



Office for Democratic Institutions and Human Rights

# FEDERAL REPUBLIC OF GERMANY

ELECTIONS TO THE FEDERAL PARLIAMENT  
(BUNDESTAG)

27 September 2009

OSCE/ODIHR NEEDS ASSESSMENT MISSION REPORT

15-17 July 2009



Warsaw  
5 August 2009

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**FEDERAL REPUBLIC OF GERMANY  
ELECTIONS TO THE FEDERAL PARLIAMENT (BUNDESTAG)  
27 September 2009**

**OSCE/ODIHR Needs Assessment Mission Report**

**I. INTRODUCTION**

On 9 January 2009, the Organization for Security and Co-operation in Europe's Office for Democratic Institutions and Human Rights (OSCE/ODIHR) was invited by the Permanent Mission of the Federal Republic of Germany to the OSCE to observe the 27 September 2009 elections to the Federal Parliament (*Bundestag*). The OSCE/ODIHR undertook a Needs Assessment Mission (NAM) from 15 to 17 July 2009. The NAM included Ms. Tatyana Bogussevich, OSCE/ODIHR Election Adviser, Mr. Nikolai Vulchanov, OSCE/ODIHR external consultant, and Mr. Gilles Saphy, OSCE/ODIHR external consultant.

The purpose of the OSCE/ODIHR NAM was to assess the pre-election environment and the preparations for the elections, and to make recommendations regarding possible OSCE/ODIHR activity in relation to the upcoming elections. The OSCE/ODIHR NAM met with the Federal Foreign Office, the Federal Ministry of the Interior, the *Land* Returning Officer for Berlin and the Election Scrutiny Board, as well as representatives of political parties and the media. A list of meetings can be found in the Annex to this report.

The OSCE/ODIHR is grateful to the Federal Foreign Office for its assistance and co-operation in organizing the NAM. The OSCE/ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM.

**II. EXECUTIVE SUMMARY**

According to the Basic Law (the Constitution), the Federal Republic of Germany is a democratic and social republic consisting of 16 states (*Länder*),<sup>1</sup> which enjoy large autonomy in the exercise of state powers.

The Federal Parliament, the *Bundestag*, in principle comprises 598 members, subject to variations resulting from the implementation of the system. The representatives serve a four-year term. Half are elected in 299 single-seat electoral districts (SSEDs), with the other half elected according to a proportional representation system with closed party lists.

The legal framework appears to provide a sound basis for the conduct of democratic elections. German citizens who have reached 18 years of age and who have resided in the country at some point during their life for at least three months continuously are entitled to vote and are included on voter lists prepared by the local authorities on the basis of the civil registry. Voters abroad and those planning to be away from their place

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<sup>1</sup> The term "states" is the closest literal English language translation of the German word "*Länder*" (in plural form), which is used in the Basic Law to refer to the territorial administrative divisions of Germany. The singular form is "*Land*".

of registered residence on election day are entitled to vote by mail. While election legislation envisages the possibility of electronic voting, this form of voting will not be used in the upcoming elections.

The OSCE/ODIHR NAM interlocutors expressed an overwhelming trust in the four-tiered election administration, comprising election committees at the federal, *Land*, single-mandate district and precinct levels.

The electorate can vote for individual candidates in SSEDs and for party lists in the *Länder*. As of 17 July, 21 parties and political associations were entitled to nominate candidates and lists.

Although the election legislation does not contain detailed provisions on the conduct of the pre-election campaign, political parties confirmed to the OSCE/ODIHR NAM that they are able to compete on a level playing field and have equitable access to the media. The active phase of the election campaign is expected to start in early September.

Campaign finance is left unregulated by the election legislation. There is no ceiling on total campaign expenditures and no restrictions on sources of income. Election contestants are not bound by campaign finance disclosure requirements. However, campaign financing is part of general party financing and detailed reports must be submitted by all political parties to the Parliament on an annual basis.

According to OSCE/ODIHR NAM interlocutors, a broad range of public and private media provide voters with diverse and balanced information on election contestants. The public broadcasters plan to allocate free airtime for campaign spots for political parties in line with the principle of “gradual” equality, which takes into account the strength of parties in the Parliament, and to hold debates and interviews with candidates.

The OSCE/ODIHR NAM noted a high level of confidence in the overall integrity of the electoral process. A number of legal provisions emphasizes the public nature of the electoral process and do not preclude election observation by any interested parties. The electoral legislation, however, does not contain explicit provisions for the presence of observers and, therefore, is not fully compliant with paragraph 8 of the OSCE Copenhagen Document. All OSCE/ODIHR NAM interlocutors welcomed a possible observation activity, stating that such activity would underscore the overall transparency of the process and would present an opportunity to review the existing electoral practices in Germany. The OSCE/ODIHR has never conducted a comprehensive election activity in Germany

Based on the findings outlined in this report, and especially the stated interest in an OSCE/ODIHR activity and the fact that none of the interlocutors expressed any concerns related to the conduct of election day itself, the OSCE/ODIHR NAM recommends the deployment of an Election Assessment Mission (EAM) to the 27 September parliamentary elections. The OSCE/ODIHR EAM could focus, in particular, on the legal framework, administration of elections, campaign financing, postal voting and access for observers. In line with standard practice for EAMs, the OSCE/ODIHR would not undertake comprehensive and systematic observation of election day. It would, however, seek to visit several *Länder* to follow the election process.

### III. FINDINGS

#### A. BACKGROUND

According to Article 20 of the Basic Law (*Grundgesetz*), the Federal Republic of Germany is a democratic and social state, consisting of 16 states (*Länder*), vested with large autonomy in the exercise of state powers.

The Federal Parliament, the *Bundestag*, is the main body responsible for the legislative process and scrutiny of the government and its work. The Federal Council (*Bundesrat*) is the body through which the *Länder* participate in the legislation at the federal level. The *Bundesrat* consists of members appointed by the governments of the *Länder* and has authority to review and grant consent on government bills before their submission to the *Bundestag*. It also approves all legislation affecting the interests of the *Länder*.

Executive power is vested in the Federal Cabinet led by the Federal Chancellor. The Federal Chancellor is elected by the majority of the *Bundestag* on the proposal of the Federal President for the duration of the four-year legislative term. The Federal President is elected by the Federal Convention, which consists of members of the *Bundestag* and *Länder* parliaments.

In the context of elections, the Federal Constitutional Court (*Bundesverfassungsgericht*; FCC) is the highest court dealing with constitutional matters, including the protection of the constitutional rights of citizens, and also frequently issues interpretative rulings applicable to elections.

Six political parties are represented in the outgoing Parliament.

The Christian Democratic Union (*Christlich Demokratische Union Deutschlands*; CDU) is a centre-right conservative party. The Christian Socialist Union in Bavaria (*Christlich-Soziale Union in Bayern*; CSU) is the CDU's sister party, and operates only in the state of Bavaria. While remaining separate political structures, the CDU and CSU co-operate at the federal level and together represent the largest political formation in Germany, jointly holding 226 seats in the Parliament.

The centre-left Social Democratic Party of Germany (*Sozialdemokratische Partei Deutschlands*; SPD) is the oldest political party in the country. The party gained 222 seats in the 2005 elections. The SPD has subsequently become the CDU/CSU's partner in a grand coalition government, with Angela Merkel of the CDU elected as the Federal Chancellor and parties sharing the ministerial posts in the Federal Cabinet equally.

The third strongest party in the outgoing Parliament is the liberal Free Democratic Party (*Freie Demokratische Partei*; FDP), with 61 seats. It is followed by the Left Party (*Die Linke*) with a socialist orientation, holding 54 seats, and Alliance '90/The Greens (*Bündnis 90/Die Grünen*) with 51 seats.

The OSCE/ODIHR has never conducted a comprehensive election activity in Germany. The OSCE/ODIHR did conduct one short visit in the context of an Expert Group Assessment of the elections to the European Parliament in June 2009.

## B. ELECTORAL SYSTEM

The Basic Law provides for general, direct, free and equal suffrage by secret ballot. The members of the *Bundestag* are elected for a four-year term according to a mixed system combining proportional representation and a majoritarian element.

The *Bundestag*, in principle, consists of 598 members, subject to variations resulting from the implementation of the system. Of these, 299 members are elected from single-seat electoral districts (SSEDs) according to a first-past-the-post system. The remaining members are elected by proportional representation on the basis of closed party lists at the *Land* level, where each *Land* constitutes a multi-seat electoral constituency (MSEC).

Variations in the number of elected members may arise if a political party wins more mandates in the SSEDs than it won in the proportional vote in the whole *Land*. Following the allocation of seats per party at the federal level, and subsequently to each *Land*, the number of SSEDs won by a party in a *Land* is deducted from the overall number of seats allocated to the party on the basis of results in the proportional contest in this *Land*. The remaining number of mandates won is distributed according to the order of candidates on the MSEC list. However, there may be a situation in which a party wins more SSED seats than “proportional” mandates in a *Land*. Such excess mandates (called “overhang” mandates) are retained by the party, resulting in an increase of the total number of seats in the *Bundestag*.<sup>2</sup>

The number of seats in each MSEC is proportional to the population in the respective constituency. Each MSEC is divided into SSEDs, which should represent contiguous geographical areas respecting the administrative borders of the MSEC. Deviations of the population numbers in individual SSEDs within one *Land* should not differ from the average by more than 15 per cent.<sup>3</sup> Where possible, the borders of SSEDs should respect administrative borders of lower level units such as municipalities.

Each voter is granted two votes, marked separately on the same ballot paper. The first vote is cast for a candidate in the respective SSED and the second for a political party that has registered a list of candidates in the respective MSEC. Upon completion of the counting and aggregation of the first and the second votes, the election administration establishes the winners in the SSEDs and the number of seats to be allocated to the parties in the individual *Länder* using the divisor method. Parties that have received at least five per cent of the valid second votes at the federal level and have won mandates in at least three SSEDs across the country are eligible to participate in the allocation of proportional seats at the federal level.

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<sup>2</sup> The current Parliament consists of 612 members, with political parties having obtained 15 “overhang” mandates.

<sup>3</sup> The Council of Europe’s Venice Commission recommends that deviations in population numbers of constituencies generally should not exceed 10 per cent “and should certainly not exceed 15 per cent except in special circumstances (protection of a concentrated minority, sparsely populated administrative entity)”, paragraph 2.2.iv of the Code of Good Practice in Electoral Matters, [www.venice.coe.int/docs/2002/CDL-AD\(2002\)023rev-e.asp](http://www.venice.coe.int/docs/2002/CDL-AD(2002)023rev-e.asp).

### C. LEGAL FRAMEWORK

According to the OSCE/ODIHR NAM interlocutors, the legal framework provides a sound basis for the conduct of democratic elections. Electoral proceedings are primarily regulated by the Federal Electoral Act (*Bundeswahlgesetz*; FEA), Federal Electoral Regulations (*Bundeswahlordnung*; FER), the Law on the Scrutiny of Elections (*Wahlprüfungsgesetz*) and the relevant provisions of the Basic Law. The Political Parties Act (*Parteiengesetz*; PPA) and the relevant rulings by the FCC are also applicable.

The FEA grants candidacy rights to German citizens eligible to vote. Political parties that have won at least five seats in the last elections to the *Bundestag* or *Land* Parliaments, are allowed to submit their nominations of candidates without the need to notify the Federal Returning Officer of the intention to compete in elections and without the need to submit supporting signatures. All other parties and political associations wishing to field candidates must receive initial approval from the Federal Returning Officer. The SSED candidacies of such parties must be submitted to the District Returning Officer and must be accompanied by the supporting signatures of at least 200 voters. Their party lists must be submitted to the *Land* Returning Officer with at least 2,000 supporting signatures. Decisions on the registration of candidates and party lists are taken by the District and *Land* Election Committees, respectively.

On 17 July, the FEC announced its decision that eight political parties were entitled to nominate candidates and lists without having to submit supporting signatures, while the registration of the candidates and lists of another 21 political formations was conditional on the submission of supporting signatures.

A limited number of electoral issues can be the subject of complaints by voters. Decisions of local authorities related to voter registration and the issuance of polling cards (*Wahlscheine*) can be appealed to District Election Committees (DECs). Decisions of DECs regarding constituency candidate nominations and of *Land* Election Committees (LECs) regarding party list nominations can be appealed to higher-level committees.

Other types of complaints can only be lodged with a special parliamentary committee called the Election Scrutiny Board (*Wahlprüfungsausschuss*; ESB), and must be lodged within two months of the completion of the electoral process. The ESB is appointed by the *Bundestag* for the duration of the legislature and delivers judgments on appeals lodged with it, which are subsequently adopted by the *Bundestag*. In cases of where irregularities are revealed, the ESB has the authority to order recounts and to invalidate the results of an election in whole or in part. Decisions by the ESB are subject to appeals lodged with the FCC. Following the 2005 elections, 195 complaints were lodged with the ESB.

Following the 18 September 2005 parliamentary elections, a case was brought before the FCC pertaining to a paradoxical effect of the electoral system. In certain circumstances, situations may arise in which a higher number of proportional votes cast for a party that obtained “overhang” mandates in an SSED may result in this party receiving overall fewer mandates. In July 2008, the FCC ruled that the provisions of the FEA that allow for this phenomenon, referred to as “negative vote weight effect”, are

unconstitutional and violate the principles of equality and directness of elections. The FCC ordered the Parliament to bring the law into conformity with its ruling by 2011.<sup>4</sup>

Representatives of political parties told the OSCE/ODIHR NAM that, overall, there is a high degree of public confidence and acceptance of the existing election system. Some parties have proposed adjustments to the system during the current legislature, but no consensus has been reached thus far.

Representatives of the Ministry of Interior informed the OSCE/ODIHR NAM that a number of legal provisions emphasize the public nature of the electoral process and, hence, election observation by any interested parties, including international observers, is not legally precluded.<sup>5</sup> The election legislation, however, does not contain explicit provisions for the presence of observers and is therefore not fully compliant with paragraph 8 of the OSCE Copenhagen Document.

#### **D. ELECTION ADMINISTRATION**

The electoral process is administered by a four-tier structure, comprising the Federal Election Committee (*Bundeswahlausschuss*; FEC), 16 *Land* Election Committees (*Landeswahlausschüsse*), 299 single-mandate District Election Committees (*Kreiswahlausschüsse*) and some 80,000 Election Boards (*Wahlvorstände*; EB). All commissions are chaired by their respective Returning Officers (*Wahlleiter* for FEC, LECs and DEC, and *Wahlvorsteher* for EBs). In addition, at least one additional EB per electoral district is formed to process postal ballots. Special polling stations are also established in social institutions, hospitals and prisons.

The Federal Returning Officer and *Land* Returning Officers are permanent appointees of the Federal Ministry of Interior and the *Länder* executive authorities, respectively. The District Returning Officers and Election Returning Officers are appointed ahead of each election by the *Länder* executive authorities. Members of election committees and boards are appointed by the respective Returning Officers from among the electorate. To this end, at the request of local authorities, various federal and local public bodies and institutions are obliged to nominate their staff to serve as election officials. According to the FEA, “whenever possible” the composition of election committees should take into account the representation of political parties. The positions on election committees and boards are deemed to be honorary posts that can only be refused on compelling grounds.

Article 35 of the FEA foresees the use of electronic voting machines, which were the subject of a number of complaints during the 2005 parliamentary elections. On 3 March 2009, the FCC ruled that the Federal Voting Machine Ordinance (*Bundeswahlgeräteverordnung*) regulating the use of voting machines, including the use of voting machines not providing a verifiable audit paper trail, was unconstitutional. The Court deemed the use of such machines as undermining the constitutional principle of the public nature of elections, which requires that all aspects of an election be open to

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<sup>4</sup> See press release by the Federal Constitutional Court no. 68/2008 of 3 July 2008; [www.bundesverfassungsgericht.de/en/press/bvg08-068en.html](http://www.bundesverfassungsgericht.de/en/press/bvg08-068en.html).

<sup>5</sup> Article 10.1 of the Federal Electoral Act and Article 31 of Federal Electoral Regulations. Article 38 in conjunction with Article 20.1 and 20.2 of the Basic Law.



public scrutiny.<sup>6</sup> Electronic voting machines will not be used during the 2009 parliamentary elections.

In meetings with the OSCE/ODIHR NAM, all political party representatives commented positively on the performance of the election administration system and expressed confidence that the forthcoming elections will be administered in an impartial, efficient and professional manner.

## **E. VOTER REGISTRATION**

The right to vote is granted to every German citizen who has reached at least 18 years of age, and who had a domicile or permanently resided in Germany for at least three months continuously at some point in their life since the adoption of the Basic Law in 1949. Persons with mental disabilities and persons convicted for serious crimes are deprived of the right to vote. According to information published by the Federal Statistical Office, some 62.2 million German citizens will be entitled to vote in the forthcoming elections.<sup>7</sup>

The responsibility for the compilation of voter lists in Germany is vested with the lowest level of public administration, which draws them on the basis of information contained in the civil registry. Voters are automatically registered at the place of their permanent residence. When changing residence, citizens are obliged to register with the local authorities at the place of new residence, which are responsible for ensuring the de-registration of the voter at his/her previous address.

German citizens permanently residing abroad are eligible to vote if they meet the three-month residence requirement. To exercise their right to vote, these citizens are obliged to register on the voter list at the place of their last residence in Germany by submitting a special registration form. According to the Federal Foreign Office, which co-ordinates the process of registering voters abroad, some 54,000 such citizens were registered to vote in the 2005 parliamentary elections.

Any person entitled to vote has the right to review his/her record on the voter list between the 20<sup>th</sup> and the 16<sup>th</sup> day before the elections. Upon the conclusion of the review period, voter lists are considered final and may not be altered.

Local authorities send a notification to each registered voter that includes information on the location of the voter's polling station, polling hours and the number under which the voter appears on the voter list. The notification also contains an application form for postal voting. Voters who expressed the wish to vote by mail receive ballots, special voting envelopes, and polling cards confirming their eligibility to vote. EBs established to process postal votes must receive postal vote envelopes, including the signed declaration that the vote was cast personally, before 18:00 on election day. In the 2005 parliamentary elections, at least 15 per cent of eligible voters cast their votes by mail.

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<sup>6</sup> See press release by the Federal Constitutional Court no. 19/2009 of 3 March 2009; [www.bundesverfassungsgericht.de/en/press/bvg09-019en.html](http://www.bundesverfassungsgericht.de/en/press/bvg09-019en.html).

<sup>7</sup> See statistics concerning the elections to the 17th German Bundestag at [www.bundestag.de/htdocs\\_e/elections/statistik/index.html](http://www.bundestag.de/htdocs_e/elections/statistik/index.html).

While there is no centralized voter register or available mechanisms for cross-checking multiple records, the interlocutors of the OSCE/ODIHR NAM did not raise any concerns regarding the accuracy and inclusiveness of voter lists and expressed confidence in their quality.

## F. CAMPAIGN AND CAMPAIGN FINANCING

The electoral legislation contains very limited regulations for the conduct of the pre-election campaign. Section 32 of the FEA prohibits electioneering in and around polling stations on election day. Section 5 of the PPA includes the requirement for equitable treatment of political parties by public authorities during an election campaign with regard to the use of public resources and services, which may be granted according to the number of votes received in the last elections.

Representatives of political parties informed the OSCE/ODIHR NAM that the active phase of the campaign was expected to start in early September. The assessment by political parties was that economy and national welfare would be the key issues in the campaign. The majority of parties plan to actively campaign in the media through electoral spots and participation in election-related programmes, as well as to place campaign posters and billboards. Some parties deemed direct dialogue with the electorate and door-to-door canvassing to be the most effective campaign activity. Nearly all political parties highlighted the importance of Internet and various social networks and forums as an emerging and very successful campaign tool, particularly in attracting young voters.

The election-related legal framework does not contain any specific provisions regulating the financing of an election campaign. Election contestants are not limited in the total amounts they raise and spent on a campaign, and are not obliged to report on campaign expenditures separately. Political parties did not regard this lack of regulation as problematic since campaign financing falls under the general framework for political party financing set forth by the PPA.

In line with the PPA, political parties finance their activities essentially through state funding, membership fees and donations. Parties qualify for state funding if they have won at least 0,5 per cent of the valid votes cast in the last elections to the European Parliament or to the *Bundestag*, or received 1 per cent of the valid votes cast in the elections to the *Land* Parliaments. Parties that only nominated individual candidates in SSEDs are eligible to receive state funding if they won 10 per cent of valid votes cast in the respective districts.

The amount of state funding for each political party is determined on the basis of the number of valid votes won by the party in the recent elections and on the basis of donations received by the party.<sup>8</sup> In addition to state funding, parties are entitled to accept donations with an obligation *inter alia* to disclose the sources and amounts for donations exceeding 10,000 euros in a calendar year and to immediately report single donations over 50,000 euros.

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<sup>8</sup> The maximum total amount of public funds paid annually to political parties shall not exceed 133 million euros.

In line with Article 21.1 of the Basic Law and Article 23 of the PPA, political parties are obliged to report on their finances, including the sources, amounts, financial transactions and assets, in audited annual statements of accounts submitted to the President of the *Bundestag*, who reviews them for accuracy and orders corrections if necessary. Parties submitting inaccurate or falsified financial reports are fined. Financial reports are classified as public information.

## G. MEDIA FRAMEWORK

Germany has a diverse media environment. In the broadcasting sector, a wide range of both public and private television and radio channels operate across the country, with a strong role played by local and regional broadcasters. At the federal level, various regional broadcasting companies form part of two major public broadcasting corporations, ARD (*Arbeitsgemeinschaft der Rundfunkanstalten Deutschlands*) and ZDF (*Zweites Deutsches Fernsehen*). Both are largely financed through license fees paid by viewers, with advertising time legally restricted to a maximum of 20 minutes per day. The private broadcasting sector is dominated by the channels belonging to the two largest media groups, ProSiebenSat.1 Media AG and RTL Group. The print media market is dominated by the five leading daily newspapers, including *Frankfurter Allgemeine Zeitung*, *Süddeutsche Zeitung*, *Die Welt*, *Frankfurter Rundschau* and the tabloid *Bild*, as well as a number of weeklies, in particular *Der Spiegel*.

The Basic Law provides for the freedom of press and reporting and prohibits censorship. As there are no media-related regulations at the federal level,<sup>9</sup> the activities of the broadcasters are primarily regulated by the laws of the *Länder*. A number of judgments issued in the past by the FCC on various media-related cases detail the constitutional principles governing broadcasting and provide guiding principles for media outlets.

While there is no centralized federal body regulating the conduct of the media, the public broadcasting corporations are governed by independent Broadcasting Councils (*Rundfunkräte*) and the private broadcasters are scrutinized by supervisory bodies at the *Land* level (*Landesmedienanstalten*). The German Press Council (*Deutscher Presserat*), comprising representatives from journalist and publishing organizations, oversees the print media. The Council's decisions on complaints are not legally binding but are expected to be published by the incriminated media outlet as a corrective measure.

ARD representatives told the OSCE/ODIHR NAM that, during the election campaign, its television and radio channels offer free airtime for the broadcast of campaign spots to the political parties competing in elections. In line with the spirit of Section 5 of the PPA, ARD determines the amount of airtime to be allocated to the parties, both for campaign spots and in news casts and editorials, based on the principle of "gradual" equality, which takes into account the strength of parties in the *Bundestag*. A similar approach is reportedly adopted by ZDF and by some private broadcasters. In addition to the broadcasting of campaign spots, ARD plans to organize debates among and interviews with election contestants, including one debate between the two lead candidates for the post of Federal Chancellor.

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<sup>9</sup> The only exception is the federal Law on Deutsche Welle, which specifically regulates the broadcasting by the channel.

The representatives of political parties expressed their overall satisfaction with the work of the media during the pre-election period and confirmed that they are generally provided with adequate access and coverage. However, one political party, *Die Linke*, drew the attention of the OSCE/ODIHR NAM to what it deemed to be undue refusal by some publishing houses to publish their paid materials. Two other parties, the FDP and Alliance '90/The Greens, criticized the ARD's choice to hold the debate for candidates for the position of Federal Chancellor only between the nominees of the two largest parties.

#### IV. CONCLUSIONS AND RECOMMENDATIONS

The OSCE/ODIHR NAM noted a high level of confidence in the overall integrity of the election process. A number of legal provisions emphasize the public nature of the electoral process and do not preclude election observation by any interested parties. The election legislation, however, does not contain explicit provisions for the presence of observers and is therefore not fully compliant with paragraph 8 of the OSCE Copenhagen Document. All OSCE/ODIHR NAM interlocutors welcomed possible observation activity, stating that such activity would underscore the overall transparency of the process and would present an opportunity to review existing electoral practices in Germany. The OSCE/ODIHR has never conducted a comprehensive election activity in Germany

Based on the findings outlined in this report, especially the stated interest in an OSCE/ODIHR activity, and the fact that none of the interlocutors expressed any concerns related to the conduct election day itself, the OSCE/ODIHR NAM recommends the deployment of an Election Assessment Mission (EAM) for the 27 September parliamentary elections. The OSCE/ODIHR EAM could focus in particular on the legal framework for and administration of elections, campaign financing, postal voting and access for observers. In line with a standard practice, the OSCE/ODIHR EAM would not undertake comprehensive and systematic observation of election day. It would, however, seek to visit several *Länder* to follow the election process.

## **ANNEX: LIST OF MEETINGS**

### **State and Election Authorities**

#### **Federal Foreign Office**

Ms. Karin Goebel, Deputy Head of the Division 203 (OSCE)

Ms. Sarah Degen, Desk Officer, Division 203

Ms. Jana Wall, Division 505 (Legal Department)

#### **Federal Ministry of Interior**

Mr. Franz Schnauhuber, Head of Division V15 (Federal Election Law, European Election Law, Law on Political Parties)

Ms. Gabriele Roth, Deputy Head of Division V15

Mr. Thomas Muller, Desk Officer, Division V15

#### **Election Scrutiny Board of the Bundestag**

Mrs. Caroline Mass, Desk Officer, Secretariat

#### ***Land* Returning Officer**

Mr. Andreas Schmidt von Puskás, *Land* Returning Officer, Berlin

### **Media**

#### **Public Broadcaster ARD**

Dr. Hans-Martin Schmidt, Media Policy Analyst

Ms. Monika Wolf, Analyst

#### **Süddeutsche Zeitung**

Mr. Daniel Brossler, Correspondent, Parliamentary Division

### **Political Parties**

#### **Social Democratic Party**

Mr. Konstantin Woinoff, Department for International Politics

#### **Christian Democratic Union**

Mr. Klemens Mömkes, Head of the International Office

Mr. Peter Brörmann, Lawyer

#### **Free Democratic Party**

Mr. Hans-Jürgen Beerfeltz, Executive Director

#### **The Left**

Dr. Dietmar Bartsch, Secretary General

#### **Alliance '90/The Greens**

Mr. Stephan Schilling, Bureau Chief