responsibilities of women and men in all spheres of life and the State party’s limited efforts to tackle such discriminatory practices. The Committee is concerned that such customs and practices perpetuate discrimination against women and girls and that they are reflected in women’s disadvantaged and unequal status in many areas, including education, public life and decision-making...”.

<sup>14</sup> See the [2018 GRECO second round compliance report \(reassessment\)](#) on party funding.

Parties are obligated to designate no more than three bank accounts, and candidates one bank account, for campaign finances, with funds accumulated in these or any additional bank accounts subject to forfeiture to the state. An inter-institutional Audit Committee is responsible for the oversight of party and campaign finance. The Committee is comprised of representatives of the parliament, the three Supreme Courts and other state institutions. The timeframe under which campaign finance is assessed begins six months prior and elapses two months following election day. In the case of snap elections, the Audit Committee determines and announces the applicable timeframe. While the committee may request additional information from contestants to verify financial data, the monitoring functions of the committee are otherwise limited. All ODIHR NAM interlocutors expressed confidence in the impartiality of the Audit Committee.

Parties, successful candidates, and their deputies must file a report on campaign income and expenditures no later than three months following an election. Unsuccessful candidates are not required to file a report, contrary to a prior ODIHR recommendation. All final reports are published online. No interim campaign finance reports are required of parties or candidates, apart from parties' routine annual financial report.

## H. MEDIA

The media environment allows for pluralism and includes a diverse range of views across some 1,000 broadcast media outlets and 50 newspapers. The public broadcaster (ERT) operates four national television channels as well as five national radio stations, and additional regional outlets, all of which air exclusively in the Greek language. Television remains the primary source of political information, though online sources are increasingly more important compared to radio and print media.

The Constitution provides for freedom of expression and the right to publish without censorship, and declares that radio and television are under the "direct control of the state". Despite a prior ODIHR recommendation, defamation remains a criminal offense for which journalists can receive prison sentences. Most ODIHR NAM interlocutors expressed overall confidence in the protection of media freedoms, but noted instances of hostility towards journalists and a fear of reprisals.<sup>15</sup>

The electoral law governs the allocation of public and private media airtime during campaigns, which envisages proportional coverage based on the parties' representation in parliament. The precise allocation of airtime, including for non-parliamentary parties, is decided by ministerial decisions with input from the media regulator and the inter-party working committee. Individual candidates, including party candidates, may appear only once on each national radio or television channel during the pre-election period, and twice on each regional network. Paid political advertisements are prohibited, and all political advertising is subsidized by the state budget. All broadcasters must report commercial advertising prices to the state fiscal office on a monthly basis, and these prices are used to determine the amount of public funding for political advertising. Some ODIHR NAM interlocutors criticized the proportional rather than equal allocation of airtime among political parties.

Broadcast media are regulated by the National Council for Radio and Television (NCRTV), which monitors broadcasters' compliance with legal obligations, but does not conduct comprehensive monitoring of media during election campaigns. Broadcasters are required to provide statistical reports to the NCRTV of their compliance with provisions on equitable coverage of parties and candidates, and these reports are randomly audited by the NCRTV. Some ODIHR NAM interlocutors noted that smaller political parties receive significantly less primetime coverage than the two largest parties, and alleged a pro-government bias in the public broadcaster.

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<sup>15</sup> The [Reporters Without Borders report](#) for Greece for 2021 and 2022 noted "serious setbacks for journalists with journalists regularly prevented from covering issues from migration to Covid-19". See also [Council of Europe platform on the safety of journalists](#).

## **I. ELECTION DISPUTE RESOLUTION**

The Special Electoral Court has jurisdiction over all appeals related to parliamentary elections, complaints of violations of the election law, and the compatibility of election legislation with the Constitution. The court also hears matters regarding the validity of election results, the eligibility of an elected candidate to take office, or the removal of a sitting member of parliament. Complainants have 15 days following the announcement of results by the court of first instance to submit their complaint, though the timeframe for such a review is not specified.

Voters and representatives of political parties may file complaints related to the inclusion or exclusion of a person from the voter list, and candidates or party representatives can file complaints regarding the eligibility of a party or candidate to contest the elections. These complaints are filed with the basic courts of first instance, whose decisions in these matters are not subject to appeal, contrary to a prior ODIHR recommendation.

Complaints in regards to election day violations can be submitted by voters, candidates and candidate representatives in writing to the PSC. Following the announcement of results by the court of first instance, a candidate may request a recount of ballots.

## **J. CITIZEN AND INTERNATIONAL OBSERVERS**

The election law does not expressly provide for citizen or international observers, although the MoI informed the ODIHR NAM that it would accommodate potential requests by national or international organizations to accredit observers. The law provides for a maximum of three political party representatives to observe the process in each polling station on a rotation basis. Most parties informed the ODIHR NAM of plans to deploy representatives in polling stations for the parliamentary elections, particularly during the count.

## **IV. CONCLUSIONS AND RECOMMENDATIONS**

Most ODIHR NAM interlocutors welcomed a potential ODIHR activity for the upcoming elections, emphasizing the benefits of an external review of some aspects of the electoral process. Among the areas identified that would benefit from an ODIHR observation activity were recent amendments to the legal framework, including regarding the candidate registration process, election administration and campaigning with particular respect to the participation of persons with disabilities, women and youth, as well as the implementation of campaign finance and media regulations.

The ODIHR NAM recommends the deployment of an Election Assessment Mission (EAM) for the upcoming parliamentary elections to focus on recent legal changes, the election administration, the registration of candidates, the election campaign, and campaign finance as well as the media environment.

## **ANNEX: LIST OF MEETINGS**

### **Ministry of Foreign Affairs**

Ambassador G. Diakofotakis, Director of Directorate on NATO and OSCE  
Aspasia Raftopoulou, First Counsellor Directorate on NATO and OSCE

### **Ministry of Interior, Directorate for Elections**

T. Oikonomou, Director General  
P. Skiadas, Director for Elections  
A. Barouta, Head of Unit on Elections and Political Parties  
T. Garoufallis, Head of Unit on Electoral Rolls and Electoral Results.  
M. Stavrianoudakis, Secretary General of Interior

### **Supreme Court (Areios Pagos / Supreme Civil and Criminal Court) and Supreme Special Court**

Maria Georgiou, Chair of Areios Pagos and of the Supreme Special Court

### **Audit Committee for Political Party Finance**

Stylianos Galoukas, Director of the Directorate for the Investigation of Declarations of Assets  
Stylianos Michalas, Head of the Department of Income Control of Associations, Political Parties

### **National Council for Radio and Television**

Athanassios Koutromanos, President  
Efterpi Koutzamani-Drilia, Vice-president  
K. Oikonomou, Legal Counsellor  
O. Garoufallia, Legal Counsellor

### **Public Broadcaster (ERT)**

Fotis Kafarakis, News General Director

### **Political Parties<sup>16</sup>**

Yiannos Zois, member of political planning committee, MERA25  
Dimitris Mantzos, Spokesperson, PASOK  
Konstantinos Zachariadis, Member of Parliament, Member of the Central Committee, SYRIZA  
Costas Poulakis, Member of the Central Committee, SYRIZA

### **Civil Society**

Vasilis Pantzos, President ELLANPASSE Confederation  
Chrysostomos Kalogirou, Scientific Associate, ELLANPASSE Confederation  
Panayote Dimitras, Greek Helsinki Monitor  
Vasilis Koutsianos, General Secretary, National Confederation for Persons with Disabilities  
Dimitrios Logaras, Executive Staff, National Confederation for Persons with Disabilities

### **International and Diplomatic Community<sup>17</sup>**

Representatives of resident embassies of OSCE participating States: Germany, Ireland, Italy, Latvia, Lithuania, Poland, Türkiye, the United Kingdom, and the United States of America.

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<sup>16</sup> The ODIHR NAM requested meetings with all parliamentary political parties though some did not respond to these requests.

<sup>17</sup> The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in Greece.