

THREAT ASSESSMENT OF THE 2026 HUNGARIAN PARLIAMENTARY ELECTIONS

December 2025



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1. Executive summary

In April 2026, the Hungarian parliamentary elections will be a pivotal moment for democracy, fundamental rights and the rule of law in Hungary and for the entire European Union. There is a serious likelihood that they will be marred, yet again, by grave violations of both domestic and international standards for democratic elections.

Since the previous parliamentary elections in 2022, Hungary has adopted numerous legal and institutional changes affecting the electoral framework. While some amendments have addressed administrative or technical issues, others have weakened checks and balances, reduced transparency, and further increased advantages for the governing party. Key developments include redrawing single-member constituencies without consultation, abolishing campaign spending limits, changing the National Election Commission's membership, and adopting the Sovereignty Protection Act.

Hungary's political context has become hyperpolarised, shaped by economic stagnation, social dissatisfaction, and the emergence of the TISZA Party as a major opposition force. Attempts to discredit TISZA have contributed to an increasingly tense pre-electoral environment.

Campaign practices have blurred and increasingly obliterated the boundaries between state and party Government-funded communications, including through 'national consultations', and publicly endorsed campaigning networks, are serving partisan objectives. Oversight remains limited, and unequal access to resources persists. In the field of campaign finance, the abolition of spending limits, increased public funding for parliamentary groups, and weak supervision of third-party actors have reinforced existing asymmetries.

Media concentration among government-aligned outlets, the dominance of state advertising, a strong bias in state media, and the absence of an independent media regulator continue to undermine pluralism. Online, the governing party and affiliated actors make extensive use of sponsored content, loosely regulated networks, and, increasingly, Al-generated material, including disinformation targeting the opposition. The transparency and financing of online campaigning remain very limited.

Several institutions central to electoral integrity exhibit enduring shortcomings. The composition and practices of the National Election Commission favour the governing party, while access to effective legal remedy is hindered by strict procedural rules. Other state bodies – including the State Audit Office, the media regulator, and the police – have acted in ways that raise concerns about their impartiality.

Participation gaps also remain unaddressed. The voting system for national minorities has not been reformed, ignoring a European Court of Human Rights ruling. Roma representation remains low, and discriminatory rhetoric persists. Women, LGBTQI people, and persons with disabilities continue to be underrepresented in public life, with both legal and societal barriers affecting their participation.

At the local level, clientelist structures, the use of municipal resources for campaigning, manipulation of address registration, and vote-buying continue to pose real risks. Previous elections have featured some Election Day violations; similar or even more serious issues are expected to occur in 2026, particularly if the contest is closely fought.

Overall, developments since 2022 underscore a further narrowing of political pluralism and persistent structural imbalances that adversely affect the fairness of the 2026 parliamentary elections.

Election Day – expected to be held on 12 April – has not yet been formally announced by the head of state, and the official 50-day long campaign period will only begin in mid-February. Nevertheless, de facto campaigning has been ongoing for many months in a highly charged political atmosphere.

The potential of a close electoral race combined with a high degree of polarisation among the electorate and low public confidence in the fairness of the electoral process call for the EU and the OSCE to direct their urgent attention to an unprecedentedly widespread breaches of election integrity in an EU member state.



2. Legal developments

2.1. Background and key developments

Since the April 2022 parliamentary elections, Hungary has adopted a series of amendments affecting the legal and institutional framework for elections. While several reforms have addressed administrative or technical aspects, others have significant implications for the equality and competitiveness of the electoral process.

In July 2022, the Fundamental Law was amended to align local and national minority elections with those to the European Parliament,¹ resulting in simultaneous polls for the first time in 2024. An accompanying amendment package revised procedural rules based on lessons from the 2022 elections.² It expanded the territorial scope of the Electoral Procedure Act³ to include breaches committed abroad – although this measure alone does not prevent the potential abuse of postal voting – and introduced clearer provisions on election observers and the composition of the National Election Commission (NEC). The latter change, however, weakened procedural fairness by removing voting rights from delegated NEC members representing parties without a parliamentary group.

Further amendments increased public funding for parliamentary party groups,⁴ which predominantly benefit the governing party, introduced extensive digitalisation and automated decision-making in election administration,⁵ and prohibited by-elections for up to a year prior to general election.⁶ Amendments to the Freedom of Information Act reinstated deadlines for data disclosure, but introduced new exemptions that further limit access to public information.⁷

The Sovereignty Protection Act,⁸ was adopted in 2023, criminalised "illegal influencing of the will of voters," and extending the ban on foreign funding to independent candidates and non-partisan groups. The law also established the Sovereignty Protection Office (SPO) which operates with a broad and vaguely defined mandate, without effective judicial oversight, and has been used to intimidate independent media, civil society, and political actors.⁹

In 2024, Parliament adopted a comprehensive redrawing of single-member constituencies without public or cross-party consultation.¹⁰ The revisions, which favour the governing party, have raised concerns of gerrymandering. In June 2025,¹¹ the Venice Commission criticised these and other amendments for undermining checks and balances, and the principle of equal suffrage. Shortly afterwards, Parliament removed all limits on campaign expenditure,¹² further consolidating

⁴ Section 113(1) of Act XXXVI of 2012 on the Parliament, entered into force on 1 January 2023.

¹ Article 35(2) of the Fundamental Law and Chapter XVI of Act XXXVI of 2013 on electoral procedure (Electoral Procedure Act).

² Act XXIII of 2022 amending certain electoral and related laws.

³ Section 1 of the Electoral Procedure Act.

⁵ Act XXIV of 2023 on amendments to the rules of electoral procedure in relation to electronic administration. See also 13/F of the Electoral Procedure Act.

⁶ Section 8(2) of the Electoral Procedure Act.

⁷ Section 30(2a) of Act CXII of 2011 on the right to informational self-determination and on the freedom of information as amended by Act CI of 2023; Section 3/A of Act CXXII of 2009 on the austerity measures applicable to publicly owned enterprises as amended by Act CI of 2023; Section 7/A of Act CXXV of 2018 on Government administration as amended by Act CIX of 2023.

⁸ Act LXXXVIII of 2023 on the protection of national sovereignty.

⁹ For an analysis of the SPO Act, see Amnesty International Hungary and Hungarian Helsinki Committee, <u>Hungary's</u>
Act on the Protection of National Sovereignty in Breach of EU Law, 8 February 2024.

¹⁰ Act LXXIX of 2024 amending certain election-related Acts.

¹¹ Hungary – Act LXXIX of 2024 Amending Certain Laws Relating to Elections, adopted by the Venice Commission at its 143rd Plenary Session (online, 13-14 June 2025), CDL-AD(2025)018.

¹² Act LXVIII of 2025 on the amendment of Act LXXXVII of 2013 on the transparency of campaign costs for the election of members of the National Assembly.



incumbents' advantages. Additional amendments introduced asset declaration rules for Members of the European Parliament, ¹³ authorised closed NEC sittings¹⁴ – allowing for further restrictions on the publicity of the NEC's work – and expanded judicial panels adjudicating election-related disputes. ¹⁵ The state of danger, allowing rule by decree, is still in force.

2.2. Integrity threats

The current legislative trajectory raises persistent concerns regarding electoral integrity and political pluralism. The redrawing of constituencies and abolition of campaign spending limits have reinforced structural advantages for the governing party. The lack of transparent and inclusive consultations in electoral law-making and the ruling party's ability to enact further legislative changes will continue to undermine confidence in the process.

The Sovereignty Protection Act poses additional risks by enabling the investigation of political actors, media, and civil society organisations under broad and ambiguous notions of 'foreign influence', potentially curbing independent oversight of elections.

Further concerns include the politicisation of the NEC, unequal voting rights for citizens living abroad and national minorities, limited access to public information, and the lack of provisions allowing domestic citizen election observation.

Taken together, these developments reflect a continued centralisation of political control over the electoral framework and a severe narrowing of the space for independent and pluralistic participation ahead of the 2026 general election.

3. Political context

3.1. Background and key developments

Since the 2022 elections, the government and Fidesz, the governing party, have extensively conveyed their message that "Brussels" (i.e., the EU) seeks to infringe Hungary's sovereignty while Fidesz defends it. More importantly, they have asserted that the Hungarian government is the only sane voice in the EU advocating for peace to end the war in Ukraine. They placed high hopes on President Trump's ability to end the war quickly. Meanwhile, Hungary has been facing high cost-of-living inflation and very slow economic development for several years, and the government has failed to meet its economic promises. In this environment, social discontent has grown significantly and has highlighted several problems, including the state of healthcare, public transport, and the child protection system. This helped the opposition TISZA Party to build its support.

In February 2024, a presidential pardon in a child abuse case destabilised Fidesz and led to the resignation of President Katalin Novák and then Minister of Justice Judit Varga, who at the time was an MP and the leading candidate on Fidesz's planned list for the 2024 EP election. ¹⁶ Public outrage created fertile ground for Péter Magyar, Ms Varga's former spouse and a former Fidesz beneficiary, to emerge as a new opposition leader. He founded the TISZA Party (*Tisztelet és Szabadság Párt*, Respect and Freedom Party). ¹⁷ TISZA soon became strong enough to finish second in the June 2024 EP elections. ¹⁸ Since then, the government and Fidesz have attempted, so far unsuccessfully, to discredit TISZA using a wide range of tools, such as spreading unsubstantiated information about TISZA and its politicians,

¹³ Act XX of 2025 on the amendment of certain laws in connection with the obligation of Members of the European Parliament to declare their assets.

¹⁴ Sections 41/A and 41/B of the Electoral Procedure Act.

¹⁵ Section 229(2) of the Electoral Procedure Act.

¹⁶ BBC, Hungarian President Katalin Novak resigns over child-abuse pardon scandal, 10 February 2024.

¹⁷ https://magyartisza.hu/.

¹⁸ https://vtr.valasztas.hu/ep2024.



and passing controversial laws, for example those banning the Pride marches, to weaken TISZA among conservative or progressive voters. The overlap between the governing party, the government, and the state has intensified. Polls at the time of writing show TISZA slightly ahead of the governing Fidesz-KDNP.¹⁹

Beyond the electoral framework itself, the government has leveraged allegations of foreign influence to justify increasingly repressive measures against civil society and the opposition. Shortly after the 2022 elections, the then united opposition's prime ministerial candidate, Péter Márki-Zay, admitted in an interview that his association has received funding for campaign expenses from a US-based foundation. Political parties are prohibited from receiving funding from legal entities or non-Hungarian sources. Some politicians compared this funding scheme to that of CÖF (Forum for Civil Union, Civil Osszefogás Fórum), a state-funded GONGO that echoes government messaging through billboard and media campaigns and mass events. Framed the issue as a major breach of sovereignty, the government has used it in its communication and to justify its policies ever since. The National Information Centre, a national security agency and hub for intelligence, produced reports on the funding of the united opposition, which were later declassified and widely referred to in the media.²⁰ These developments served to justify the Sovereignty Act and the Sovereignty Protection Office. On 15 March 2025, in his speech on Hungary's national memorial day, Prime Minister Viktor Orbán referred to his critics as "bedbugs" promising that a spring cleaning would sweep them out.²¹ In May, Fidesz submitted a draft law enabling the withholding of funds, the issuing of fines, and even the dissolution of any legal entity (civil society and media organisations, and private sector companies) targeted by the Sovereignty Protection Office and the government. The bill was deemed an attempt to 'starve and strangle' dissenting voices.²² The bill's discussion in Parliament was postponed in early June 2025, however, it has not been withdrawn.

3.2. Integrity threats

The rise of a strong opposition party, TISZA, and its sustained popularity underscore deep political polarisation in Hungary. Fidesz appears to be seeking new methods to counter TISZA, as those previously used against opposition parties are now proving to be ineffective. While the state and its institutions are obliged to maintain electoral neutrality, this continues to be disregarded, and the pervasive overlap between the state, the government, and the governing party has intensified dramatically. Fidesz has already threatened or restricted the fundamental rights of certain social groups for political gain, and this could continue until Election Day.

The 2026 general election in Hungary are therefore expected to differ from previous ones in tone, intensity, and possibly even in the use of irregular and fraudulent methods, such as spreading Algenerated content (see Section 6.3).

Despite the likelihood of a very high turnout on Election Day, public confidence in a fair election process is alarmingly low. 48 percent of respondents to a survey, commissioned by Political Capital from Median, feared that election fraud would occur, and 28 percent thought election authorities would fail to conduct the election process fairly and properly.²³

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¹⁹ See the continuously updated polls results comparison by the Vox Populi election guide.

²⁰ Overview of the united opposition's foreign support, 17 November 2022; Overview of the financial sources received to influence elections in Hungary, 20 January 2023; Summary report on the foreign influence of the Hungarian Parliamentary elections of 2022, 21 June 2023.

²¹ Telex.hu *Bugs, cockroaches, vermin – how dehumanising propaganda sets the stage,* 17 March 2025.

²² Hungarian Helsinki Committee and others, <u>Operation Starve and Strangle. How the Hungarian Government</u> Decided to Put Companies, Independent Media and Civil Society in a Chokehold, 20 May 2025.

²³ Political Capital, *Politikai polarizáció és tribalizmus a kétpártrendszer küszöbén* (Political polarisation and tribalism on the eve of a two-party system), 10 December 2025.



Regarding foreign influence, according to Medián's public opinion poll from early November, overall 83 percent of Hungarians consider some form of external influence conceivable. Survey respondents identified Russia (53%), the European Union (49%), and the United States (49%) as the most likely sources of potential external influence in Hungarian elections.²⁴

(For in-depth political analyses, see the work of Political Capital.²⁵)

4. Election campaign

4.1. Background and key developments

State and party functions in Hungary have become increasingly indistinguishable. Despite repeated OSCE/ODIHR recommendations²⁶ to prohibit the misuse of administrative resources and prevent public officials from campaigning in their official capacity, state-funded communication continues to serve partisan objectives. Government-sponsored information campaigns are frequently indistinguishable from Fidesz messaging, replicating the same slogans, imagery, and narratives across publicly financed media and online platforms. Initiatives such as the government-funded national consultations and the Vote2025 campaign — officially presented as public outreach but widely perceived as partisan mobilisation — exemplify the use of public resources to promote Fidesz's political agenda. Together, these activities contribute to a continuous and largely unregulated campaign environment that extends well beyond the official campaign period.

A further merging of state and ruling party activities is evidenced in the active participation of senior government officials in initiatives closely aligned with the governing party's electoral interests. Digital networks such as the Digital Civic Circles (*Digitális Polgári Körök*) and the Fight Club (*Harcosok Klubja*), which involve state officials, have served as political messaging and voter mobilisation platforms to support incumbents. Fight Club is a 'digital army' as announced by the Prime Minister in May 2025 bringing together Fidesz supporters to help increase the reach of Fidesz propaganda.²⁷ Looking ahead to the official campaign period, the 2018 amendment to the Electoral Procedure Act,²⁸ which exempts state communication from campaign rules, continues to shield such practices from scrutiny. In addition, the National Election Commission – with a majority of members nominated by the governing party – has consistently interpreted the law in a manner favourable to the incumbents.

4.2. Integrity threats

The persistent use of administrative and communication resources for partisan purposes poses a serious threat to electoral integrity. The erosion of boundaries between state and party functions distorts the campaign environment, granting incumbents significant advantages in visibility and outreach. Unofficial campaigning through government-sponsored initiatives, coupled with weak and selective enforcement of existing rules, undermines the principle of equal opportunity among contestants. These practices distort voter perceptions, marginalise opposition voices, and upset the level playing field in the electoral contest. As a consequence, the OSCE/ODIHR's 2022 call for

²⁶ For example, Office for Democratic Institutions and Human Rights, <u>Hungary: Parliamentary Elections and Referendum</u>, 3 April 2022 – ODIHR Election Observation Mission Final Report, 29 July 2022.

²⁴ Hvg.hu, *Medián*: <u>A magyarok többsége tart attól, hogy az oroszok beavatkoznak a választásokba</u> (Majority of Hungarians fear Russian election interference), 11 December 2025.

²⁵ https://politicalcapital.hu/.

²⁷ The European Correspondent, *Fight Club with an Orbánian twist*, 26 May 2025.

 $^{^{\}rm 28}$ Act CLXVII of 2020 on the amendment of certain acts relating to elections.



transparent, equitable, and pre-defined criteria for state-funded advertising and for a ban on public advertising during campaign periods remains especially relevant.²⁹

5. Campaign finance, political party finance

5.1. Background and key developments

Overall, despite multiple legal changes, Hungary's campaign finance system continues to allow the extensive use of public resources for political advantage and lacks effective mechanisms to ensure accountability or transparency in campaign spending.

Hungary's campaign finance framework underwent notable changes since the 2022 general election, yet systemic deficiencies in transparency and oversight remain largely unresolved. In June 2025, Parliament adopted an amendment abolishing limits on campaign expenditure, ³⁰ which had previously been set at modest levels and inconsistently enforced by state authorities. While earlier ceilings were widely seen as unrealistic, their complete removal further advantages the ruling party, which already benefit from disproportionate access to state, public and media resources.

Financial support for parliamentary party groups was also substantially increased,³¹ with the most significant gains accruing to the governing party. These developments have reinforced a campaign environment characterised by unequal access to resources. Oversight remains fragmented and weak. The State Audit Office (SAO) formally supervises party and campaign finances but continues to operate without sufficient independence or transparency. (See more in Chapter 7.3 Other relevant state bodies.)

At the same time, third-party entities and organisations engaged in political campaigning are governed by a relatively loose set of rules, which are often circumvented and rarely result in timely enforcement. The absence of clear reporting obligations and transparency requirements for these actors allows third-party entities closely linked to political parties to engage in campaign-related activities without accountability. Digital and social media campaigning also remain largely unsupervised, further enabling indirect financing and coordination through third-party groups.

5.2. Integrity threats

The persistent opacity of campaign financing and the limited oversight of third-party actors present serious integrity risks. The abolition of spending limits and the selective enforcement of existing rules have deepened financial asymmetries in electoral competition. Third-party organisations with informal links to political parties operate with minimal transparency, enabling the circumventing of financing rules and the indirect use of public resources. Combined with the weak independence of oversight bodies, these practices contribute to a campaign environment dominated by the ruling party, undermining equal opportunities and public trust in the integrity of the electoral process.

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²⁹ Office for Democratic Institutions and Human Rights, <u>Hungary: Parliamentary Elections and Referendum, 3</u>
April 2022 – ODIHR Election Observation Mission Final Report, 29 July 2022.

³⁰ Act LXVIII of 2025 on the amendment of Act LXXXVII of 2013 on the transparency of campaign costs for the election of members of the National Assembly.

³¹ Section 113(1) of Act XXXVI of 2012 on the Parliament, entered into force on 1 January 2023.



6. Media

6.1. Traditional and digital media space

6.1.1. Background and key developments

No progress has been made in strengthening the independence of the media regulator, the National Media and Infocommunications Authority (NMHH) (see Section 7.3.), nor in enhancing the independence of public service media or increasing transparency regarding the ownership structures of media companies or the distribution of state advertising. The government remains the largest advertiser in the media market, accounting for over 30 percent of total ad spending and directing public funds to government-aligned media outlets. The Central European Press and Media Foundation (KESMA), a conglomerate of pro-government media, receives 75-80 percent of its total revenue from state advertising.

Meanwhile, independent journalists continue to face smear campaigns, derogatory statements, and denial of access to press conferences and state events, while their inquiries frequently go unanswered by state officials. The Sovereignty Protection Office (SPO) uses its power to issue unsubstantiated publications on media outlets and journalists allegedly linked to threats to national sovereignty. ³² The SPO's publications are widely disseminated via pro-government media outlets and social media platforms. Journalists are subject to the threat of state surveillance and to strategic lawsuits against public participation (SLAPPs). ³³ The bill on the transparency of public life, submitted to Parliament in May 2025 and henceforth postponed, represents a new and serious threat to media freedom and independent media outlets. ³⁴

State communication is conducted under a single large framework contract. Between spring 2022 and autumn 2025, HUF 225 billion (about EUR 591 million) was spent, and the budget has been increased again by a further HUF 75 billion (approximately EUR 196 million) until spring 2026. The state television's evening news programmes primarily reflect the government's messaging, as the Republikon Institute found, "[g]overning party politicians appear predominantly in a positive context, with dominant screen time, while opposition figures are presented mainly in neutral or negative terms. Politicians of the Tisza Party – especially Péter Magyar – are mentioned extremely frequently, typically in a discrediting, scandal-focused context."³⁵

Despite the NMHH's Media Council having already declared this practice partly unlawful during the summer, state television again used virtual advertisements for the latest national consultation in autumn 2025. This was declared only partly unlawful because the Media Council's reasoning focused on the lack of distinction of these ads as community-purpose ads, whereas under the Media Act, ³⁶ such virtual or even community-purpose ads may not be broadcast at all.

In autumn 2025, *Blikk*, the most widely read independent daily tabloid, was sold by its foreign owner, Ringier, which had already relinquished a large part of its portfolio, including a public affairs newspaper,

³² European Commission, <u>2025 Rule of Law Report, Country Chapter on the rule of law situation in Hungary,</u> 8 July 2025, pp. 20-23.

³³ Amnesty International Hungary, Háttér Society, Hungarian Civil Liberties Union, Hungarian Helsinki Committee, K-Monitor, Mérték Media Monitor, Streetlawyer Association, Transparency International Hungary, Ökotárs Foundation, <u>Selected questions and recommendations for Hungary in the Article 7(1) TEU procedure</u>, October 2025, p. 18.

³⁴Hungarian Helsinki Committee and others, <u>Operation Starve and Strangle</u>. How the <u>Hungarian Government</u> Decided to Put Companies, Independent Media and Civil Society in a Chokehold, 20 May 2025.

³⁵ Republikon Institute, <u>Semi-annual Report: Public Media Monitoring, Based on M1 news broadcast at 7:30 PM, February-July 2025</u>, September 2025, p2.

³⁶ Act CLXXXV of 2010 on media services and on the mass media.



a sports newspaper, and several local titles, ultimately to KESMA in a 2016 deal. The acquisition of *Blikk* is likely part of the governing party's strategy to insert government propaganda into content generally unrelated to public affairs. Local newspapers are owned by KESMA's company, Mediaworks. Only a handful of independent local news outlets remain nationwide, and their reach and funding are significantly smaller than those of KESMA-owned titles.

From 2018 onwards, the Hungarian government built a pro-government media conglomerate in the Transylvania region of Romania, through the Transylvanian Media Space Association (*Erdélyi Médiatér Egyesület*), in order to reach Hungarian voters there directly. Over six years, EUR 29 million of Hungarian public funding was spent on this project. Following the 2022 elections, the flow of public funds was temporarily halted due to Hungary's economic situation, leading to the closing of media outlets and staff lay-offs. However, in 2023, KESMA began reconstruction efforts. In October 2025, the Transylvanian Media Space Association's director was replaced by an individual coming directly from KESMA.

6.1.2. Integrity threats

The extensive concentration of media ownership among government allies, the sector's centralisation, the overt bias of state media, and the absence of an independent regulator continue to undermine media freedom, freedom of speech, and democratic discourse. The current media landscape significantly distorts the political competition and the fairness of elections. The impact in neighbouring countries is also relevant considering the large Hungarian minority communities who have the right to vote³⁷ and are strongly targeted with clearly pro-government information.

6.2. Social media platforms

6.2.1. Background and key developments

In recent campaigns, Fidesz has increasingly relied on social-media platforms and loosely regulated digital networks to circumvent formal restrictions on campaign advertising. Digital networks such as the Digital Civic Circles and the Fight Club have served as prominent platforms for political messaging and voter mobilisation in support of the incumbents. Despite the formal ban on political advertising imposed by major social-media companies, these networks have reportedly continued to promote government-aligned content through sponsored posts and targeted recruitment drives.³⁸ The Digital Civic Circles alone published hundreds of Facebook advertisements encouraging users to join their communities and provide personal contact details for further engagement.³⁹

In parallel, third-party actors linked to the government have markedly intensified digital content production. This surge illustrates how Fidesz seeks to circumvent the advertising ban by shifting towards less regulated forms of online outreach and leveraging third-party structures to maintain high levels of reach and engagement. Despite the restrictions, actors such as the National Resistance Movement (Nemzeti Ellenállás Mozgalom) have also disseminated Al-generated videos, exploiting loopholes with substantial financial backing and generating tens of millions of views. A common tactic involves uploading videos in multiple versions; although platforms may remove some, others remain

³⁷ 378.000 registered postal voters to date in Romania and Serbia.

³⁸ Lakmusz, <u>Fidesz Spent Crazy Amounts of Money on Facebook Ads as Our International Comparison Highlights</u>, 5 November 2025.

³⁹ Telex.hu, <u>Despite the Ban, Fidesz Continues to Advertise on Facebook with Its Digital Civic Circles Freely</u>, 29 October 2025.

⁴⁰ Lakmusz, <u>Felpörgette a Facebook-videók gyártását a Fidesz, így alig látszik a számokon, hogy elvileg már nem lehet pénzért hirdetni őket</u> (Fidesz Has Stepped Up the Production of Facebook Videos – Making It Hard to See in the Numbers That They Are No Longer Supposed to Be Advertised for Money,) 26 November 2025.



active. Even when removed, many of these videos have already reached millions of viewers before any intervention occurs.

The financial transparency of these operations remains limited. In the case of third-party actors, advertising expenditure becomes visible only when Meta suspends campaigns for rule violations. Yet even then, the sources of funding for such campaigns remain opaque. Social-media campaigning therefore remains largely unsupervised, with government-linked spending among the highest in Europe. During the 2024 election campaigns, Hungary, particularly the government and Fidesz-allies, recorded the highest overall level of political advertising expenditure in the EU. ⁴¹ Following 6 October 2025, when Google and Meta stopped political, electoral and social issue advertisements on their sites, major advertisers largely compensated for the ban by increasing their video output.

While the new EU Regulation on the Transparency and Targeting of Political Advertising⁴² aims to enhance transparency in online political advertising, its relevant provisions have not yet been transposed into Hungarian law. Consequently, the National Media and Info-communications Authority (NMHH) currently lacks the legal instruments to enforce the regulation or sanction violations. Effective oversight of government-aligned advertisers, therefore, is unlikely to materialise before the upcoming election.

6.2.2. Integrity threats

The extensive use of third-party actors and networks to promote political messages online undermines the transparency and accountability of campaign communication. By circumventing the formal ban on paid political advertising, Fidesz maintains a disproportionate presence in the digital space and an advantage in reaching and mobilising voters. The lack of effective oversight of digital campaigning, combined with the opaque financing of third-party digital operations, raises serious concerns. What appears as spontaneous online participation often conceals a centrally coordinated campaign effort, reinforcing existing inequalities in political competition and further eroding public confidence in genuine electoral competition.

6.3. Use of AI for campaign purposes

6.3.1. Background and key developments

Al-generated content has been used as a tool in political communication for several years, but by 2025 it has become increasingly prevalent. Known pro-government organisations and political influencers widely employ Al-generated content, primarily to discredit the opposition party, TISZA, and to bolster support for Fidesz. Such content is not only tolerated by the government but is also disseminated by government officials and Fidesz MPs, despite their frequent accusations of government critics spreading fake news and hatred.

Several Al-generated videos and images containing disinformation have been published, with social media advertising often supporting their dissemination, and public funds were reportedly used to finance them.⁴³ Some concrete examples are below.

• In some videos, the actions of the TISZA leader, Péter Magyar, were altered to make him appear aggressive, 44 while in another case, a speech originally delivered by someone else was

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⁴¹ Political Capital, Mérték Media Monitor, Lakmusz: <u>Fidesz & Co. flooded social media with anti-Western hostile</u> disinformation in Hungary's election campaign, reaching EU spending records, Summary report, June 2024.

⁴² Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising.

⁴³ Telex.hu, Fidesz and AI – bringing the worst out in each other, 7 August 2025.

^{44 &}lt;u>https://www.facebook.com/watch/?v=1813891299505078.</u>



manipulated to appear as if he had spoken it.⁴⁵ The latter was originally posted by , the Prime Minister's political director and Fidesz campaign manager Balázs Orbán. Fidesz's youth organisation Fidelitas conducted a campaign to collect signatures based on allegations concerning TISZA's supposed plans for bringing back military conscription, which were in fact derived from a manipulated video – the original stated the exact opposite. We note that the purpose of such signature collections is generally database building and increasing street visibility.

- Even state media broadcast an Al-generated interview featuring fabricated pedestrians to illustrate allegations regarding TISZA's purported plans to raise taxes if it came to power. The video was originally shared by the National Resistance Movement (NEM, Nemzeti Ellenállási Mozgalom), an organisation founded by a pro-Fidesz influencer. The public broadcaster failed to clearly distinguish its own content from that of NEM, nor did it sufficiently indicate the Algenerated elements.⁴⁶
- Local county news outlets owned by the KESMA media conglomerate used Al-generated fake photos of TISZA's protests to support allegations of low attendance. These outlets also published nearly identical Al-generated images depicting the opposition politician Magyar on all fours, held on a leash by Manfred Weber, president of the EPP parliamentary group in the European Parliament.⁴⁷ These images were subsequently reshared by Fidesz parliamentary group leader Máté Kocsis.

There is substantial evidence of coordinated digital activity involving fake and Al-generated profiles designed to amplify pro-government narratives.

• In November 2025, the independent fact-checking media organisation and Hungarian Digital Media Observatory member *Lakmusz* uncovered an inauthentic network comprising 87 fake Facebook profiles with Al-generated photos and detailed digital personas supporting the government and the governing party. Some of these accounts have been active in Facebook groups and private chats, where they steer conversations to echo government messaging and attack opposition figures, creating an illusion of broad grassroots support.

6.3.2. Integrity threats

Hungarian voters are facing a digital environment where the boundaries between organic political debate and orchestrated propaganda are increasingly unclear, and where Al-generated content poses a serious threat to the integrity of the 2026 general election. Although digital literacy in Hungary is not particularly low,⁴⁹ it is often difficult for users to recognise Al-generated content and profiles. Even advanced computer users may find it challenging to detect all such content, allowing disinformation and manipulation to spread easily – particularly when such practices are employed, and in some cases financed, by the government. The use of fake and Al-driven profiles further erodes the authenticity of public discourse, suppresses genuine political debate, and misleads voters.

⁴⁶ Telex.hu, <u>A közmédia Híradójában is lejátszott Nemzeti Ellenállás Mozgalom-videóban még az utca emberét is mesterséges intelligenciával csinálták meg</u> (In the National Resistance Movement video, which was also broadcast on public media news, even the people on the street were created using artificial intelligence), 7 September 2025.

⁴⁵ https://www.facebook.com/watch/?v=3004975889892146.

⁴⁷ 444.hu, <u>Egyszerre jelent meg a megyei lapok Facebook-oldalán a Magyar Pétert láncos kutyaként ábrázoló kép</u> (A picture depicting Péter Magyar as a chained dog appeared simultaneously on the Facebook pages of county newspapers), 21 October 2025.

⁴⁸ Lakmusz, <u>Young, Attractive, Fans of Football, Orbán and Relationship Drama Inside the Most Sophisticated Pro-</u> Fidesz Fake Profile Network on Facebook, 2 December 2025.

⁴⁹ Hungarian Institute for Economic Research, <u>Digital Competencies in Hungary</u>, 7 August 2024.



(For in-depth media analyses, see the work of Mérték Media Monitor.⁵⁰)

7. Election administration and independent control mechanisms

7.1. Election administration and voter registration

7.1.1. Background and key developments

As a general rule, voter registration is automatic in Hungary. However, voters may need to submit several administrative requests to election offices. These include, for example, requests for registering to vote abroad at an embassy or consulate, to vote by post from abroad, or to be entered on the national minority self-government's list; requests to change the place of voting; and requests for accessibility arrangements or a mobile ballot box.

The work of the electoral bodies, such as record-keeping and the collection and aggregation of results, has also been digitalised Since 2022, the digitalisation of election administration has advanced further. Voters' requests are submitted electronically and, as a general rule, are processed through automated decision-making. Requests submitted in person or by post are being phased out and are becoming exceptional. These technical developments were supported by amendments to the Electoral Procedure Act.⁵¹ As a result, deadlines for submitting requests have become more voter-friendly, and the entire election administration has been centralised within the National Election Office. Although the digital tools generally function well, during the 2024 EP elections some voters residing abroad reported failures in the online identification system, which prevented them from registering to vote at a Hungarian foreign representation.⁵²

The electoral rules still discriminate between voters residing abroad on Election Day. Voters with a registered address in Hungary who are abroad on Election Day may only vote at Hungarian foreign representations, whereas voters who do not have a registered address in Hungary may vote by post.⁵³

Individuals deprived of the right to participate in public affairs by a criminal court do not have the right to vote during their imprisonment and for an additional one to ten years following their release, depending on their individual sentence.⁵⁴ The exclusion of convicted persons is concerning, as the time served is not counted, and criminal courts too often apply the maximum exclusion period of ten years.

Persons with limited mental capacity who have been disenfranchised by a court are also excluded from voting.⁵⁵ The disenfranchisement of persons with limited mental capacity is excessively broad and does not differentiate according to the degree of impairment; the regulation is also poorly defined. (For more specific information, see Section 8 Participation of national minorities and Section 9 Equal suffrage for women, LGBTQI people and people with disabilities.)

7.1.2. Integrity threats

While the digitalisation of election administration is satisfactorily implemented, it may create an additional burden, and even an obstacle, for individuals with limited digital literacy in exercising their right to vote. Addressing this issue requires a much broader policy response concerning digital education. Although the National Election Office (NEO) has repeatedly proven its competence, the high level of centralisation and the complex technical background of the digital systems may undermine

intips.//inertex.eu/en/

⁵⁰ https://mertek.eu/en/.

⁵¹ For example, Sections 13/D-13/F of the Electoral Procedure Act.

⁵² Hungarian Citizen Election Report, p. 10.

⁵³ Sections 259 and 266 of the Electoral Procedure Act.

⁵⁴ Article XXIII(6) of the Fundamental Law of Hungary and Sections 61-62 of the Criminal Code.

⁵⁵ Article XXIII(6) of the Fundamental Law of Hungary, Title V of the Civil Code, and Section 445 of the Code of Civil Procedure.



public confidence in the accuracy of the election administration, particularly in a tense and highly polarised electoral environment. The errors identified in the online identification system in 2024 should be remedied to increase citizen trust.

Different voting arrangements for citizens voting abroad, as well as the legal framework governing the exclusion of individuals from voting rights on the basis of imprisonment or limited mental capacity, remain serious shortcomings in the protection of the right to free elections.

7.2. The National Election Commission and courts

Background and key developments

The National Election Commission (NEC) plays a key role in resolving election-related disputes. It is the sole legal forum for appeals and for complaints (objections) in cases concerning more than one singlemember constituency. Decisions made by the NEC may be challenged through applications for judicial review before the *Kúria* (Supreme Court).⁵⁶

The right to an effective legal remedy continues to be hindered by overly strict formal requirements for complaints, coupled with the fact that appeals and judicial review applications may only be lodged by those directly affected by the case.⁵⁷

Due to the NEC's composition rules and the governing party's two-thirds majority in Parliament, government-leaning NEC members consistently hold a majority within the body, rendering the decision-making process effectively hollow. NEC members who were delegated by parties without a parliamentary group standing in the next election do not have voting rights within the NEC. Decisions on complaints regarding violations during the campaign period and on Election Day, as well as on election results, are therefore adopted without their participation. National minority self-governments have lost their right to delegate members to the NEC.⁵⁸ This issue is exacerbated by the fact that NEC members cannot participate in drafting decisions or reasoned justifications because this is usually done by the president of the NEC and the NEO, thereby members' views are sidelined during the adjudication of complaints.⁵⁹

The Hungarian Helsinki Committee's analysis of legal remedies in the 2022 general election shows that NEC practice is often inconsistent, demonstrating a loose interpretation of the law in high-level national cases and favouring the government.⁶⁰ Of particular concern is the fact that, from summer 2025 onwards, the NEC is responsible for overseeing the asset declarations of Hungarian Members of the European Parliament and holds the power to terminate their mandates. 61 This is widely regarded as a potential means of removing the EP mandates of opposition leaders.

Experience shows that, in cases politically sensitive for the government, the Kúria generally rules in the government's favour. Even in instances where this does not happen, the politically captured Constitutional Court acting on constitutional complaints tends to quash the ruling and order a new procedure before the Kúria.⁶² According to the bill introducing asset declaration rules for MEPs, the

⁵⁶ Sections 208, 297(3), and 229(1) of the Electoral Procedure Act.

⁵⁷ Sections 212, 221(1) and 222(1) of the Electoral Procedure Act.

⁵⁸ Sections 20, 27, 45(5) of the Electoral Procedure Act.

⁵⁹ Section 45(1) of the Electoral Procedure Act.

⁶⁰ Hungarian Helsinki Committee, Lessons learned from legal remedies. General elections and referendum in Hungary, in 2022, Chapter 7, 24 August 2022, pp. 11-12.

⁶¹ Sections 4f), 7/B, 9/A, and 9/B of Act LVII of 2004 on the legal status of Hungarian Members of the European Parliament.

⁶² Hungarian Helsinki Committee, Lessons learned from legal remedies. General elections and referendum in Hungary, in 2022, Chapters 8 and 9, pp. 12-16; and 20K, Hungarian Helsinki Committee, Mérték Media Monitor, Political Capital, Hungarian Civil Liberties Union, Unhack Democracy, <u>Hungarian Citizen Election Report. European</u> and Local Elections, Hungary, June 2024, pp. 12-13.



Kúria will hear election-related cases in five-judge panels instead of the previous three.⁶³ Given the high workload faced by the Kúria during election periods, this change appears unreasonable and could lead to alterations in the case allocation order on the grounds of case overload.

7.2.2. *Integrity threats*

As an electoral body, the NEC is unable to level the playing field, which remains tilted in favour of the governing party. As a politically appointed body, the NEC has even facilitated and enforced the blurring the lines between the state, the government, and the ruling party. In politically sensitive matters, the Kúria and, in particular, the Constitutional Court have issued decisions that appear biased. Similar patterns can be expected in 2026. Given the rule of law concerns about the Kuria, it cannot be excluded that these concerns will also have an adverse impact election-related cases.⁶⁴

7.3. Other relevant state bodies

7.3.1. Background and key developments

A number of additional state institutions also perform a significant role in relation to elections and political parties.

The **State Audit Office (SAO)** is responsible for overseeing political party finances at all times,⁶⁵ and of candidates and nominating organisation after elections,⁶⁶ including matters relating to campaign expenditure and unlawful funding. The SAO issues reports and imposes fines, which are collected by the National Tax and Customs Administration (NAV) if not paid voluntarily by the obligated party.⁶⁷ In the event of a severe legal violation or non-compliance with a notification for lawful operation, the SAO may apply to the prosecutor to start court proceedings for dissolving a party.⁶⁸ According to the Constitutional Court, there is no effective legal remedy against decisions of the SAO.⁶⁹ Legal remedy can be sought against the NAV; however, it has a legal obligation to follow up on the SAO's report. The SAO has heavily fined opposition parties on multiple occasions, while finding no legal violations in the operation of Fidesz or its non-partisan allies that support its campaign.⁷⁰

The National Media and Infocommunications Authority (NMHH) is responsible for ensuring a balanced media market, the lawful operation of public media, and overseeing the legality of broadcasters' programme content, among other functions. However, the NMHH does not operate independently.⁷¹ Media concentration of Fidesz-aligned outlets, the government's advertising practices, and bias within the public media have been evident for many years. The NMHH fails to properly carry out its duties to oversee content in accordance with the law. National consultations are regularly broadcast as community purpose advertisements, despite their content clearly constituting political advertising, which may only be aired during election campaign periods and must be clearly

⁶⁴ <u>Selected questions and recommendations for Hungary in the Article 7(1) TEU procedure</u>, October 2025, pp. 5 9.

⁶³ Section 229(2) of the Electoral Procedure Act.

 $^{^{65}}$ Act XXXIII of 1989 on the operation and financial management of political parties.

 $^{^{66}}$ Act LXXXVII of 2013 on the transparency of campaign costs related to the election of the members of the Parliament.

⁶⁷ Section 4(4) of the Act XXXIII of 1989.

⁶⁸ Section 10(4) of the Act XXXIII of 1989.

⁶⁹ 32/2019 (XI.15) Constitutional Court decision was stating that the SAO is an office without official authority, its reports are not binding official decisions, it has no direct sanctioning power, therefore its reports are not subject to the requirements of fair procedure or the right to legal remedy.

⁷⁰ European Commission, <u>2025 Rule of Law Report, Country Chapter on the rule of law situation in Hungary</u>, 8 July 2025, p. 26.

⁷¹ European Commission, <u>2025 Rule of Law Report, Country Chapter on the rule of law situation in Hungary</u>, 8 July 2025, p. 20.



distinguishable from other programming.⁷² In 2025, virtual advertisements were aired for the VOKS 2025, a government communication campaign that resembled national consultations. These virtual adverts flashed in the corner of viewers' screens during all TV programmes, including football matches and the news – on several channels, particularly on public television. Although this practice was against the law in several ways, the Media Council initiated a procedure and imposed small fines, but only after the VOKS 2025 campaign had concluded, despite being immediately notified by the press.⁷³

The National Authority for Data Protection and Freedom of Information (NAIH) has powers to oversee the practices of political parties and the government as they relate to data protection. In 2021, the government began to send propaganda email messages to citizens the who had consented to future contact when registering for COVID-19 vaccination. The NAIH did not identify any breach of data protection law in this practice. However, in 2025, the first-instance court found a legal violation in a lawsuit initiated by the Hungarian Civil Liberties Union. No final decision is expected before the 2026 elections; therefore, the government is expected to continue using this database.

TISZA experienced two significant data leaks in autumn 2025: the first affecting around 20,000 individuals, and the second around 200,000. The NAIH initiated appropriate procedures. The second set of leaked data was shared online by unknown individuals. The disclosed information was maliciously used by government officials, government-aligned media outlets, and influencers.⁷⁴ In this context, the NAIH issued a statement drawing attention to the illegality of reusing data that had been unlawfully published. It remains to be seen whether this position will also be reflected in the NAIH's official procedures.⁷⁵

The **police** play a crucial role in protecting the right to freedom of expression at all times, as well as safeguarding the integrity of elections on Election Day, while maintaining impartiality to political competition. During previous elections, the police lacked capacity to respond to every reported incident of vote buying and other fraudulent activities on Election Day. It also failed to investigate most of these cases, creating the impression that such activities could be carried out with impunity. In autumn 2025, the police carried out an alarming new practice when it conducted house searches and interrogated a former opposition politician and YouTuber in a politically sensitive case for the government, as well as a non-Fidesz candidate during a local by-election campaign. The actions of the police were significantly faster and unusually thorough. Raids on nightclubs and searches of celebrities' homes loss appear to be part of the governing party's campaign strategy.

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⁷² Section 32 of Media Act.

⁷³ Hungarian Helsinki Committee blog, <u>Adáshiba: politikai kampányok álruhában</u> (Broadcasting error: political campaigns in disguise), 12 June 2025.

⁷⁴ Atlatszo.hu, <u>Friends of Fidesz commit unprecedented privacy violations in Tisza app scandal</u>, 20 November 2025.
⁷⁵ NAIH, <u>Közlemény a politikai pártok adatbázisaiból nyilvánosságra kerülő személyes és különleges adatok médiaszolgáltatók általi felhasználásának adatvédelmi követelményeiről</u> (Announcement on data protection requirements for the use of personal and special data disclosed from political party databases by media service providers), 7 November 2025.

⁷⁶ 444.hu, <u>Juhász Péter: Semmiféle rágalmazás szóba sem került</u> (Péter Juhász: There was no question of defamation whatsoever), 3 October 2025.

⁷⁷ Telex.hu, <u>Hajnalban bevitték a rendőrök a józsefvárosi képviselőjelöltet, drogtesztet csináltattak vele, és házkutatást tartottak nála</u> (At dawn, police officers took the Józsefváros representative candidate into custody, administered a drug test, and conducted a search of his home), 20 October 2025.

⁷⁸ Magyar Narancs, <u>Rendőrök a drograzziákról: "Egy nagy f.ság az egész, egyértelmű választási fogás"</u> (Police officers on drug raids, "It's all bullshit, a clear election ploy"), 27 November 2025.



7.3.2. Integrity threats

These state authorities' lack of independence is a general concern, which is connected to the pervasive overlap between the state, the government, and the governing party. Even supposedly independent public authorities such as the SAO⁷⁹ are influenced by Fidesz, as its president is elected by Parliament, in which Fidesz holds a two-thirds majority. The SAO is unlikely to act on suspicions of unlawful support for Fidesz, but it may be extra thorough and rigorous when examining – and fining – opposition parties. The NMHH and its Media Council are also likely to turn a blind eye to irregularities that benefit the government. The already intense unofficial campaigning and the formal election campaign period will likely generate significant work for the NAIH; it remains to be seen whether it will act impartially and swiftly.

8. Participation of national minorities

8.1. Background and key developments

In 2023, the *Bakirdzi and E.C. v. Hungary* judgment of the European Court of Human Rights became final, ⁸⁰ which found the present the system of national minority voting to be in violation of the European Convention on Human Rights. Since then, there has been no positive development regarding the voting rights of national minorities. In 2024, the Hungarian government cited the need for extensive public consultation to justify its failure to implement changes. ⁸¹ This reasoning appears cynical when considered alongside the frequent practice of amending electoral laws without any meaningful public, expert, or cross-party consultation. National minority voters can register on the national minority electoral register, in which case they may cast a vote for the single-member constituency candidate, as any other voter can. However, instead of voting for party lists, they may vote only for their national minority self-government's list, which essentially consists of a single name on the ballot paper. National minorities have a preferential quota to elect a representative to Parliament; however, of the thirteen registered national minorities in Hungary, only two have sufficient number to do so. The remaining eleven can only elect spokespersons.

Roma people continue to be underrepresented in Parliament, among candidates, and in public life more generally. Although TISZA promised to include more Roma candidates on its party list than other parties usually do, the backgrounds of its single-member candidates have not yet proven this commitment. Discrimination against Roma people remains pervasive in Hungarian society, as does the tendency to blame the Roma community for being overrepresented among socially disadvantaged groups — as illustrated by recent statements of the Prime Minister and a government minister.

- On 11 November, Prime Minister Viktor Orbán gave an interview on ATV. While praising the
 government's family benefits, he was asked why child poverty remains so prevalent. He
 responded that it should be examined whether the statistical data concerned "Gypsy children
 or Hungarian children." When the reporter corrected him, noting that "Gypsy children are also
 Hungarian children," Orbán replied "Yes, yes, but still a special group."⁸²
- On 24 November, János Lázár, the Minister for Construction and Transport, was asked at a local
 event whether he maintained his 2018 statement comparing Roma people to migrants and
 claiming that they had not integrated into society for 600 years. Lázár responded that he had
 been referring only to the government's shortcomings, not those of the Roma community, and

⁷⁹ Article 43 of the Fundamental Law.

⁸⁰ Bakirdzi and E.C. v. Hungary, App. Nos. 49636/14 and 65678/14 (ECtHR, 10 November 2022).

⁸¹ Hungarian Civil Liberties Union and the Hungarian Helsinki Committee, <u>Discriminatory restriction of national minorities' voting rights remain unresolved</u>, Communication submitted to the Committee of Ministers of the Council of Europe on 20 January 2025.

⁸² Hungarian government, <u>Transcript of Interview with PM Orbán on ATV</u>, 11 November 2025.



that "the Gypsy community should be given an opportunity, not Africans," adding that "the Gypsy community is the best opportunity for Hungary today."⁸³

8.2. Integrity threats

The unfair system governing national minority voting rights remains unchanged. The underrepresentation of Roma people in politics, and in public life more broadly, continues to be alarming.

9. Equal suffrage for women, LGBTQI+ people, and people with disabilities

9.1. Background and key developments

Women remain significantly underrepresented in Hungarian politics. The gender balance remains far from optimal, and there has been no broad public discussion on quotas or other means to increase women's participation in political leadership. Not a single one of the 13 government ministries is led by a woman. Only two out of 26 government commissioners, as well as the government spokesperson, are female. 15 percent of Members of Parliament and 13 percent of governing party MPs are women. TISZA has announced most of its single-member constituency candidates; one-third of these, and two out of eight of the party's leading experts, are women.

Intimidating anti-LGBTQI rhetoric and laws have intensified further. For example, in 2025, Pride marches were banned by law,⁸⁴ and an anti-LGBTQI propaganda video was shared in the Fidesz-supporters' Fight Club Facebook group for redistribution in the name of Prime Minister Orbán.⁸⁵

The prohibition on legal gender recognition, which violates human dignity, has cascading effects throughout the political sphere, affecting both potential candidates and voters. Following the 2020 ban on the legal recognition of transgender persons⁸⁶ transgender persons, hence also transgender politicians, may only use a name corresponding to their sex at birth. They are required to use only this name when conducting official business, campaigning, and acting in a political capacity. This provision is among the obstacles preventing openly transgender people from participating in politics as public figures. Even as voters, they may be exposed to humiliating situations when signing the electoral roll with a name that corresponds to their sex at birth and does not reflect their gender identity. Even as voters, they may be exposed to humiliating situations when signing the electoral roll with a name that corresponds to their birth sex and does not reflect their gender identity.

The situation of people living with disabilities in Hungary regarding political participation and inclusion in public life presents a troubling picture of persistent human rights violations despite international obligations, notably Article 29 of the UN Convention of the Rights of People with Disabilities. People with visible disabilities are generally underrepresented, or not represented, among candidates, politicians, and members of the government. Approximately 50,000 people remain unable to vote due to guardianship-based restrictions that have been repeatedly condemned by the UN Committee on the Rights of Persons with Disabilities.⁸⁷ Combined with the broader context of illiberal governance, people

⁸³ Telex.hu, <u>Lázár János szerint még két választást meg kell nyerniük ahhoz, hogy lehessen valamit csinálni a MÁV-val</u> (According to János Lázár, they need to win two more elections before they can do anything about MÁV, the Hungarian Railways), 24 November 2025.

⁸⁴ Amnesty International Hungary, Háttér Society, Hungarian Civil Liberties Union, Hungarian Helsinki Committee, <u>Legislating Fear: Banning Pride is the latest assault on fundamental rights in Hungary</u>, 21 March 2025.

⁸⁵ https://www.youtube.com/watch?v=bei1XoDCB84.

⁸⁶ Act XXX of 2020 amending the Act I of 2010 on the civil registration procedure.

⁸⁷ UN Committee on the Rights of Persons with Disabilities, <u>Concluding observations on the combined 2nd and</u> <u>3rd periodic reports of Hungary</u>, CRPD/C/HUN/CO/2-3, 20 May 2022.



with disabilities in Hungary are increasingly marginalised from political and public life, unable to exercise their fundamental rights as equal citizens.

9.2. Integrity threats

It is highly likely that women, LGBTQI persons, and people with disabilities will remain underrepresented – or not represented at all – during the 2026 election campaign and in the next government.

10. Clientelism, gerrymandering, voter tourism

10.1. Background and key developments

Entrenched clientelist practices and patterns of dependence influencing voting behaviour continue to affect electoral integrity in Hungary, particularly in smaller and economically disadvantaged municipalities. Observers have consistently reported vote-buying, intimidation, and coercive dependency relations centred around local powerholders.⁸⁸ These relations of dependence are both a product and a driver of clientelist practices, enabling local elites to mobilise voters through their control of municipal resources, social aid, and public work schemes. Such dynamics reinforce hierarchical systems of patronage and sustain a culture of dependency that undermines the autonomy of voters.

The 2024 Hungarian Citizen Election Report⁸⁹, jointly produced by several Hungarian civil society groups, confirmed that municipal resources had again been used to the benefit of incumbents, including through the discriminatory use of local publications and the conversion of public events into campaign activities. Additionally, in several locations, courts found that municipal constituencies had been redrawn unlawfully,⁹⁰ reinforcing concerns about gerrymandering and the political manipulation of local administrative processes.

Persistent risks relate to manipulation of address registration and organised voter tourism,⁹¹ particularly in locations close to Hungary's borders, with reports indicating coordinated re-registrations for electoral gain. Earlier amendments to the Electoral Procedure Act (2021-2022)⁹² abolished the requirement for a genuine residential connection to a registered address, effectively legalising the practice of registering voters who do not actually reside in the locality.

10.2. Integrity threats

Electoral integrity in Hungary remains challenged by the interplay of clientelist networks, local dependency structures, vote-buying, intimidation, and politically driven manipulation of local institutions. The use of municipal resources and services for campaign purposes continues to distort equality of opportunity, while voter tourism and address manipulation undermine the reliability of voter registration. Weak legal safeguards and the limited capacity of oversight bodies to detect or sanction abuses at the local level further exacerbate these risks. In combination, these factors compromise the secrecy and freedom of the vote and sustain public perceptions that electoral

⁹¹ Ibid.

⁸⁸ See, for example, Office for Democratic Institutions and Human Rights, <u>Hungary: Parliamentary Elections and Referendum</u>, <u>3 April 2022 – ODIHR Election Observation Mission Final Report</u>, 29 July 2022. See also 20K, Hungarian Civil Liberties Union, Hungarian Helsinki Committee, Mérték Media Monitor, Political Capital, Unhack Democracy, <u>Hungarian Citizen Election Report</u>, June 2024.

⁸⁹ Hungarian Citizen Election Report 2024, June 2024.

⁹⁰ Ibid.

⁹² Section 4 and 17 of Act CXIX of 2021.



outcomes in many municipalities are influenced by coercion and dependence rather than genuine choice.

11. Election Day

11.1. Background and key developments

Breaches of the electoral legal framework are highly likely to occur on Election Day similarly to what happened during the 2024 European Parliament and local elections. These included incidents of vote-buying, the unlawful transportation of voters, political pressure on nursing home residents, an unrealistic number of new address – hence voter – registrations in smaller settlements, family or group voting, and violations of the ban to campaign on Election Day in the vicinity of polling stations.⁹³

11.2. Integrity threats

It can be expected that as election competition intensifies and public sentiment becomes even more polarised, unlawful activities on Election Day could rise proportionally. Should public tensions and a small difference in polling numbers among political parties persist, we may witness an unprecedented electoral environment where legal violations on Election Day, and even election-related crimes, could become significantly more intense and widespread. In contrast, if the contest is not close, legal violations on Election Day will likely remain isolated.

12. Conclusions

ODIHR's report on the 2022 general election represented a damning verdict on election integrity breaches, describing that "the campaign was marked by the absence of a level playing field, characterized by a pervasive overlap between the ruling coalition's campaign messages and the government's information campaigns, giving an advantage to the ruling coalition and blurring the line between state and party". ODIHR further noted that "the lack of impartial information in the media about the main contestants, the absence of debates among the major electoral competitors, and the independent media's limited access to public information and activities of national and local government significantly limited voters' opportunity to make an informed choice." ⁹⁴

Since 2022, Hungary's political and legal landscape that should ensure a pluralistic democracy and high standards for rule of law and election integrity have further deteriorated. The 'pervasive overlap' between government and Fidesz messaging -- a defining feature of Hungary's campaign landscape — has evolved into a captured institutional context where the two are essentially indistinguishable. Using its supermajority in the legislature, the government has weakened independent institutions and the rule of law and has further shaped the electoral context in its favour.

The 2026 general election requires close scrutiny, not only by Hungarian citizens and civil society (which is excluded from monitoring electoral processes) but, more importantly, by EU member states that have an opportunity to second election observers to the ODIHR Election Observation Mission. Hungarian parliamentary elections, after all, are European elections.

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⁹³ Hungarian Citizen Election Report, Chapter on Election Day and Annex, pp. 15, 17-19.

⁹⁴ Office for Democratic Institutions and Human Rights, <u>Hungary: Parliamentary Elections and Referendum, 3</u>
<u>April 2022 – ODIHR Election Observation Mission Final Report</u>, 29 July 2022, p.