



Office for Democratic Institutions and Human Rights

ICELAND

PRESIDENTIAL ELECTION

1 June 2024

ODIHR NEEDS ASSESSMENT MISSION REPORT

11-15 March 2024



Warsaw
28 May 2024

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**ICELAND
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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

Following an invitation from the Permanent Mission of Iceland to the OSCE to observe the 1 June 2024 presidential election, and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) from 11 to 15 March. The NAM included Ana Rusu, ODIHR Senior Election Adviser, and Martina Barker-Ciganikova, ODIHR Election Adviser.

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

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

II. EXECUTIVE SUMMARY

Iceland is a parliamentary republic, with the president serving as the head of state, directly elected for a four-year term without term limits. In line with the legal framework, the presidential election will take place on 1 June. Women are well represented in political life with 30 out of 63 parliamentary seats (some 48 per cent) and 6 out of 12 ministerial positions. Up until April 2024, the Prime Minister was also a woman.

The election will be held under a significantly revised electoral legal framework. According to all ODIHR NAM interlocutors, the reform process was consultative and inclusive addressing many prior ODIHR recommendations including priority ones. The amendments relate, among others, to the unification of different electoral acts into one codified piece, the establishment of a National Election Commission (NEC) to oversee the electoral process, harmonization of deadlines between candidate registration and the start of early voting, setting up of an Election Appeal Committee to deal with election dispute resolution and provisions for citizen and international election observation in line with OSCE commitments. All ODIHR NAM interlocutors assessed the electoral legislation as providing a sound basis for the conduct of democratic elections.

The administration of the presidential election is performed jointly by a number of institutions, including the NEC and several subordinate tiers of election commissions, state bodies and local authorities. All ODIHR NAM interlocutors expressed a high level of trust in the integrity and professionalism of the institutions administering the election, including the conduct of election day procedures. The Election Act provides for different voting options, such as early, mobile and in-person voting, as well as voting abroad. The ODIHR NAM was informed about specific provisions to facilitate participation of persons with different types of disabilities in the electoral process, including fully accessible polling stations for persons with physical disabilities.

Voter registration is passive and citizens above 18 years of age are eligible to vote; 267,264 voters are registered for this election. The amended legal framework provides for a centralized electronic voter register extracted from the national population register. The electronic register will not yet be used for this election due to logistical challenges. Voter lists are available for public scrutiny with the possibility to rectify omissions. All ODIHR NAM interlocutors expressed confidence in the inclusiveness and accuracy of the voter register.

Eligible voters over 35 years of age may stand for the presidency. Prospective candidates must be supported by signatures of at least 1,500 voters. Support signatures may be collected on paper and electronically, but voter can sign in support of only one contestant. Candidate registration ends on 26 April and the NEC has until 2 May to decide on the validity of candidacies and publicly announce them. In general, no ODIHR NAM interlocutors expressed concerns with the candidate registration process but all noted that the number of support signatures could be raised.

The Constitution protects fundamental freedoms, and no ODIHR NAM interlocutors raised concerns about the ability to campaign freely. Election campaigning is largely unregulated and there is no official campaign period. ODIHR NAM interlocutors expect the campaign to take place via broadcast media, social networks, as well as traditional in-person canvassing. Political parties that the ODIHR NAM met with stated they do not intend to nominate or support any candidate as they view the presidential election as a non-partisan contest.

No public financing is available for presidential candidates and their electoral campaigns may be financed only from private donations and the candidate's own funds. Campaign finance legislation sets limits for donations and expenditures and obliges candidates to submit final reports on their finances; there are no provisions for interim reporting ahead of election day. The National Audit Office, the campaign finance oversight body, provides guidance to candidates and publishes their reports but does not have the authority to impose sanctions in case of violations. According to most ODIHR NAM interlocutors, the legal framework provides for sufficient transparency of campaign finances, and in practice stakeholders adhere to the financial rules.

Freedom of expression is provided for by the Constitution but defamation and insult remain criminalized. All ODIHR NAM interlocutors expressed general satisfaction with media freedom being guaranteed in practice. Nevertheless, they raised concerns about the shrinking number of media outlets due to financial difficulties as well as the increased concentration of private media ownership in a limited media market and the consequences these may have for the diversity of opinions available to voters. The public broadcaster is obliged to provide equal coverage of all candidates and plans among others to air interviews and debates. The Media Commission, the regulatory authority, ensures media's compliance with the law and can apply sanctions.

All ODIHR NAM interlocutors expressed confidence in an impartial and effective election dispute resolution mechanism. The recent legal amendments provide for the establishment of an Election Appeal Committee in charge of election dispute resolution and establish specific deadlines for the adjudication of certain complaints in line with a prior ODIHR recommendation. Any individual may lodge complaints related to election day irregularities, including online. The Committee's decisions may be appealed to a court of law and shall be dealt with in an expedited procedure. Administrative complaints pertaining to voter registration are filed with the Registers Iceland and media-related complaints with the Media Commission.

All ODIHR NAM interlocutors expressed full confidence in the electoral process and the ability of the election administration to professionally and transparently administer the presidential election. While all interlocutors acknowledged the benefit of an external assessment, the vast majority noted no added

value from an observation activity for the upcoming presidential election as they had strong confidence in the democratic process in Iceland. All ODIHR NAM interlocutors viewed the recently electoral reform as conducted in an inclusive and consultative manner, addressing many prior ODIHR recommendations. No concerns were expressed relating to the respect for fundamental freedoms, application of the amended legal framework, voter registration, candidate registration, campaign and media conduct, election dispute resolution and election day procedures. Based on these findings, the ODIHR NAM does not recommend an election-related activity for the 1 June presidential election. Nevertheless, ODIHR encourages the authorities to consider previous recommendations, which remain unaddressed and reiterates that it stands ready to offer its assistance upon request in a post-election process.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

Iceland is a parliamentary republic with legislative powers vested in the 63-member unicameral parliament (*Althingi*). Executive power is exercised by the government led by the prime minister. While the office of the president formally holds both legislative and executive powers, the president mainly fulfils a ceremonial role. The Constitution gives the president the powers to appoint the government, including the prime minister, to dissolve the parliament and veto laws, nevertheless, in practice the president's decisions are based on government's recommendations.

Following the last parliamentary elections on 25 September 2021, eight political parties gained representation in the parliament.¹ The three parties in the ruling coalition government, the Independence Party, the Left-Green Movement, and the Progressive Party, agreed to continue in office, with Katrín Jakobsdóttir (Left-Green Movement) remaining Prime Minister. In April 2024, Jakobsdóttir resigned both as Prime Minister and chairperson of her party in order to run in the presidential election.

In line with the legislation, the presidential election will be held on 1 June. The incumbent president, Guðni Thorlacius Jóhannesson who served two terms, has publicly announced he will not stand for re-election. The Constitution does not provide for term limits. During the last 2020 election, the incumbent won with 92 per cent of the votes.

Women are well represented in political life, currently holding 30 out of 63 parliamentary seats (some 48 per cent) and 6 out of 12 ministerial positions, including the Prime Minister.² Women have previously run several times for the presidency, and Vigdís Finnbogadóttir was a president from 1980 to 1996. The legislation provides for gender equality and in 2020, the Parliament approved laws on equal status and equal rights irrespective of gender.³ Nevertheless, in October 2023, a nationwide protest against gender inequality in the labour market and gender-based violence took place.⁴

¹ Independence Party (17 seats), Progressive Party (13 seats), Left-Green Movement (8 seats), People's Party (6 seats), Pirate Party (6 seats), Social Democratic Alliance (6 seats), Liberal Reform Party (5 seats), and Centre Party (2 seats),

² Iceland has been leading the [World Economic Forum's Global Gender Gap Index](#) in recent years given women's political participation, high level of education and equal access to health care among other factors.

³ The 2020 Act on Equal Status and Equal Rights Irrespective of Gender (Gender Equality Act) and the 2020 Act on the Administration of Matters Concerning Equality. In 2020, the parliament also approved laws that require companies to either obtain an equal pay certification or an equal pay confirmation.

⁴ According to [Statistics Iceland](#), the overall pay gap was 9.1 percent in 2022, widening to 26.2 percent in finance and insurance jobs.

ODIHR has previously observed three elections in Iceland.⁵ No election observation activities were recommended for the 2020 presidential and the 2021 parliamentary elections.

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

The presidential election is primarily regulated by the 1994 Constitution (last amended in 2013) and the 2021 Election Act (last amended in 2023) which codified the 1945 Law on Candidacy and Election of the President of Iceland and the 2000 Parliamentary Elections Law.⁶ Other laws pertinent to the conduct of the presidential election include the 2006 Law on the Finances of Political Organisations and Candidates (Campaign Finance Law, last amended in 2018), the 2011 Media Law, and the 2013 Law on Icelandic National Broadcaster. Iceland is a party to major international and regional instruments related to the democratic elections.⁷

The electoral legal framework has been significantly amended since the last presidential and parliamentary elections. The amendments addressed many prior ODIHR recommendations, including priority ones, and relate among others to the unification of different electoral acts into one codified piece, the establishment of a National Election Commission to oversee the electoral process, harmonization of deadlines between candidate registration and the start of early voting, election dispute resolution and provisions for citizen and international election observation in line with OSCE commitments. Other pertinent changes refer to the introduction of electronic voter register and establishment of a new body to handle election related complaints and appeals, the Election Appeal Committee.⁸ Some previous ODIHR recommendations related *inter alia* to campaign finance, such as provisions for interim reporting and strengthening the capacity of the oversight body, including with respect to issuing sanctions, as well as some media-related recommendations remain unaddressed.

The amended Election Act is a result of an electoral legal reform that has been ongoing since 2013. All ODIHR NAM interlocutors welcomed the amendments and assessed the reform process as inclusive and consultative encompassing a wide array of different cross-party and public consultation mechanisms. Overall, interlocutors expressed satisfaction with the legal framework concerning elections and its implementation in practice and opined it provides a sound basis for the conduct of democratic elections.

Modernization of the Icelandic Constitution has been publicly debated for over a decade, alternating between attempts to draft a brand new Constitution and an incremental approach of redrafting the current Constitution. In 2020, the government submitted to the parliament four draft constitutional bills, one devoted mainly to the status of the executive and functions of the president and the government, one concerning the mechanisms for initiating referenda, and two devoted to the protection of environment and the status of natural resources.⁹ However, as of 2024, the constitutional reform process

⁵ See previous [ODIHR election-related reports on Iceland](#).

⁶ The bill proposed by a parliamentary electoral reform working group was approved by the Constitutional and Supervisory Committee of the parliament already ahead of the 2021 parliamentary elections. Nevertheless, the changes became applicable only for this presidential election.

⁷ Including the 1966 International Covenant on Civil and Political Rights, 1965 International Convention on the Elimination of All Forms of Racial Discrimination, 1979 Convention on the Elimination of All Forms of Discrimination against Women, 2003 UN Convention against Corruption, 2006 Convention on the Rights of Persons with Disabilities and 1950 European Convention on Human Rights. Iceland is also a member of the Council of Europe's Venice Commission and Group of States against Corruption (GRECO).

⁸ An individual proposal to reduce the voting age from 18 to 16 years for the municipal elections is currently with the Parliament but has not reached cross-party support.

⁹ See the [Venice Commission 2020 Opinion](#) on the four constitutional draft bills. According to the Constitution, any constitutional amendments should be followed by dissolution of the parliament and require repeated voting by the next legislature.

has not been implemented and several ODIHR NAM interlocutors noted lack of political consensus with respect to some proposed changes.¹⁰

The president is directly elected for a four-year term, without term limits. The candidate that obtains the highest number of valid votes in a single-round election becomes president. According to the Constitution, if there is only one candidate, that person is elected unopposed without voting taking place.¹¹

C. ELECTION ADMINISTRATION

The administration of presidential election is performed jointly by a number of institutions, including the NEC, several tiers of election commissions, state bodies and local authorities. In accordance with the amendments, for the first time for this election, the overall oversight and co-ordination role for the election was transferred from the Ministry of Justice to the NEC. The NEC is in charge of the technical preparations; it announces the election, conducts voter education, prepares voting materials, registers candidates, and determines and announces the election results.¹² The Ministry for Foreign Affairs (MFA) co-ordinates voting abroad. All ODIHR NAM interlocutors expressed a high level of trust in the integrity and professionalism of bodies administering elections, including in the conduct of election day procedures.

The NEC is an independent body composed of five members and an equal number of alternates appointed for a five-year term, with the term of one member expiring each year.¹³ NEC's sessions are conducted behind closed doors, but minutes and decisions of meetings are published on its website. The six Senior Election Commissions (SECs), one per constituency, oversee the electoral process at the constituency level. The SECs are composed of five members each nominated by the parliamentary political parties and appointed by parliament after each parliamentary election. Any parliamentary party not represented in the SECs, may appoint a member with an observer status. Subordinate election commissions including municipal, district and local election commissions, assist with the preparation of the election including distribution of election material.¹⁴ Polling stations are composed of three members appointed by municipalities from among registered voters in the given municipality. The Reykjavik City Council informed the ODIHR NAM of their efforts to secure a sufficient number of polling staff by inviting individuals who have served in previous elections and additionally publicizing an open call for recruitment on various social networks.

Early voting has a long tradition and takes place both in the country and abroad. District Commissioners administer in-country early voting which started on 2 May for this election.¹⁵ Previously early voting commenced as early as eight weeks prior to the election day and its start conflicted with the deadline for registration of candidate lists. In line with a prior ODIHR recommendation, early voting may now start only once the NEC has registered and announced the presidential candidates. A voter may cast multiple early votes, as well as a ballot in-person on election day, and only the last vote is counted. Most commonly, early voting takes place at the offices of District Commissioners, but can be conducted also

¹⁰ These relate among others to the long disputed question of collective ownership of natural resources and electoral system for parliamentary elections and equal distribution of votes between constituencies

¹¹ This situation occurred in 1945, 1949, 1956, 1960, 1964, 1972, 1976, 1984, 1992, 2000 and 2008. In all these cases, the only candidate for the presidency was the incumbent.

¹² The NEC also determines constituency boundaries and allocates parliamentary seats between constituencies.

¹³ Three members, including the chairperson, are elected by the parliament and two are appointed by the Icelandic Association of Local Authorities.

¹⁴ There are 63 municipal election commissions; district and local election commissions are appointed only in municipalities with a higher number of voters.

¹⁵ District Commissioners are appointed by the Ministry of Justice and have wide administrative responsibilities.

in other locations, including special polling stations, hospitals, health-care facilities, prisons, or at private homes.¹⁶ Early voting abroad takes place at embassies and consulates and ends on 31 May.

The counting takes place at the constituency level. Following a recount ordered after the 2021 parliamentary elections, a number of ODIHR NAM interlocutors expressed some concerns about lack of uniform application of procedures by different SECs in particular during counting. The NEC informed about preparations, in consultation with other stakeholders, of detailed counting regulations to be applied in a consistent manner for this election.

Voters with special needs can be assisted at polling stations by a person of their choice or receive assistance from the polling staff. The ODIHR NAM was informed that Braille sleeves are provided for voters with visual impairment and that all polling stations are equipped for independent access of persons with physical disabilities. Voter information is available online in different formats, including easy-to-read format and audio recordings for voters with visual impairment; videos with sign language interpretation shall be prepared closer to election day. The NEC prepares training manuals and SECs conduct online trainings for polling staff closer to election day.

D. VOTER REGISTRATION

All citizens who are 18 years of age or older on election day and have a permanent residence in Iceland are eligible to vote.¹⁷ Voter registration is passive but voters who have resided abroad for more than 16 years must actively register.¹⁸ All ODIHR NAM interlocutors expressed overall confidence in the accuracy and inclusiveness of the voter register.

The amended Election Act provides for an electronic voter register, which was welcomed by all ODIHR NAM interlocutors. Nevertheless, the ODIHR NAM was informed that the electronic register has not yet been finalized and will not be used for the upcoming presidential election due to logistical challenges, including installations of computers in all polling stations. The electronic register will be used for out-of-country and early voting, whereas on election day, its manual version will be used in all polling stations. Registers Iceland is in charge of maintaining the central electronic database of voters based on the national population register. By law, Registers Iceland finalizes the continuous updates to the register 38 days before the election (24 April for this election). Those voters who change their residence after this deadline have to vote according to their place of previous residence. Registers Iceland informed the ODIHR NAM that 267,264 voters were registered for this election, including some 17,420 voters living abroad.¹⁹

Voter lists are displayed for verification 21 days before election day and voters can check their data online or in-person at the municipal offices and request changes in case of mistakes or omissions. Changes can be made up until and on election day.

E. CANDIDATE REGISTRATION

Eligible voters over 35 years of age may stand for presidency. Prospective candidates have to submit relevant application documents to the NEC no later than 36 days before the election day (26 April for

¹⁶ Early voting at home is possible only upon a special request submitted no later than two days prior to the polling day if the voter is unable to cast the vote in-person on election day due to illness, disability or childbirth.

¹⁷ In addition, a small group of Danish citizens retain their right to vote based on having been resident in Iceland on 6 March 1946 or at any point in the 10 years before that.

¹⁸ Voters residing abroad remain in the voter register for 16 years following their departure. Prior to the amendments, the length of the residence outside Iceland was eight years. For this election, the affected voters must have actively registered by 1 December 2023.

¹⁹ Of the out-of-country voters, 286 lived abroad for more than 16 years and thus needed to register actively.

this election) either electronically or on paper. The application needs to be accompanied by supporting signatures of between 1,500 and 3,000 voters. Signatures can be collected on paper or electronically with the use of an electronic ID.²⁰ Candidates can also designate proxies to collect signatures in their name. The NEC on its website has encouraged the electronic method of collection referring to less administrative hurdles, easy-to-use format and a quick possibility for candidates to continuously check the number of required signatures. Registers Iceland has developed software which automatically checks for duplicate signatures and confirms the eligibility of supporters.²¹ By law, candidates have to collect a minimum number of signatures from each of the four quarters of the country, which is calculated in proportion to the number of voters in that region.²² Should the NEC determine that insufficient number of signatures has been submitted, the law allows to re-start the process and submit the remaining signatures. Voters can sign only in support of one candidate, contrary to good practice and the principle of freedom of association.²³

The vast majority of ODIHR NAM interlocutors considered the required nationwide number of 1,500 support signatures too low and were of the opinion that the number could be increased. Reform of the signature collection would require a constitutional amendment and the ODIHR NAM was informed that there is unanimous cross-party agreement on the matter.

The NEC decides on the validity of candidacy and publicly announces registered candidates latest 30 days before the election (2 May for this election). NEC's decisions may be appealed to the Election Appeal Committee. In general, ODIHR NAM interlocutors did not raise concerns regarding the inclusiveness of the candidate registration process.

F. ELECTION CAMPAIGN

The Constitution guarantees freedoms of association, assembly and expression, and no ODIHR NAM interlocutors raised any concern about their ability to campaign freely. The legislation does not define an official campaign period and the campaign is largely unregulated. There are no provisions for silence period and campaigning can take place up to and on election day. Several ODIHR NAM interlocutors noted that the lack of defined campaign period poses certain practical challenges in particular with respect to campaign finance oversight and media coverage of candidates.

None of the parliamentary political parties intends to nominate or support a presidential candidate. All parties stated that they traditionally view the presidential election as a non-partisan contest. Topics of the campaign were not known at the time of the NAM as the campaign is considered to be highly personalized, but some ODIHR NAM interlocutors expect it to focus, among others, on the role and powers of the president and the discussion on whether to maintain the largely ceremonial role of the office or to expand the presidential authority pertaining to political decisions. In interlocutors' view the campaign will take place via broadcast media, social networks, as well as traditional in-person canvassing.

A few ODIHR NAM interlocutors expressed concerns about the use of artificial intelligence for campaign purposes and the spread of misinformation on social networks and the fact that there is no institution to effectively oversee legal compliance of campaign conduct on social networks. In March

²⁰ The electronic signature collection started as of 1 March.

²¹ The ODIHR NAM was informed that any double entries are automatically eliminated and the system stops the verification once it reaches the maximum number of 3,000 signatures.

²² At least 1,233 signatures are needed from the southern quarter of the country, 157 from the northern, 56 from the western, and 54 from the eastern quarter.

²³ Paragraph 196 of the [2020 ODIHR and Venice Commission Guidelines on Political Party Regulation](#) recommends that "a requirement that a citizen be allowed to sign in support of only one party should be avoided, as such a regulation would affect his/her right to freedom of association".

2024, the Data Protection Agency, a body providing guidelines and recommendations on use of personal information on social networks by political parties, issued a statement calling on all presidential candidates to comply with applicable legislation on processing of personal data while targeting voters on social networks.²⁴

G. CAMPAIGN FINANCE

Political and campaign finances are regulated by the 2006 Campaign Finance Law (last amended in 2018).²⁵ According to most ODIHR NAM interlocutors, the legal framework provides a sound basis for sufficient transparency of campaign finance, and in practice stakeholders adhere to the financial rules.²⁶ All interlocutors were of the opinion that the system of informal checks also works very efficiently, given the small size of the country.

No public financing is available for presidential candidates and their electoral campaigns may be financed only from private donations and the candidate's own funds. Donations from legal entities and individuals, including in-kind contributions, can amount up to ISK 400,000 (some EUR 2,700) per calendar year.²⁷ Donations exceeding the limit should be promptly returned.²⁸ Contributions from state, foreign and anonymous sources are forbidden. The expenditure limit is calculated based on the number of adult residents and for this election amounts to some ISK 74 million. Some ODIHR NAM interlocutors representing political parties were of the opinion that the donations and expenditure limits are too low. Candidates are obliged to open separate bank accounts for any campaign-related transactions.

The National Audit Office (NAO) is responsible for campaign finance oversight. Candidates who spent more than ISK 550,00 are obliged to submit an independently audited statement on their campaign contributions and expenditures within three months of the election.²⁹ The accounting period starts with the submission of candidacy to the NEC, unless the contestant commenced campaigning earlier. Despite prior ODIHR recommendations, the legislation does not provide for interim reporting prior to the election day. The NAO issues guidelines for candidates, publishes full candidates' reports, including the sources of donations exceeding ISK 300,000, and may request additional information in case of mistakes or omissions. Nevertheless, the NAO does not have any authority to impose sanctions provided for by the legislation, and it may turn to the police instead for further investigation.³⁰ Previously, ODIHR recommended to strengthen NAO's oversight capacity and to grant it the ability to impose administrative sanctions. The NAO informed the ODIHR NAM that any discrepancies in the submitted reports are solved amicably, and the contestants are provided with an opportunity to adjust the accounts.

H. MEDIA

Freedom of expression and of the media is guaranteed by the Constitution. Nevertheless, both defamation and insult are criminal offenses subject to fines or prison sentences of up to one year. The 2011 Media Law and the 2013 Law on Icelandic National Broadcaster regulate the activities of media

²⁴ See the statement [here](#).

²⁵ Political parties that obtained at least one seat in parliament or received at least 2.5 per cent of the vote in the last parliamentary elections are entitled to public funding.

²⁶ Two bills, [one](#) amending the ceilings of public and private contributions to political parties with the aim to secure more independent source of income and the [other](#) proposing abolition of direct contributions from legal entities, have been tabled in the parliament in September 2023. Nevertheless, the ODIHR NAM was informed these are proposals by individual MPs and do not enjoy cross-party support.

²⁷ EUR 1 is approximately ISK 148 (Icelandic Crown).

²⁸ If it is impossible to return the donation, it should be separately reported and deposited in a separate bank account.

²⁹ The NAO informed the ODIHR NAM that it only cross-checks candidates' income reports but not the expenditures.

³⁰ The sanctions include fines and imprisonment of up to two years.

and oblige them to ensure objective and impartial news. The Media Law establishes several legal protections for journalists that extend to the online sphere, including protection of anonymous sources and editorial independence from owners of media service providers. Some ODIHR NAM interlocutors opined that the media related legal framework is not sufficiently detailed, in particular with regards to provisions on political advertising and media campaign coverage and would benefit from amendments.

Television remains the main source of political information with the public broadcaster *RÚV* and the privately owned *Channel 2* as the main news-oriented TV channels enjoying the highest viewership. All ODIHR NAM interlocutors expressed general satisfaction with media freedom being guaranteed. Nevertheless, all interlocutors raised concerns that the number of media outlets and thus the diversity of opinions offered to the voters in the traditional media may be seen as shrinking, most prominently following the bankruptcy of one of the two main daily newspapers in 2023.³¹ On the other hand, interlocutors acknowledged that social networks provide ample opportunities to voice opinions.³² Many also noted the increased concentration of private media ownership in a limited media market and the dominant role of the public broadcaster. While interlocutors welcomed the government's initiative to financially support private media outlets, they also noted this assistance might have been insufficient.

By law, *RÚV* is obliged to provide equal coverage of all candidates and introduce their programmes to the voters. Each candidate is entitled to a total of up to four minutes of free airtime. In addition, each candidate may purchase unlimited airtime for advertisements on both public and private broadcasters and label them accordingly as paid for. For this election, *RÚV* informed the ODIHR NAM of its plans to schedule two TV debates between all presidential candidates and 25 minutes long individual interviews with each candidate to be aired in primetime.³³ Debates will be aired with sign language and subtitles. While there is no legal obligation, *RÚV* also intends to air voter information material.

The Media Commission ensures compliance of all media, including online, with the legislation.³⁴ The Commission monitors advertising, sponsorship and product placement in media and issues broadcasting licenses. It also publishes information about media ownership, list of media service providers and their rules on editorial independence on its website. On its own initiative, the Commission conducts awareness raising and media literacy campaigns for voters *inter alia* on the use of the Facebook ad library.

Any individual who believes to have observed a violation may submit a complaint or informal tips with the Commission; the Commission can also act *ex officio*.³⁵ The Media Law does not set any specific deadlines for dispute resolution but merely stipulates that the Commission shall take decision "as quickly as possible". The Commission can apply sanctions and its decisions, which are published online, may be appealed to a court.³⁶ At the time of the NAM, it had received one complaint from a prospective candidate alleging lack of coverage, which was dismissed as the candidate registration was still ongoing. The Media Commission informed the ODIHR NAM that, although there is no legal obligation, it plans to monitor the public broadcaster for compliance with the legislation during the campaign.

³¹ Previously two newspapers, Morgunbladid and Fréttabladid, retained a strong position in influencing political opinion. Fréttabladid has closed down in 2023.

³² Internet penetration is ubiquitous in Iceland with a vibrant digital sphere, and almost all traditional media, including print, radio, and television, offer versions of their content online. According to 2021 [data](#) from Eurostat, 99 percent of the population uses the internet, and 98 percent of households have internet connections.

³³ The ODIHR NAM was informed that the exact format and number of activities can only be confirmed at a later stage once the final number of candidates is known. The public broadcaster aims to invite all registered candidates to participate in the debates; if their number is higher than 10, the candidates will be split into more groups.

³⁴ Social networks are excluded.

³⁵ Complaints are considered informal tips if the complainant chooses to remain anonymous.

³⁶ The sanctions range from fines to imprisonment for up to six months if there is a high degree of culpability.

I. ELECTION DISPUTE RESOLUTION

The 2021 amendments to the Election Act provide for the establishment of an independent Election Appeal Committee (EAC) in charge of election dispute resolution as well as for expedited deadlines for the adjudication of complaints.³⁷ In line with the amendments, administrative complaints pertaining to voter registration are directly lodged with the Registers Iceland that must react upon them immediately. ODIHR NAM interlocutors welcomed this change as it merely formalized the practice given that previously municipalities consulted the Registers Iceland for an opinion. Decisions of Registers Iceland can be appealed within 24 hours with the EAC and the appellant may be afforded reasonable time to supplement further information before the Committee issues a ruling on the case.

Complaints related to election day irregularities and the election administration can be lodged by any citizen directly to the EAC, including online. The EAC also serves as an appeal body to all NEC decisions, including on eligibility and registration of candidates; these decisions can be appealed within 20 hours and the EAC has 48 hours to issue a ruling.

Issues concerning election day irregularities shall be submitted to the EAC within seven days following the declaration of results by the NEC and the EAC is to rule within four weeks of receiving the complaint.³⁸ All EAC's decisions, which are also published on a dedicated government portal, may be appealed to a court of law within three weeks of the ruling's publication and shall be dealt with in an expedited procedure. Violations of the law, such as breaching the secrecy of the vote, giving inaccurate or misleading instructions, or obstructing voting in any manner, are subject to criminal procedures and are referred to the district prosecutor. All ODIHR NAM interlocutors voiced trust in the efficiency and transparency of election dispute resolution.

IV. CONCLUSIONS AND RECOMMENDATION

All ODIHR NAM interlocutors expressed full confidence in the electoral process and the ability of the election administration to professionally and transparently administer the presidential election. While all interlocutors acknowledged the benefit of an external assessment, the vast majority noted no added value from an observation activity for the upcoming presidential election as they had strong confidence in the democratic process in Iceland. All ODIHR NAM interlocutors viewed the recently electoral reform as conducted in an inclusive and consultative manner, addressing many prior ODIHR recommendations. No concerns were expressed relating to the respect for fundamental freedoms, application of the amended legal framework, voter registration, candidate registration, campaign and media conduct, election dispute resolution and election day procedures. Based on these findings, the ODIHR NAM does not recommend an election-related activity for the 1 June presidential election. Nevertheless, ODIHR encourages the authorities to consider previous recommendations, which remain unaddressed and reiterates that it stands ready to offer its assistance upon request in a post-election process.

³⁷ The Committee is composed of three members appointed for up to maximum of six years by the Minister of Justice, whereas the Supreme Court nominates the chairperson, and the Icelandic Rector's Conference and the Icelandic Association of Local Authorities each nominate one member. Alternate members are appointed in the same manner.

³⁸ The deadline may be extended up to six weeks if the matter is very complex.

ANNEX: LIST OF MEETINGS

Ministry for Foreign Affairs

Veturliði Þór Stefánsson, Director General, Consular Services Department
Ögmundur Hrafn Magnússon, Director, Consular Services Department
Ísak Óli Sigurjónsson, Specialist, Consular Services Department

Constitutional and Supervisory Committee of the Parliament

Þórunn Sveinbjarnardóttir, Chairperson, Social Democratic Alliance
Steinunn Þóra Árnadóttir, First Vice Chairman, Left-Green Movement
Sigmar Guðmundsson, Second Vice Chairman, Remainder
Ágúst Bjarni Garðarsson, MP, Progressive Party
Ásthildur Lóa Þórsdóttir, MP, People's Party
Berglind Ósk Guðmundsdóttir, MP, Independence Party
Halla Signý Kristjánsdóttir, MP, Progressive Party
Hildur Sverrisdóttir, MP, Independence Party
Þórhildur Sunna Ævarsdóttir, MP, Pirates

National Election Commission

Ástríður Jóhannesdóttir, Director
Hjördís Stefánsdóttir, Legal Adviser

Registers Iceland

Árný Guðrún Ólafsdóttir, Specialist
Karen Edda Benediktsdóttir, Specialist
Finnur Marteinn Sigurðsson, Lawyer

Election Appeal Committee

Berglind Svavarsdóttir, Chairperson
Anna Tryggvadóttir, Board Member

Reykjavík City Council

Hildur Lilliendahl Viggósdóttir, Elections Project Manager
Bjarni Þóroddsson, Administrative Affairs Project Manager

National Audit Office

Jarþrúður Hanna Jóhannsdóttir, Deputy Director

Political Parties

Hannes Karlsson, Manager, Centre Party
Þórður Þórarinnsson, Manager, Independence Party
Steinunn Þóra Árnadóttir, MP, Left-Green Movement
Anna Lía Björnsdóttir, Left-Green Movement
Stefanía Sigurðardóttir, Political Advisor, Liberal Reform Party
Sigurjón Arnarsson, Political Advisor, People's Party
Björn Leví Gunnarsson, MP, Pirate Party
Arndís Anna Kristínardóttir Gunnarsdóttir, MP, Pirate Party
Indriði Stefánsson, Pirate Party
Helgi Héðinsson, Manager, Progressive Party
Tómas Guðjónsson, Information Officer, Social-Democratic Alliance
Aldís Mjöll Geirsdóttir, Political Advisor, Social-Democratic Alliance

Prospective candidates

Thor Magnússon, prospective candidate

Media

Heiðar Örn Sigurfinnsson, News Director, RÚV
Stígur Helgason, News editor election coverage, RÚV
Elfa Ýr Gylfadóttir, Director, Media Commission
Þóra Jónsdóttir, Media Commission

Civil Society

Tatjana Latinovic, President, Icelandic Women's Rights Association
Auður Önnu Magnúsdóttir, Member, Icelandic Women's Rights Association

International Community

Representatives of diplomatic missions resident in Iceland