



EISA Election Observation Mission to the 2020 General Elections in Tanzania

Preliminary Statement

1. Introduction

This statement presents the preliminary findings, conclusions and recommendations of the Electoral Institute for Sustainable Democracy in Africa (EISA) International Election Observer Mission (IEOM) deployed to 2020 General elections in the United Republic of Tanzania. **This statement is being issued while the transmission and tallying of results are still on-going, and therefore only reflects the mission's observations up to the conclusion of the counting process at polling stations. This statement therefore neither covers the transmission of results nor the finalisation of the results tally process, and anything contained in this statement excludes those processes.** EISA will issue a final report covering the entire electoral process after the declaration of the final election results.

Since its arrival in Tanzania, the EISA IEOM has interacted with various Tanzanian stakeholders including the National Electoral Commission (NEC), the Tanzania Police Force (TPF), Tanzania Communications Regulatory Authority (TCRA), accredited Civil Society Organisations (CSOs) and election experts. The EISA Mission closely coordinated with other IEOMs in the country on matters related to the elections.

The EISA IEOM's assessment of the electoral process is based on the principles and obligations for democratic elections stipulated in the following international benchmarks: the African Union (AU) Declaration on the Principles Governing Democratic Elections; the African Charter on Democracy, Elections and Governance (ACDEG); the Principles for Election Management, Monitoring and Observation (PEMMO); and the legal framework for elections in Tanzania. EISA's observation methodology is guided by the Declaration of Principles for International Observation (DOP) and its attendant code of conduct for observers.

This IEOM is the 4th to be deployed by EISA in Tanzania since the 2000 elections. For the 2020 elections, EISA deployed 14 International observers from CSOs and Election Management Bodies (EMBs) from 9 African states. The EISA IEOM is led by Advocate Pansy

Dikeledi Tlakula, former Chairperson of the Electoral Commission of South Africa and the current Chairperson of the Information Regulator of South Africa. She is deputised by EISA's Senior Manager for Governance Institutions and Political Processes, Mr Grant Masterson, and supported by a coordination team and a technical team. Observer teams were deployed to seven (7) regions in mainland Tanzania and Zanzibar¹ to observe key processes beginning with the electoral campaigns, pre-polling, election day and limited post-election activities. The mission will remain in Dar es Salaam until 2 November 2020.

This report gives a summary of the situation regarding the electoral campaigns; the state of preparedness of the EMB; as well as the legal, political and security environment up to and including the voting and counting operations on Election Day.

2. Political environment:

The October 2020 general elections were the sixth to be held since the reintroduction of multi-party politics in Tanzania in 1992². These elections were the first to be fully funded by the government of Tanzania. Voters in mainland Tanzania cast their ballots for the President, and members of the unicameral National Assembly (Bunge) and local offices. Zanzibar voters cast ballots for a President, House of Representatives and Local Councils in addition to the Union President and Bunge.

Since the 2015 general elections, Tanzania's political environment has undergone several pertinent changes. Under the current government, holding political rallies and public gatherings has been severely limited by the TPF. While the Mission noted conflicting reports on the existence of an official ban on such gatherings, the effect has been the same whether such a decree existed or not.

Furthermore, the Mission notes with concern the arrest and detention of government officials and political leaders of opposition parties, particularly members of the CHADEMA and ACT-Wazalendo parties, for various alleged offences committed under Tanzania's laws. While every individual has a responsibility to respect and uphold the laws of Tanzania within its sovereign borders, it is important for the state to ensure that legal proceedings are conducted in a manner that enhances trust in the electoral system.

The Mission further noted concerns relating to public access to information. It is regrettable that live broadcasts of parliamentary sessions were suspended in 2017 reducing access to information about this important institution of government. During the pre-election period, the IEOM also received reports of bans issued by the TCRA against media outlets, and

¹ The seven (7) regions are: Dar es Salaam; Dodoma; Arusha/Moshi; Mwanza; Mbeya; Pemba; and Unguja.

² Since the introduction of multi-party politics, five elections have been held, in 1995, 2000, 2005, 2010 and 2015

limitations on other media freedoms that are not in line with international standards and best practices regarding freedom of information.

Fifteen presidential candidates were nominated for the 2020 Union presidential elections, of whom two were women. A total of 1,257 candidates were nominated for seats in the National Assembly, 293 of these candidates were women. Finally, 9,231 candidates were nominated for local authorities, of whom 669 candidates were women.

The 2020 general elections were held against the backdrop of the Covid-19 pandemic around the world. While some nations have opted to either postpone or delay upcoming elections³, Tanzania has conducted its elections as scheduled. The country was declared Covid-19 free with the last public report of cases being April 29, 2020. In this context, the Mission did not witness any meaningful measures to mitigate the transmission of the Covid-19 virus during campaigning or voting procedures.

3. Constitutional and Legal background:

The United Republic of Tanzania is a union of Mainland Tanzania and Zanzibar. The Constitution defines Tanzania as a democratic, secular and socialist state which adheres to multi-party democracy⁴. The legal framework for the conduct of elections in Tanzania is provided by the Constitution of the United Republic of Tanzania, 1977; the National Elections Act (NEA), 1985, as amended; the Political Parties Act (PPA), 1992, as amended; the Local Authorities (Elections) Act, 2015; and the Elections Expenses Act (EEA), 2010, as amended.

For Zanzibar, the key instruments are the Constitution of Zanzibar, 1984; the Elections Act, 1984; the Zanzibar Municipal Council Act, 1995; and the District and Town Councils Act, 1995. The EISA IEOM is cognisant of other supportive legislations, policies and penal code that support and regulate the conduct of electoral processes in Tanzania.

The EISA IEOM notes that the Constitution recognises fundamental rights and freedoms that are critical in a democratic dispensation. These include the freedoms of movement, assembly, association and expression, and the right to protection from discrimination.

The Mission notes that while the Constitution vests the courts with the power to hear and determine election petitions, there are no provisions for dispute resolution following the announcement of the Presidential election results. The Constitution prohibits enquiry by the courts into a Presidential election result declared by the NEC. Petitions for parliamentary

³ Ethiopia, Kenya, South Africa, Nigeria, Tunisia, Uganda, Zambia, Zimbabwe, and South Africa.

⁴ Article 3 (1) of the Constitution, 1977.

elections must be made within 14 days of the announcement of results and are heard by the High Court⁵. Section 15 of the Basic Rights and Duties Enforcement Act does not allow any petitions against the electoral process while the election is ongoing.

New regulations to operationalise the National Elections Act and Local Authorities (Elections) Act were introduced ahead of the 2020 elections. These were the National Elections (Presidential and Parliamentary Elections) Regulations, 2020; and Local Authorities (Councilors Elections) Regulations of 2020. The Electoral Code of Conduct for the 2020 general elections were also reviewed. However, some stakeholders informed the mission that they were not consulted in the development and review of these regulations.

According to the Guidelines for Local and International Election Observers, 2020 various restrictions were placed on observer groups that impacted their ability to conduct a full and proper observation. Section 10(k) prevents Observer groups from expressing any opinion in the media while the election is ongoing. Section 10(l) specifically orders IEOMs to refrain from “acting as a commission of inquiry”, without specifying further what type of actions constitute such a commission. Section 13(e) further limits observer groups “not to express any opinion to the press on the electoral process when polling in polling stations is still in progress”. These prescriptions are not in line with Section 6 of the SADC guidelines, Article 19 (2) of the ACDEG, and DOP section 12 (e) which require the host country to guarantee free access to information, freedom to issue public statements without interference and full cooperation with international election observer missions.

The EISA IEOM notes that while the legal framework broadly provides sufficient basis for the conduct of democratic elections, its implementation appears to have been unevenly applied to different stakeholder groups during the 2020 general elections.

4. The Electoral System:

The Tanzanian electoral system combines the First-Past-The-Post (FPTP) and Proportional Representation (PR) systems in electing of representatives. The President of the Union, as well as the President of Zanzibar are elected by simple majority through a FPTP system. Members of the Union National Assembly and Zanzibar House of Representatives are elected at constituency level and Local authorities are elected at ward level using the same FPTP system. A number of special seats reserved for women in the National Assembly, House of Representatives and local councillors are allocated using a PR system. Due to the nature of the Union arrangement, if a presidential candidate comes from the mainland in Tanzania,

⁵ See Constitution 1977, Article 41(7); National Elections Act, 35, 81, 110, 111

then his running mate, the vice-presidential candidate, must come from Zanzibar, and vice versa⁶.

5. The electoral management body

Election management in the United Republic of Tanzania is conducted by the NEC and the ZEC. The two institutions are established under their respective Constitutions and have a membership of seven (7) Commissioners⁷. The Chairpersons of the two Commissions have to be judges of the High Court or the Court of Appeal of Tanzania. The Chairperson's of the Commissions are appointed by their respective President.

The Constitution mandates the NEC to perform the following functions: supervision and conduct of Presidential and Parliamentary elections in the United Republic of Tanzania and local authority elections in Tanzania; supervision and coordination of voter registration; delimitation of constituencies and other electoral areas; supervision and coordination of elections; declaration of results; and any other functions legislated by Parliament. ZEC is responsible for conducting Zanzibar Presidential and House of Representatives elections.

Commissioners enjoy security of tenure of office and their appointment may only be revoked by the President for inability to discharge their functions arising from infirmity or misconduct or for losing qualifications for being a member.

The Constitution defines NEC as an autonomous department which shall not be obliged to comply with orders or directions of any person or any government department or the views of any political party while discharging its functions. Further, no court shall have power to inquire into anything done by the Electoral Commission in the discharge of its functions in accordance with the provisions of this Constitution⁸. The Mission notes that this limitation of the role of the courts during the electoral process has serious potential to undermine the rights of citizens enjoyed under the Constitution of Tanzania.

6. Voter registration:

The Constitution provides for universal suffrage with citizens who have attained the age of 18 being eligible to vote. NEC is entrusted with the responsibility of supervising and coordinating the registration of voters. Section 12 of the NEA, 1985 provides for updates to

⁶ Articles 66(1)(b) and 78(1) of the Constitution, 1977 and Article 67(1) (2) of the Constitution, 1984, as amended

⁷ Article 74(1) of the Constitution of the United Republic of Tanzania, 1977 and Article 119 of the Constitution of Zanzibar, 1984

⁸ Articles 74(7)(11)(12) of the Constitution of Tanzania, 1977.

the Permanent National Voters Register (PNVR) under the custodianship of the NEC to be carried out twice every five years⁹.

As provided in the law the NEC and ZEC updated the PNVR at different stages between 17 April 2020 to 4 May 2020. Any citizen who would attain the age of 18 by October 2020 was eligible to be registered to vote in the 2020 elections. NEC procedures allowed for voters not in possession of their voter's card to present other official identification, such as a driver's licence and cast their vote if their name appears on the official register.

In line with the law and with the principles of transparency, the provisional voters' register was displayed for verification and objections¹⁰. Display of the Provisional Register granted an opportunity for the voters to verify their details, correct any mistakes and make objections, in the case of those who were considered ineligible. A total of 27 objections were made at the time of displaying the Register. The objections were successfully determined by voter registration officials. The voters register was made available to all political parties.

A total of 29,754,699 voters from both the mainland and Zanzibar were registered. Of these 14,496,604 (49.67%) were male while 14,691,743 (50.33%) were female. A total of 7,326,552 (24.6%) new voters were added to the roll.

7. Political parties and nomination of candidates

Section 37 of the NEA, 1985 provides for the announcement of nomination dates by NEC. In line with this provision, the nomination of candidates for the Presidency and Vice President, Parliament, and Councillor was on 25 August 2020. A total of 19 political parties nominated candidates for the various elective seats for the 2020 general elections. NEC received 627 appeals, out of which 165 were for Members of Parliament and 462 for councillors.

Following the nomination process, the NEC validated the nomination of 15 presidential and vice-presidential candidates, 1,257 National Assembly candidates and 9,231 local authority candidates. A total of 28 candidates for the parliamentary seats and 870 for the councillor seats ran unopposed, all of whom were for the CCM party.

The legal framework provides for an enforceable code of conduct for political parties that all political parties are expected to abide by. Political parties pledged their commitment to free and fair elections and upholding the Code of Conduct on 27 May 2020.

⁹ Section 15(5) of the National Elections Act, Cap. 343, and section 21(5) of the Local Authorities (Elections) Act, Cap. 292.

¹⁰ Sections 11A and 22 of the NEA, 1985 and Section 15A of the Local Authorities Act, Cap. 292.

Amendments to the PPA introduced new provisions to allow for the formation of coalitions between political parties. These amendments are in line with recommendations made by IEOMs during the 2015 elections. The Mission was informed of the absence of NEC and ZEC trainings for political party agents.

8. Gender and voters with disability

The legal framework provides for equality before the law¹¹. It further makes provisions for affirmative action aimed at increasing the number of female representatives in the National Assembly and House of Representatives. Article 66(1)(b) of the Union Constitution, 1977 stipulates that women parliamentarians should comprise at least 30% of the total number of members of parliament. Women are elected by political parties on the basis of proportion of the electoral votes. Additionally, five of the ten presidential appointees to the National Assembly should be women. These provisions are mirrored in the Zanzibar Constitution, 1984 for the House of Representatives¹².

Women constitute 50.3% of registered voters in Tanzania. Two (2) of the 15 Presidential candidates and 5 of the Vice-Presidential candidates are women. The IEOM notes that the special seats for women, coupled with the presidential appointments have previously boosted the number of women in both Houses.

The Mission further notes that the legal framework permits persons with disability to be assisted by persons of their choice. The Mission appreciated the provision of tactile ballot papers, introduced in 2015, to aid voters with visual impairments to have an independent and secret vote during elections. The NEC also provided guidelines for assisting these voters.

9. Civil Society Organizations

Civil Society Organizations (CSOs) in Tanzania are registered under the Non-Governmental Organisations (NGO) Act, 2002 (as amended). Ahead of the elections, amendments were introduced to the NGO Act (Amendments) Regulations, 2018 and the Written Laws (Miscellaneous Amendments) No. 3 Bill of 2019 and the NGO guidelines, 2020.

Organisations planning to provide civic education and observe elections need to be accredited by NEC. The application period for accreditation as voter educators and domestic observers for the general elections closed on 31 January 2020. The list of accredited organisations was released on 7 July 2020. A total of 247 organisations were accredited to

¹¹ Article 12(1) of the Constitution, 1977.

¹² Article 67 (1)

undertake voter education while 97 were approved for domestic observation. Some CSOs who had conducted extensive voter education and observation activities in 2015 were not accredited to do the same in 2020. As a result, and compared to 2015, CSO roll out of voter education may have been more limited in the 2020 pre-election period. Furthermore, national CSOs excluded from election observation and voter education were neither provided with reasons for their rejection in writing nor opportunities for timely appeals.

10. Media

Article 39 (2) of the Constitution guarantees freedom of speech and of expression. This is further amplified under Section 53(1) of the Elections Act. The Electoral Law enjoins the public broadcaster, the national radio, television and print media, to ensure that candidates and political parties have access to airtime during the campaign period. The law provides for access to state radio and television broadcasting service by presidential and vice-presidential candidates and all political parties during the official period of election campaign. It further encourages total impartiality and prohibits discrimination by state media in relation to any candidate journalistically and in the amount of space dedicated to them. The NEC is obligated to coordinate the use of state-owned media to give equal opportunities to presidential and vice-presidential candidates and their parties¹³.

Section 37 of the Electronic and Postal Communications Act (EPCA), 2018 was expanded to require any broadcasting station seeking to air materials from another station within or outside the country to secure a permit from the TCRA. It prohibits Tanzanian radio and television broadcasters from working with foreign broadcasters without communications authority or other government staff present.

The Electronic and postal communication (Online Content Regulations), 2018 as amended requires online content service providers (bloggers) to register and pay licence fees. Additionally, bloggers are required to reveal their sources of information.

Stakeholders consulted indicated that these amendments narrow the democratic space, infringe fundamental freedoms, and limit the scope of action for bloggers, media, and CSOs.

The Mission notes the efforts by the TCRA to convene weekly meetings with all the media houses and journalists. The meetings provide a platform for the regulator and media to analyse the media landscape and deliberate on adherence to the media code of conduct and any challenges thereof.

¹³ Articles 53(1)(3) of the NEA, 185, as amended, Art. 4.1(h) of the Electoral Code of Conduct for the presidential, parliamentary and councilors' elections, and the Political Party Elections Broadcasts Code (PPEBC), 2020

6. Campaigns

Campaigns in Tanzania are regulated by the PPA, 1992; NEA, 1985; and EEA, 2010. Campaigns for 2020 general elections were held from 26 August and ended on 27 October 2020, 24 hours before the election day. The EISA IEOM observed campaigning during the deployment of its observer teams.

For the most part, political parties conducted their campaigns in a peaceful and orderly manner. Police officers were present during the campaigns and professionally undertook their duties. The IEOM observed that political parties conducted largely peaceful campaigns in the areas which it deployed. NEC reported that it received 12 complaints and seven (7) appeals during the campaign period, all of which were resolved. However, the Mission received reports from opposition political parties of several challenges faced during the campaign period, including: cancellation of pre-approved campaign events, arrests and detention of party candidates during campaigning, the use of teargas and dispersion of party supporters by the TPF, intimidation and restriction of movement. The Mission also noted with concern reports of a specific incident in Pemba on 27 October 2020 during which live ammunition was used on political party supporters allegedly attempting to interfere with the electoral process in polling stations in Kagangani village in Ole constituency in Pemba.

7. Preparedness of the National Electoral Commission

The overall budget for 2020 elections was 331,728,258,035 Tanzania Shillings and was fully funded by the government of Tanzania, without donor funding. The NEC indicated that the amount was sufficient to run the elections.

The NEC set up 81,567 polling stations, recruited and trained 329,861 election staff¹⁴. The NEC also procured and distributed electoral materials, monitored campaign activities including resolution of complaints in relation to the electoral code of conduct.

Section 3 of the NEA empowers NEC to issue regulations, directives and notices under the signature of the Chairman of the NEC or the Director of Elections. The mission observes that several directives were issued close to the elections. While the issuance of these directives can assist in bringing clarity to specific matters of law and procedure, they can also create disruption and uncertainty when they are issued close to the elections and without sufficient stakeholder consultations and sensitisation.

¹⁴ These included 28 Regional Election Coordinators (RECs); 194 Returning Officers (ROs), 742 Assistant Returning Officers (AROs) at the constituency level and 7,912 AROs at the ward level, 181 Election officers; 184 procurement officers and 320,620 polling staff

Stakeholders consulted by the EISA IEOM expressed concerns about the transparency of NEC. They noted that they were not adequately engaged by the NEC during the pre-election period with meetings held mainly for information sharing as opposed to consultation purposes. For instance, some stakeholders noted that they were not consulted during development of the electoral code of conduct for the 2020 general elections but were called upon to launch and append their signature.

8. Role of Security

Security agencies play important roles in the electoral process by maintaining a peaceful election environment. They ensure that all voters, stakeholders and election officials, as well as materials are secured and safe.

The Mission understands that several measures had been put in place to ensure peace and security. These included provision of close protection to all presidential candidates and their residences; ensuring security of NEC and ZEC officials; and crowd control during campaigns. The police also established a Joint Operation Center (JOC) in cooperation with other law enforcement agencies aimed at jointly evaluating and responding to security affairs in the country. The JOC operates at the national, regional and district levels.

The Mission observes that the pre-election period was characterised by stability and calm, and in many areas, campaigning continued without major obstacles.

9. Findings from Election day and results tally procedures

EISA teams observed election day procedures, including opening, voting, closing and counting, in a total of 87 polling stations, across seven (7) regions where they were deployed. This is a summary of the election day observations of the EISA IEOM.

The polling station environment was reported as orderly and mostly peaceful. Security personnel were present at all stations, and their presence was mostly professional and discreet. Party agents were present in 100% of the polling stations where the Mission observed.

Most of the polling stations visited (79%) were accessible to persons with disability. The inaccessible stations were either in facilities with very rough surfaces or located upstairs. Priority was given to persons with disability, the elderly, nursing mothers and other persons requiring assistance.

The presence of women at polling stations as voters, polling officials, party agents and citizen observers was noteworthy. At the polling stations, 49% of the polling staff and 42% of the

party agents were women. The EISA IEOM also noted that young people participated in the process significantly.

EISA observer teams noted an average of 5 polling agents per polling station. The Mission reported varying levels of competence and vigilance from polling agents, likely indicating uneven levels of training.

Opening Procedures

The EISA teams observed opening procedures in 9 polling stations, of which 8 opened on time. The NEC rules and procedures were inconsistently applied by the polling staff during the opening.

Voting Process

The layout in 94% of the polling stations visited was adequate for an easy flow of voters. In all polling places visited, secrecy of the vote was protected. The ballot boxes were appropriately sealed in all but one of the polling stations.

In the majority of the polling stations visited, voters took less than 6 minutes to complete the voting process.

The EISA IEOM noted the presence of citizen observers in 26% of polling stations visited. The presence of citizen observers and polling agents is important to enhance confidence in the electoral process.

Closing and counting process

EISA observers were present at 8 polling stations for the close of the polls.

The closing and counting process environment was reported as peaceful. The closing and counting procedures were not consistently applied according to NEC guidelines.

The Mission teams reported that all polling stations closed on time and voters in the queues at the time of closing were allowed to vote before the counting process began.

The counting took place in the polling stations, immediately after the conclusion of voting and closing procedures.

The mission witnessed a serious irregularity during counting in Shule ya Msingi Bunge 1, where the Presiding officer completed the acceptance form and made polling agents sign prior to commencing the count. When polling agents later objected to the final tally, the form had already been completed.

Observers also witnessed counting errors that consistently prejudiced specific political parties, and are concerned at the recurrence of these errors.

This statement does not pronounce on any findings or observation made relating to the tabulation and announcement of results. A final report will be released that will incorporate EISA's findings on these and all aspects of the 2020 electoral process.

Conclusion

The EISA IEOM appreciates the invitation by the United Republic of Tanzania to observe the 2020 general elections.

The mission applauds the Tanzanian government's commitment to fully fund the cost of its electoral administration, enhancing the sovereignty of the country.

In the context of challenges faced globally in administering elections during the global Covid-19 pandemic, Tanzania has held elections on time and with minimal disruptions due to the virus. The online accreditation system for observer groups facilitated remote applications, enabling international observer groups to submit the necessary documents at distance.

The participation of women in the electoral administration and as polling agents is commendable. However, the number of women candidates on all ballots is not yet approaching equitable levels, and all parties are encouraged to promote opportunities for more women candidates on the constituency ballots. The allocation of special seats for women MPs is a useful legal provision that enhances representation in the legislature.

The IEOM would also like to commend the NEC and ZEC for the efficient delivery of the necessary materials to polling stations, with almost no issues relating to electoral materials reported during the 2020 elections.

While the IEOM commends the Tanzanian government, NEC, ZEC and the people of Tanzania for the above, it noted the following areas of concern that impacted on the 2020 general elections.

- (1) The political environment in which the 2020 elections took place was less open and less tolerant than previous elections in Tanzania, including the limitation of political campaigning, freedom of assembly, freedom of speech and freedom of expression.
- (2) Amendments to Tanzania's legal and electoral framework: the net effect of which was to decrease the levels of openness and opportunity for all stakeholders to contest on an equal or at least equitable footing.
- (3) Amendments to the electoral regulations, including through certain directives issued by Tanzania regulators and state institutions which heightened the levels of uncertainty about the legality of actions which occur ordinarily in the course of election observation. This includes but is not limited to restrictions to the conduct of international observers themselves which do not fall within international guidelines and standards.

- (4) Access to election information by voters, political parties and other stakeholders: Limited televised access to parliamentary proceedings, restrictions on freedoms of the media and internet restrictions during the voting process are all examples of ways in which information was limited during the 2020 electoral period.
- (5) The arrest and detention of significant numbers of opposition candidates, party leaders and members of the press. While the IEOM supports the upholding of the laws of Tanzania, the effect of these arrests in creating an atmosphere of tension and fear is regrettable.
- (6) The instability and loss of life due to election related violence, particularly in Zanzibar, is of grave concern to the IEOM, who once again appeals for calm and orderly conduct by all stakeholders to allow the electoral process to conclude without further loss of life or serious injury.
- (7) The decision not to accredit established CSOs to support NEC and ZEC efforts to promote voter and civic education, as well as limited evidence of national voter education campaigns likely impacted on the familiarity of voters, polling staff and polling agents with the electoral rules and procedures on election day.

Recommendations

1. Review the legal framework to provide for mechanisms for redress of disputes arising from the presidential election.
2. In order to enhance independence of the NEC, government should consider adoption of a two-tier appointment process where the NEC Commissioners are subjected to parliamentary vetting before approval. Further considerations should be made to provide for hiring of ad hoc staff to help the Commission in conducting elections as opposed to secondment of public servants.
3. To enhance transparency, NEC should consider timely and comprehensive consultation with all electoral stakeholders.
4. The NEC should consider reviewing the accreditation procedures for citizen observers to ensure timely and efficient consideration of accreditation requests.
5. Decisions not to accredit national observer groups to participate in national elections should be an exception and written reasons for accreditation rejection should be provided and timely appeals made possible
6. To make the election process competitive and provide a level playing field, NEC should consider reviewing the direct nomination of unopposed candidates.

