

Amendments to the Hungarian election- related legal framework

From 4 April 2022 until 10 December 2025

10 December 2025



HUNGARIAN
HELSINKI
COMMITTEE

Table of content

I.	Local and minority elections are moved to join European Parliament elections	2
II.	Amendment package based on lessons learned from the general elections	2
a.	Territorial scope of the Electoral Procedure Act	3
b.	Deadline to respond to freedom of information requests	3
c.	Definition of international election observers	3
d.	Composition of the National Election Commission	3
e.	Mobile ballot box voters at the polling station	4
f.	Divided absentee electoral rolls	4
g.	Administrative deadlines	4
h.	Additional postal voting packages	4
i.	Granting the right to vote for shift workers	5
j.	Collection of supporting signatures on referenda	5
III.	Increased financial support for party groups	5
IV.	Digitalisation amendment package	5
a.	Digitalisation, automatic decision-making	5
b.	No by-elections for a year before elections	6
V.	Freedom of information	6
VI.	Sovereignty Protection Act	7
a.	Prohibition of foreign funding	7
b.	Criminal offence of “illegal influence of the will of voters”	7
c.	Sovereignty Protection Office	7
VII.	Amendment package on redrawing the constituencies and other rules	8
a.	Single-member constituency boundaries	8
b.	Recount in case of small difference in the results	9
c.	Recount in case of equal number of votes	9
d.	Phasing out the use of personal identification numbers	9
e.	Address card is not necessary anymore when voting	9
VIII.	Asset declaration of MEPs and other amendments	9
a.	Asset declaration obligation for MEPs with the possibility of mandate termination	9
b.	Closed sitting of the National Election Commission	10
c.	Five judges in the adjudicating panels	10
IX.	Lifting the campaign costs limits	10
X.	Prolonged state of danger	11

Hungary's last general election was held on 3 April 2022. Since then, the Parliament has passed several changes to the election-related legal framework. Some of these amendment packages were proposed by the National Election Office (NEO) to the Ministry of Justice as set out in the Electoral Procedure Act.¹ These amendments mostly concerned technicalities and were copied verbatim by the Ministry of Justice. The draft laws were even published for public consultation before being submitted to the Parliament, although public consultation remained a mere formality.² Many of the technical amendments concerned the further digitalisation of the electoral process. In the case of fundamental or politically sensitive amendments, no public, expert or cross-party consultation generally preceded the submission of the bills. In many cases, submissions were made by Members of Parliament (MPs) of the governing parties, which circumvents the public consultation obligation of draft laws.

The list below does not contain every amendment. Only the fundamental ones and those that we consider important in the context of the electoral process are included. Several amendments were introduced to the legislation on election of the Members of the European Union, local council members and mayors, and national minority self-governments. With a few exceptions, these are not included in the list because they are not directly linked to the general elections. However, those included can provide more insight into the general nature of election-law amendments and the legislative and political processes preceding them.

I. Local and minority elections are moved to join European Parliament elections

According to the 11th Amendment to the Fundamental Law, which came into force on 23 July 2022, the members of the local councils, mayors, and national minority self-governments should be elected on the same day as Members of the European Parliament. Prior to this, local elections were held every five years in the autumn. 2024 saw the first joint election in line with this new rule.

II. Amendment package based on lessons learned from the general elections³

In July 2022, a larger amendment package based on the NEO's proposal and experience was passed. Submitted on the same day as the above Fundamental Law amendment, this package modified the Electoral Procedure Act accordingly as regards the local and European Parliament elections as well (these modifications are not listed below).

¹ Section 76(1)) of the Act XXXVI of 2013 on the Electoral Procedure.

² Amnesty International Hungary, Hungarian Civil Liberties Union, Hungarian Helsinki Committee, K-Monitor, Mérték Media Monitor, Ökotárs – Hungarian Environmental Partnership Foundation, Political Capital, Transparency International Hungary, *Contribution of Hungarian CSOs to the European Commission's Rule of Law Report*, January 2025, p. 70.
https://helsinki.hu/en/wp-content/uploads/sites/2/2025/01/HUN_CS0_contribution_EC_RoL_Report_2025.pdf.

³ Act XXIII of 2022, entered into force on 26 July 2022.

a. Territorial scope of the Electoral Procedure Act

The amendment was submitted partly in response to scandals concerning the postal voting.⁴ It expanded the territorial scope of the Electoral Procedure Act beyond Hungary's borders.⁵ This was necessary because, during the 2022 electoral campaign, both the National Election Commission (NEC) and the courts concluded that they lacked the authority to rule on complaints (objections) concerning breaches of electoral laws committed abroad due to the Act's limited territorial scope. While the amendment constitutes a positive change, merely deciding on complaints concerning issues that occur beyond the borders would not prevent the abuses related to postal voting.

b. Deadline to respond to freedom of information requests

Under the rules in force before the amendment, during the election period, the electoral bodies have had five days to respond to freedom of information requests. However, the amendment narrowed this obligation by specifying that only requests concerning the given set election should be answered within five days, otherwise, the general rules of 15+15 days apply.⁶

c. Definition of international election observers

The amendment specified that international election observers could be registered observers from other states, intergovernmental organisations, international non-governmental organisations or associations. Previously, the law had only referred vaguely to other states or international organisations. According to the amendment, the NEO should be notified about the observers by the 9th day before Election Day at the latest.⁷

d. Composition of the National Election Commission

The NEC comprises of elected and delegated members. Delegated members are appointed by parliamentary party groups between two general elections and by parties setting up party lists for elections during the given election campaign (until the election results will become final and binding). Prior to the amendments, there was a period of around 6 weeks, between the announcement of the elections and the registration of the party lists standing for election, when the NEC consisted solely of elected members, with no delegated members. The amendment now ensures that party-delegates are present in the NEC at all times, including before the registration of party lists for elections. The amendment also stipulates that these delegated members must hold a law degree. However, the same amendment has resulted in delegated members of candidate or party list nominating parties without a parliamentary group losing their voting right in the NEC. This differentiation in the rights of delegated members is unjustified. It undermines the prospects of fair procedures for parties without parliamentary groups that are running in elections. National minority self-governments that nominate

⁴ Several irregularities (some of them particularly severe) were reported in connection to postal voting, e.g. a Fidesz-KDNP ally NGO delivered the voting packages instead of the Post Office in Serbia, or a bag of half burnt, filled out mail ballots were found in Romania. For more details and examples see e.g. Hungarian Helsinki Committee, *Lessons learned from legal remedies: general elections and referendum in Hungary*, 2022, pp. 9-10, https://helsinki.hu/en/wp-content/uploads/sites/2/2022/08/Legal_remedy_elections.pdf.

⁵ Section 1 of the Electoral Procedure Act.

⁶ Section 2(3) of the Electoral Procedure Act.

⁷ Section 4 of the Electoral Procedure Act.

minority lists for elections can no longer delegate members to the NEC, despite previously being able to do so, and these members having voting rights on issues affecting national minorities.⁸

e. Mobile ballot box voters at the polling station

Under the new rules, voters who have registered to vote using the mobile ballot box may also vote at the polling stations if the mobile ballot box is inside the station.⁹ This amendment is welcome, as some voters complained that the mobile ballot box never arrived at their place of residence. There is also a risk that people could be added to the list of voters requesting a mobile ballot box without their knowledge or consent, as such a request is easy to falsify.

f. Divided absentee electoral rolls

The amendment prescribes that if the electoral roll for a polling district has to be divided due to the high number of registered absentee voters, in order that voting could happen parallel at more voting places, each roll may contain a maximum of 800 voters.¹⁰ This is a limitation that has been put in place to prevent long waiting times for the voters and to decrease the occurrence of mistakes in the administration.

g. Administrative deadlines

The amendment changed some election administration deadlines, many of which are now more favourable for voters. For instance, registration as a national minority voter can now be requested nine days before Election Day, instead of 16 days as previously.¹¹

h. Additional postal voting packages

Following the amendment, postal voters who did not receive their postal voting package by mail until seven days before Election Day may request an additional package at any foreign representation or single-member constituency election office.¹² The reason behind this new rule is that several voters complained that they did not receive their packages in time to vote in the 2022 general elections. While some embassies had already provided the additional packages for affected voters, this was a more practical, *de facto*, solution without a proper legal basis.¹³ Despite these positive changes, several voters still cannot access embassies due to distance. If a voter's data is abused and confidentiality of correspondence is breached, resulting that another individual casts a vote in the voter's name, the voter may still collect a postal voting package at an appointed location (typically an embassy). However, only the first vote received by the NEO will be counted.

⁸ Sections 17(3), 27, 45(5) and former 45(5) of the Electoral Procedure Act.

⁹ Section 175(2) of the Electoral Procedure Act.

¹⁰ Section 257/A(3) of the Electoral Procedure Act.

¹¹ Section 248 of the Electoral Procedure Act.

¹² Section 277(4) of the Electoral Procedure Act.

¹³ Hungarian Helsinki Committee, *Amendments to the electoral law after the Hungarian elections in 2022*, https://helsinki.hu/en/wp-content/uploads/sites/2/2022/08/Omnibus-amending-the-electoral-laws_2022.pdf.

i. Granting the right to vote for shift workers

Following the amendment package, the Labour Code now requires employers to allow their employees to vote on Election Day, even if they are at work.¹⁴

j. Collection of supporting signatures on referenda

Prior to the amendment, before starting to collect signatures in support of a proposed referendum, the organiser had to wait for the legal remedy time limit to expire or for the *Kúria* (Hungary's top court) to reach a decision in case the NEC's decision to approve a referendum question has been challenged. (The NEC's decisions on national referendum questions can only be challenged directly before the *Kúria*.) According to the amendment, the organiser must also wait for either the Constitutional Court's decision or the time limit for submitting a constitutional complaint to pass.¹⁵ This prevents the organisers from starting the signature collection process for a question that may be quashed by the Constitutional Court. On the other hand, it prolongs the entire process. The time limit for submitting constitutional complaints is eight days from the announcement of the *Kúria*'s decision in the Hungarian Gazette, and the Constitutional Court has 30 days to reach a decision.¹⁶

III. Increased financial support for party groups

In late 2024, financial support for party groups in the Parliament and the staff available to them was increased significantly, along with the resources of individual MPs.¹⁷ This increase was particularly significant for the governing party groups.¹⁸

IV. Digitalisation amendment package¹⁹

a. Digitalisation, automatic decision-making

Several technical changes were introduced throughout the Electoral Procedure Act to facilitate the digitalisation of election administration. Due to the amendments, automatic decision-making²⁰ is also widely available in the election administration. Digitalisation leads to centralisation, since the NEO operates the digital tools. Most of the requests submitted by voters, candidates and nominating organisations (parties) are now digitalised. Electronic administration has become the norm, with paper-

¹⁴ Section 51(7) of Act I of 2012 on the Labour Code.

¹⁵ Section 14 of Act CCXXXVIII of 2013 on Initiating Referendums, the European Citizen's Initiative and the Referendum Procedure (Referendum Act).

¹⁶ Section 30(5) of the Act Referendum Act.

¹⁷ Sections 112(3), 113(1), 114(3), 115(2) and 115(4) of Act XXXVI of 2012 on the Parliament, amended by Section 164 of Act LXXIV of 2024 on the Foundations for Hungary's 2025 Central Budget as of 21 December 2024.

¹⁸ Teczár Szilárd, „[Nem szavazták meg az ellenzéki pártok, hogy több közpénzt kapjanak a frakcióik](#)” (Opposition parties did not vote to receive more public funds for their factions), *Lakmusz*, 14 January 2025.

¹⁹ Act XXIV of 2023 on Amendments to the Rules of Electoral Procedure in Relation to Electronic administration, entered into force on 27 May 2023.

²⁰ Section 13/F of the Electoral Procedure Act.

based administration increasingly being phased out, and personal administration becoming the exception.

b. No by-elections for a year before elections

The amendment banned by-elections for single-mandate constituency representatives, mayors, municipal representatives, and nationality self-government representatives during the period between the elections and 1 April of the preceding year.²¹ During this period, parliamentary seats are filled by the former member's party choosing from its party list from the previous election. If the given party did not have a list, or if the MP was independent, the mandate is filled by the next candidate on the total list of candidates from the previous election.²² In practice, this means that, in the case of general elections, no by-elections are held for around 12 months prior to the upcoming elections. Before the amendment, the respective date used to be 1 January of the election year. These provisions were added to the bill only after the public consultation had been closed and the bill had already been submitted to the Parliament, upon the proposal of the Legislative Committee of the Parliament.

V. Freedom of information

The deadlines for responding to freedom of information (FOI) requests have been reinstated to their pre-state of danger status. Information must be provided within 15 days, a period which may be extended by a further 15 days if justified. The costs of FOI requests, where the data provider may claim reimbursement of the cost of providing access to the data, have also been reduced. These amendments were introduced in compliance with one of the milestones of Hungary's Recovery and Resilience Plan. However, in December 2023, the provisions on accessing public interest information were amended²³ to allow state bodies and public fund recipients to deny access to information held by a subordinate entity. A second amendment²⁴ exempted state-owned companies from transparency requirements relating to foreign investments and relations for ten years. A third amendment²⁵ empowered the government to classify its resolutions for 20 years.²⁶ Overall, Hungary has shifted towards a more restrictive approach to access to public interest information and transparency.

²¹ Section 8(2) of the Electoral Procedure Act.

²² Section 19(3) of Act CCIII of 2011 on the Election of Members of the Parliament.

²³ Section 30(2a) of Act CXII of 2011 on the Right to Informational Self-Determination and on the Freedom of Information. Amended by Act CI of 2023, the provision entered into force on 1 January 2024.

²⁴ Section 3/A of Act CXXII of 2009 on the Austerity Measures Applicable to Publicly Owned Enterprises. Amended by Act CI of 2023, the provision entered into force on 7 January 2024.

²⁵ Section 7/A of Act CXXV of 2018 on Government Administration. Amended by Act CIX of 2023, entered into force on 1 March 2024.

²⁶ *Contributions of Hungarian CSOs to the European Commission's Rule of Law Report*, January 2024, p. 46, https://helsinki.hu/en/wpcontent/uploads/sites/2/2024/01/HUN_CS0_contribution_EC_RoL_Report_2024.pdf.

VI. Sovereignty Protection Act²⁷

a. Prohibition of foreign funding

The Sovereignty Protection Act, adopted in December 2023, amended the Electoral Procedure Act. According to the new rules, candidates and at local elections non-partisan nominating organisations (associations) must not use foreign support or any assets originating from abroad for activities aimed at influencing the voters' decisions. They must attest to this when registering for the election race.²⁸ This rule already applied for parties before the amendment. However, the restriction was new for independent candidates and non-partisan nominating organisations.

b. Criminal offence of "illegal influence of the will of voters"

The Sovereignty Protection Act amended the Criminal Code establishing a new criminal offence called "illegal influence of the will of voters". This offence is committed when a "member, responsible person or executive officer of a nominating organisation within the meaning of the Electoral Procedure Act and a candidate within the meaning of the Electoral Procedure Act who uses prohibited foreign support or material advantage originating from an agreement disguising, to circumvent this prohibition, the origin of prohibited foreign support". The offence is punishable by up to three years of imprisonment. The wording of the provision lacks clarity, breaching the requirement of legal certainty.²⁹ Although no legal action has yet been taken under this provision, the chilling effect is significant.³⁰

c. Sovereignty Protection Office

The Sovereignty Protection Act was a culmination of the government's earlier attempts to "securitise" independent civil society and aims to intimidate and silence critical voices, including those in civil society and the media. It established the Sovereignty Protection Office (SPO), which has a wide range of tools at its disposal with which to investigate private individuals, informal groups, and legal entities both inside and outside Hungary. The law's vaguely worded provisions allow the SPO to use its invasive powers against virtually anyone exercising their democratic right to engage in public affairs. The scope of the activities that might trigger an SPO investigation is extremely broad and open to arbitrary interpretation. Investigations are followed by a public report, and there is no legal remedy (including judicial review) against the SPO's actions. During the 2024 local and European Parliament elections campaign period, the SPO issued its first ad hoc "report" and evidence allegedly supporting it on 22 May 2024³¹ and on 4 June 2024.³² This focused on opposition parties and allegations about their joint campaign in the 2022 general election, while a significant part of the "report" focused on the Budapest mayor's 2019 local election campaign. These opposition parties were nominating organisations for the 2024 EP and local elections, and the Budapest mayor was again a mayoral candidate. The "report" was issued 18 days before Election Day. Evidence supposedly substantiating the "report" against the

²⁷ Act LXXXVIII of 2023 on the Protection of National Sovereignty.

²⁸ Sections 3(1)16, 124, 129 and 307/D of the Electoral Procedure Act.

²⁹ Section 350/A of Act C of 2012 on the Criminal Code.

³⁰ Civilizáció, Hungarian Helsinki Committee, *Kutatás a szuverenitásvédelmi törvény hatásairól* (Research on the effects of the Sovereignty Protection Act), Budapest, 12 February 2025, https://helsinki.hu/wp-content/uploads/2025/04/Kutatas_a_szuverenitasvedelmi_torveny_hatasairol.pdf.

³¹ <https://szuverenitasvedelmihivatal.hu/dokumentumok/jelentes-az-x-kozossegi-plattformon-megjelentfelvetelekrol.pdf>.

³² https://szuverenitasvedelmihivatal.hu/dokumentumok/Dokumentum_2.pdf.

Budapest mayor/mayoral candidate was published five days before Election Day. The “reports” echoed the government’s / governing parties’ messaging.³³

VII. Amendment package on redrawing the constituencies and other rules³⁴

This bill,³⁵ adopted in December 2024, was almost identical to the NEO’s proposal³⁶ for amending the Electoral Procedure Act, except for the significant part of it on amending several single-member constituency boundaries. Beforehand, in September 2024, the NEO President’s 2024 election report³⁷ indeed recommended amending several single-member constituencies due to changes in the numbers of residents, as well as the state’s respective legal obligation. However, these recommendations did not provide details regarding the new boundaries of the affected constituencies, and were not strictly followed by the bill. The bill was submitted by the Committee of Justice of the Parliament (rather than the Ministry of Justice). There was no public, expert³⁸ or cross-party consultation on the content of the draft bill, and even the usually ineffective public consultation was circumvented. Besides gerrymandering (see below), the amendment package contains mainly technical amendments and a few other interesting, albeit unalarming, provision modifications.³⁹

a. Single-member constituency boundaries

The main issue with the amendment is the severe gerrymandering. According to the Act on Election of Members of the Parliament,⁴⁰ the number of eligible voters in a single-member constituency may not differ from the national arithmetic mean by more than 15%, unless this would breach the provisions on drawing up constituencies. The number of voters may not ever exceed the mean by 20% or more. The number of eligible voters is to be determined by the number of eligible voters on the previous national election day. While some overdue adjustments were made in the amendment, others were unnecessary or omitted.⁴¹ The number of constituencies in the capital was reduced by two, while the number of constituencies in the surrounding Pest County was increased by two. This triggered a full redrawing of boundaries in Budapest and the surrounding region, which was often unreasonable.

³³ Hungarian Helsinki Committee, *Threat Assessment of the 2024 European Parliamentary and Local Elections in Hungary*, 2 May 2024, https://helsinki.hu/en/wpcontent/uploads/sites/2/2023/05/HHC_threat_assessment_2024elections.pdf, pp. 9-10; 20K, Hungarian Civil Liberties Union, Hungarian Helsinki Committee, Mérték Media Monitor, Political Capital, Unhack Democracy, *Hungarian Citizen Election Report*, June 2024, pp. 4-5, <https://helsinki.hu/en/wp-content/uploads/sites/2/2024/06/2024-Hungarian-Citizen-Election-Report.pdf>.

³⁴ Amending law: Act LXXIX of 2024, entering into force in three phases, on 31 December 2024, 1 February 2025, and 1 January 2026.

³⁵ <https://www.parlament.hu/irom42/10000/10000.pdf>.

³⁶ https://www.valasztas.hu/documents/d/guest/nvi_tvmod_javaslatok_20241031.

³⁷ <https://www.valasztas.hu/documents/d/guest/nvi-elnok-beszamolo>, pp. 12-13.

³⁸ Despite an already published alternative expert proposal: <https://telex.hu/valasztasi-foldrajz/2024/08/12/uj-valasztasi-rendszer-2026-aranytalansag>.

³⁹ An opinion of June 2025 of the Venice Commission on this amendment package raised serious concerns about the weakening of checks and balances, minority rights, and compliance with European human rights standards, and set out several recommendations. See: European Commission for Democracy Through Law of the Council of Europe (Venice Commission), *Hungary, Opinion on Act LXXIX of 2024 amending certain laws related to elections*, approved at its 143rd Plenary Meeting, online, 13-14 June 2025, [https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2025\)018-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2025)018-e).

⁴⁰ Section 4 of Act CCIII of 2011 on the Election of Members of the Parliament.

⁴¹ Lines 1 and 14 of Annex 1 and Budapest, Csongrád-Csanád County, Fejér County, Pest County, of Annex 2 of Act CCIII of 2011 on the Election of Members of the Parliament.

Overall, the changes – and the lack of changes in some areas – favour the governing party, with several constituencies showing clear signs of gerrymandering.⁴²

b. Recount in case of small difference in the results

Under the new rules, if the difference between the first and second candidates is small, the ballots are to be recounted upon the second candidate's request without the need to state and prove a legal violation. At local elections, a maximum of 0.5% difference is considered small. For the general elections of single-member constituency candidates, 100 votes are considered a small difference.⁴³ This rule should apply to all elections, including those for party lists, with a uniform threshold of 0.5% or less. In the 2024 Budapest mayoral election, 0.5% equalled approximately 4000 votes. If 0.5% were the main rule at general elections, this would equate to an average of approximately 360 votes in single-member constituencies.

c. Recount in case of equal number of votes

If two or more candidates receive an equal number of votes, the votes will be recounted automatically instead of a repeated election being held immediately.⁴⁴

d. Phasing out the use of personal identification numbers

For requests relating to the electoral register, the personal identification number is no longer necessary; the ID card number may be used instead.⁴⁵ However, this data remains a formal requirement for objections (complaints). The personal identification number is written on the back of the address card and is rarely necessary; many people are unaware of its existence.

e. Address card is not necessary anymore when voting

Voters will no longer need to present an address card when proving their identity to receive ballots; only an identity card will be required.⁴⁶ Since 1 February 2025, it has not been obligatory to hold a physical address card, although it is still necessary in most of the areas where it was previously required.

VIII. Asset declaration of MEPs and other amendments⁴⁷

a. Asset declaration obligation for MEPs with the possibility of mandate termination

The amendment introduced a new obligation for Hungarian Members of the European Parliament (MEPs) and their family members to submit asset declarations in the same way as members of the Hungarian Parliament. These declarations must be made annually, those of the MEPs are public, while

⁴² Tamás Kovalcsik, „[A Fidesznek kedvez, a Tiszának nem a keverés a választókerületeknél – térképen a változások](#)” (Mixing constituencies favours Fidesz, not Tisza – changes shown on map), *Telex*, 19 November 2024.

⁴³ Sections 258/A and 307/M of the Electoral Procedure Act.

⁴⁴ Section 258/A(1)c) and (2)b) of the Electoral Procedure Act.

⁴⁵ Section 92(d) of the Electoral Procedure Act.

⁴⁶ Section 176 of the Electoral Procedure Act, entering into force on 1 January 2026.

⁴⁷ 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, entered into force in two phases on 28 May 2025 and 12 July 2025.

those of the family members are not. The NEC was authorized to oversee the submission of the declarations and ensure the accuracy of their content. If a declaration contains false information, is incomplete, or is not submitted, and the person obligated to submit it fails to correct the mistake, the NEC may terminate their mandate in the EP.⁴⁸ By contrast, there are no such severe consequences if MPs in the Hungarian Parliament fail to publish valid asset declarations. Taking into consideration the composition of the NEC, which is dominated by members elected and delegated by the governing party, the role of the body in this regard is worrying. The amendment was widely understood to be a tool against the rising opposition party, *TISZA*, and its leader, Péter Magyar.

b. Closed sitting of the National Election Commission

In relation to the asset declarations of MEPs, the possibility of holding closed and partly closed NEC sittings was introduced.⁴⁹ As a general rule, NEC sittings are open to the public. According to the amendment, sittings may be closed in cases specified by law. The aforementioned asset declaration rules probably prescribe such closed sittings due to the personal data contained in the declarations. However, this provision allows for further restrictions on the publicity of the NEC's work.

c. Five judges in the adjudicating panels

Applications for judicial review in election-related cases shall be heard by a panel of five professional judges at the *Kúria*.⁵⁰ Prior to the amendment adjudicating panels were composed of three judges. According to the reasoning of the bill, this modification was necessary due to the changes in the *Kúria*'s operations.⁵¹ However, given the high workload imposed on the *Kúria* during election periods, this does not seem reasonable. In 2024, a provision was already included in the case allocation order allowing the *Kúria*'s respective Chamber to decide on alternative case allocation if the number of election cases exceeded 15 per day for three consecutive days.⁵² This situation did not arise in 2024; however, the adjudication of legal challenges regarding those elections were less concentrated to the *Kúria* than the legal challenges regarding the general elections, and judges were sitting in panels of three. This provision of the amendment was not related to the MEPs' new asset declaration obligations.

IX. Lifting the campaign costs limits

On 28 May 2025, Gergely Gulyás, the Minister of the Prime Minister's Office, responded to a journalist's question that the government had no intention of amending the electoral laws prior to the 2026 general election. Eight days later, three MPs from the governing parties submitted a bill to remove limits on campaign costs. The bill was passed in June 2025. Prior to the amendment,⁵³ candidates and parties were required to keep their campaign expenditure within a certain limit. This limit was set too low and was not strictly adhered to, nor consistently enforced by state authorities. Although the limit

⁴⁸ 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.

⁴⁹ Sections 41/A and 41/B of the Electoral Procedure Act.

⁵⁰ Section 229(2) of the Electoral Procedure Act.

⁵¹ <https://www.parlament.hu/irom42/11281/11281.pdf>.

⁵² Hungarian Helsinki Committee, *Threat Assessment of the 2024 European Parliamentary and Local Elections in Hungary*, 2 May 2024, pp. 3-4, https://helsinki.hu/en/wp-content/uploads/sites/2/2023/05/HHC_threat_assessment_2024elections.pdf.

⁵³ Section 7 of Act LXXXVII of 2013 on The transparency of Campaign Costs related to the Election of the Members of the Parliament, not in force since 27 July 2025. Amended by Act LXVIII of 2025.

itself was due to be increased, abolishing it does not serve the electoral competition, as this clearly benefits the governing parties.

X. Limiting certain forms of third-party campaigning

In December 2025, upon the proposal of the Legislative Committee,⁵⁴ a provision was added to an unrelated omnibus bill pending before the Parliament, amending the rules on party financing.⁵⁵ The new provision prohibits domestic legal entities and organisations without legal personality to carry out activities that are not joint activities with a party or do not directly support a political party but support its objectives if they do so in a manner that is not independent of the party's control or cannot be distinguished from the party's image, and if it is carried out in whole or in part from foreign sources, or from sources originating from foreign organisations or natural persons who are not Hungarian citizens.

XI. Prolonged state of danger

The state of danger has been extended again, this time until 13 May 2026.⁵⁶ Decrees the government can issue under the state of danger have not been used to directly amend electoral laws. However, they have been used for campaign purposes, for example to amend tax secrecy during the 2022 election period in order to send letters signed by the Prime Minister to every household about the exceptional refund of the 2021 personal income tax for families raising children.⁵⁷ Similarly, an emergency government decree made it possible for the government to send a letter signed by the Prime Minister via the tax authority in December 2025 to mothers receiving a new kind of tax exemption.⁵⁸

⁵⁴ <https://www.parlament.hu/irom42/12797/12797-0006.pdf>.

⁵⁵ Section 4(2a) of Act XXXIII of 1989 on the Functioning and Financial Management of Parties. Added by Bill T/12797 (adopted on 10 December 2025, pending promulgation at the time of issuing the present compilation).

⁵⁶ Section 5 of Government Decree 424/2022. (X. 28.) on Declaring a State of Danger Due to the Armed Conflict and Humanitarian Disaster in the Territory of Ukraine, and in Order to Eliminate and Manage the Consequences of these in Hungary and on Certain State of Danger Rules. Amended by Government Decree 343/2025. (X. 31.).

⁵⁷ Hungarian Helsinki Committee, „[Még az adótitok sem úszhatta meg a választási kampányt](#)” (Not even tax secrecy could escape the election campaign), 444, 13 February 2022.

⁵⁸ Vilmos Weiler, „[Igényelte a háromgyerekes anyáknak járó adómentességet, Orbán Viktor levelével találta szembe magát](#)” (She requested the tax exemption available to mothers of three children, and was confronted with a letter from Viktor Orbán), *Telex*, 10 December 2025.

www.helsinki.hu

helsinki@helsinki.hu

