SNAPSHOT
ANALYSIS

Institutional and Municipal Communication on Facebook and Their Official Webpages

During the 2025 Local Election Campaign in North Macedonia

METAMORPHOSIS
Foundation for Internet and Society

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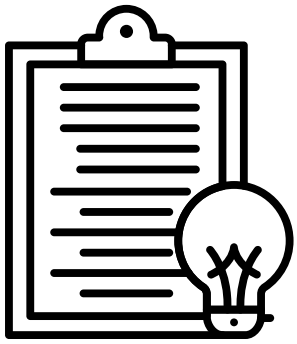
Executive Summary



1. Executive Summary

This report presents the results of the monitoring of institutional and municipal communication on social media and official websites during the election campaign period of the 2025 local elections in North Macedonia. The monitoring aimed to assess how public institutions communicated with citizens in the twenty days preceding the first round of local elections, focusing on compliance with the Electoral Code and the principle of institutional neutrality.

This report contributes to a wider initiative aimed at assessing the potential misuse of administrative resources (MAR). Within this framework, 70 civil society monitors from 10 civil society organizations (CSOs) conducted monitoring across 26 municipalities with a view to assessing the presence of practices involving the use of public office, activities, or resources during the 2025 local elections in ways that could influence equality and fairness of electoral competition.[1],

This report complements the aforementioned efforts, and its findings reveal that public institutions, both at the central and local level, frequently used their official communication channels for promotional purposes that closely resembled campaign messaging. Nearly 60 percent of the analysed Facebook content across 26 municipalities and 10 central institutions had a promotional character, while only 40 percent were neutral informational posts. Such imbalance indicates that official communication during the election period served not only to inform but also to reinforce political visibility and public recognition of incumbents, often blurring the distinction between governance and campaigning.

At the national level, the Prime Minister, Hristijan Mickoski and Deputy Prime Minister, Izet Mexhiti were the most active actors on Facebook, using their official profiles primarily for campaign-oriented content that emphasized leadership, achievements, and ongoing or completed infrastructure projects. The same pattern was reflected in several municipalities, especially those led by incumbent mayors seeking re-election. Municipalities such as Butel, Kumanovo, Bogovinje, and Makedonski Brod displayed a pronounced personalization of communication, where the mayor's figure dominated the messaging tone and imagery. Even routine activities were presented through a political lens, highlighting results and achievements tied to the incumbent's tenure.

The analysis shows that while some institutions and ministries maintained neutral and service-based communication, like the Ministry of Internal Affairs, the Ministry of Education and

[1] A Preliminary Report of the CSOs' monitoring activities and related efforts is available on https://electoralsupportprogramme.mk/wp-content/uploads/2025/11/Preliminary-report-MAR-Eng.pdf

Science, and the Ministry of Agriculture, Forestry and Water Economy, others engaged in posts that could be considered promotional or even borderline violations of Article 8-a of the Electoral Code. This article prohibits the use of public resources for political promotion, including the initiation of new infrastructure projects, public inaugurations, and extraordinary payments during the election period if these activities weren't previously planned with the budget. For example, the case of the Struga Municipality, which announced the distribution of air conditioners during the campaign, was identified as a potential violation under this provision.

Monitoring also revealed a deliberate divergence in communication behaviour between platforms. While official websites mainly remained compliant and restrained in publishing obligatory information and administrative notices, social media channels, especially Facebook, became the dominant venue for promotional content. This dual approach suggests that institutions consciously shifted political promotion to less regulated digital spaces, exploiting a known oversight gap: the absence of specific monitoring mechanisms or legal definitions regarding online campaigning by public institutions.

The report further contextualizes these findings within the evolving legal environment. Amendments to the Electoral Code in 2021 and 2024 weakened previously robust preventive provisions, allowing greater interpretative discretion in defining permissible institutional communication. The removal of explicit bans on inaugurations and ceremonial public events during the campaign period has blurred the boundary between state and party activities. Both the State Commission for the Prevention of Corruption (SCPC) and the OSCE/ODIHR Election Observation Mission noted that these changes have diluted institutional accountability, leaving enforcement inconsistent and reactive rather than preventive.

Overall, the monitoring results point to a systemic challenge: institutional communication during elections continues to be politicized, with official resources and platforms often used to sustain political narratives. The persistence of this practice undermines public trust, weakens equal electoral competition, and erodes the separation between state and party.

The report concludes that ensuring institutional neutrality in the digital age requires renewed attention to legal precision, ethical standards, and proactive oversight. Future reforms should restore clear preventive norms in the Electoral Code, expand the scope of monitoring to include social media, and establish interpretative guidelines that clearly distinguish public-interest communication from political promotion. Without such safeguards, institutional communication risks remaining a powerful but unregulated tool of electoral influence.

1.1 Electoral code context and potential violations

The Electoral Code of the Republic of North Macedonia contains specific provisions aimed at preventing the misuse of public resources and ensuring a level playing field during the election period, defined as 20 days prior to voting day. Key articles relevant to this monitoring include:

- **Article 8-a:** This article explicitly prohibits the misuse of budget funds, public funds, or state resources during the election period. These prohibitions apply from the moment elections are announced until all election processes are completed. Crucially, paragraph 1 prohibits several categories of actions during the election period. It prohibits the initiation **of construction of new infrastructure projects** (such as roads, water supply systems, sewage, sports facilities, schools, kindergartens, and other public buildings , etc.) funded by the State Budget, or involving state capital, during the election period, unless previously approved budget funds were allocated for projects already initiated. In addition, it prohibits payments from the Budget or public funds that are not part of regular monthly disbursements and prohibits initiating procedures for hiring or terminating employees in state or public institutions. Paragraph 2 further restricts activities by prohibiting **public events marking the start or completion of infrastructure projects** during this period. This prohibition does not apply to public statements by officeholders or candidates given at rallies, in media interviews or debates, or as responses to journalists' questions. Paragraph 3 requires the Ministry of Finance, from the date elections are announced until their completion, to publicly disclose all budget expenditures (except regular salaries, pensions, and utility payments).
- **Article 75-d:** This article regulates media advertising during the election period and sets strict limits to prevent undue political influence.

Based on the analysis of promotional content during the monitored period (September 29 – October 17, 2025), several activities raise concerns regarding potential violations of these articles:

1. **Promotion of infrastructure projects:** A significant number of promotional posts across numerous municipalities (e.g., Butel, Lipkovo, Gostivar, Vrapchishte, Debar, Makedonski Brod, Bogovinje, Kochani) and even central figures (Prime Minister (PM), Deputy Prime Minister (DPM)) focused heavily on showcasing ongoing or recently completed infrastructure projects (road paving, reconstructions, building constructions, utility networks). While reporting on ongoing work is permissible for public statements during a rally, interview in the media or debate, the *promotional framing* and frequency, especially highlighting the role of incumbent mayors/candidates, during the monitoring period raises concerns under Article 8-a, paragraphs 1 and 2. It blurs the line between informing the public and campaigning on

achievements using public platforms. Posts announcing the *start* of new works (e.g., Butel's bridge, Vrapchishte projects) appear particularly inconsistent with Article 8-a, paragraph 2.

2. **Personalization around candidates:** Several municipalities (notably Kumanovo, Butel, Makedonski Brod, Prilep, Kochani) and the profiles of the PM and DPM (who were actively campaigning) featured heavy personalization. Official activities and projects were consistently presented through the lens of the incumbent candidate, using institutional channels to boost their visibility and associate them directly with positive developments. This practice risks violating the principle against using public office and resources for campaign purposes, implicitly covered under Article 8-a's general prohibition and the spirit of ensuring fair competition. The use of official/semi-official profiles (like the Bogovinje Mayor's page) *exclusively* for campaign content represents a clear conflation of roles.
3. **Potential abuse (specific case):** The post by Struga Municipality announcing the distribution of air conditioners during the campaign period represents a potential violation of Article 8-a, paragraph 1, regarding extraordinary payments or benefits that could influence voters.

While definitive legal judgment requires further investigation, the observed patterns strongly suggest that the boundaries between institutional communication and political promotion were frequently crossed during the monitored pre-election period, potentially infringing upon the Electoral Code's provisions designed to prevent the misuse of public resources for electoral advantage.

1.2 Effects from the recent Electoral code amendments

It is important to note that under the 2021 and 2024 revisions of the Electoral Code, **several previously strict prohibitions under Article 8-a were deleted or narrowed**. The revised text allows certain public events, inaugurations, and communication activities that were formerly prohibited, introducing broader interpretative discretion and weakening preventive safeguards.

The deletion of certain preventive clauses in Article 8-a (e.g., prohibitions on inaugurations and symbolic events) marks a significant regression in the institutional safeguards previously aligned with OSCE/ODIHR and EU standards.

In this context, the State Commission on Prevention of Corruption's (SCPC) 2022 Report[2] on the 2021 local elections identified persistent dilemmas in the application of Article 8-a, including uncertainty regarding what constitutes legitimate institutional communication versus campaign promotion. The Commission noted a lack of clear procedural guidance for pre-election approvals and inconsistent enforcement among oversight bodies.

The SCPC's 2022 report emphasised that legal ambiguity fosters selective enforcement. These dilemmas remain relevant under the new framework, where institutions now act within undefined grey zones, interpreting legality case-by-case without consistent oversight.

The ODIHR Election Observation Mission (EOM) statement of preliminary findings and conclusions on the 2025 local elections[3] also highlighted that the weakened Article 8-a "blurs the distinction between state and party activities" and urged clarification of permissible **institutional communication through by-laws or interpretative guidelines.**

[2] Special Report on the Identified Abuses in the Financing of the Election Campaign - Local Elections 2021, 2022 State Commission on Prevention of Corruption https://dksk.mk/wp-content/uploads/2022/02/%D0%9F%D0%BE%D1%81%D0%B5%D0%B1%D0%B5%D0%BD-%D0%B8%D0%B7%D0%B2%D0%B5%D1%88%D1%82%D0%B0%D1%98-7.2.2022.pdf

[3] ODIHR election observation mission statement of preliminary findings and conclusions on the 2025 local elections. Please see: https://www.osce.org/files/f/documents/d/6/600656.pdf

MONITORING METHODOLOGY

2. MONITORING METHODOLOGY

2.1 Monitoring Objectives

The key objectives of this monitoring component were:

- To identify examples of potential misuse of administrative resources (MAR) by the targeted 26 municipalities and 10 central institutions during the election period, focusing on activities potentially violating the Electoral Code.
- To provide data and visualizations that aid in public information and enhance transparency.

2.2 Scope and Duration

The monitoring was conducted during the first round of the local elections, specifically in the electoral campaign period from **September 29 to October 17, 2025** (covering the 20 days before the voting day on October 19, 2025 and excluding the election silence period). This period corresponds to the timeframe during which specific restrictions under the Electoral Code apply.

Monitoring involved tracking the posts of municipalities and central institutions.

- **(A) Scope:** The monitoring covered up to 36 official Facebook pages and webpages of municipalities, relevant officials, and institutions.
- **(B) Method:** Daily tracking and archiving (screenshots and links) of all posts published on these pages were performed.

2.3 Post classification and coding

Posts were classified based on their content and keywords. The aim was to identify calls, information, or activities potentially contrary to the Electoral Code (e.g., announcements of hirings, commencement or promotion of infrastructure projects, extraordinary payments or subsidies, promotional activities highlighting incumbents, etc.).

The data processing and analysis was done using tools such as Excel, Word and Visual analysis.

Coding was performed according to the following categories:

- **Neutral informational posts:** Regular institutional information, service announcements, legally mandated postings. These posts usually inform the citizens about a regular activity of the municipality, does not mention the mayoral candidate, nor includes any for of call for action, or praise for the candidate and the political party behind him.

One example of a neutral informational post can be the post from the Municipality of Valandovo. It refers to the municipal holiday "November 6", and it announces a competition for the award and the annual recognitions of the Council of the Municipality of Valandovo. The public call was also featured on the Municipal website.

Another example is the post by the Municipality of Prilep, where they publish an invitation for the event's connected with October 11 - Day of the National Uprising of the Macedonian People. The same content was not published on the Municipal website.

- **Promotional/biased posts:** Content explicitly or implicitly promoting a specific party, candidate, or official, often showcasing achievements, projects, or public appearances in a favourable light, blurring the line between official duty and campaign activity. The promotional post is also characterized by praising the candidate for Mayor or the political party that s/he is a member of, usually the incumbent mayor is a candidate for one more mandate.

  An example of promotional post is one from the Municipality of Kumanovo, Maksim Dimitrievski, who was running for another mandate. Dimitrievski, together with the President of the Municipal Council met with representatives of different sports associations at the city pool in Kumanovo. The representatives of the associations awarded the Mayor with a certificate of appreciation "for his dedication and continuous support of school sports".

  One more example of a promotional post is the mutual promotion from the Municipality of Butel and the Ministry of Health. On October 2 the Minister, Azir Aliu, and the Mayor, Darko Kostovski who was a candidate for another mandate, promoted the announcement of the procurement procedure for the construction of a new polyclinic. The promotion included posts by the Government, as well as two posts by the Municipality, and a post by the candidate.

- **Potential abuses:** Posts containing elements suggestive of using public resources for electoral purposes, such as announcing new projects, grants, or subsidies during the restricted period, or using official channels for direct campaigning.

  One example of potential abuse by the monitored municipalities in the period of the election campaign, was the post by the Municipality of Struga. On the day of the start of the campaign, September 29, the Municipality published a post on Facebook, calling the citizens to apply for free air conditioning unit as part of a public call by the Ministry of Energy, Mining and Mineral Resources. The deadline for applications for the call was October 5, in the middle of the campaign.

2.4 Monitoring list – municipalities/institutions

The monitoring of the misuse of administrative resources (MAR) on Facebook pages and profiles represents a complementary component to the field monitoring of MAR occurrences conducted by ten civil society organizations (CSOs) across twenty-six municipalities during the 2025 local elections[4]. This combined approach enables a more comprehensive assessment of MAR manifestations, capturing both online and offline dimensions of electoral conduct.

In this segment, a total of 36 Facebook profiles and pages were monitored, encompassing municipalities across various electoral districts, key government officials (Prime Minister, Deputy Prime Minister Izet Mexhiti-further in the text referred as Deputy Prime Minister), the main Government page, and several ministries.

Out of the 26 municipalities[5], five **municipality FB pages were inactive. These are**: Studenichani, Dolneni, Kisela Voda, Centar Zhupa and Shuto Orizari.

In addition to the FB pages of the municipalities, the monitoring efforts included central level institutions that are relevant in relation to potential MAR occurrences during the election period. The monitored institutions were: the Government of the Republic of North Macedonia, Prime Minister (President of the Government), Deputy Prime Minister, Ministry of Transport, Ministry of Local Self-Government, Ministry of Interior, Ministry of Agriculture, Forestry, and Water Economy, Ministry of Social Policy, Demographics, and Youth, Ministry of Education and Science, Ministry of Public Administration.

The analysis is therefore based on the content published by the 30 active pages. The findings related to potential Electoral Code violations pertain only to these active entities. The full table of monitored entities on Facebook can be found in Annex I of this report.

[4] Preliminary-report-MAR-Eng.pdf

[5] The 26 municipalities where the monitoring MAR took place are: Lipkovo, Studenichani, Kumanovo, Strumica, Dolneni, Chair, Butel, Gostivar, Vrapchishte, Delchevo, Kisela Voda, Struga, Debar, Centar Zhupa, Valandovo, Saraj, Makedonski Brod, Tetovo, Bogovinje, Tearce, Bitola, Prilep, Ohrid, Shtip, Kochani, and Shuto Orizari

MAIN FINDINGS

3. MAIN FINDINGS

3.1 Structure and Nature of Posts by Type

During the analysed period (September 29 – October 17, 2025), the monitoring of official Facebook pages revealed a significant prevalence of promotional content.

- **Promotional posts** constituted the majority, accounting for **59.77%** of all analysed content.
- **Informational posts** made up **40.12%**.
- Posts classified as potential **abuses** were minimal, representing only **0.12%** of the total (one specific instance).

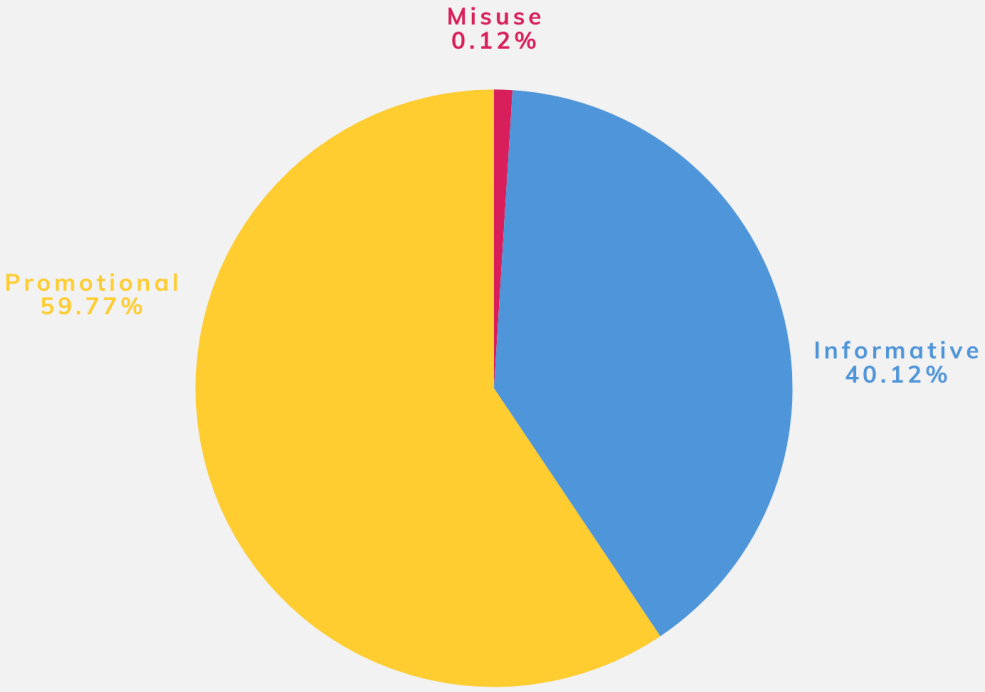


Chart 1: Almost two thirds of the posts were promotional

This ratio indicates that institutional communication during the election period adopted a strongly promotional character. Such an approach can potentially undermine the principle of equal access and raises questions about the distinction between public information and party-political communication.

3.2 Average Daily Volume and Dynamics of Posts

On average, **45 posts** were published daily across the monitored active pages.

- Of these, an average of **27** were **promotional**.

- An average of **18** were **informational**.

Promotional posts consistently dominated throughout the monitoring period. Their intensity notably increased in the second half of the monitoring period (after October 10th), correlating with an overall rise in the daily number of posts as election day approached.

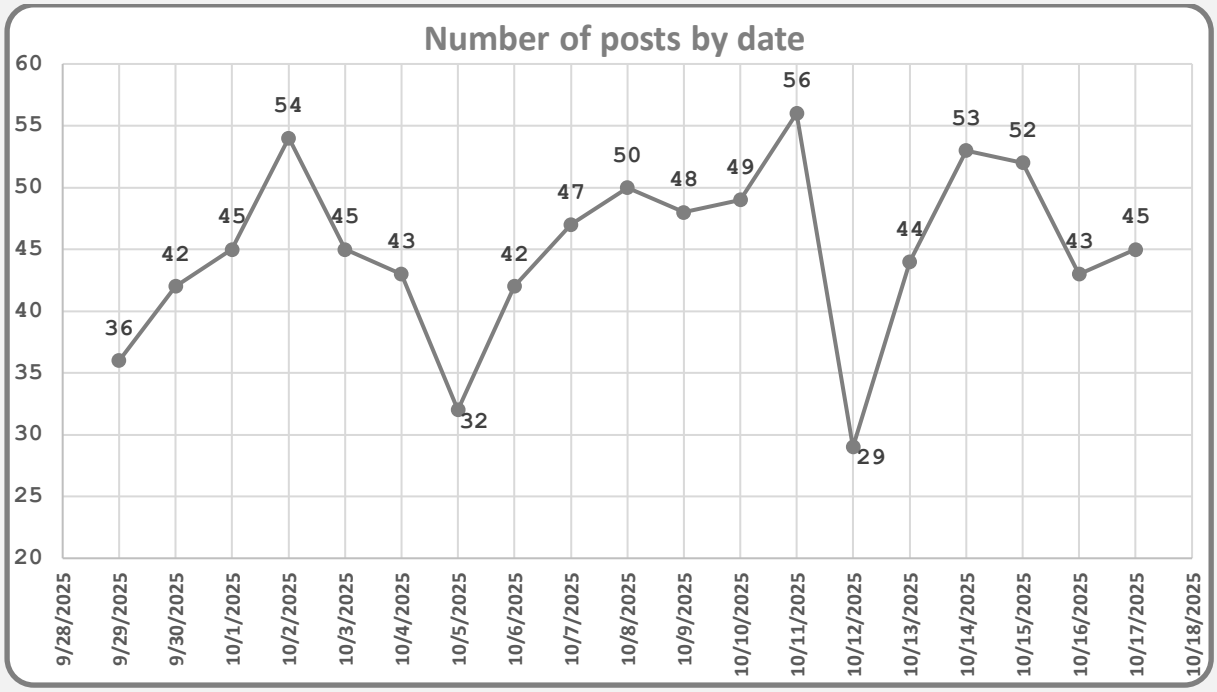


Chart 2: The highest number of posts was registered on October 2, October 11 and on October 15 and 16

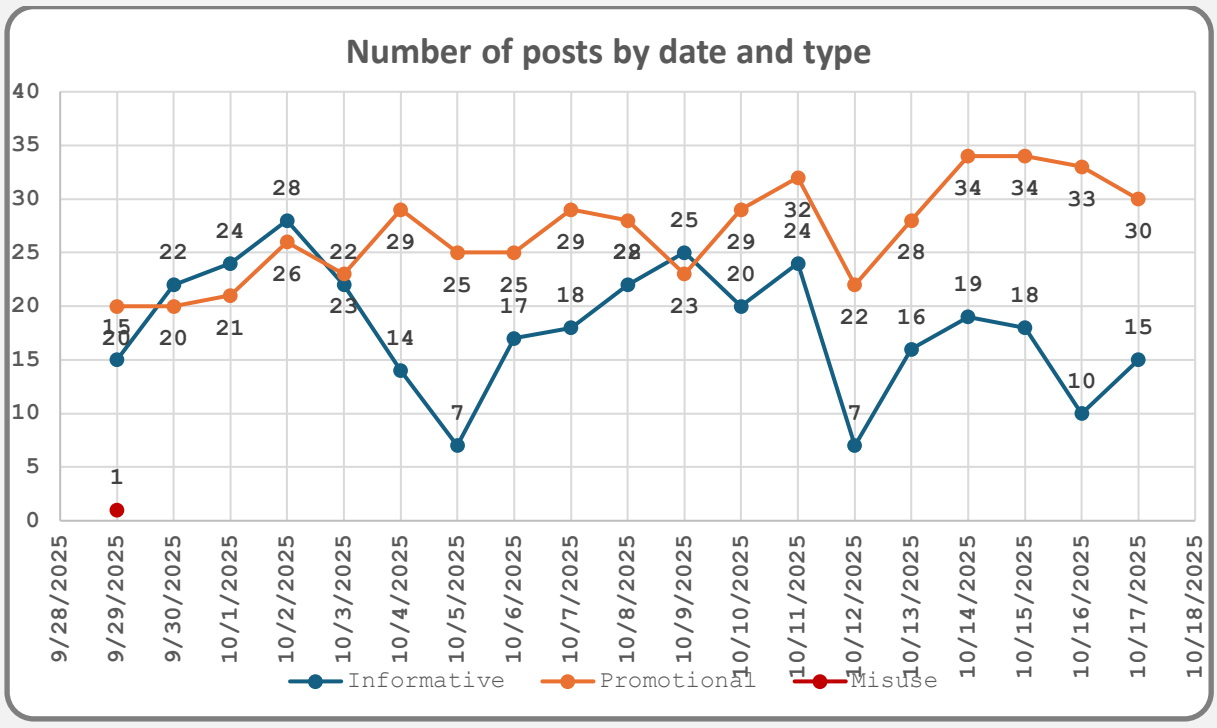


Chart 3: As the campaign developed the number of daily promotional posts increased and the number of informative posts decreased.

Conversely, informational content was less frequent and exhibited variable intensity, with noticeable drops on October 4th and 12th.

These results suggest that institutional communication in the pre-election period was primarily focused on promotion, emphasizing the showcasing of activities and results rather than purely informing citizens or ensuring accountability.

ANALYSIS BY ENTITY TYPE (CENTRAL VS. LOCAL)

4. ANALYSIS BY ENTITY TYPE (CENTRAL VS. LOCAL)

A significant concentration of activity was observed at the central level.

- The **highest number of posts originated from the Government and its representatives**, with the Prime Minister (201 posts) and Deputy Prime Minister (173 posts) being exceptionally active. These profiles functioned primarily as campaign platforms.
- The Ministry of Internal Affairs (139 posts) and the main Government page (46 posts) followed in terms of volume.
- The activity level of **municipalities was considerably lower** on average, though some were quite active (e.g., Bogovinje - 40, Struga - 30, Kumanovo - 19, Butel - 18, Prilep - 16, Kochani - 16).

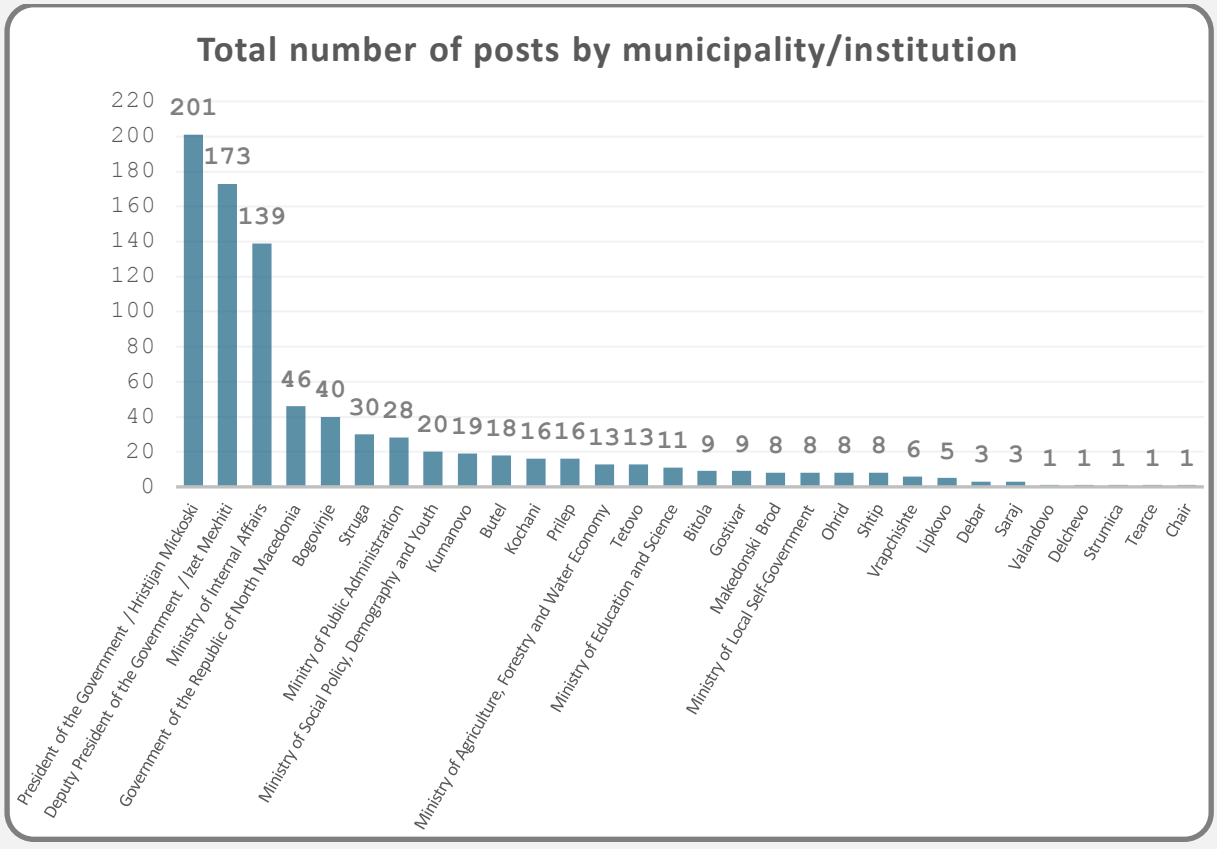


Chart 4: The FB pages that posted most of the content were the Prime Minister's and the Deputy Prime Minister's page.

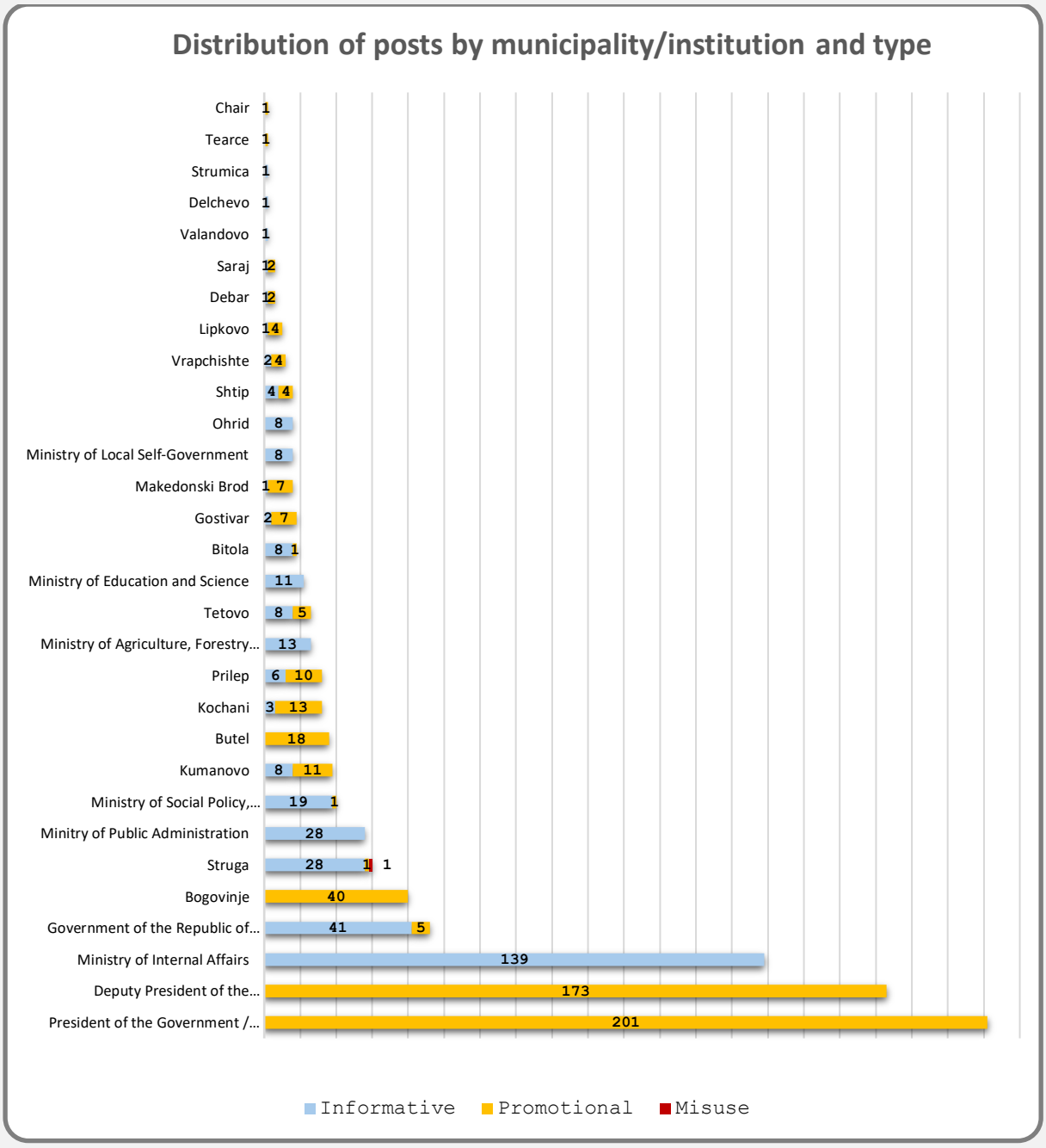


Chart 5: The content posted on the Prime Minister's and Deputy Prime Minister's page was almost exclusively promotional.

Regarding the nature of the content:

- The pages of the **Prime Minister and Deputy Prime Minister were exclusively promotional/campaign-oriented**.
- The main **Government page** had a mix but included promotional content highlighting government figures.
- **Ministries**, particularly Ministry of Internal Affairs (MOI), Ministry of Agriculture, Forestry and Water Economy (MAFWE), Ministry of Education and Science (MES), and

Ministry of Public Administration (MPA), were predominantly informational and neutral. The Ministry of Social Policy Demography and Youth (MSPDY) had one promotional instance.

- **Municipalities** showed a wider range. Some were almost entirely promotional (Butel, Bogovinje), many had a strong promotional lean focused on incumbents and infrastructure projects (Kumanovo, Makedonski Brod, Prilep, Kochani, Gostivar, Vrapchishte, Lipkovo, Debar, Saraj, Tearce, Chair), while others were predominantly or entirely informational/neutral (Strumica, Delchevo, Valandovo, Ohrid, Bitola). Tetovo and Shtip showed a more balanced mix.

Overall, the distribution indicates that communication volume and promotional intensity were heavily concentrated at the central political level (PM, DPM) and in municipalities where incumbents appeared to actively leverage official channels for visibility, particularly through infrastructure promotion. Most core ministries maintained neutrality.

Monitoring of Municipal and Institutional Websites

5. Monitoring of Municipal and Institutional Websites

While the monitoring of official Facebook pages provided a dynamic, real-time view of institutional and political communication during the pre-election period, the simultaneous monitoring of official websites offers a critical complementary perspective on the exercise of institutional neutrality and adherence to legal requirements. Websites serve as the primary legal platform for the publication of mandatory public information.

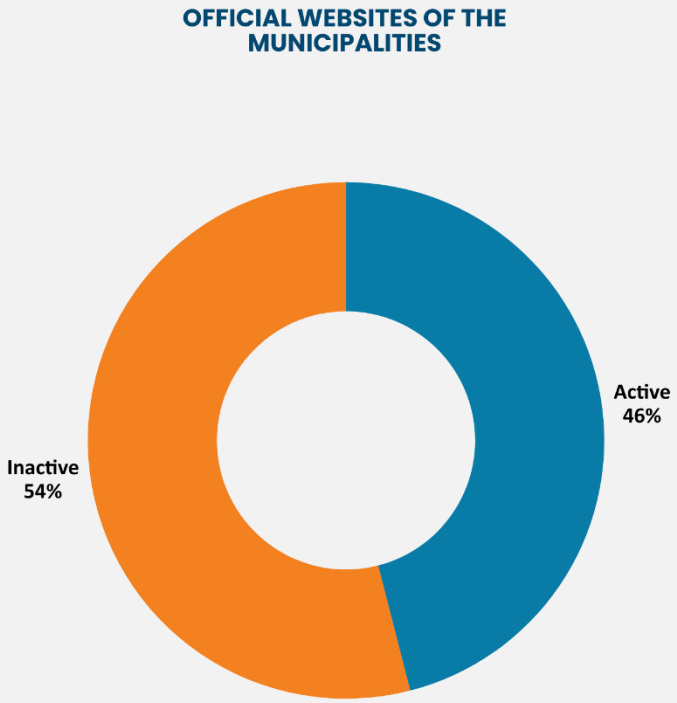
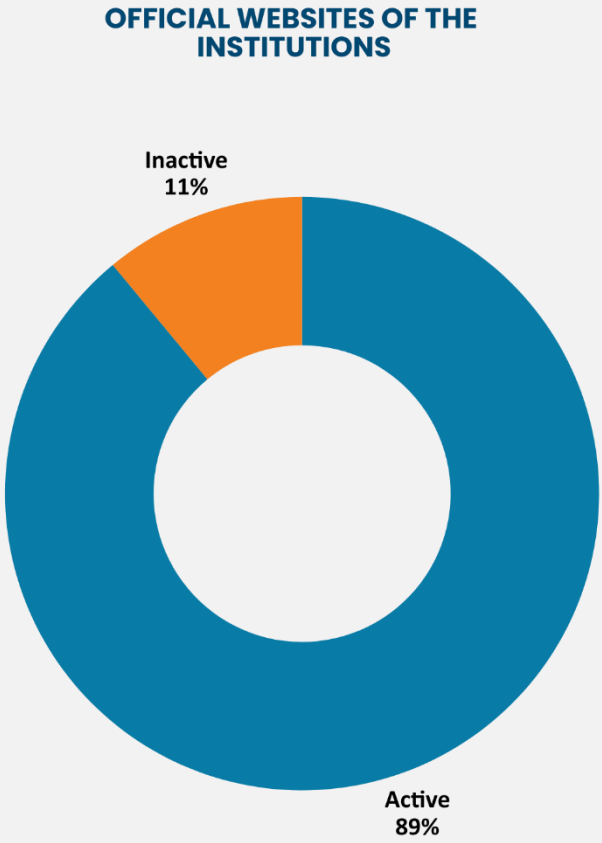


Chart 6: More than half of the monitored official municipal websites were inactive during the monitoring period.

The monitoring covered the existing official websites for the 26 targeted municipalities and 10 central institutions. The high rate of inactivity among municipal websites (14 out of 26 monitored) during the monitored period is a significant barrier to public transparency and accountability. This forces citizens to rely on other, often less formal or verifiable, information channels. Regarding the institutions, it is important to note that there are no public websites specifically dedicated to the PM and DPM. The Ministry of Transport, on the other hand



refrained from publishing anything in the monitored pre-election period. This limited the number of monitored institutional websites to six.

Chart 7: Almost 90% of the monitored institutional websites during the monitoring period were active.

Promotional activity, though lower than on Facebook, persisted, primarily concerning infrastructure announcements.

Promotional activity of municipal webpages persisted in 40% of the posts, primarily concerning infrastructure announcements. Websites publicized the signing of contracts, the commencement, or the completion of projects.

Regarding the institutions, six active monitored webpages had 89 total posts out of which 52 promotional, which is 58.4%. The website of the MOI on the other hand, had total of 125 posts alone, out of which only 21, or 16.8% were classified as promotional, the others were of informative nature.

The official central Government website was dominantly promotional in 57% of their webpage activities (19 out of 33 posts) and it was used to publicize announcements for investments in specific municipalities (e.g., new polyclinic in Butel or hospital strengthening in Prilep).

5.1 Assessment Against the Electoral Code and Democratic Standards

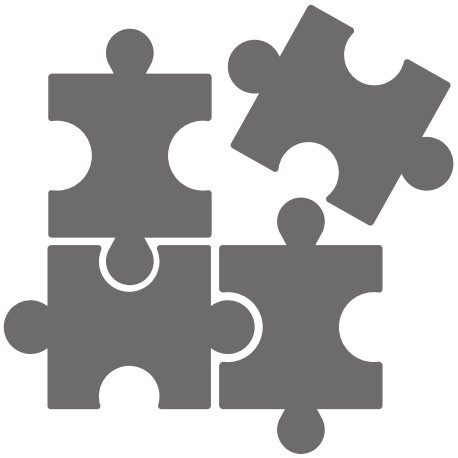
Website monitoring confirms that institutions often prioritize posting about administrative information, leading to better overall neutrality than observed on social media. However, the key concern regarding the MAR persists in several specific content areas.

First, targeted infrastructure promotion was noted on several active municipal websites which published news items detailing the signing of contracts, the commencement, or the completion of infrastructure projects during the restricted period (e.g., Kochani, Delchevo).

Second, around central institution campaigning for the local elections, the official central Government website was used to publicize announcements for investments in specific municipalities. Such publications leverage state resources and the appearance of high office to promote local incumbent parties or candidates just before the election, blurring the distinction between state and party activities.

And third, concerning the displacement of promotion to social media, the observation of largely clean websites alongside highly promotional Facebook pages suggests that institutions are actively seeking to comply with formal restrictions on one channel (the legal website) while strategically conducting political promotion on another (social media).

CONCLUSIONS AND RECOMMENDATIONS



6. CONCLUSIONS AND RECOMMENDATIONS

6.1 Conclusions

The monitoring of public communication on official Facebook pages and on municipal and institutional websites during the pre-election period (September 29 - October 17, 2025) reveals a clear trend: institutional channels were frequently used for **promotional campaign purposes that potentially infringe upon the Electoral Code**, rather than solely for informing citizens in the public interest.

- Nearly **60% of posts exhibited a promotional character**. This widespread practice indicates a significant blurring of the line between informing the public about governmental activities and promoting incumbent officials or parties, particularly concerning Article 8-a of the Electoral Code. This observation aligns with the OSCE/ODIHR findings, which noted that such practices "blurred the line between state and party, contrary to paragraph 5.4 of the 1990 OSCE Copenhagen Document."

- The dichotomy between largely neutral, compliant official websites and overwhelmingly promotional institutional Facebook pages highlights a **strategic behaviour:** institutions maintain minimal compliance on formal channels (websites) while aggressively displacing political and campaign-style promotion to less-regulated social media platforms. This displacement exploits a systemic gap identified by the International Election Observation Missions, which noted that "campaigning on social networks... is not specifically regulated" and that "no oversight authority is mandated to monitor the campaign on social networks." This confirms that institutions are leveraging a specific regulatory vacuum.

- **Promotion of Infrastructure Projects:** The most prevalent potential violation observed was the extensive promotion of ongoing or recently completed infrastructure projects by numerous municipalities and central figures during the restricted 20-day period. Highlighting these achievements, especially when coupled with the visibility of incumbent candidates, raises serious concerns regarding Article 8-a, paragraph 2 (prohibition of public events for projects unless public statements by officeholders or candidates are given at rallies, in media interviews or debates, or as responses to journalists' questions) and potentially paragraph 1 (prohibition **of construction of new infrastructure** projects). The frequent showcase of paving, reconstructions, and new facilities served as implicit campaign messaging. ODIHR EOM also specifically observed that "mayors and high-level government officials inaugurated, visited, or promoted investment and infrastructure projects, effectively undermining these legal safeguards."

- **Personalization around candidates/incumbent public office holders:** A significant number of municipalities (Kumanovo, Butel, Makedonski Brod, Prilep, Kochani) heavily personalized their official communication around incumbent mayors who were candidates. Official activities were framed through their presence and leadership. This practice strongly suggests a misuse of public office and resources (the official communication channel) for electoral advantage, contrary to the spirit and potentially the letter of Article 8-a.
- **Use of official/semi-official profiles for campaigning:** The profiles of the PM and DPM, along with the Mayor of Bogovinje's profile, were used almost exclusively for direct campaign messaging and mobilization. While expected for candidates, using profiles associated with high public office for purely campaign content raises concerns about the use of state resources (staff, information, official platforms) for partisan purposes, potentially violating Article 8-a.
- **Concentration of Activity:** Promotional intensity and volume were highest at the central political level (PM, DPM) and within specific municipalities where incumbents were actively leveraging official channels. While most core ministries maintained neutrality, the overall picture shows a strategic use of public platforms for political gain during the campaign period.
- **Specific Abuses:** The instance in Struga (announcing distribution of air conditioners) stands out as a potential direct violation of Article 8-a, paragraph 1, concerning extraordinary benefits.
- **Deletion of clauses in Article 8 leaves grey areas:** While certain acts no longer constitute formal breaches, they contradict the spirit of equality of opportunity and fair competition. Monitoring findings thus capture governance risks rather than legal violations, underscoring the need for proactive transparency and ethics-based communication. Overall, the amendment shifted Article 8-a from a preventive mechanism to a reactive clause, placing greater responsibility on interpretation, guidance, and self-regulation. These ambiguities remain unresolved and are exacerbated by the last revisions, which reduces regulatory precision while maintaining punitive obligations. This shift effectively transfers the responsibility for interpretation from legal clarity to institutional discretion.

- **Institutional neutrality during elections remains a systemic challenge:** Although explicit bans have been relaxed, ethical obligations persist. The monitoring data reveal that self-promotional communication, particularly at the municipal level, continues to undermine public trust.

In summary, the analysis confirms that public communication in the electoral context was heavily politicized. The widespread promotion of infrastructure achievements and the personalization of official communication around candidates appear inconsistent with the Electoral Code's aim to prevent the misuse of public resources and ensure fair electoral competition.

6.2 Brief Overview by Subject and Post Type on Facebook

Out of 36 total monitored subjects, more than 83,33% were active during the monitoring period. Around 16,67% were inactive. To clarify, active means that these pages or profiles had at least one post during the monitoring period, and inactive means that they had no posts during the monitoring period.

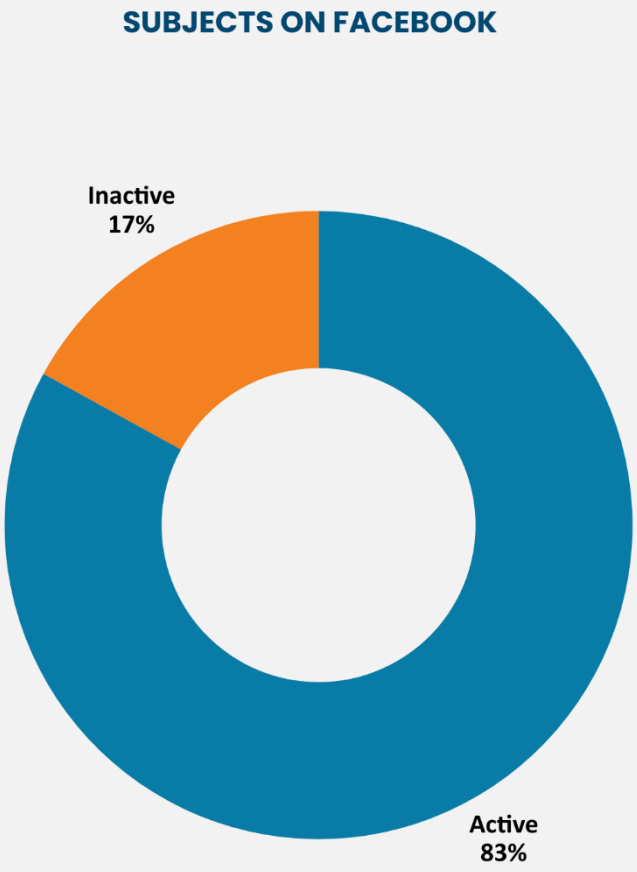


Chart 8: Majority of the monitored subjects (municipalities and institutions) were active on Facebook.

Half of the active subjects were posting predominantly promotional content, related to the activities of officials, infrastructure projects, and public appearances. The number of promotional contents published by these 15 pages/profiles, as part of the total number of posts on Facebook, by the subjects in the monitoring period, amounted to 511 or 59,77%.

On the other hand, almost half of the subjects (14), published 343 posts or 46.67% of the total, with content which was predominantly informational, with institutional, neutral, and

service character (public announcements, reports, meetings). The monitoring team identified one post on Facebook that was identified as abuse or a possible violation of the Election code.

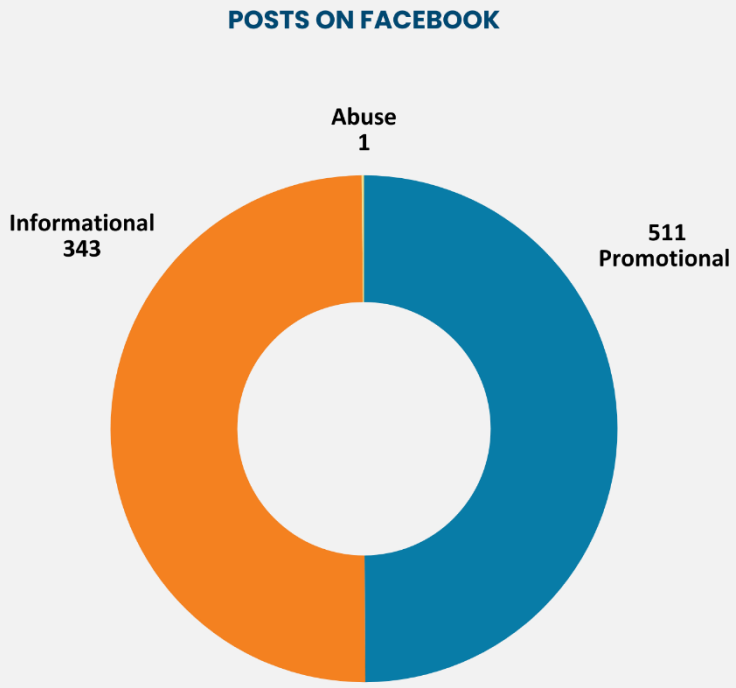


Chart 9: In only one instance the monitoring team identified an obvious possible abuse.

Regarding the distribution of the posts, among the subjects that published most of the predominantly informational posts were the central government, the ministries that were monitored, the Municipalities of Struga (except for one possible abuse), Ohrid, Valandovo, Delchevo, Strumica, Tetovo and Bitola.

When it comes to the predominantly promotional content, it was used by 15 subjects, including the PM, DPM, but also the Municipalities of Kochani, Butel, Prilep, Gostivar, Makedonski Brod, Vrapchishte, Lipkovo, Debar, Sajar, Tearce, Chair and Bogovinje.

Chart 10: Most of the promotional content was published by the Facebook pages of the Prime Minister and the Deputy Prime Minister.

6.3 Recommendations

Based on the findings, the following recommendations are proposed to improve institutional communication practices and ensure compliance with the Electoral Code, especially during election periods:

1. **Strict adherence to Electoral Code Article 8-a:** Institutions at all levels must strictly refrain from initiating or holding public events for infrastructure projects during the monitoring period, unless projects were already budgeted and initiated beforehand and the event is part of a regular schedule. Promotion of ongoing work should be strictly informational, avoiding celebratory tones or highlighting incumbent roles. No extraordinary subsidies or benefits should be announced or disbursed.
2. **Alignment of legislation with international standards:** The 2024 amendment diverges from OSCE/ODIHR Recommendation 2.5 (2021) and EU acquis principles demanding clear safeguards against misuse of administrative resources. The OSCE/ODIHR Statement of Preliminary Findings and Conclusions (2025) called for revisiting Article 8-a to establish enforceable definitions of institutional neutrality and public-interest communication.[6]

[6] North Macedonia, Local Elections, First Round, 19 October 2025: Statement of Preliminary Findings and Conclusions, OSCE/ODHR International Election Observation Mission https://www.osce.org/files/f/documents/d/0/599568.pdf

3. **Clear separation of official duties and campaigning and enhanced regulation:** Incumbents running for re-election must maintain a clear separation between their official functions and campaign activities. Official institutional social media pages should not be used to promote candidacy, campaign events, or partisan achievements. Personal or campaign-specific profiles should be used for electioneering. This aligns with the ODIHR proposed expansions[7] of the Electoral Code, which aim to prohibit public officials from using institutional or official social media profiles to 'support, promote, or discredit election participants'. Adopting this specific provision would close the current regulatory gap.

4. **Develop clear guidelines for institutional communication during elections:** National guidelines should be created and disseminated to all public institutions detailing permissible and prohibited communication activities during the pre-election period, specifically addressing social media use, infrastructure project communication, and the role of officials. The guidelines should explicitly cover all institutional online channels, including official websites and third-party party communication tools. The distinction between permissible communication and prohibited promotion must be applied equally across all digital platforms.

5. **Strengthen oversight and enforcement:** Regulatory bodies responsible for overseeing elections (e.g., State Election Commission, State Commission for Prevention of Corruption and the Agency for Audio and Audio-Visual Media Services) should proactively monitor institutional social media and websites during the restricted period and investigate potential violations of the Electoral Code, imposing sanctions where necessary. They should actively monitor the timing and narrative of announcements related to infrastructure, grants, and subsidies published on official websites to proactively investigate potential non-compliance with Article 8-a provisions.

6. **Training for public officials and communication staff:** Conduct mandatory training for elected officials, candidates holding public office, and public relations staff on the Electoral Code provisions related to misuse of public resources and appropriate communication practices during election campaigns.

7. **Focus on neutral, service-oriented information:** Encourage institutions to prioritize genuinely informational content (service updates, public safety information, legally

[7] Opinion on 2006 Electoral Code, as amended, and Draft Law on amending the Electoral Code, ODIHR-557/2025, https://www.osce.org/files/f/documents/a/3/596869.pdf

required notices) during the election period, minimizing content that could be perceived as self-promotional.

8. **Increase transparency of public spending:** Ensure public access to information regarding budget allocations and expenditures, particularly for infrastructure projects and public events, to allow for scrutiny regarding compliance with election period restrictions.

9. **Promote media and CSO monitoring:** Encourage independent monitoring by media outlets and civil society organizations to report on potential misuse of public resources and institutional communication for campaign purposes.

10. **Reinstate clear preventive norms:** Future amendments should restore explicit bans on inaugurations, openings, and other ceremonial events financed by public funds during the pre-election period. Such norms are essential to restore the preventive balance lost in the 2021 and 2024 revisions.

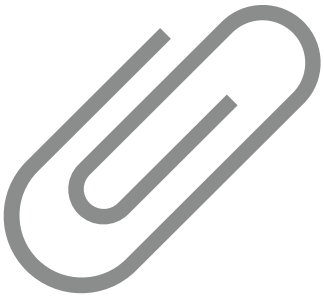
11. **Clarify interpretative criteria:** The SEC and SCPC should jointly issue interpretative guidelines distinguishing public-information duties from electoral promotion, defining operational parameters for communication officers in line with OSCE/ODIHR recommendations.

12. **Interpretative and coordination mechanisms:** Establish an inter-institutional working group (SEC–SCPC–AAVMU) to develop unified guidelines and criteria for Article 8-a enforcement, ensuring consistency and transparency across all government levels. SCPC opinions should be made public and binding during election periods.

13. **Transparency in budget execution:** The Ministry of Finance should maintain an open registry for all election-period expenditures with tagged budget lines and real-time public access.

14. **Strategic outlook:** Ensuring fair competition now relies on transparency, ethical conduct, and proactive oversight rather than strict prohibitions. Reinstituting preventive provisions should be prioritised in future reforms under EMFA and Chapter 23 of the EU accession framework.

ANNEX I



7. ANNEX I

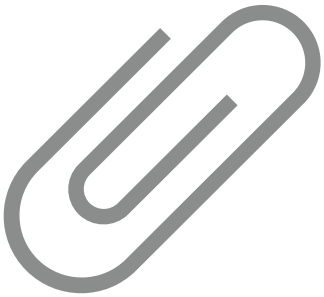
7.1 Table of monitored entities on Facebook

No	Entity	Electoral District	Facebook Page	Ruling Party	Active
1	Lipkovo	ED2	/komuna.elikoves.3	DUI	Yes
2	Studeničani	ED1	/studenicani.gov.mk	DPA	No
3	Kumanovo	ED2	/opstinakumanovo	ZNAM	Yes
4	Strumica	ED4	/opshtina.strumica	SDSM	Yes
5	Dolneni	ED5	/OpshtinaDolneni	DUI	No
6	Čair	ED2	/cair.gov.mk	Vlen / Democratic Movement	Yes
7	Butel	ED2	/zaopstinabutel	VMRO-DPMNE	Yes
8	Gostivar	ED6	/KomunaGostivar	AA / Taravari	Yes
9	Vrapčište	ED6	/komunavrapcisht	AA / Taravari	Yes
10	Delčevo	ED3	/OpstinaDelchevo	SDSM	Yes
11	Kisela Voda	ED1	/OpstinaKiselaVoda	VMRO-DPMNE	No
12	Struga	ED5	/komunaestruges	DUI	Yes
13	Debar	ED6	/MunicipalityofDebar	DUI	Yes
14	Centar Župa	ED6	/merkezjupa	DPTM	No
15	Valandovo	ED4	/valandovo.gov.mk	SDSM	Yes
16	Saraj	ED1	/komunasaraj	DUI	Yes
17	Makedonski Brod	ED1	/opshtinamakedonskibrod	VMRO-DPMNE	Yes
18	Tetovo	ED6	/komunaofficial	Vlen / BESA	Yes

No	Entity	Electoral District	Facebook Page	Ruling Party	Active
19	Bogovinje	ED6	/besnikemshiu	DUI	Yes
20	Tearce	ED6	/komunatearces.official	DUI	Yes
21	Bitola	ED5	/OpstinaBitola	VMRO-DPMNE	Yes
22	Prilep	ED4	/opshtinaprilep	VMRO-DPMNE	Yes
23	Ohrid	ED5	/MunicipalityofOhrid	VMRO-DPMNE	Yes
24	Štip	ED3	/OpstinaStip	VMRO-DPMNE	Yes
25	Kočani	ED3	/opstinakocani	Independent	Yes
26	Šuto Orizari	ED2	/opshtinashutorizari	Decisive for Change	No
27	Government of RNM	–	/VladaMK	–	Yes
28	Prime Minister	–	/MickoskiHristijan	VMRO-DPMNE	Yes
29	Deputy PM / Izet Mejiti	–	/share/17G9sBntJC	DUI	Yes
30	Min. of Transport	–	/profile?id=100068981597208	–	No
31	Min. of Local Self-Gov.	–	/Ministerstvo-za-lokalna-samouprava	–	Yes
32	Min. of Interior	–	/mvr.gov.mk	–	Yes
33	Min. of Agriculture	–	/mzsv.gov.mk	–	Yes
34	Min. of Social Policy	–	/MTSPmk	–	Yes
35	Min. of Education	–	/obrazovanieinauka	–	Yes

No	Entity	Electoral District	Facebook Page	Ruling Party	Active
36	Min. of Public Administration	–	/profile?id=61562616617342	–	Yes

ANNEX II



8. ANNEX II

8.1 ANALYSIS BY POLITICAL PARTY

Analyzing the ruling parties associated with the monitored municipalities and institutions revealed:

- The largest volume of posts was linked to municipalities and institutions led by **DUI and VMRO-DPMNE**. Both central government figures (PM Mickoski - VMRO-DPMNE, DPM Mexhiti – VLEN/Democratic Movement (DM)) were extremely active promotionally.
- Among municipalities, those led by DUI (Lipkovo, Struga, Debar, Saraj, Bogovinje, Tearce) and VMRO-DPMNE (Butel, Makedonski Brod, Bitola, Prilep, Ohrid, SHtip) generated the most content overall.
- For both parties, **promotional content was dominant or very significant** across their associated active entities. Examples: Butel (100% promo), Bogovinje (100% promo), Makedonski Brod (87.5% promo), Prilep (62.5% promo), Lipkovo (80% promo), Debar (66.7% promo), Saraj (66.7% promo).
- The single instance of **abuse** was linked to a DUI-led municipality (Struga).
- Municipalities linked to other parties (ZNAM - Kumanovo; AA/Taravari (AKI coalition) - Gostivar, Vrapchishte; VLEN/BESA - Tetovo; VLEN/DM - Chair) also showed promotional activity, sometimes significantly outweighing informational content (Kumanovo 58% promo, Gostivar 78% promo, Vrapchishte 67% promo).
- The municipality led by an **independent mayor** (Kochani) also exhibited a strong promotional focus (81% promo), heavily featuring the acting mayor/candidate.

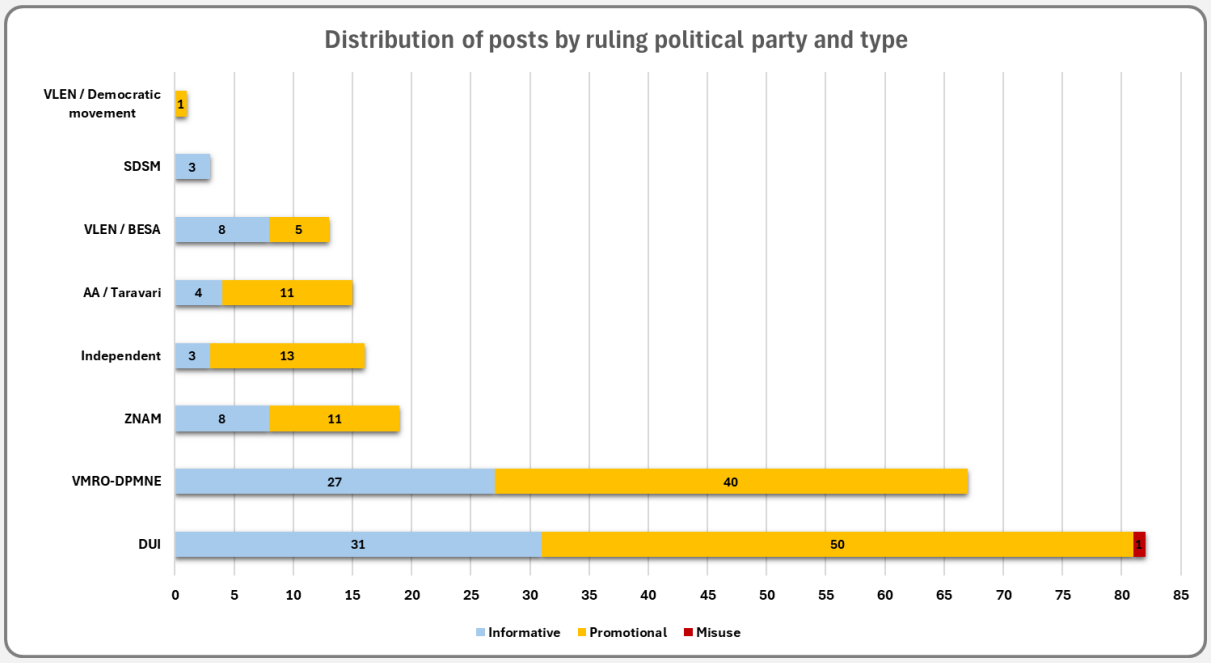
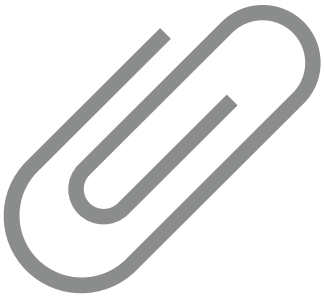


Chart 11: Having in mind the political prominence of the incumbents, the highest number of posts in the monitoring period were published by DUI and VMRO-DPMNE.

Overall, this distribution suggests that the practice of using official communication channels for promotion during the pre-election period was widespread among the major ruling parties at both central and local levels, often focusing on incumbent figures and infrastructure projects, raising concerns about adherence to Electoral Code principles.

ANNEX III



9. ANNEX III

9.1 DETAILED ANALYSIS BY MUNICIPALITIES

This section provides analysis for each active monitored entity among the municipalities that are part of the methodology.

1. Lipkovo (DUI/AKI)

- **Post Breakdown:** 5 total posts; 1 Informational (20.00%), 4 Promotional (80.00%).
- **Analysis:** Posts were predominantly promotional, focusing on infrastructure activities like paving local streets, regulating riverbeds, and installing sidewalks. The tone was positive, emphasizing municipal investments and improvements. One neutral post concerned a cultural event.
- **Assessment Against Electoral Code:** The focus on promoting infrastructure projects (paving, sidewalks) during the restricted pre-election period raises potential concerns regarding Article 8-a, which limit starting and publicizing such projects.

2. Kumanovo (ZNAM)

- **Activity:** Active
- **Post Breakdown:** 19 total posts; 8 Informational (42.11%), 11 Promotional (57.89%).
- **Analysis:** Kumanovo published a significant number of promotional posts focused on showcasing the activities, appearances, and public statements of **Mayor Maksim Dimitrievski, who was also a candidate** for re-election. Posts covered diverse events, but institutional communication was heavily personalized around the mayor's figure. Even cultural or commemorative content featured the mayor prominently, creating an effect of continuous public promotion contributing to his campaign visibility. Overall, the page was dominated by promotional content.
- **Assessment Against Electoral Code:** The heavy personalization and use of the official municipal page to highlight the incumbent candidate's activities and presence at numerous events, including those involving municipal projects or functions, blurs the line between official duties and campaigning, raising concerns about the misuse of public resources/position for electoral advantage (potentially inconsistent with the spirit of Art. 8-a).

3. Strumica (SDSM)

- **Activity:** Active
- **Post Breakdown:** 1 total post; 1 Informational (100.00%).

- **Analysis:** Only one post was shared, clearly informational and neutral, related to the commemoration of the October 11 national holiday. The communication was professional and institutional.
- **Assessment Against Electoral Code:** No potential violations observed.

4. Chair (VLEN / Democratic Movement)

- **Activity:** Active
- **Post Breakdown:** 1 total post; 1 Promotional (100.00%).
- **Analysis:** A single promotional post regarding a public cleaning action, presented as part of the municipality's continuous efforts. The tone was positive, showcasing responsible management.
- **Assessment Against Electoral Code:** A single post about a routine municipal service like cleaning is less likely to be a violation, unless specifically framed to promote a candidate or initiated extraordinarily during the campaign period. Insufficient data for a strong assessment, but on its own, seems low risk.

5. Butel (VMRO-DPMNE)

- **Activity:** Active
- **Post Breakdown:** 18 total posts; 0 Informational (0.00%), 18 Promotional (100.00%).
- **Analysis:** Communication was **entirely promotional**. Every post focused on the incumbent mayor (also a candidate), highlighting "fulfilled promises," initiated or completed infrastructure projects (pools, bridge, sports centres, street reconstructions). Even administrative topics were framed around the mayor's presence or statements, using narratives of achievement and continuity. The tone was declarative and slogan based.
- **Assessment Against Electoral Code:** The exclusive focus on promoting the incumbent mayor/candidate and showcasing numerous infrastructure projects (announcing starts, highlighting completions/progress) during the restricted period appears strongly inconsistent with Article 8-a, paragraphs 1 and 2. It represents a clear use of official channels for campaign-like promotion.

6. Gostivar (AA/AKI/Taravari)

- **Activity:** Active
- **Post Breakdown:** 9 total posts; 2 Informational (22.22%), 7 Promotional (77.78%).
- **Analysis:** Posts were predominantly promotional, related to infrastructure and communal activities (completion of sports grounds, road paving, installing

photovoltaic panels). Emphasis was on concrete results and investments. Two neutral posts covered a meeting with an ambassador and a holiday greeting.

- **Assessment Against Electoral Code:** The frequent promotion of infrastructure projects (paving, sports grounds finishing) during the restricted period raises potential concerns regarding Article 8-a, paragraph 2.

7. Vrapchishte (AA/AKI/Taravari)

- **Activity:** Active
- **Post Breakdown:** 6 total posts; 2 Informational (33.33%), 4 Promotional (66.67%).
- **Analysis:** Posts were mainly promotional, focusing on infrastructure work and local government activities (street reconstruction, **start** of construction projects, road arrangements), portraying the administration as effective. Informational posts were limited to institutional activities (meetings).
- **Assessment Against Electoral Code:** Promoting infrastructure projects, especially announcing the *start* of construction projects during the campaign period, appears inconsistent with Article 8-a, paragraphs 1 and 2.

8. Delchevo (SDSM)

- **Activity:** Active
- **Post Breakdown:** 1 total post; 1 Informational (100.00%).
- **Analysis:** A single neutral post informing about the commemoration of the October 11 holiday using only photos without promotional text. Standard institutional reporting.
- **Assessment Against Electoral Code:** No potential violations observed.

9. Struga (DUI)

- **Activity:** Active
- **Post Breakdown:** 30 total posts; 28 Informational (93.33%), 1 Promotional (3.33%), 1 Abuse (3.33%).
- **Analysis:** Highly active but mostly neutral and informational, often sharing content from partners or reporting on cultural/educational/environmental events. Multilingual communication. One promotional post positively framed the mayor. One post announced the allocation of air conditioners during the campaign.
- **Assessment Against Electoral Code:** The announcement regarding the distribution of air conditioners during the campaign period represents a potential abuse under Article

8-a, paragraph 1 (prohibition of extraordinary payments/benefits). The single promotional post highlighting the mayor raises minor concerns about personalization.

10. Debar (DUI/AKI)

- **Activity:** Active
- **Post Breakdown:** 3 total posts; 1 Informational (33.33%), 2 Promotional (66.67%).
- **Analysis:** Communication focused on informing and affirming municipal activities, with promotional content dominating. Emphasis was on showing results of infrastructure projects (new water supply, waste management improvements). Tone was positive, showcasing commitment. One neutral informational post.
- **Assessment Against Electoral Code:** Promoting infrastructure project results during the restricted period raises potential concerns under Article 8-a, paragraph 1.

11. Valandovo (SDSM)

- **Activity:** Active
- **Post Breakdown:** 1 total post; 1 Informational (100.00%).
- **Analysis:** A single informational and administrative post regarding a call for municipal awards applications. Content was entirely neutral.
- **Assessment Against Electoral Code:** No potential violations observed.

12. Saraj (DUI/AKI)

- **Activity:** Active
- **Post Breakdown:** 3 total posts; 1 Informational (33.33%), 2 Promotional (66.67%).
- **Analysis:** A mix of content. The informational post was about solar systems in schools (project supported by a foundation). Promotional posts related to the mayor's activities (inspecting infrastructure works, receiving students), emphasizing his presence and engagement.
- **Assessment Against Electoral Code:** The posts highlighting the mayor's inspection of infrastructure works and official activities lean towards self-promotion using the municipal platform, raising concerns about blurring lines during the election period (potentially inconsistent with the spirit of Art. 8-a).

13. Makedonski Brod (VMRO-DPMNE)

- **Activity:** Active
- **Post Breakdown:** 8 total posts; 1 Informational (12.50%), 7 Promotional (87.50%).

- **Analysis:** Posts were predominantly promotional, centering on **Mayor Zharko Risteski, also a candidate** for re-election. Content focused on his presence and active role in various local events (infrastructure activities, sports/cultural events, meetings). Frequent exposure created personalized promotion contributing to his campaign visibility.
- **Assessment Against Electoral Code:** The strong personalization and use of the official page to showcase the incumbent candidate mayor at events, including those related to municipal functions and infrastructure, blurs the line between official duties and campaigning, raising concerns regarding Art. 8-a. Promoting infrastructure activities during this period adds to potential concerns under Art. 8-a, paragraph 1.

14. Tetovo (VLEN/BESA)

- **Activity:** Active
- **Post Breakdown:** 13 total posts; 8 Informational (61.54%), 5 Promotional (38.46%).
- **Analysis:** A mix of informational service updates (water outages, construction work) and promotional posts showcasing municipal achievements (paving streets, cleaning landfills, arranging public spaces). Also included posts with positive social tone (student recognitions, event support). Tone was moderate and institutional.
- **Assessment Against Electoral Code:** While providing service information is appropriate, the promotional posts highlighting municipal achievements (paving, cleaning) during the election period raise concerns under Art. 8-a, paragraph 1, as they can serve as indirect promotion of the incumbent local government. Announcing planned works (like paving) could also raise concerns under Art. 8-a, paragraph 2 if interpreted as commencement.

15. Bogovinje (DUI/AKI)

- **Activity:** Active
- **Post Breakdown:** 40 total posts; 0 Informational (0.00%), 40 Promotional (100.00%).
- **Analysis:** The monitored profile belonged to the **incumbent Mayor Besnik Emshiu, also a candidate**. All posts were **entirely promotional campaign content**: opening headquarters, rallies with party leaders, constant calls for support/votes, and highlighting realized/planned projects (school infrastructure, roads/sewage). Communication was fully election-politically oriented with mobilizing rhetoric.
- **Assessment Against Electoral Code:** The use of an official (or perceived official due to position) profile *exclusively* for direct political campaigning represents a clear conflation of the official role with candidacy, potentially violating the principles of Art.

8-a regarding misuse of public position/resources. Furthermore, the promotion of infrastructure projects during the campaign period raises concerns under Art. 8-a, paragraphs 1 and 2.

16. Tearce (DUI/AKI)

- **Activity:** Active
- **Post Breakdown:** 1 total post; 1 Promotional (100.00%).
- **Analysis:** A single promotional post showcasing municipal activity related to infrastructure improvements in schools (heating systems).
- **Assessment Against Electoral Code:** Promoting infrastructure improvements during the restricted election period raises potential concerns under Article 8-a, paragraph 1.

17. Bitola (VMRO-DPMNE)

- **Activity:** Active
- **Post Breakdown:** 9 total posts; 8 Informational (88.89%), 1 Promotional (11.11%).
- **Analysis:** Content was predominantly neutral and institutional, informing about activities related to education, energy efficiency, public safety, culture, and sports. Only one post had a promotional element, related to investments in school infrastructure, portraying the municipality positively. No personalized or election-focused promotion.
- **Assessment Against Electoral Code:** The single promotional post related to school infrastructure investment could raise minor concerns under Art. 8-a, paragraph 1, but the overall communication profile appears largely compliant.

18. Prilep (VMRO-DPMNE)

- **Activity:** Active
- **Post Breakdown:** 16 total posts; 6 Informational (37.50%), 10 Promotional (62.50%).
- **Analysis:** Prilep had a high frequency of promotional posts, largely because most content on the official page consisted of **shared posts from Mayor Borche Jovcheski**. The mayor was the central figure, present at various events, openings, and visits, emphasizing results and projects. Informational posts covered public events and council sessions. The dominance of content highlighting the mayor created a distinct promotional tone, shifting communication towards a personalized direction.
- **Assessment Against Electoral Code:** Sharing the mayor's posts extensively on the official municipal page, where he highlights his activities and projects during the

election period, constitutes a strong case of personalization and potential misuse of official channels for campaign advantage, raising concerns under Art. 8-a. Promotion of projects adds concerns regarding Art. 8-a, paragraph 2.

19. Ohrid (VMRO-DPMNE)

- **Activity:** Active
- **Post Breakdown:** 8 total posts; 8 Informational (100.00%).
- **Analysis:** Communication was exclusively neutral and institutional, informing the public about regular administrative and public activities (council sessions, public surveys, meetings, cultural events). Formal and transparent, without highlighting individuals or political affirmation.
- **Assessment Against Electoral Code:** No potential violations observed.

20. Shtip (VMRO-DPMNE)

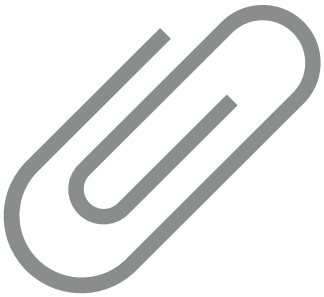
- **Activity:** Active
- **Post Breakdown:** 8 total posts; 4 Informational (50.00%), 4 Promotional (50.00%).
- **Analysis:** A combination of informational and promotional content. Neutral posts conveyed public interest information (contests, notices, interventions). Promotional posts highlighted the municipality's role in improving quality of life, cultural offerings, and urban services, creating a positive image without overt political bias.
- **Assessment Against Electoral Code:** The promotional posts highlighting the municipality's role and achievements, while not overtly partisan, could still be interpreted as promoting the incumbent government during the restricted period, potentially raising concerns under Art. 8-a, paragraph 2.

21. Kochani (Independent)

- **Activity:** Active
- **Post Breakdown:** 16 total posts; 3 Informational (18.75%), 13 Promotional (81.25%).
- **Analysis:** Communication was predominantly promotional. Most posts related to the activities of the **acting mayor, also a candidate**, highlighting infrastructure projects (street reconstructions, public space improvements, utility upgrades), contract signings, and grants. Neutral content focused on administrative notices and cultural/educational projects. Prominence of the acting mayor contributed to heightened political visibility.
- **Assessment Against Electoral Code:** The heavy focus on promoting infrastructure projects and the activities of the acting mayor/candidate through the official municipal

page raises significant concerns regarding both the personalization aspect (misuse of position/resources under Art. 8-a) and the specific prohibitions on promoting infrastructure projects during the campaign (Art. 8-a, paragraphs 1 and 2).

ANNEX IV



10. ANNEX IV

10.1 DETAILED ANALYSIS BY INSTITUTIONS

This section provides analysis for each active monitored entity among the institutions that are part of the methodology.

1. Government of the Republic of North Macedonia

- **Activity:** Active
- **Post Breakdown:** 46 total posts; 41 Informational (89.13%), 5 Promotional (10.87%).
- **Analysis:** Presented a mix. Most posts were informational/institutional (international meetings, MoUs, ministry activities). However, promotional posts focused on **Prime Minister Hristijan Mickoski and specific ministers**, emphasizing their roles in reforms, municipal visits, and investments, often with a personal tone highlighting leadership.
- **Assessment Against Electoral Code:** While the volume of promotional posts is relatively low compared to informational ones, their existence on the official Government page, particularly those highlighting the PM and ministers visiting municipalities or discussing investments during the election period, blurs the line between governmental duty and political promotion, potentially raising concerns under the spirit of Art. 8-a regarding misuse of public resources/position for visibility.

2. Prime Minister (Hristijan Mickoski)

- **Activity:** Active
- **Post Breakdown:** 201 total posts; 0 Informational (0.00%), 201 Promotional (100.00%).
- **Analysis:** Posts represented clearly defined and intensive **election communication**, fully focused on mobilizing voters using campaign slogans and calls to vote. All content was promotional, highlighting candidates, rallies, and party messages. Even institutional or media appearances were framed within the election narrative.
- **Assessment Against Electoral Code:** While the content is overtly campaign material appropriate for a candidate/party leader, potential violations arise if state resources (e.g., staff funded by the state budget working on the PM's official page, integration of official travel/duties into campaign messaging) were used for its creation or dissemination, which would contravene Art. 8-a. The heavy promotion of infrastructure projects, even within a campaign narrative, also touches upon concerns

related to Art. 8-a, paragraphs 1 and 2, especially if framed as governmental achievements being highlighted for electoral gain.

3. Deputy Prime Minister Izet Mexhiti

- **Activity:** Active
- **Post Breakdown:** 173 total posts; 0 Informational (0.00%), 173 Promotional (100.00%).
- **Analysis:** Similar to the PM's page, this profile served as a platform for continuous and clearly promotional communication directed at citizens, focused on promoting the candidate (Mexhiti himself for Mayor of Chair) and the VLEN movement, using campaign slogans. Posts highlighted infrastructure, social issues, and mobilization calls.
- **Assessment Against Electoral Code:** Similar to the PM's profile, the content is campaign material. Potential violations under Art. 8-a could arise from the use of resources associated with the Deputy Prime Minister's office (staff, travel, access) for campaign purposes. Promoting infrastructure achievements/plans during the campaign period also raises concerns under Art. 8-a, paragraphs 1 and 2.

4. Ministry of Local Self-Government

- **Activity:** Active
- **Post Breakdown:** 8 total posts; 8 Informational (100.00%).
- **Analysis:** Communication was moderate and institutional, focusing on current activities, international cooperation, and support for local/regional development processes. Posts about the Minister's attendance at events were within institutional obligations.
- **Assessment Against Electoral Code:** No potential violations observed.

5. Ministry of Internal Affairs

- **Activity:** Active
- **Post Breakdown:** 139 total posts; 139 Informational (100.00%).
- **Analysis:** Highly active but maintained a fully neutral, institutional approach focused on public safety, transparency, operational activities (arrests, crime reports, traffic control), warnings, and international cooperation. Communication related to elections focused on guaranteeing a peaceful process.
- **Assessment Against Electoral Code:** No potential violations observed. Communication appears compliant.

6. Ministry of Agriculture, Forestry and Water Economy

- **Activity:** Active
- **Post Breakdown:** 13 total posts; 13 Informational (100.00%).
- **Analysis:** Consistent, informative, and professional communication focused on sector policies, current activities, and farmer support opportunities. Tone was official and neutral.
- **Assessment Against Electoral Code:** No potential violations observed.

7. Ministry of Social Policy, Demography and Youth

- **Activity:** Active
- **Post Breakdown:** 20 total posts; 19 Informational (95.00%), 1 Promotional (5.00%).
- **Analysis:** Predominantly institutional and public-service communication, focusing on awareness campaigns (gender-based violence) and service information (social benefits payments). One post with potential electoral impact was identified: the Minister's visit to Zhelino municipality, showcasing cooperation with the mayor and promoting local investments.
- **Assessment Against Electoral Code:** The single promotional post featuring the Minister's visit and highlighting local investments during the election period could be seen as blurring the line between official duties and providing promotional visibility in a local context, raising minor concerns under Art. 8-a.

8. Ministry of Education and Science

- **Activity:** Active
- **Post Breakdown:** 11 total posts; 11 Informational (100.00%).
- **Analysis:** Continuous and transparent communication focused on educational policies, student/teacher support, and infrastructure improvements. Reported on activities like the start of the school year, projects, public calls. Tone was neutral and informative.
- **Assessment Against Electoral Code:** No potential violations observed.

9. Ministry of Public Administration

- **Activity:** Active
- **Post Breakdown:** 28 total posts; 28 Informational (100.00%).

- **Analysis:** Maintained a professional and institutional tone, focusing on reform processes, digital transformation, capacity building through training, and international cooperation. Communication showed institutional progress without partisan aspects.
- **Assessment Against Electoral Code:** No potential violations observed.