



**The fundamental issues of the
GEO for the June 2024 elections**



Expert Forum

Semilunei 7, ap. 1

Bucharest

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Policy brief EFOR #167, 4 March 2024

Expert Forum analysed the draft emergency ordinance¹ and submitted comments to the Ministry of Interior, some related to the context in which the legislative draft is initiated, and others related to specific legislative issues. Below are presented the fundamental issues we have identified in relation to this method of legislation. We note that on a technical level the text brings some improvements that contribute to a better organisation of the European parliamentary elections. These changes should have been made in advance so that they could be properly implemented. Expert Forum has already shown why the merger of elections only three months before the date of the European Parliament elections is not justified and recommended².

In conclusion, EFOR maintains its position on the constitutionality risks posed by the merging of the European parliamentary and local elections. At the same time, we welcome the introduction of rules that improve the process of organising the European parliamentary elections, although we remain concerned about the chosen method of lawmaking.

1. Overall, **we note that the drafting of an emergency ordinance regulating the merger of elections is not justified. It does not arise as a result of an "extraordinary situation whose regulation cannot be postponed"**, an element which is part of the essence of regulating through GEOs, in accordance with Article 115 of the Romanian Constitution. The electoral calendar had been known for a long time, it was predictable, and the merger is not the result of an unforeseen situation, which was not under the control of the decision-makers, but is the result of political negotiations that were started late and were very protracted, risking to jeopardize the proper conduct of the elections. Therefore, issuing an GEO to merge and change key issues such as the mandate of local elected representatives is not justified.

On this issue, the practice of the Romanian Constitutional Court (RCC) is relevant - Decision No 761/2014 on the admission of the objection of unconstitutionality of the provisions of the Law on the approval of Government Emergency Ordinance No 55/2014 for the regulation of certain measures concerning local public administration³:

¹ Emergency Ordinance on some measures for the organization and conduct of elections for members of the European Parliament from Romania in 2024 and elections for local government authorities in 2024, https://webapp.mai.gov.ro/frontend/documente_transparenta/631_1709276701_OUG%20.pdf

² <https://expertforum.ro/comasare-alegeri-haos/>

³ <https://legislatie.just.ro/Public/DetaliiDocumentAfis/164759>

According to the case law of the Constitutional Court on Art. 115 para. (4) of the Constitution (e.g. Decision No 255 of 11 May 2005, published in the Official Gazette of Romania, Part I, No 511 of 16 June 2005), the Government may adopt emergency ordinances under the following cumulative conditions: the existence of an extraordinary situation; its regulation cannot be postponed and the urgency must be justified in the content of the ordinance. Extraordinary situations express a high degree of deviation from the ordinary or common and are objective in nature, in the sense that their existence does not depend on the will of the Government, which, in such circumstances, is compelled to react promptly to protect a public interest by means of an emergency ordinance (see mutatis mutandis Decision No 83 of 19 May 1998, published in the Official Journal of Romania, Part I, No 211 of 8 June 1998). Also, according to Decision No 258 of 14 March 2006, published in the Official Journal of Romania, Part I, No 341 of 17 April 2006, "the non-existence or non-explanation of the urgency of regulating extraordinary situations [...] clearly constitutes a constitutional barrier to the adoption by the Government of an emergency ordinance [...]. To decide otherwise is to empty of content the provisions of Article 115 of the Constitution on legislative delegation and to leave the Government free to adopt, as a matter of urgency, normative acts with the force of law, at any time and - taking into account the fact that an emergency ordinance may also regulate matters covered by organic laws - in any field" (see also Decision No 366 of 25 June 2014, published in the Official Gazette of Romania, Part I, No 644 of 2 September 2014)."

The proposal currently under public debate does not meet these cumulative conditions.

Overall, the proposed changes could have been made earlier. As early as 2019 EFOR – as part of the Ficare Vot coalition - pointed out after the European Parliamentary elections that there were many problems with the electoral legislation⁴, and in December 2023 we published a report⁵ which highlighted that the legislation had not been updated. However, the electoral legislation should be amended in the Parliament and not by a GEO issued by the Government, as also stated in RCC Decision 51/2012:

These considerations recommend that electoral regulations should be debated in Parliament and not adopted by means of an exceptional procedure, whereby Parliament is bypassed but obliged to vote tacitly on a regulatory content that is almost exclusively at the discretion of the Government.

2. The adoption of this GEO, which amends important rules of the electoral process three months before the elections, goes against the principles of predictability and legal stability

⁴ <https://expertforum.ro/raport-observare-euoparlamentare-2019/>

⁵ <https://expertforum.ro/en/loopholes-ep-legislation/>

The Venice Commission stresses in the 2010 Report on the timeline and inventory of political criteria for assessing an election that "In general, any reform of electoral legislation to be applied during an election should occur early enough for it to be really applicable to the election.' In certain circumstances, exceptions to the one year rule could be accepted, namely where there is a need to rectify, through legislation, unforeseen problems or to provide redress to violations of internationally recognised rights where they had been built into the electoral law"⁶.

The RCC Decision 150/2020 also notes that exceptions to the one-year rule may be accepted if it is necessary to remedy **unforeseen** problems or **rectify** national legislation so as not to prejudice internationally recognised rights⁷. Furthermore, it states that "if the amendment of the electoral legislation in question brings about **an improvement in citizens' right to vote**, this can be done even less than one year before the elections, because this principle does not take precedence over other principles and cannot be invoked to maintain a situation contrary to European standards in this field". The RCC notes that "the stability of these rules is an expression of the **principle of legal certainty**, implicitly established by Article 1 (5) of the Constitution, a principle which essentially expresses the fact that citizens must be protected against a danger that comes from the law itself, against an insecurity that the law has created or risks creating, by requiring that the law be accessible and predictable".

In Decision No. 426/2023, the RCC refers to the amendment of legislation less than a year before the elections and the effects on the predictability of the legislative framework:

Thus, a first aspect of the principle of legal certainty in electoral matters concerns the frequency of legislative changes, which leads to the unpredictability of the regulatory framework and voter confusion about the applicable voting system. Alternatively, it is when legislative changes occur. The closer to the date of the elections, the stronger the presumption that these changes are intended to create a benefit/advantage for the political party that adopted them, dictated by its imminent interests, and may result in manipulation of the electorate.

EFOR noted in its December 2023 report⁸ that certain improvements need to be made and are absolutely necessary for the European Parliament elections, as long as they are of a technical nature and do not distort key elements of the electoral process - merging the elections does not fit into such logic in any way. The draft EGO contains articles that change such key elements (**merger of elections, mandates of local elected representatives, how electoral commissions are constituted**) three months before the elections, which is contrary to international standards.

⁶[https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD\(2010\)037-e](https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-AD(2010)037-e)

⁷ <https://www.ccr.ro/wp-content/uploads/2022/04/Decision-No-150.pdf>

⁸ <https://expertforum.ro/en/loopholes-ep-legislation/>

The project has a high potential to create difficulties for members of the electoral administration. The draft GEO extends voting until 10 PM to allow more voters to cast their ballots. This is a false premise - that this extension will solve the problem of the longer time it takes for the voter to be verified in the Electronic System for Monitoring the Turnout and Preventing Illegal Voting (SIMPV), sign on two electoral lists and vote. The extension of the voting period in itself will not solve the major difficulties faced by polling station officials who were already facing a challenge in organising local elections and who will now have to manage the EP elections. While the possibility of extending voting even further – to 23:59 -, where there are voters queuing, is welcome, it can create even more stress for polling stations in this context, as operations can be very lengthy. Another concern relates to the capacity of constituency electoral commissions and the Central Electoral Bureau to manage the process. EFOR has consistently advocated measures to enable as many voters as possible to vote. **The smooth implementation of such measures may, however, be affected by the merger of elections.** The RCC Decision 51/2012 underlined that:

However, the contested law, by amending the procedure for holding elections less than a year before the elections, departs from the invoked provisions. Such an untimely legislative amendment is likely to create additional difficulties for the authorities responsible for its application, in terms of adapting to the newly established procedure and the technical operations which it entails.

The same logic applies if there are difficulties in exercising the right to vote.

It is true that only the Ombudsman can challenge this GEO at the RCC, but **the principle of loyal cooperation between state institutions prohibits the incorporation into the proposed legislation of legislative solutions already declared unconstitutional by the RCC.** This draft GEO repeats some of the amendments for which the attempt to merge the 2012 elections was declared unconstitutional (high number of ballot papers, procedures that create confusion or make the work of electoral officials more difficult, etc.). If this GEO goes before the RCC, taking into account the previous jurisprudence of the Court, there is a major risk of invalidation and, consequently, of blocking the electoral process.

3. The GEO applies only to these elections and does not resolve the ambiguities related to Law 33/2007 in the long term

We note that by approving **an GEO that applies only to these elections we may end up in a situation similar to that after the 2019 European Parliament elections.** While the Government issued a GEO it only applied to those elections and Law 33/2007 was not subsequently amended in Parliament to introduce the legislative innovations used in those elections or approved in other electoral laws. GEO 29/2019 on amending and supplementing certain electoral legislation and for some measures for the organisation of the elections for members of the European Parliament from

Romania and the national referendum of 26 May 2019⁹ only applied to those elections, and the failure to transpose it into basic legislation led to the need to significantly amend the electoral legislation by GEO in March 2024.

4. **The explanatory memorandum¹⁰ does not sufficiently explain the need to merge elections. The document states that "in the Member States of the European Union, European parliamentary elections are frequently held at the same time as local elections".** Expert Forum analysed the legislation of all EU Member States and the electoral calendar in recent years and came to the following conclusions.¹¹ In short, the **situation is not at all similar to that of other countries, which already have experience in this respect, rules agreed long before, regulated at constitutional or by law.**

- EFOR has identified 7 countries where local or regional elections are held at the same time with the European Parliament elections.
- In several of these countries, the legislation was not amended just a few months before the elections, as is the case in Romania. In no other country has the decision to merge been taken arbitrarily, for the first time in 2024 and 4 months before the election.
- In some countries, the regulations establishing the holding of elections on the same day are found in the Constitution.
- There are very few examples (the closest being Hungary and partly Italy) where elections are held for a significant number of local government positions.
- In countries such as Malta, Belgium and Ireland there are no elections for mayors.
- Some countries, such as Italy or Germany, hold local elections constantly, for a limited number of local governments in each round, not just once every four to five years for the whole country.
- In most countries, election periods have been the same for many years and sometimes overlap with the European Parliament elections.
- The closest case to the Romanian one seems to be Hungary. The reasons for the merger are similar, but there the constitution was changed in 2022 for the 2024 elections. Even though the change was made in advance, there is criticism of the negative effects the changes will have. Hungary will still have overlapping mayoral mandates after the June elections, a political decision for which there has been criticism from the opposition and outside observers.

On the other hand, the explanatory memorandum does not mention any impact under the chapter *Impact on fundamental human rights and freedoms*, which is not in line

⁹ <https://legislatie.just.ro/Public/DetaliiDocumentAfis/213560>

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https://webapp.mai.gov.ro/frontend/documente_transparenta/631_1709221236_Nota%20de%20fundamentare.pdf

¹¹ <https://expertforum.ro/comasare-euro/>

with what the draft GEO proposes and shows the lack of a solid justification of the project.

The budgetary impact and the savings to the state budget are not sufficiently justified. The explanatory memorandum states that "Expenditure and the electoral period are reduced, given that in Romania in 2024, as mentioned above, there will be four types of elections."

We reiterate that the RCC established in Decision 51/2012 that:

However, the importance and necessity of measures to reduce budgetary expenditure in a context of economic crisis - undeniable in any case - cannot be used as arguments to support, under any circumstances, restrictions on the exercise of rights or freedoms or to advocate measures likely to affect fundamental principles of the rule of law.

- 5. The merger may create more confusion and inequality between electoral stakeholders.** The explanatory memorandum refers to the beneficial effects of the GEO, including increased turnout and budgetary savings.

The explanatory memorandum states that "Holding the two types of elections on the same date has numerous benefits and can motivate citizens to vote, ensuring greater representation of Romanian members in the European Parliament, strengthening Romania's position in the European Union by sending a clear signal that it wishes to follow the pro-EU position and projects for the development of the Union for all administrative-territorial units. Moreover, local elected representatives can motivate citizens to turn out in greater numbers to vote and express their choices".

Overlapping elections with different stakes, with very different campaign topics may create confusion among voters rather than the pro-EU unity described in the note. Also, given that this logic benefits the main governing parties, it rather contributes to creating an electoral framework in which smaller parties or parties that do not have the same financial and organisational capacity will be disadvantaged. Shortening the preparation period for local elections could create additional difficulties for potential electoral contestants who do not benefit from political party subsidies or strong party structures.

In addition, the overlapping of elections will create difficulties in controlling the financing of political parties and election campaigns, as the boundary between the two campaigns will be blurred and parties running in the European Parliament elections will have an advantage. The legislation is not very clear on this either, as Law 334/2006 does not include regulations on how the rules apply to the elections that are taking place at this time.

Also, new and more complex procedures and a high number of ballot papers (which can lead to an extended voter's presence in the polling station) may affect the right to information and political expression of voters, as noted by the RCC in Decision 51/2012:

The Court also finds that that legislation is liable to create difficulties in the exercise of the right to vote, difficulties which may ultimately have the effect of restricting the exercise of that right. Thus, by organising the elections to the Chamber of Deputies and the Senate and those to the local government authorities at the same time, citizens will have to perform a much more complex task - expressing their option on six ballot papers - which will mean an exponential increase in the time required for each citizen to vote, taking into account the distribution of ballot papers, the time spent voting in the booths and the placing of ballot papers in the three ballot boxes. The complexity of the voting operations may result in voters being excluded from voting if they are unable to cast their ballot, independently of their will, during the time allocated for voting until the polls close." [...] The Court holds that a cumbersome voting procedure, resulting from the large number of ballot papers, and the different public authorities on which voters must express their choice at the same time, may have the effect of preventing the free expression of their opinion.

6. The rules on loss of mandate for local elected representatives create once more the conditions for political migration and give an advantage to mayors and county council presidents over local and county councilors.

The draft provides a grace period only for mayors and chairpersons of county councils who can migrate to another party without losing their mandate, by exception to the rule established by GEO 57/2019 on the Administrative Code in Article 160 (1) (h)¹² and 193 (2)¹³ - when they resign from the party they represent in the current mandate, they cannot continue their elective mandate. The grace period begins 60 days before the date of the local elections and expires on the date the new mandate begins. Please note that it is possible to change parties at any time during this grace period. **These regulations create a high potential for political migration and affect legislative predictability, similar to the context generated by GEO 55/2014 for the regulation of certain measures concerning local public administration¹⁴.**

The draft GEO creates discriminatory conditions for local and county councillors, who cannot change party because the ban in the Administrative Code continues to apply to them. For these categories of local elected

¹² "(1) The mayor's term of office shall automatically cease in the following cases: h) loss, by resignation, of membership of the political party or national minority organisation on whose list he/she was elected;"

¹³ "(2) The provisions of Articles 160-162 shall apply accordingly to the President of the County Council."

¹⁴ <https://legislatie.just.ro/Public/DetaliiDocumentAfis/161004>

representatives, there are already RCC decisions that invalidate political migration during the mandate. It should be noted that in Decision No 761/2014 the RCC finds that Emergency Ordinance 55/2014 violates Article 147 para. (4) of the Constitution "only in relation to the situation of local and county councillors".

To reflect the negative effects of political migration, we reiterate the following paragraph from the RCC Decision No 153 of 12 March 2013:

"the mayor also loses, consecutively, the voters' endorsement, obtained initially by virtue of his candidacy on a list supported in the election campaign by a certain political party and finally voted by them. The legislator opted for such a regulation in order to curb political migration and political opportunism, the existence of which has been demonstrated by the realities of recent years. A change in the mayor's political affiliation during his term of office risks affecting the interests of the community itself, on the one hand, by the disruption and instability it may cause within the administrative apparatus through which he exercises the powers vested in him by law and which may affect the effectiveness of the actions taken in the performance of his duties, and, on the other, by the lack of certainty as to the achievement of the objectives promoted during the electoral campaign, on the basis of which the electorate voted for him.

7. The GEO extends the deadlines for taking office, with the regulated deadlines starting from 27 September. Article 34 states that:

For the entry into office of the elected local government authorities in 2024, by derogation from the provisions of Article 113(1), the following shall apply (1), art. 114 par. (1) and (3), art. 115 par. (1), art. 121 par. (1) (a), Art. 149 para. (1), Art. 150 par. (1) and Article 187 (1) (2) of Government Emergency Ordinance No. 57/2019, as amended, the deadlines set out in these articles shall start to run from 27 September 2024.

This will create confusion over the takeover and create a parallel administration that will have to wait three months to take office. In some cases, mayors or councillors who have not won a mandate may be disinterested in carrying out their duties or will no longer have authority in the community. Moreover, some elected officials may not take office, which may even lead to a by-election. **Therefore, holding local elections in June and extending the period for taking office may create confusion and imbalance in the work of local government. Moreover, it could affect the quality of local governance.**

8. The draft redefines the way electoral commissions are set-up, to include representatives of the contestants in both elections. It introduces rules that change the procedure for filling the commissions and includes unclear rules, i.e. the risk of disadvantaging certain electoral competitors.

The filling of electoral commissions (except for the constituency commission for polling stations abroad) at the political level includes several successive stages, with representatives of:

- a. *the political parties and organisations of citizens belonging to national minorities which were allocated seats in the 2019 elections for members of the European Parliament in Romania, in descending order of the number of seats obtained*
- b. *parliamentary political parties and organisations of citizens belonging to national minorities which had their own parliamentary group in at least one of the chambers of Parliament on the date of its establishment following the elections to the Senate and the Chamber of Deputies in 2020, in descending order of the number of parliamentary seats.*
- c. *of the Group of National Minority Organisations in the Chamber of Deputies*
- d. *if there are still vacant seats - representatives of political parties and organisations of citizens belonging to national minorities who did not obtain seats in the European Parliament, as well as representatives of political parties and organisations of citizens belonging to national minorities who did not obtain seats in the European Parliament, in descending order of the number of nominations submitted for the elections of 9 June 2024.*

Note that continually changing the way electoral commissions are set-up is not good practice. We recall that the Code of Good Practice in Electoral Matters states that "The fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendment less than one year before an election, or should be written in the constitution or at a level higher than ordinary law." The 2020 parliamentary election assessment mission also recommended: "To enhance stability of the election administration, the tenure of the members could be better protected against arbitrary replacement during a reasonable time prior to election day."¹⁵ The draft changes the logic of Law 115/2015, which states in Article 38 (4) that the CEB shall be completed with one representative of each political party that has at least 7 senators or 10 deputies as members or that obtained parliamentary representation in the previous election, respectively representatives of competitors that submitted complete lists for county councils in at least 18 counties. In turn, this regulation was introduced by Law 91/2020, one month before the election date, contrary to international standards assumed by Romania.

Moreover, **the wording in point d) is not very clear** and introduces into the same distribution process both local and EP competitors, which may have a very different number of candidates. It should be noted that the number of candidates in the local elections is much higher, so these competitors could be favoured. In addition, it reduces the possibility of a broad representation in favour of large parties.

¹⁵<https://www.osce.org/files/f/documents/3/3/484562.pdf>

With regard to the set-up of the commission for out of country voting, the GEO restricts representation compared to the current wording of Law 33/2007. Thus, the constituency electoral commission for polling stations abroad is filled in at the political level with parties "that have members in the European Parliament at the beginning of the electoral period and participate in the elections for Romanian members of the European Parliament in 2024". In the current version of the law, it is supplemented by representatives of political parties, political alliances, electoral alliances or organisations of citizens belonging to national minorities participating in the elections, first having representatives in the European Parliament and , in the second stage, with those not having representatives in the EP.

9. Art. 14 states that at the "elections on 9 June 2024, by derogation from the provisions of Art. 18 para. (4¹) of Law no. 115/2015, as amended, citizens with the right to vote who have established their residence in the constituency less than 60 days before the date of the election will be able to exercise their right to vote only in the commune, town, municipality or administrative-territorial subdivision of the municipality in which they have their domicile."

Although the deadline has been reduced from 6 months, the 2-month period is too short, given that the GEO could come into force in March, so it gives voters less than a month to register their residence. Therefore, the 60-day period should be shortened, especially as the new rules are being adopted untimely by GEO. Without an effective information campaign, this regulation could become even more restrictive and affect voters' rights.

10. According to Article 30, by derogation from the regulations on contraventions of Laws 33/2007 and 115/2015, the contravention regime provided by Law 208/2015, as amended and supplemented, shall apply accordingly. It should be noted, however, that there are certain types of contraventions specific to these types of elections, which must remain in force.
11. Overall, **the legislation does not define how certain aspects that are different in the two types of elections will be unified**, including important issues such as deadlines for dealing with complaints or appeals, how the electoral campaign will be conducted, financing and oversight of the electoral campaign, the functioning of electoral commissions, etc.

12. Some issues that reduce the efficiency and transparency of the electoral process remain unresolved:

- In the EP elections a citizen can only support one competitor, this rule is restrictive and contrary to international standards. The law must be changed so that any citizen can support one or more competitors. Moreover, in the local elections, it is allowed to support more than one candidate, which can create confusion for voters who want to support candidates for both types of elections.

- The number of signatures of support for the filing of candidacies is very high (200 thousand for parties and 100 thousand for independents) and exceeds the threshold recommended by the Code of Good Practice in Electoral Matters of 1% of the total number of voters - "The law should not require collection of the signatures of more than 1% of voters in the constituency concerned". The number of signatures should be reduced.
- There is no clear and regulated methodology for verifying signatures, which may raise questions about the integrity of the process, especially if we take into account previous experiences where criminal cases have been started for irregularities in the preparation of competitors' candidatures. The verification process cannot be observed, although Expert Forum has filed such requests in previous elections. We reiterate the provisions of the Code of Good Practice in Electoral Matters: "Checking of signatures must be governed by clear rules, particularly concerning deadlines. iv. The checking process must in principle cover all signatures; however, once it has been established beyond doubt that the requisite number of signatures has been collected, the remaining signatures need not be checked.;"
- Election office meetings are not public, which reduces the transparency of the process. The ODIHR report for the 2020 parliamentary elections recommended: "To increase transparency, sessions of the election bureaus should be open to the public, media and election observers".¹⁶
- The deadlines for the publication of decisions and decisions of electoral commissions are not clearly specified in Law 33/2007.
- For the optimal functioning of polling stations abroad, the number of polling station members (more than 8 representatives of the electoral contestants) and the number of allocated tables could be increased.
- For abroad, Law 33/2007 does not take over the regulations laid down in other legislation (see Law 208/2015), which allow polling stations to be set up at the request of at least 100 voters in a region. The criteria for establishing polling stations abroad could also be further detailed - see Art. 23 of Law 208/2015.
- The law does not encourage the publication of data about the electoral process, and much of the communication under Law 33/2007 is done through posters or radio and TV channels. The legislation does not mention the publication of detailed candidate data, and this is generally at the discretion of the CEB. Candidate information should be published in as much detail as possible on the CEB website, and what information is published should be determined by law and not by arbitrary decisions at each election round. As data is collected at the time of submission of candidatures, it could be published in open formats (xls, csv etc) and detailed, including information on gender, age, professional profile.
- Certain provisions on election campaigning are at odds with those of Law 334/2006 regulating election campaign financing. For example, Law 33/2007 refers to methods of street promotion which are prohibited under Law

¹⁶ <https://www.osce.org/files/f/documents/3/3/484562.pdf>

334/2006. There are also contradictory regulations, such as those relating to the size of posters that can be used.

- In local elections, lists that do not comply with the provisions of Article 7 (1) - "Lists of candidates for election to local councils and county councils must be drawn up in such a way as to ensure the representation of both sexes, except for those containing only one candidate." – are not automatically cancelled. Such provision should be introduced.
- The GEO provides the possibility for voters with disabilities who can travel to the polling station to change polling station if it is not accessible for the EP elections (art 13 of the GEO). However, for local elections there is no such regulation and this raises the question of how a person in this situation will vote for both elections.
- The procedures for voting with a special ballot box remain limited, and registration can only be done within a very short period of time and only physically (by a representative) until the day of the vote. There is no possibility of registering electronically, nor until the day of the vote. In order to facilitate the participation of people with disabilities, the deadline for registration should be extended until voting day at a certain time (e.g. by noon). Electronic registration should also be introduced (email or a dedicated platform). Experience during the 2020 parliamentary elections has shown that this is possible - registration can be done at the BEJ, as the BESV members are not constantly working and electronic applications are transmitted by the BEJ to the BESV. The ODIHR report on the 2020 parliamentary elections included a recommendation proposing that "The extended deadline for homebound voting should be maintained for future elections and regulated through the law".¹⁷

¹⁷ <https://www.osce.org/files/f/documents/3/3/484562.pdf>