



# SEEEDS

Supporting Engagement in European Elections  
and Democratic Societies



ELECTION-WATCH.EU



Co-funded by  
the European Union

## Policy Paper

# Enhancing the integrity of the 2024 European Parliament elections

August 2023

### EXECUTIVE SUMMARY

This policy paper<sup>1</sup> aims to contribute to the integrity of the 2024 European Parliament (EP) elections by:

- **Highlighting risks and opportunities** in the political campaign and electoral processes including mal-intended interference, **disinformation**, and challenges of shrinking civic space;
- Pointing out where to enhance **equality, inclusion, transparency, and accountability**;
- Providing **recommendations for improving integrity and security**.

This policy paper recommends European Union (EU) and EU Member States (MS) to:

- Encourage MS to **engage in comprehensive European electoral reforms**;
- **Strengthen free media** and **protect journalists** against threats and intimidation;
- **Protect civic space** and **strengthen civil society engagement** in elections;
- Enhance the **inclusion of youth, women, persons with disabilities and mobile EU citizens**;
- **Strengthen oversight bodies** for a consistent application of political advertising and finance rules;
- **Improve the fight against disinformation** and awareness of the sources of information;
- **Stimulate policy debates** and democratic participation among European citizens;
- **Strengthen the impression** of the EU as promoter and role model of democratic elections.

<sup>1</sup> The Supporting Engagement in European Elections and Democratic Societies (SEEEDS) project policy paper was shared prior its publication with electoral stakeholders for comments and is available in eight other European languages including Bulgarian, Czech, Greek, Hungarian, Latvian, Polish, Romanian and Slovak [on this website](#).

## INTRODUCTION

This policy paper originates from the ongoing research and human rights advocacy of [Election-Watch.EU \(EW\)](#), the [European Partnership for Democracy \(EPD\)](#), [Democracy Reporting International \(DRI\)](#), and the [European Platform for Democratic Elections \(EPDE\)](#). Four thematic webinars under the [Supporting Engagement in European Elections and Democratic Societies \(SEEEDS\) project](#) had European policy makers and experts discuss key topics of the 2024 European elections.<sup>2</sup> A high-level panel, including representatives of the four major political groups and civil society, debated about enhancing electoral integrity ahead of the upcoming European elections at the EP on 4 July 2023.<sup>3</sup> The SEEEDS project partners stand ready to support European and MS decision makers in protecting trust in and enhancing integrity of the 2024 EP elections. The findings and recommendations are outlined in four chapters: 1) Equality and Inclusion, 2) Transparency, 3) Accountability, and 4) Risks and Opportunities.

### 1) EQUALITY AND INCLUSION

The 2024 elections to the EP comprise of 27 different elections resulting in one representative body. While an overall legislative framework for the elections is in place at the European level, each MS draws on its own electoral system and its election administration – embedded in its own legal framework and electoral traditions – to carry out the elections. This results in a diversity of electoral rights, rules and procedures, ranging from voter and candidate eligibility to electoral calendars, election days, and voting methods. Conditions for electoral participation vary considerably, leaving room for improvement to enhance equality and inclusion.<sup>4</sup>

#### Findings

During the ongoing and previous legislative terms, the majority of Members of the European Parliament (MEPs) have voted for legislative reforms aiming at greater European electoral cohesion. However, the EP's legislation has not yet been unanimously adopted by all EU MS and therefore did not become law. Although the remaining legislative avenues ahead of the 2024 EP elections may be limited, there is still room for improvement for particular groups of voters, for example the inclusion of mobile European citizens, as well as the accessibility of elections for persons with disabilities. Women are disadvantaged as candidates in most MS, resulting in unequal representation.<sup>5</sup> An emerging phenomenon affecting women candidates more than men is gendered hate speech in online environments.

There are still legal and practical barriers for the electoral participation of persons with disabilities. While legal barriers mostly affect those with intellectual and psychosocial disabilities, millions suffer from practical barriers, ranging from the physical accessibility of the voting process to the accessibility of relevant information. A key insight from ongoing reform efforts is that best results are achieved where disabled persons organisations work hand in hand with the election administration to address remaining obstacles.

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<sup>2</sup> The SEEEDS project aims at: raising awareness about the European elections, fight disinformation, and bridging the gap between active European citizens and EU decision makers; developing practical recommendations at European level; encouraging citizen participation, in particular of women, youth, voters with disabilities, and mobile European citizens. The 4 SEEEDS webinars can be watched online: [Webinar 1](#) on “Equality and Inclusion”, [Webinar 2](#) on “Transparency”, [Webinar 3](#) on “Accountability”, and [Webinar 4](#) on “Risks and Opportunities”.

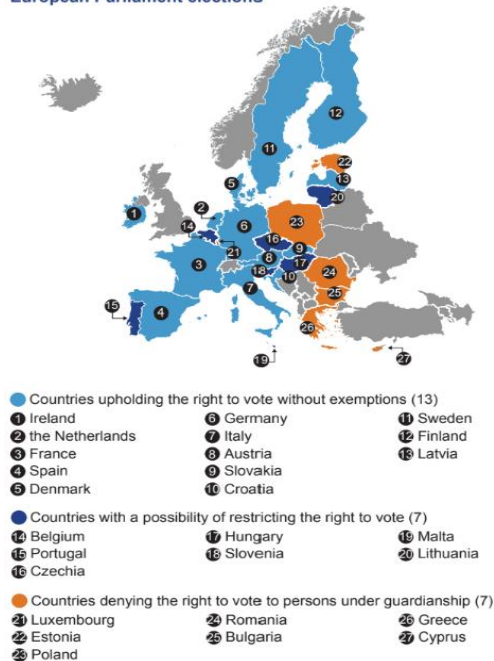
<sup>3</sup> The summary of the EP high-level event can be accessed [here](#) and recordings can be accessed as [short](#) and [long version](#).

<sup>4</sup> [Election-Watch.EU Election Assessment Mission Report 2019](#)

<sup>5</sup> [Women in the European Parliament \(2022\)](#)

Table 1: Right to vote of persons with disabilities in 2021<sup>6</sup>

The right to vote of persons with disabilities for European Parliament elections



Efforts by the EP and civil society organisations to promote the last European elections have resulted in a remarkable turnout, particularly among young and first-time voters, in most but not in all EU MS. Further efforts are needed to keep youth interested and to increase their active participation in European affairs. One such measure may be lowering the voting age to 16 years. Youth engagement could also be enhanced by creating possibilities of non-partisan election observation, and to incorporate youth perspectives from their reports into electoral reforms. Citizen election observation is not yet equally possible across the EU due to heterogeneous legislations, but enabling such active participation in the electoral process would further increase youth turnout and contribute to greater transparency and accountability. Further concerted efforts by the European Institutions and EU MS are required to continue the initiated electoral reforms.

### Recommendations

We call on the European Union and EU Member States to:

1. Consider **additional common European voter and candidate eligibility criteria** to ensure the equality of the right to vote and to stand as a candidate across the EU.
2. Implement additional **measures to support the equal participation of women and men** to alleviate the obstacles faced by women candidates. This can be remedied, for example, through provisions for candidate registration. In particular, gender related online hate speech should be addressed as a priority.
3. Remove remaining **barriers to effective electoral participation of persons with disabilities**, including those related to restrictions based on mental/intellectual disability, to the lack of access to polling stations, and to barriers to accessible information. Measures aimed at **supporting independent and informed** voting and decision-making such as the free choice of assistance and assistive tools should be prioritised.
4. Accord mobile EU citizens the same electoral rights and opportunities to register, to vote and to stand for elections across all EU MS.
5. Conduct regular **targeted information campaigns** and activities to explain European institutions and democratic processes to continue **fostering youth participation** in elections.
6. Include provisions in EU MS legislation to explicitly allow **impartial citizen-led election observation** throughout the electoral process, including access and accreditation, as it reveals shortcomings and highlights best electoral practices.
7. Engage in an **inclusive, consultative, and participatory electoral reform process** with the involvement of all stakeholders, including civil society and underrepresented groups.

<sup>6</sup> European Disability Forum (EDF) [Human Rights Report 2022](#)

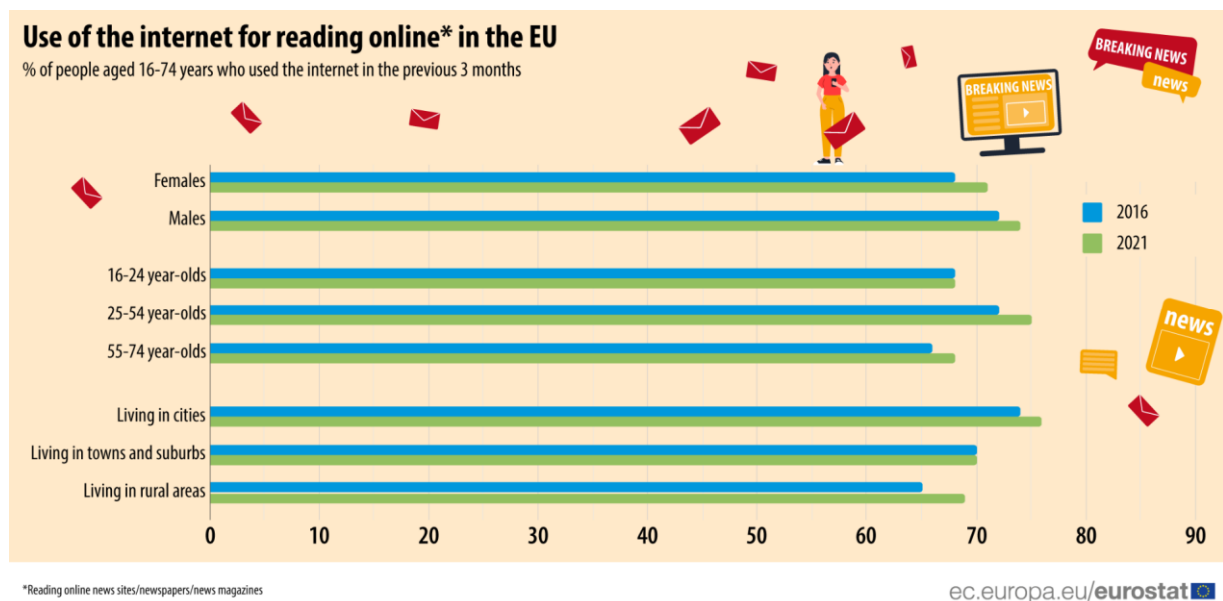
## 2) TRANSPARENCY

Transparency is a key principle for credible elections. Independent verification of political campaigning and electoral processes by electoral stakeholders, whether political parties, election observers or voters, strengthens trust and public confidence in elections free of irregularities or mal-intended interference. As online political advertising has become increasingly important in campaigning, its regulation and oversight has been largely missing at EU and MS levels.

### Findings

EU institutions are in the process of regulating political advertising<sup>7</sup> with the aim to enhance transparency of political advertising and of Artificial Intelligence (AI)-powered online campaigning, and to counter disinformation. Online news platforms are becoming increasingly important as the first source of news among EU citizens. To date, political advertising online is only regulated on the basis of the voluntary self-regulatory commitment of major platforms. This [Code of Practice against Disinformation updated in 2022](#) has failed to solve many of the problems regarding political advertising, such as lack of independent third party oversight. X (formerly Twitter), an important platform for political debate, has withdrawn from the Code.

Table 2: Use of the internet for reading online news sites/newspapers/news magazines in the EU<sup>8</sup>



The envisaged regulation, including a possible sanction mechanism, had been scheduled to pass mid-2023 and to be implemented ahead of the 2024 EP elections. However, key concerns like the protection of personal data, the secrecy of the vote, addressing algorithm biases against women and minorities,<sup>9</sup> to fully embrace a human rights-based approach, remain. Civil society organisations played a key role in helping to shape the new regulatory framework of elections but have been facing problems with shrinking civic space or lack of recognition.

<sup>7</sup> [European Commission Transparency and Targeting of Political Advertising Regulation Initiative](#)

<sup>8</sup> [Eurostat, August 2022](#), See also Flash Eurobarometer FL011EP: [Media & News Survey 2022](#)

<sup>9</sup> EU Agency for Fundamental Rights, 2022: [Bias in Algorithms – Artificial Intelligence and Discrimination](#)

### Recommendations<sup>10</sup>

We call on the European Union and EU Member States to:

1. Pursue a **human rights-based approach** to regulate political advertising in order to protect fundamental freedoms, democratic processes and open government.<sup>11</sup>
2. Enable the **timely passage** and full implementation of a new regulatory framework of political advertising ahead of the 2024 EP elections in all 27 EU MS. Create clarity on the **definition of political advertising** to cover only sponsored political content and not all political content. Consider **effective sanctions and sanctions enforcement mechanisms** by all EU MS, the Commission and EU agencies, as well as the General Data Protection Regulation ([GDPR](#)) and the Digital Services Act ([DSA](#)).
3. Put in place measures to **enforce detailed and timely reporting** to electoral authorities on **campaign financing and advertising**.
4. **Strengthen oversight institutions** at EU level like the European Data Protection Board ([EDPB](#)) and at EU MS level like national data/media monitoring and regulating authorities.
5. **Protect personal data**, which should not be used without consent, including for the purposes of political advertising and micro-targeting. Prohibit default consent to third-party companies and cross-platform tracking. Individuals should be informed in a clear and transparent manner why they are seeing certain advertisements and who has paid for them.
6. Make all **political online advertisements easily accessible and searchable**, containing detailed information about sponsor, source and amount of the funds involved, number of users reached, as well as specific targeting parameters that were used.
7. **Expand and protect the space for civil society organisations** to operate, including by fully recognising the positive role of non-partisan election observation as well as of ad tech platforms monitoring before, during and after elections, including through granting accreditations.

### 3) ACCOUNTABILITY

Political finance accountability is a cornerstone of electoral and political integrity and refers to mechanisms that aim to hold electoral actors to account in case of non-compliance with applicable regulations. Accountability mechanisms at both the European and national levels are intended to ensure the effective enforcement of regulations through oversight and sanctioning systems. Accountability is a shared value within the EU region and the EU has a critical role in promoting best practices among MS. Across the EU region, there is a variety of political finance regulators tasked with the supervision and enforcement of accountability mechanisms.

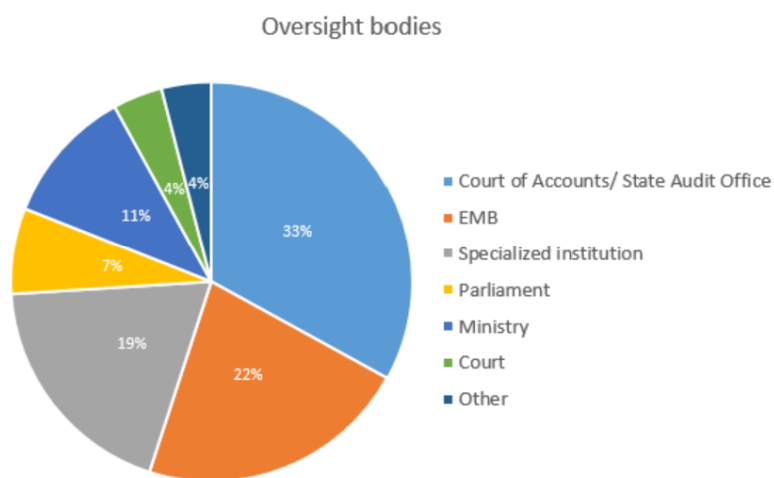
<sup>10</sup> Additional recommendations have been outlined in the [Joint Civil Society and Democracy Organisations' Priorities for the Defence of Democracy Package](#) in March 2023.

<sup>11</sup> Businesses operating under E MSs territorial jurisdiction should respect human rights, as per the United Nations' [Guiding Principles on Business and Human Rights](#) framework.

## Findings

Existing EU and EU MS regulations on party and campaign finance do not respond to the needs of the EU as a community of shared values. For the EU to become a promoter of best practices regarding accountability, it needs to tackle the new challenges, such as disinformation, online campaigning and foreign influence. There are discrepancies between EU-level rules<sup>12</sup> and national regulations with regards to the financing of EP elections and the envisaged strategies to enhance political finance accountability. Following the money has become a common issue of concern for most national oversight bodies. There is also a gap between the EU and EU MS with regards to enforcement mechanisms.

*Table 3: Responsible oversight bodies in EU Member States<sup>13</sup>*



European political parties are facing barriers while campaigning.<sup>14</sup> The distinction between European and national campaigns impacts their ability to reach voters, which crucially questions legitimacy of their role. Existing national regulations on EP elections mostly pertain to the activities of national political parties, and the financing of EP election campaigns remains a national

matter creating a financial firewall between the European and the national levels of regulations.

### Recommendations

We call on the European Union and EU Member States to:

- 1. Close the gap between European regulations of European political parties and national regulations of national political parties**, especially where national campaign issues are of cross-border nature, such as online political advertising.
- 2. Set up a network of oversight bodies** under the control of the European regulator (Authority for European Political Parties and European Political Foundations, [APPF](#)) to ensure the uniform and consistent application of EU regulations at the MS level and **bridge the gap in political finance implementation**. While the Authority does not have the mandate to regulate national political parties, the APPF could empower national oversight bodies to perform their duties more effectively.
- 3. Remove the current financial firewall that prevents European political parties from participating in a significant number of national EP electoral campaigns**. The absence of a clear distinction between national campaigns in a MS in a "national" EP election campaign, and European campaigns through the holding of European campaign activities in a MS significantly affects the ability of European political parties to engage in campaigning.

<sup>12</sup> Governed by [Regulation No 1141/2014](#)

<sup>13</sup> European Platform for Democratic Elections, June 2022: [Puzzling Rules – Equal Game?](#)

<sup>14</sup> See: European Platform for Democratic Elections, June 2022: [Puzzling Rules – Equal Game?](#) and [Election-Watch.EU Election Assessment Mission Report 2019](#)



#### 4) RISKS AND OPPORTUNITIES

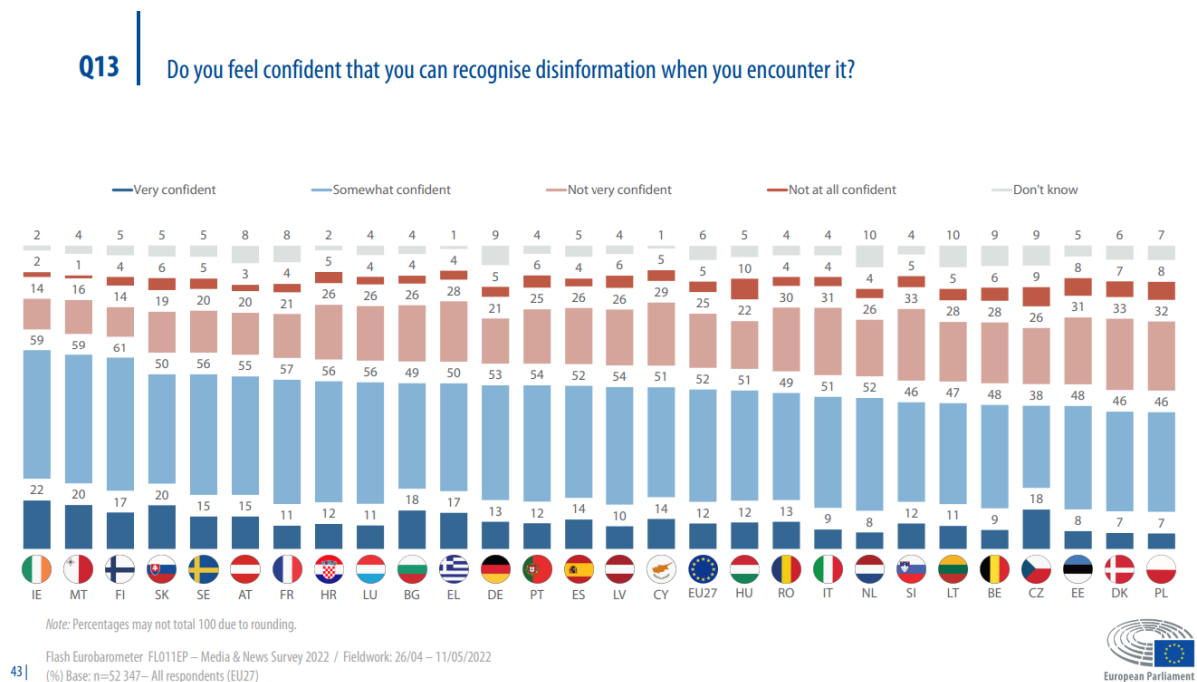
Challenges to EP elections are increasing due to the digitalisation of political campaigning and news consumption as well as anti-democratic interference from outside and within. The erosion of democracy and the rule of law in a number of MS poses a particular problem. Extremely biased reporting by public media, overlap of state and party and a lack of independent judiciary in some cases contribute to problems that challenge the integrity of the EP election process.

At the same time, there are opportunities in the EP elections in that more voters have become motivated to defend democratic structures and that the EU has become more visible as a decisive political actor, in particular in the context of the Covid pandemic, its recovery funds, and its role in supporting Ukraine. This impetus could translate into voter mobilisation, but also reignite the idea of lead candidates (“Spitzenkandidaten”).

#### Findings

Awareness of disinformation and hate speech as a risk has increased since the 2019 EP elections, also due to ongoing efforts in this area by European institutions.<sup>15</sup> Countries such as Russia, China and other authoritarian states are seeking to influence public discourse in the EU, particularly online, to serve their own strategic goals.

Table 4: Confidence by EU citizens to recognise disinformation in EU Member States<sup>16</sup>



The risk of biased media reporting is further intensified by the issue of oligarchic or governmental control over media outlets in several MS, as well as the shrinking space for independent media in general. This includes physical threats, foreign agent legislation, state surveillance, and Strategic

<sup>15</sup> See [EUvsDisinfo](#)

<sup>16</sup> [Flash Eurobarometer, News&Media Survey 2022](#)

Lawsuits Against Public Participation (SLAPP),<sup>17</sup> among other factors. These circumstances have a detrimental effect on the quality of political campaigns and electoral processes.<sup>18</sup> Moreover, the well-documented concerns regarding the independence of the judiciary<sup>19</sup>, particularly in Poland and Hungary, could potentially impact the EP elections if electoral challenges arise. Judicial independence has been perceived as low in several MS.<sup>20</sup>

Although the 2019 EP Elections registered the first ever increase in voter turn-out, this issue remains a concern especially in MS that consistently register very low turn-outs to EP elections. The EU has gained in visibility, especially in the context of the Covid pandemic and the Russian war of aggression against Ukraine. The EP elections could benefit from this increased visibility, especially if the idea of lead candidates (one lead candidate per faction, the winner becomes the President of the European Commission, “Spitzenkandidaten”) is finally implemented. In 2019, the MS did not fulfil this promise. Lead candidates could help create a sense of identification with EU institutions as well as direct representation and choice in the elections. The EU MS governments rejected the EP [vote for a proposal](#) that would establish a Union-wide constituency for the election of 28 MEPs. Instead, the EU MS’ governments preliminary agreed to add 15 EP seats, taking the number of seats from 705 to 720 for the next EP between 2024 and 2029.<sup>21</sup>

### Recommendations

We call on the European Union and EU Member States to:

1. **Strengthen free and independent media** and **protect journalists, human rights activists** and civil society organisations, and counter restrictions by foreign agent legislation, SLAPP, physical threats and intimidation to counter media capture and biased reporting.
2. **Stimulate policy debates** on topics important to European voters and encourage democratic participation while balancing the attention to anti-European narratives and far-right parties in the elections to support voter engagement and a positive vision of the EU as a project.
3. **Respond decisively to the undermining of the rule of law** in MS as rule of law weaknesses may affect electoral integrity (i.e., the possibility of election appeals).
4. **Improve communication around the EU institutions’ activities in the fight against disinformation** to raise awareness about the sources and quality of information for citizens.
5. Support the **creation of stronger systems** by civil society, media, and academia **to monitor and counter disinformation** in EU and EU MS domestic context.
6. **Strengthen the EU’s perception** in public opinion as solution provider and inform citizens more about its activities and functioning.

<sup>17</sup> An [EU anti-SLAPP Directive](#) is in preparation; see also: [PATFox](#) project

<sup>18</sup> See Organization for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights (ODIHR) [Elections Activities reports](#). For example, the [OSCE/ODIHR](#) noted in relation to the 2022 Hungarian parliamentary elections that “(t)he media are divided along political lines and operate in an increasingly concentrated market. The extensive government advertising campaigns and biased news coverage in the public and many private media provided a pervasive campaign platform for the ruling party. The campaign opportunities in the media for other parties were significantly limited by the constitutional prohibition on paid political advertisement and scarce allocation of the free airtime by only a few media.”

<sup>19</sup> [2022 EU Rule of Law Report](#)

<sup>20</sup> [Flash Eurobarometer, Perceived Independence of National Justice Systems - General Public, June 2023](#)

<sup>21</sup> France, Spain and the Netherlands would gain two MEPs, while the countries that will add one more are Austria, Belgium, Poland, Slovenia, Slovakia, Finland, Latvia, Ireland and Denmark. The changes still need formal legal approval by the European Council and the Parliament itself; [Politico.EU 28 July 2023](#)