

European Union Election Observation Mission PHILIPPINES 2025 Final Report



National Midterm Elections 12 May 2025



PHILIPPINES NATIONAL MIDTERM ELECTIONS

12 May 2025

FINAL REPORT

EUROPEAN UNION ELECTION OBSERVATION MISSION

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Acronyms

ACM	Automated Counting Machine
ACT	Alliance of Concerned Teachers
AES	Automated Election System
AFP	Armed Forces of the Philippines
AHRD	ASEAN Human Rights Declaration
AI	Artificial Intelligence
AKBAYAN	Aksyon Sambayanan – Citizen's Action Party
ALYANSA	Alyansa para sa Bagong Pilipinas - Alliance for a New Philippines
ANFREL	Asia Network for Free and Fair Elections
APP	Accessible Polling Place
ASEAN	Association of Southeast Asian Nations
ATA	Anti-Terrorism Act
AVC	Accessible Voting Center
BARMM	Bangsamoro Autonomous Region in Muslim Mindanao
BH	Bagong Henerasyon – New Generation
BTA	Bangsamoro Transition Authority
CAR	Cordillera Administrative Region
CBOC	City Board of Canvassers
CEDAW	Convention on the Elimination of Discrimination Against Women
CFO	Campaign Finance Office
CoC	Certificate of Canvass
COMELEC	Commission on Elections of the Philippines
CPA	Cybercrime Prevention Act
CPP	Communist Party of the Philippines
CRPD	Convention on the Rights of Persons with Disabilities
CSO	Civil Society Organisation
CSPP	Clustered Separate Polling Place
DA	Department of Agriculture
DFA	Department of Foreign Affairs of The Philippines
DICT	Department of Information and Communications Technology
DoJ	Department of Justice
DOST	Department of Science and Technology
EB	Electoral Board
ERB	Electoral Registration Board
ESPP	Exclusive Separate Polling Place
EU	European Union
EU DEL	European Union Delegation
EU EOM	European Union Election Observation Mission
FTS HoP	Final Testing and Sealing
HoR HRET	House of Representatives House of Representatives Electoral Tribunal
ICC	International Criminal Court
ICCPR	International Covenant on Civil and Political Rights
ICCPR GC	ICCPR General Comment
	International Convention on the Elimination of All Forms of Racial
ICERD	Discrimination
ICESCR	International Covenant on Economic, Social and Cultural Rights
IEMC-BARMM	
& Sulu	Independent Election Monitoring Center for BARMM and Sulu

IP	Indigenous peoples
Lakas - CMD	Lakas – Christian Muslim Democrats
LENTE	Legal Network for Truthful Elections
LGBTIQ	Lesbian, Gay, Bisexual, Transsexual, Intersexual and Queer
LP	Partido Liberal ng Pilipinas – Liberal Party of The Philippines
LPD	Laban ng Demokratikong Pilipino – Fight of Democratic Filipinos
MAKBAYAN	Makabayang Koalisyon ng Mamamayang – Patriotic Coalition of the People
MEP	Member of the European Parliament
ML	Mamamayang Liberal – Liberal Citizens
NAMFREL	National Citizen's Movement for Free and Fair Elections
NBI	National Bureau of Investigation
NCIP	National Commission on Indigenous Peoples
NCR	National Capital Region
NP	Nacionalista Party
NPA	New People's Army
NPC	Nationalist's People Coalition
NUP	National Unity Party
NUPL	National Union of Peoples' Lawyers
OEC	Omnibus Election Code
PBOC	Provincial Board of Canvassers
PDP-Laban	Partido Demokratiko Pilipino Lakas ng Bayan –
	Philippine Democratic Party-Popular Party
PDR	Partido para sa Demokratikong Reporma – Party for Democratic Reforms
PFP	Partido Federalista ng Pilipinas – Philippines Federal Party
PHP	Philippine Peso
PMP	Pwersa ng Masang Pilipino - Force of the Filipino Masses Party
PN DNA	Partido Nacionalista - Nationalist Party
PNA DND	Philippines News Agency
PNP PPCRV	Philippine National Police Parish Pastoral Council for Responsible Voting
PPP	Priority Polling Place
PRP	People's Reform Party
PSA	Philippine Statistics Authority
PTN	People's Television Network
PwD	Persons with Disabilities
RAP	Register Anywhere Program
RMA	Random Manual Audit
SC	Supreme Court
SCO	Show cause order
SET	Senate Electoral Tribunal
SK	Sangguniang Kabataan – Youth Council
SOCE	Statements of Contributions and Expenditures
SOGIE	Social Orientation and Gender Identity and Expression
UDHR	Universal Declaration of Human Rights
UNCAC	United Nations Convention against Corruption
VIS	Voter Information Sheet
VVPAT	Voter-Verified Paper Audit Trail

I. Executive Summary and Priority Recommendations

On 12 May 2025, Philippine voters demonstrated a strong commitment to democratic values, with a turnout of 81.65 per cent, the highest ever recorded in National Midterm Elections, despite persistent challenges, including electoral violence, the concentration of political power among a few families, vote buying and a legal framework marked by significant gaps and ambiguities. These shortcomings call for a comprehensive review, including with regard to transparency and ensuring that all stakeholders have access to key phases of the electoral process. The Commission on Elections (COMELEC) administered the elections efficiently, took proactive measures to promote inclusiveness and attempted to address entrenched vote-buying practices, but its extensive powers to exclude and disqualify candidates based on non-objective criteria, and to suspend the proclamation of duly elected officials are not in line with key international standards.

Almost 70 million registered voters were called to the polls to elect half of the 24-member Senate, all 317 members of the House of Representatives (HoR): 254 from single-member districts and 63 through sectoral-based national party lists, as well as provincial, city, and municipal executives and assemblies. Elections for the Bangsamoro Autonomous Region in Muslim Mindanao (BARMM), initially scheduled for the same date, were postponed to 13 October. The ballot paper showed a total of 66 candidates for the Senate, 615 for the district seats in the HoR, and 155 party-lists. While these figures may suggest a wide range of options for voters, genuine competition was limited by several factors: the COMELEC rejected a significant number of senatorial candidacies (118 out of 184 applications), one fifth of the HoR districts offered only one candidate, predominantly the incumbent; the national party-list system, originally intended to amplify the voices of marginalised sectors, was largely co-opted by established parties, and power remained concentrated among a few dominant political families.

On 17 May, the COMELEC proclaimed the 12 winning senatorial candidates, with seven seats secured by candidates originally aligned with the President Ferdinand Marcos' Alliance for a New Philippines (*Alyansa para sa Bagong Pilipinas*). However, two of these were publicly endorsed during the campaign by political rival, Vice President Sara Duterte. The *DuterTEN* slate secured three Senate seats, including the first and third places. The successful bids of opposition candidates from the Liberal Party-affiliated *KiBam* slate who placed second and fifth respectively, were widely regarded as the most notable surprises of the 12 May vote. In the HoR, the *Alyansa* parties won 225 of the 254 single-mandate districts, including 103 secured by the incumbent majority party Lakas Christian Muslim Democrats (Lakas-CMD).

The legal framework provides a basis for democratic elections, and it is primarily based on the 1987 Constitution and the 1985 Omnibus Election Code (OEC), supplemented by numerous COMELEC resolutions. While the OEC remains the main source of legislation, nearly half of its provisions are outdated, having been superseded by the Constitution and subsequent laws, leaving the electoral legislation scattered and not harmonised. The COMELEC and the judiciary retain broad discretion in interpreting and applying electoral rules. Provisions on voters' and candidates' eligibility, political party and candidate registration, campaign finance, election observation, election disputes, and sanctions require revision to bring them in line with international instruments related to elections. Key issues remain unaddressed, namely a comprehensive regulation of political parties and provisions to curb the dominance of political families. Several laws continue to affect the human rights and electoral environment, including the 2020 Anti-Terrorism Act, the Revised Penal Code and the 2012 Cybercrime Prevention Act and the 2012 Terrorism Financing Prevention Act.

The COMELEC issued resolutions introducing substantive changes on out-of-country voting, digital campaigning, disinformation, artificial intelligence, and campaign activities. These measures were largely welcomed, particularly those addressing the labelling of individuals as members of communist movements (red-tagging), vote buying, and the use of discriminatory and sexist speech, which in one case led to the disqualification of a candidate. Some resolutions effectively introduced

new rules, testing the limits of COMELEC's constitutional mandate and raising concerns about legal hierarchy and certainty, as such actions remained vulnerable to jurisdictional challenges.

The COMELEC's efforts to communicate electoral preparations and procedures to the public were proactive and diverse. These included nationwide "roadshows" to present the new automated counting machines (ACMs), media engagements, and use of social media platforms. The distribution of personalised Voter Information Sheets (VIS), which informed voters of their polling location and provided a sample of their ballot, was a well-intentioned measure aimed at providing institutional information and reducing voter dependence on candidate-distributed "sample ballots." However, inflexible technical procedures were prioritised over the provision of clear and accurate information to voters. For example, ballots were printed early to ensure compatibility with the ACMs, even though the list of candidates had not yet been finalised. As a result, several disqualified candidates appeared on the printed ballot, thus undermining informed choice.

Most prominent civil society organisations reported a marked improvement in the COMELEC's approach to sharing information and responding to suggestions. However, in other respects, the COMELEC did not appear to consider transparency or ensuring confidence in the electoral process to be an intrinsic part of its responsibilities, and tended to respond to concerns either dismissively, or punitively. This was the case with a municipal candidate whose concerns on the potential hacking of the ACMs were answered by COMELEC by filing a cyber libel complaint against him, an offence punishable by up to eight years' imprisonment, followed after the elections by the suspension of his proclamation as a winning candidate. The tendency to dismiss concerns about the process was particularly evident in the immediate aftermath of the elections, including a delayed explanation regarding the high number of overvotes in the Senate election.

Technology was integrated across various stages of the electoral process, including ballot design, printing, and verification; voting through optical mark recognition machines; automated counting; transmission of results; and their final publication. Additionally, online voting was available for outof-country voters. While there was broad public and stakeholder confidence in the accuracy and effectiveness of the ACMs, the system would have benefited from stronger oversight and enhanced scrutiny of voter receipts (Voter-Verified Paper Audit Trails - VVPATs). In particular, the absence of an established procedure to verify VVPATs against the election results limited the potential for meaningful transparency and full confidence in the process. Calls for a manual count of the ballots were consistently raised by numerous stakeholders before and after the elections.

The Constitution guarantees universal suffrage. However, it is suspended for individuals sentenced to at least one year of imprisonment, and remains suspended for five years after the sentence has been served. The same restriction applies to those with a final conviction for sedition, rebellion, violations of firearm laws, or crimes against national security. The continuation of these suspensions beyond the completion of the sentence is inconsistent with international standards. The final voter register for the 2025 mid-term elections included 69,673,655 registered voters, of whom 68,431,965 were in-country voters, an increase of some 2.6 million voters since the previous national elections in 2022. The COMELEC innovated to improve access to registration and changes of address by expanding the venues, and enabling voters to register anywhere and not only in their own municipality. Despite these efforts, there appear to be instances of under registration.

The COMELEC holds extensive discretionary powers over candidate registration, including the authority to reject applicants it deems to be "making a mockery of or bringing disrepute to the electoral process." This effectively grants the COMELEC *de facto* vetting powers, allowing it to reject "nuisance candidates" based on a subjective assessment of their credibility and capacity to conduct a legitimate campaign. This approach has posed particular challenges for newcomers and non-traditional candidates, reinforcing public perceptions that elections are dominated by entrenched elites, thereby limiting political pluralism and establishing an uneven playing field. In addition, the absence of centralised and accessible information about candidates hindered voters' ability to make an informed choice. After the elections, COMELEC reported having handled around

1,000 cases that may lead to disqualification, largely due to vote buying and misuse of state resources. Some of these cases remained unresolved at the time elected candidates took office.

Freedom on assembly was generally respected during the campaign, though some concerns were noted. Contestants and their materials were highly visible in public spaces, but the campaign was personality-driven and many candidates failed to present detailed platforms. Political lines were often blurred, diminishing meaningful distinctions between electoral choices. The COMELEC responded to complaints regarding discriminatory, sexist speech by issuing election warrants (show cause orders). While these measures were welcomed by stakeholders, the imposition of penalties for speech-related violations raises concerns on proportionality, potential infringements on freedom of expression, and implications for due process and equality before the law.

Vote buying remained entrenched and widespread, despite considerable efforts by the COMELEC to address it through regulations, and awareness initiatives. The EU EOM observed several indications and received credible reports of vote buying through the distribution of cash and goods, including instances of so-called "bidding wars" among candidates. These practices could compromise voters' ability to freely express their will at the ballot box. The playing field was further skewed in favour of incumbents, with the EU EOM observing or receiving credible reports of the partisan distribution of welfare payouts (*ayuda*) across the country. Violence continues to plague Philippine elections, with at least 25 shootings, 20 deaths and 31 serious injuries.

The Constitution guarantees freedom of the press, and overall, this right was respected during the campaign period. Media interlocutors reported a general atmosphere within the journalistic community, particularly at the national level, with noticeable signs of improvement. Nevertheless, long-standing challenges to freedom of expression persisted, including instances of attacks and intimidation, with one journalist killed during the election campaign, economic vulnerability and a prevailing culture of impunity. The EU EOM media monitoring findings indicated active media campaign coverage, which overall contributed to voters' ability to make an informed choice. While the state media focused on the authorities, major private broadcast and online media centered the coverage around senatorial candidates, extensively via aired paid advertisements, at the cost of critical and analytical reporting.

Disinformation had a limited impact on the online election campaign, in part due to COMELEC's efforts, including the establishment of a dedicated task force that collaborated with 24 organisations to identify and remove harmful content. Cooperation with the social media companies Meta and TikTok further reinforced these efforts, with TikTok launching a so-called Election Hub to support voter education. Meta strengthened content moderation through AI-driven detection and partnerships with fact-checking organisations. The EU EOM social media monitoring unit findings showed that some candidates boosted their campaigns by artificially increasing their followers.

The COMELEC adopted a tough stance to address gender-based harassment during the campaign period. Despite legal provisions and institutional efforts, women continued to participate in elections at significantly lower rates than men. Following the elections, only three of the 12 newly elected senators are women, reducing the number of women in the 24-member Senate from seven to five, and in the HoR the number remains the same as in the outgoing chamber. Only one party list representing women obtained representation in the HoR, with one seat. Several initiatives to enhance the participation of underrepresented groups, including persons with disabilities and indigenous peoples were taken, including mobile registration units, tailored voter education materials, dedicated polling places and, for the first time, special voting hours.

The legal framework establishes procedures for complaints and appeals that are consistent with international standards of judicial review and access to a second instance. However, the timeline for resolving electoral disputes is not aligned with the electoral calendar, thereby undermining the right to timely and effective redress. Cases related to voter registration were adjudicated as late as April 2025, and several disputes over candidate registration remained unresolved on election day. Additionally, irregularities in the registration of political parties led to the cancellation of one party

during the campaign and the suspension of the proclamation of winning party list candidates of another one. There are no deadlines for adjudicating disputes on election results before the Congress electoral tribunals or the Supreme Court (SC), allowing such cases to remain pending for years.

Despite legal provisions allowing for the observation of voting procedures, as well as the Administrative Arrangement signed by the European Union, the COMELEC, and the Department of Foreign Affairs (DFA), COMELEC informed the EU EOM, just four days before election day that its observers would not be permitted to enter polling precincts. The mission notes that the OEC and relevant regulations identify respectively political and civic organisation "watchers", and "other persons specifically authorised by the Commission", as individuals permitted inside polling places. Furthermore, the denial of access was accompanied by a warning that violations of this restriction could constitute an election offence, punishable by up to six years' imprisonment, sanctions that appear disproportionate and inconsistent with international standards. Such penalties risk acting as a strong discouragement to both national and international observation.

Nevertheless, a limited number of EU observers assessed voting and informed that the most persistent problem was an almost complete lack of voter secrecy, also reported by national and international observation groups. In a context characterised by concern about vote-buying, institutional provisions to keep votes secret, alongside education of voters and electoral staff regarding the importance of vote secrecy, should be considered a key protector of a free vote, in line with international obligations that guarantee the right to secret ballot, free from coercion of any kind. Procedures for closing and counting were generally adhered to. Nonetheless, confidence in the process during election night was affected by delays in the availability of transmitted results.

Priority recommendations

Following the assessment of the elections, the EU EOM offers 21 recommendations to the consideration of Philippine stakeholders. The seven priority recommendations are:

- The legal framework should be recodified, and the texts of the electoral code be consolidated and harmonised with existing election legislation so that discrepancies and inconsistencies are removed.
- -Remove blanket restrictions on the right to active and passive suffrage for convicted imprisoned citizens, including the five year suspension after a sentence is served.
- -As part of the recodification and consolidation of the legal framework for elections, the right of access to polling precincts should be made explicit for all duly accredited national and international election observers, not just those from citizen arms organisations. Likewise, the legal framework should ensure right of access for duly accredited candidate/ party representatives (poll watchers) from all contesting parties, not just those from dominant majority and minority parties.
- -Decisions on the rejection of the registration of candidates should be based on objective criteria and should be spelled out in the legal framework.
- -Criminal defamation provisions, including for online activities, should be repealed in favour of civil sanctions designed to restore the reputation harmed. Sanctions should be strictly proportionate to the harm caused.
- -Temporary special measures could be introduced to achieve gender parity in elected and appointed positions. Incentives for political parties should also be considered to promote more women in leadership positions and as candidates for election.
- The election administration should provide adequate means of voting in secret in terms of polling layout and booths, as well as train electoral boards and focus voter education on the importance of a secret vote. These considerations should also be given priority in special arrangements such as Local Absentee Voting, voting of underrepresented groups such as persons with disabilities and indigenous voters as well as voting from prisons, and procedures adapted accordingly.

II. Introduction

At the invitation of the Government and the Commission on Elections (COMELEC) of the Philippines, the European Union deployed an Election Observation Mission (EU EOM) to observe the 2025 national midterm elections, the first full-fledged EOM deployed by the EU in the country. The mission was led by Chief Observer and member of the European Parliament (MEP) from Portugal, Marta Temido. A core team of 12 analysts arrived in the country on 28 March. The mission was strengthened with the arrival of 72 long term observers (LTOs), who were deployed across all regions of the country between 10 April and 22 May, and 104 short-term observers (STOs) deployed between 3 and 18 May. The mission was joined by locally recruited short term observers from the EU Member States diplomatic community resident in the Philippines. A delegation of six members of the European Parliament (EP), led by Vladimir Prebilič, joined the EU EOM for the observation of the election day and endorsed its preliminary statement. This brought the full mission strength to 226 accredited observers from 25 EU member States, Canada, Switzerland and Norway.

The EU EOM remained in the country until 2 June 2025 to observe the canvassing, the proclamation of results and the post-election developments. The mission assessed the electoral process against international and regional standards for democratic elections as well as the laws of the Philippines. The EU EOM is independent in its findings and conclusions and adheres to the Declaration of Principles for International Election Observation endorsed at the United Nations in 2005.

This final report presents a detailed assessment of the findings of the mission on the various stages of the electoral process, including the announcement of the official results and related post-election events until the departure of the mission on 1 June 2025. The analysis was based on the mission's own observations as well as on reports and meetings with the election authorities, political organisations, the media, academics, civil society organisations and the international community. This report contains 21 recommendations aimed at contributing to the improvement of future electoral processes in the Philippines.

The EU EOM wishes to express its appreciation to the COMELEC, the Department of Foreign Affairs (DFA) and all other institutions, authorities, civil society and political organisations of the Republic of the Philippines for their kind and forthcoming cooperation and assistance throughout the mission's presence. The EU EOM also expresses its appreciation to the Delegation of the European Union (EU DEL) in the Philippines and the diplomatic missions of EU Member States in the country for their continued support throughout the process.

III. Political Context

Elections were held amid inter-factional rivalry, the impeachment of Vice President and the ICC case, in a context of allegiance shifting and dynastic politics challenging the democratic process.

On 12 May, voters elected the 20th Congress, including half of the Senators (12) in a nationwide constituency, and all 317 members of the HoR: 254 from single-member districts and 63 through national party-lists. Elections were also held for provincial, city, and municipal executives and assemblies. The first-ever elections for the BARMM Parliament were rescheduled for 13 October.

The 2022 elections brought the tandem of President Ferdinand 'Bongbong' Marcos Jr., son of former ruler Ferdinand Marcos, and Vice President Sara Duterte to power under the *UniTeam* alliance, which has since acrimoniously unravelled. On 5 February 2025, Duterte was impeached by the HoR on charges including alleged conspiracy to assassinate the President, graft and bribery. The Senate is set to try her in July, with a two-thirds majority required for conviction. Her father and former President Rodrigo Duterte was arrested and transferred to the ICC on 11 March over alleged crimes against humanity during his terms as Davao Mayor and later as President, further polarising the electorate. Public discourse framed the elections as a precursor to the 2028 presidential race. Regional maritime tensions with China shaped the international context, also reflected in the domestic framing of the 12 May vote.

Political parties play a largely nominal role in the Philippines, with most lacking clear ideological orientation and some only serving to facilitate cooperation among vested interests. Candidates' allegiances often shift even during campaigns, challenging the voters' ability to make informed choices. Political power is concentrated in dynastic families, which according to civil society organisations, have held four out of every five congressional seats in the outgoing convocation, including two-thirds of party-list seats reserved for underrepresented sectors.

In the 2022 elections, 30 parties won seats in the HoR via single-member districts, but over 40 percent of members switched affiliation, mostly to *Lakas*—Christian Muslim Democrats (Lakas-CMD), the party of Martin Romualdez, the Speaker and President Marcos' cousin.¹ Proadministration parties held some 95 percent of district seats overall. The widespread practice of party-switching and negligible presence of the opposition raise concerns about checks on executive power and legislative oversight.

Informal and transient party alliances shaped the pre-election competition, which was characterised by factionalism and patronage networks. President Marcos led the five-party Alliance for a New Philippines (*Alyansa para sa Bagong Pilipinas*), while the *DuterTEN* coalition was backed by Vice President Duterte and her father, former President Rodrigo Duterte, who stood for and won the mayorship of Davao City. Other key actors included the centrist opposition Liberal Party-affiliated *KiBam* and *ISambayan* coalitions, as well as the progressive *Makabayan* bloc.

IV. Legal Framework

Loopholes and inconsistencies in the long-outdated electoral code allowed COMELEC and the judiciary to retain broad discretion in interpreting and applying electoral rules

International principles and commitments

The Philippines is signatory to key international instruments related to human rights and electoral standards. These include the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD), the Convention on the Rights of Persons with Disabilities (CRPD), and the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). Although the country withdrew from the Rome Statute and the ICC in 2019, the ICC retains jurisdiction to investigate alleged crimes committed before the withdrawal, including extrajudicial killings during the "war on drugs." Investigations into such violations continue. The Philippines is a founding member of the Association of Southeast Asian Nations (ASEAN) and a signatory to the ASEAN Human Rights Declaration (AHRD) adopted in 2012.

Constitutional human rights and electoral legislation

The legal framework for elections is primarily composed of the 1987 Constitution, the Omnibus Election Code of 1985 (hereinafter OEC or the election code), and is supplemented by numerous COMELEC resolutions. In addition, electoral rules of key aspects of the process are scattered through multiple laws that include the Act Providing for the Elections of Party-List Representatives Through the Party-List System, and Appropriating Funds Thereof (1995) the Elections Fair Act, 2001, the Act on Automated Elections System (2010), and the Act providing for Mandatory Biometric Voter Registration, 2013.

The Constitution guarantees the right to vote and to be elected in periodic elections through universal and equal suffrage by secret ballot, provides for an independent judiciary and ensures fundamental rights and the freedoms of opinion and expression, the media, association, assembly and movement. The OEC outlines the rules applicable for all stages of the electoral process at all

¹ For instance, *Partido Demokratiko Pilipino–Lakas ng Bayan* (PDP-Laban) won the highest number of seats (66) in the 2022 HoR elections, but held none by the end of 2022-2025 legislative period.

levels of elections. Although the election code remains the main source of electoral legislation, it is estimated that nearly half of its provisions are outdated, having been superseded by the Constitution, enacted two years after, and by numerous subsequent laws and regulations. Specific provisions and entire sections of the electoral code that are no longer valid refer, for example, to the registration of voters and candidates, the campaign and campaign finance, voting and counting procedures, election observation and electoral offences.

The text of the election code has not been updated, and articles that are no longer applicable have not been repealed but remain in place, making it difficult to determine which provisions are still in force and which have been rendered inoperative by more recent legal acts. In the absence of consolidated legislation, COMELEC and the judiciary retain broad discretion in interpreting and applying electoral rules, significantly shaping the legal framework.

The COMELEC serves as the primary regulatory body for elections. COMELEC resolutions do not only complement but at times contradict provisions in statutory laws, for example, those regulating voting hours, the venues where elections are conducted and electoral offences, challenging the principle of legal hierarchy.

Moreover, while statutory laws have remained unchanged since last elections in 2022, the COMELEC has issued resolutions introducing substantive changes on issues such as online voting, digital campaigning, artificial intelligence and campaign rules. These have been assessed positively by most stakeholders, particularly those on red-tagging, vote buying, and discriminatory speech, but some resolutions have effectively created new rules, testing its constitutional mandate. This regulatory overreach arguably amounts to *de facto* law-making, bypassing the legislature and raising concerns about legal hierarchy and certainty, as this approach remains vulnerable to challenges on jurisdiction grounds. For instance, during the campaign period, the resolution that introduced out-of-country online voting was contested before the SC. The case had not been adjudicated at the time of reporting.

In addition, landmark rulings of the SC have underscored its pivotal role in shaping the electoral framework. These decisions not only resolve specific disputes but also establish jurisprudence significantly impacting the application of electoral rules, which results in additional layers of legal complexity. For instance, in 2001 the SC emphasised that the party-list system is intended to benefit marginalised and underrepresented sectors.² This interpretation was later broadened in 2013, when the SC held that national and regional parties and organisations no longer needed to represent marginalised sectors to participate in the party-list system, significantly expanding eligibility and shifting the political dynamics of party-list representation.³ The SC also redefined the seat allocation formula for party-list representatives,⁴ and in another decision it ruled that a person is not officially a candidate until the campaign period begins, thus decriminalising early campaigning.⁵ The SC also addressed the issue of nuisance candidates in several rulings, affirming COMELEC's authority to declare as nuisance those candidates whose intent is to "mock the process or cause voter confusion."

Most recently, in November 2024, the SC addressed the practice of red-tagging during elections,⁶ declaring that linking candidates, voters, or party-lists to insurgent groups without clear evidence constitutes a violation of constitutional rights to free speech, political participation, and due process. The Court emphasised the chilling effect such actions have on democratic engagement and ordered the development of protective measures for those targeted.

Hence, the Philippine electoral framework is fragmented and, at times, contradictory. Some provisions conflict with later reforms, creating challenges in implementation and enforcement.

² Ang Bagong Bayani-OFW Labor Party v. COMELEC.

³ Atong Paglaum, Inc. v. COMELEC.

⁴ Banat v. COMELEC, April 2009.

⁵ <u>Penera v. COMELEC</u>, November 2009.

⁶ Red-tagging is a term commonly used in the Philippines to describe the practice of labelling individuals or groups as members of the Communist Party of the Philippines (CPP) or its armed wing, the New People's Army (NPA).

Multiple legal amendments and piecemeal reforms have led to inconsistencies that challenge the uniform application of electoral rules.

Although vast and complex, the legal framework provides overall an adequate basis for the conduct of democratic elections in line with international commitments and standards. However, to fully align it with international standards espoused by the Philippines, some provisions require revision, namely those pertaining to voters' and candidates' eligibility and suffrage rights, political party and candidate registration, campaign finance, complaints and appeals, and sanctions. In addition, other issues that remain unaddressed include a regulation of political parties and provisions to limit the dominance of political dynasties, as mandated by the Constitution.

EU EOM interlocutors recognised the need for a comprehensive electoral reform. Attempts to codify and modernise election rules through a new Omnibus Election Code have repeatedly failed due to a lack of political will. The most recent initiative, introduced in 2022, remained under parliamentary review at the time of reporting.

The legal framework should be recodified, and the texts of the electoral code be consolidated and harmonised with existing election legislation so that discrepancies and inconsistencies are removed.

Several legal instruments continue to impact the human rights environment and electoral integrity. Laws that raise serious concerns include the Anti-Terrorism Act of 2020, which has been used to justify the arrest and detention of activists, journalists, and political opponents without warrants; the Revised Penal Code and the 2012 Cybercrime Prevention Act include libel and sedition provisions that have been applied to silence critics and restrict press freedom; and the Terrorism Financing Prevention Act of 2012 has been used to freeze assets and hinder the operations of civil society organisations (CSOs) and opposition groups under the pretext of counter-terrorism.

Election system and boundary delimitation

Legislative power is vested in a bicameral Congress, composed by a 24 member Senate and a 317 member HoR. According to the Constitution, elections are held on the second Monday of May, and the mandate of elected officials commences and ends at noon on 30 June.

Half of the Senate is renewed every three years through a national constituency using a multiple non-transferable vote system, in which each voter may select up to twelve candidates. The twelve candidates who receive the highest number of votes are elected. Senators may serve a maximum of two consecutive six-year terms, after which they must step down for at least one term before becoming eligible to run again for the Senate.

The 317 members serve three-year terms and may be re-elected for up to three consecutive terms, allowing for a maximum of nine consecutive years in office. After this, they must also step down before becoming again qualified to stand as candidate for the HoR. They are elected using a parallel voting system, in which each voter casts two votes: one for a candidate in one of the 254 single-member legislative districts, elected by majority of votes. The second vote is used to elect the remaining 63 members through a nationwide party list proportional representation system. The lists that obtain at least two per cent of the votes gain at least one seat, with no party list being allocated more than three seats.

The Constitution mandates that districts be reapportioned within three years of each census, based on a uniform and progressive ratio.⁷ For the 2025 elections, the number of districts increased by one compared to 2022. In practice, district sizes vary significantly, ranging from fewer than 20,000 to over 1.2 million inhabitants, a disparity partly explained by the large number of inhabited islands across the archipelago.⁸ Such imbalances may be seen as challenging the principle of equal suffrage. Furthermore, following a 2009 SC decision, the allocation of the party list seats is made in a two-

⁷ <u>Article VI, Sections 5.1 and 5.4.</u> Constitution of the Republic of the Philippines.

⁸ The Batanes Islands at-large district hosts a population of around 20,000 inhabitants, whereas Rizal's first district has a population of over1.2 million. Source: <u>Philippine Statistics Authority.</u>

stage process: first, the lists obtaining more than two per cent of the votes are allocated a seat following the constitutional provisions. If after this first apportionment there are still seats to be allocated, they are distributed to the remaining lists with the higher percentage of votes on the basis of one seat per list. The Constitution reserves these party list seats to vulnerable, marginalised and under-represented groups including, youth, women, national minorities, peasants and poor urban, among others (*see Candidate Registration section*).

V. Election Administration

Operationally successful but insufficient efforts to generate confidence through transparency

Structure and composition of the election administration

Established by the Constitution as an independent body, the COMELEC is responsible for organising elections and voter registration, as well as determining appeals regarding regional, provincial and city elections. Its seven commissioners are appointed by the President, with the approval of the bi-cameral Commission on Appointments, for a single seven-year term.⁹ Appointments are on a rolling basis and mandates are set to end in February. In election years, Congress is in recess in that month and the Commission on Appointments only vets new commissioners once it reconvenes after the elections, which are constitutionally mandated to be held on the second Monday of May. Such will be the case for the two commissioners appointed on 10 February 2025, just one week after the Commission on Appointments' last session before recess. During the electoral process for the 12 May elections, this issue did not cause controversy, but it remains that in such cases, commissioners organise the elections after an exclusively presidential appointment, before having their candidacy scrutinised. Interim appointments are usually approved, but not always; for example, the chairman and two commissioners appointed in March 2022 organised the May 2022 elections, but were not confirmed by the Commission on Appointments.

Appointments to the COMELEC should be timed to ensure they are vetted by the corresponding Congressional Commission before the appointed commissioners organise and oversee elections.

The COMELEC has permanent decentralised representations, staffed by civil servants: regional directors, provincial supervisors and municipal registrars. During the electoral period, the COMELEC may transfer its employees to different postings, either based on its own assessment, or in response to complaints, and did so in a small number of cases. The election code vests the COMELEC with regulatory powers as well as the power to direct national or local officials, including law enforcement officers, if required for the conduct of the elections (*see Campaign Environment section*).

Administration of the elections

The COMELEC organised the elections in an efficient and professional manner. Technical directors in Manila were well-organised and succeeded in ensuring preparation and deployment of ballots and ACMs. In the field, EU observers found that regional directors, provincial election supervisors and city and municipal election officers were experienced and competent, and generally trusted by electoral stakeholders. In addition, they were in their vast majority open and supportive of the work of EU observers in the field.

The COMELEC's efforts to communicate electoral preparations and procedures to the public were proactive and varied, ranging from 'roadshows' to present the new ACMs throughout the country in January, to media appearances and social media posts. The distribution of personalised VIS, which informed people on where they would vote and what their ballot would look like, was a well-intended measure aiming to provide institutional information and diminish voters' reliance on

⁹ Article IX, C, Section 1 (2), Constitution of the Republic of the Philippines. The Commission on Appointments consists of the President of the Senate, 12 senators and 12 members of the HoR, elected by each house on the basis proportional to their parties' representation in Congress. (Constitution, Article VI, Section 18).

candidate-distributed 'sample ballots'. However, the onus on local election officers to hand deliver the VIS did not take into account their limited logistical and time resources, and it is difficult to know how many reached voters.

In some instances, delayed decisions and inflexible technical processes took precedence over ensuring clear and accurate information for voters. This was the case when, to ensure all ballots were readable for the ACMs, several weeks were allocated to manually inserting each of the 63 million ballots into ACMs before deployment. A different verification method or opting to provide surplus ballots might have enabled later printing, with fewer instances of candidates appearing on the ballot who had in fact been disqualified (*see Candidate Registration section*).

Equally, although training the electoral boards responsible for overseeing voting procedures in the early part of the year ensured this concluded at an early stage of preparations, some details on usage of the ACM functions, such as display of votes onscreen, were only finalised at a later date and 'refresher' sessions during the last weeks of April actually had to address some subjects for the first time. Usefully, manuals and an online learning platform were prepared for electoral boards, although the design of latter could have been more pedagogical. At times too, there were delays in communicating technical information to electoral boards, such as with the issuance of 'supplemental contingency procedures', approved in a COMELEC resolution on 8 April, and available on the COMELEC website several weeks later, and later still on the electoral board learning platform.

Transparency and accountability

The COMELEC enabled EU EOM observation of all pre-electoral events and locations, including electoral board trainings, materials transport and stockage, and the pre-deployment preparation as well as Final Testing and Sealing (FTS) of ACMs in polling places. The most prominent civil society organisations met by the EU EOM reported a marked improvement in the COMELEC's approach to sharing information and responding to suggestions.

However, in other respects, the COMELEC did not appear to consider transparency or ensuring confidence in the electoral process to be an intrinsic part of its responsibilities, and tended to respond to concerns either dismissively, or punitively. The case of vice-mayoral candidate Harold Respicio was particularly concerning: after he published a video in January 2025 claiming to demonstrate that ACMs could be hacked, the COMELEC sought to have him charged with 'cyber libel' and further, announced that it would file for his disqualification, as well as seeking Respicio's suspension from the Philippines Bar Association, and revocation of his licence as a certified public accountant (*see Results and Post-Election Environment section*)¹⁰.

The COMELEC's dismissal of concerns about the process was particularly pronounced in the immediate aftermath of the elections. On election day, some voters asserted that the VVPAT receipts issued to them did not match how they had voted, and their concerns were reported by organisations including LENTE and Vote Report PH. COMELEC responded that the voters had probably forgotten who they had voted for, and later added that if anyone was genuinely concerned, they should file a complaint, supported by a notarised affidavit. While such a course of action may be proportionate for a candidate, it is unlikely to be so for voters, for whom it would be more appropriate to provide an explanation or commit to an evaluation.

The COMELEC's reluctance to provide timely explanations or to consider any possibility of error tended to generate mistrust. Only on 23 May did the COMELEC explain, by means of a fake news alert on its social media, the meaning of the apparent 17 million 'overvotes' in the senatorial elections, evident in the COMELEC's own published figures.¹¹ In its 'fact check' the COMELEC

¹⁰ The COMELEC Chairperson George Garcia personally filed the complaint at the Office of the City Prosecutor in Manila against lawyer Jeryll Harold Respicio for allegedly violating Article 154 of the Revised Penal Code, in relation to Section 6 of Republic Act (RA) No. 10175, also known as the Cybercrime Prevention Act.

¹¹ An overvote occurs when a voter selects more candidates than allowed for a particular contest on a ballot, rendering the vote invalid.

explained that due to the manner of counting overvotes in the senatorial election, the real number of invalidated ballots was some 1.4 million, close to 2.5 percent of all voters who turned out, within the range of a normal number of spoilt ballots. According to COMELEC, the system counted any number of marks exceeding the maximum of 12 senatorial candidates as 12 overvotes. Therefore, the published figures had to be divided by 12 to understand how many people's vote for Senate had been invalidated for marking more than the maximum number of options. However, the post did not explain how to interpret overvotes in other elections (for example, over 3.3 million in the party list election) and organisations such as the Computer Professionals Union rejected the explanations.

The COMELEC should ensure transparency in all its activities and phases of the electoral process. This should include but not be limited to the publication of the decisions on candidate registration, tests and certificates of the automated election system, campaign finance reports, and the publication of detailed election results.

Lastly, the COMELEC has largely ignored calls for greater oversight of vote counting by returning to manual counting or devising a hybrid system, most often asserting that only a legal change would allow this or that there is no budget provision. While an oft-cited 2022 survey indicated a vast majority of Philippine citizens trusted that automated election results were accurate, ¹² it would be prudent not to assume this trust to be unwavering. In the lead up to the 2025 elections, several organisations called for manual counting, notably election monitoring organisation *Kontra Daya*; the Alliance of Concerned Teachers (ACT) and left-wing alliance BAYAN, as well as ANIM, a coalition of six sectoral groups, including religious and retired military personnel. PDP-Laban also called on the COMELEC to carry out manual counting. After the elections, calls for manual recounts were issued by unsuccessful candidates including from the Makabayan Bloc, composed of four party-list groups and seven of the *DuterTEN* candidates; as well as several mayoral and gubernatorial candidates. In addition, the National Union of Peoples' Lawyers (NUPL) advanced that manual counting was necessary since diminished trust called for greater transparency.

Improve transparency and confidence in the results by enabling timely scrutiny of voter receipts (VVPATs) on election night as a means of verifying the outputs from the ACM, thereby strengthening public trust.

Out-of-Country voting

For the first time, in a bid to increase turn-out, almost all of the 1,241,690 registered Filipinos outof-country voters were required to vote online, with just 20,748 retaining previous methods of voting in person in consulates, or by post. To vote online, voters already registered with their diplomatic representations had to enrol on the online platform from 20 March. Following a slow take-up, the enrolment deadline was twice extended, until finally it closed at noon on 12 May. Online voting began on 13 April, and reportedly generated some concerns from voters who were surprised to find the platform did not confirm whom they had voted for. The COMELEC did not publish developing enrolment or voting figures, but did report to media figures indicating that 18.36 per cent of registered voters had turned out. The COMELEC stated that turn-out had been 32 per cent among those in locations where voting was in person (6,727 of the 20,748) and 18.12 per cent among those who had to vote online (221,284 of the 1,220,942 potential online voters). This figure is almost exactly the same as the turn-out for the previous mid-term elections in 2019, and substantially lower than 40 per cent turn-out abroad for the 2022 presidential election. This may indicate that the new system did not succeed in mobilising greater participation. The COMELEC published the election returns generated from 243 'clustered precincts' making up all the vote from abroad. On 3 April, PDP-Laban submitted an appeal to the SC, arguing that electoral legislation does not provide for online voting. The SC has not responded to date.

¹² Nationwide Survey on Trust in the Outcome of the May 2022 Elections and Various Probes about the Automated Voting System. Pulse Asia, June 2022.

Special voting programmes

Local Absentee Voting (LAV) was held between 28 and 30 April for media and government workers, including military and police, who made up most of the 57, 589 LAV voters unable to vote on election day at their usual precinct for work reasons. LAV voters were provided with ballots which they returned in two sealed envelopes to their supervisors or commanders, who had some two weeks to ensure these reached COMELEC. Ballots were processed through ACMs by the COMELEC LAV Committee on election day. This system is practical but presents clear secrecy of vote concerns. Like out-of-country voters, LAV voters only participate in national constituency elections. EU observers attended 13 LAV votes and found a variety of different practices and environments. In half of the observed cases, the vote was not secret.

Finally, some 31,715 detained citizens, either pre-trial, sentenced to less than a year or on appeal, were registered to vote on 12 May, mostly from 393 polling stations established in prisons, and in other instances (for 464 prisoners) on escorted sorties to nearby precincts.

VI. Election Technology

While COMELEC was committed to transparency and preparations, including contingency plans, there was room for improvement in procedures, public information and implementation.

Technology was integrated across various stages of the electoral process, including ballot design, printing, and verification, as well as voting through optical mark recognition machines, automated counting, transmission of results, and their final publication, and the online voting for overseas voters. New ACMs were introduced following a tender process with only one qualified bidder. While the process followed established procurement rules, EU EOM interlocutors raised concerns regarding the overall transparency of the procedure, as the former provider of vote counting machines was barred from participating due to alleged irregularities in the 2022 elections,¹³ leaving the tender with only just one bidder. EU interlocutors also raised concerns on the competitiveness of other technology-related tenders (online voting, secure transmission system and independent testing services).

There was widespread trust among most of the population and stakeholders in the accuracy and effectiveness of ACMs. A core component of the automated system is the secure counting, transmission, and tabulation of votes. It has undergone source code review, software implementation process, and certification, overseen by the COMELEC, the Department of Information and Communications Technology (DICT), the Department of Science and Technology (DOST), and an international third party (Pro V&V). Citizen observation groups PPCRV and NAMFREL, as well as IT professional organisations, were invited to observe these procedures, strengthening transparency and public trust. However, some interlocutors mentioned limited possibilities to review the source code in detail.

The final certification report was delayed beyond the legally mandated three-month deadline and was published only shortly before election day. Only one out of six annexes to the certification report was made public. In the only published annex of the certification report, the audited ACM software version was different from the one displayed in the machines, raising doubts about the audit's relevance. Later, COMELEC informed that the displayed version was also audited. Although various tests were conducted and not formally contested, their results were not publicly accessible, weakening transparency. There was also no public information regarding the types of tests that were conducted. Tests of the physical and chemical characteristics of the ballot paper under various environmental conditions and workloads were not considered.

¹³ The Supreme Court later overturned this decision on the grounds that the company was barred before submitting the offer. The SC ruled however that the contract with the new supplier should remain in place. <u>Decision GR. 270654</u> <u>Smartmatic vs COMELEC</u> of 16 April 2024.

EU observers reported logistical setbacks in the delivery and storage of ACMs, instances of insufficient training to electoral boards members and ICT staff, and challenges encountered during the Final Testing and Sealing (FTS) of the machines in some provinces. Connectivity remained a concern in many places, and the FTS did not include transmission testing. Altogether, these factors raised doubts before the elections about the system's troubleshooting capacity and overall reliability on election day. According to EU observers and reports from other observation groups, efforts were made to ensure an ordered and coordinated voting process, despite instances of ballot rejection, incorrect ballot evaluations, and occasional machine jams. These issues were also highlighted in post-election reports by NAMFREL and PPCRV. The COMELEC informed the EU EOM that 311 ACMs out of more than 90,000 needed to be replaced due to malfunctions on election day.

Conduct a full nationwide mock election exercise of the functioning of the ACMs and results transmission system, ideally on a single day.

The COMELEC has introduced other measures to enhance transparency, such as voting receipts (VVPATs) with QR codes confirming the voter's selection but offering no remedy in case of discrepancy with the ballot. There was no established procedure for their use to verify election results. Although the system quickly produced results, information about rejected ballots was not available,¹⁴ and no procedures existed to reconcile the number of ballots cast with the number of signatures in the voter list, preventing full reconciliation. Only several days after the election did the COMELEC provide an explanation for the unusual number of overvotes in the senatorial elections (*see Election Administration section*).

VII. Voter Registration

COMELEC has improved access to registration, although there remains room for further enhancements to ensure accuracy and inclusivity

The right to vote

The Constitution guarantees universal suffrage, with the right to vote extended to all adult citizens. While in principle citizens must have resided in the Philippines for one year and in the municipality where they propose to vote for at least six months, original residence is not lost if a change of location occurs for work or educational reasons, including naval, police or military service, or detention in government institutions. The right to vote is suspended for those sentenced to at least one year's imprisonment, until five years after the sentence is served. The same suspension applies to anyone subject to a final conviction for sedition, rebellion, violation of firearm laws, or any crime against national security. Maintaining the suspensions beyond the sentence served is at odds with international standards on passive suffrage. Since 2010, citizens living abroad may register to vote at their consulates. While the 1985 election code provides for compulsory voting, this is not enshrined in the Constitution, adopted in 1987, highlighting a legal inconsistency that underscores the need for comprehensive electoral reform, even on fundamental issues.

Remove blanket restrictions on the right to active and passive suffrage for convicted imprisoned citizens, including the five year suspension, after a sentence is served.

Voter registration procedures

The final register for the 2025 mid-term elections included 69,673,655 voters, of whom 68,431,965 were in-country voters. This was an increase of some 2.6 million voters since the previous national elections in 2022. Voter registration in the Philippines is active, not automatic, and open only in preelectoral periods. However, the register is permanent, such that registration need only be done once, except for after a period of disqualification, when changing address, or after removal from the

¹⁴ Rejected ballots refer to ballots that were not scanned by the machine after several attempts. The election return QR code only shows the number of unsuccessful attempts to insert a ballot as rejected, making the data difficult to use for result reconciliation.

register due to not voting in two consecutive regular elections. Despite an attempted roll-out from 2019, there is no universal national identity card.

An active registration process which can only be accessed in certain periods may constitute a challenge to ensuring all eligible voters wishing to be registered are included. Conservative projections by the Philippine Statistics Agency (PSA) indicate over 72 million citizens aged 20 and above in July 2025.¹⁵ This suggests that under registration persisted in the 2025 voter register.

For the mid-term elections, the COMELEC innovated to improve access to registration and changes of address during the registration period between 12 February and 30 September 2024, by expanding deployment of satellite registration points, piloted in 2022, to malls, local halls, universities, government offices and church organisations, as well as to indigenous communities, and in prisons to register eligible citizens in detention.

These initiatives were bolstered by the Register Anywhere Program (RAP), which enabled voters to register anywhere in the country, rather than just in their own municipality. In another positive feature, voters turning 18 years old between the registration period and election day were able to register, and eligible citizens who registered for *Sangguniang Kabataan* (Youth Council) elections to be held in December 2025 (15 to 30-year-olds, registering between February and March 2024) were transferred automatically to the main voter register. These measures undoubtedly increased the inclusivity of the voter register, although reports of lengthy queues persisted, particularly towards the close of the registration period, to the point that some were still not able to register, as reported by EU observers.

Enhance universal suffrage by ensuring inclusion in the voter register of all eligible voters, with the aim of eliminating instances of under registration.

In December 2024, the COMELEC reported having identified over 400,000 multiple registrations, most of which were the result of legitimate changes of address. In such cases, multiple entries were referred back to the municipal electoral registration boards (ERBs) to delete. In over 100,000 of the multiple registration cases, the COMELEC considered that that residence changes were based on 'questionable' *barangay* residence certificates,¹⁶ and did not reflect reality, known as 'flying voters', and asserted it would take corresponding action.

After registration closed, lists were displayed in local COMELEC offices and during the following 12 days, unduly excluded voters had the right to apply to be included, and equally, a registered voter could challenge another's registration. Decisions on these appeals were taken by the board of elections inspectors, and the final voter lists were required to be posted on 11 February 2025, three months before election day, in line with good electoral practice.

In practice, however, EU observers reported that 'manual updates' were continuously carried out on voter lists right up until election day. On occasion, these were in response to court orders, as was the case on 22 April in Pualas (Lanao del Sur), but in most cases such updates appeared to be based on more routine updates as a result of learning some voters were deceased, others transferred, or others still erroneously removed, suggesting that the verification processes could be more efficient to ensure a reliable final list. As a result of these late changes, some voters found they did not figure on the online precinct finder, despite being on local lists. Nonetheless, EU observers found that municipal and provincial election officials were generally diligent and responsive to complaints, and the accuracy of the voter register was not a subject of debate among EU EOM interlocutors.

¹⁵ Source: <u>Philippine Statistics Authority (PSA)</u>, January 2024.

¹⁶ The barangay is the smallest administrative division in the Philippines. It is represented by elected officials who form the Barangay Council, part of local government.

VIII. Registration of Candidates

COMELEC's extensive powers to exclude and disqualify candidates undermined the fundamental right to stand

Under the Constitution, candidates for Congress must be natural-born citizens, literate, registered voters, and residents of the Philippines. Additional age and residency conditions apply: Senate candidates must be at least 35 years old and have resided in the country for at least two years prior to election day, while candidates for the HoR must be at least 25 years and residents of the district they seek to represent for a minimum of one year. The election code further details the criteria that disqualifies a citizen to stand for office; those legally declared insane or incompetent, sentenced for insurrection, rebellion or a to a penalty of more than eighteen months or for a crime involving moral turpitude cannot run as candidates until five years after the sentence has been served or expunged. In addition, citizens found guilty of an election offence contained in the electoral code are disqualified from holding public office and deprived of their suffrage rights. All these limitations to the right to stand are contrary to international standards.

The requirements of being a natural born citizen and the residency period requirement for candidacy in national elections should be reconsidered to ensure that they are fully in line with international commitments and good practices on the right to stand.

Candidate applications (Certificates of Candidacy) were submitted to the COMELEC from 1 to 8 October 2024. On 30 January 2025 the COMELEC published that the list of contenders included 66 candidates for 12 Senate seats, 615 for 254 district-level HoR seats, and 155 party-list groups vying for 63 seats reserved under the proportional representation system.

The COMELEC holds extensive discretionary powers over candidate registration, including the authority to reject candidates whose applications it considers as "making a mockery of or bring disrepute to the electoral process."¹⁷ This effectively grants the COMELEC *de facto* vetting powers to declare a candidate "nuisance" based on its subjective overall assessment of a candidate's credibility and capacity to conduct a campaign. The law does not provide for specific objective criteria. The COMELEC rejected 118 of 184 Senate candidate applications and 84 applications for other electoral races. Eighteen of these rejections were subsequently challenged before the SC, with 14 remaining unresolved on election day. The absence of deadlines for adjudicating disputes undermines the right to an effective remedy as even if the SC were to overturn the COMELEC decisions, reinstated candidates would still be unable to run, as ballots were printed in January 2025.

Decisions on the rejection of the registration of candidates should be based on objective criteria and should be spelled out in the legal framework.

Limited political competition was also prominent in 51 of 254 of the HoR districts where candidates ran unopposed. The majority were affiliated with Lakas-CMD (29), followed by National Unity Party (NUP) – eight, Nationalist People's Coalition (NPC) – six, *Nacionalista* Party – four, *Partido Federal ng Pilipinas* (PFP) – three, and *Laban ng Demokratikong Pilipino* (LDP) – one. This figure increased from 51 to 53 following the disqualification of two candidates during the campaign.¹⁸ Unopposed candidates were recorded in all 14 regions except Region X (Northern Mindanao) and BARMM. Central Luzon and Calabarzon, two of the most populous regions of the Philippines, recorded the highest numbers, with up to seven unopposed district races each. At the local level, a total of 1,068 candidates ran without opposition. According to EU EOM interlocutors, in many cases incumbents stood unopposed because no potential competitors believed they could successfully challenge them: the fear of retribution may have discouraged some from registering as candidates.

The Constitution and the 1995 Party-List System Act reserve 20 percent of HoR seats for representatives of marginalised sectors, including the urban poor, peasants, youth, indigenous

¹⁷ <u>Article I, Section 69</u>, Omnibus Election Code.

¹⁸ Matt Florido (Quezon 3rd District) and Ian Sia (Pasig City 1st District).

communities, and women. However, a 2013 SC decision broadened eligibility to include groups that do not directly represent these sectors (*see Legal Framework section*). The decision led to the party-list system being captured by political dynasties and elites, undermining its intended purpose of amplifying marginalised voices, and thus losing its original intent. Calls for reform to restore genuine sectoral representation are widespread and were broadly conveyed to EU observers. In 2025, at least 86 of 155 registered party-list groups were associated with political clans or businesses, with unclear or questionable sectoral representation.¹⁹ Four parties submitted multiple candidate lists, causing disputes over legitimate representation. COMELEC failed to resolve the conflicts before election day, leaving voters without clarity as to what list would be allocated a seat in the case that gained representation, hindering the right to make an informed choice. Ultimately, none of these factions secured a seat.

Despite a constitutional mandate, the absence of legal limitations has allowed political dynasties to maintain their dominance in public office. At the same time, the COMELEC's wide discretionary authority in the absence of an objective criteria for rejecting candidacies has further restricted fair access to political competition. This approach has made it especially difficult for newcomers and non-traditional candidates to enter the race, reinforcing public perceptions that elections are shaped more by elite, limiting political pluralism and the playing field remains uneven. Moreover, the lack of centralised and accessible information about candidates forces voters to rely on media and exposes them to misinformation and rumours, hindering their ability to make an informed choice.

The COMELEC authority to disqualify candidates and parties upon petition or *motu proprio* extended until successful candidates took office on 30 June. On 21 May 2025, COMELEC reported handling around 1,000 cases that could lead to disqualification largely due to reports of vote-buying and misuse of state resources. The COMELEC informed that all Congress disqualification cases must be resolved before 30 June, after which jurisdiction transfers to the respective Senate and HoR Electoral Tribunals. During the campaign, two congressional candidates were disqualified before election day, one for vote buying and one for sexist remarks, and one party was disqualified (PBBM) for irregularities in the registration of its candidates.

IX. Campaign Environment

Extensively regulated campaign marked by rampant vote buying, incumbent advantages and mixed competitiveness, with continued violence challenging access to fundamental freedoms

Election campaign

Election campaigns in the Philippines are extensively regulated under the election code, the Fair Elections Act and numerous COMELEC resolutions. The senatorial and party-list campaigns began on 11 February, followed by the district representative campaigns on 28 March. Billboards, streamers and posters must meet specific size requirements, include imprint data identifying their proprietor and be displayed only in designated common poster areas approved by local election officers or on private property with the owner's consent. In February 2025, the COMELEC established guidelines for environmentally sustainable election propaganda.²⁰

Access to fundamental freedoms of assembly and movement were generally respected, though some concerns were noted. The campaign was highly visible, with campaign materials saturating public spaces.²¹ Candidates relied on door-to-door visits and public meetings with voters – some also opted for motorcades or large rallies. Voter engagement was strong nationwide but belied the fact that one in five district races was non-competitive, typically featuring only an incumbent (*see Candidate*

¹⁹ Kontra Daya. Press Statement, February 2025.

²⁰ COMELEC <u>Resolution No. 11111</u>, February 2025.

²¹ EU EOM observed a total of 98 campaign events, including 72 rallies, 11 meetings, two door-to-door contestant visits, as well as 13 others, including motorcades. These events took place in 34 of the 82 provinces and the NCR. The atmosphere was mostly described as calm (59 percent) and enthusiastic (59 percent).

Registration section). Many candidates lacked detailed platforms, focusing instead on single issues or personality-stagecraft. These factors compounded to narrow the availability of genuine political alternatives to voters. Overlapping endorsements and shared campaign slates across different elections blurred political lines, further reducing meaningful distinctions between choices.

To foster accountability and programmatic politics, consideration could be given to supporting political party development, internal democratic processes and curbing party-switching.

Between 11 February and 16 May, the COMELEC issued 11,421 notices to candidates for unlawful materials and removed 711,193 posters or tarpaulins. However, only a fraction of COMELEC's addressees complied: some 1,799 did not, and may be subject to further investigations and sanctions if they are found to have committed an election offence. In total, 83 cases for disqualification were filed. EU observers noted the COMELEC's efforts but reported uneven enforcement and limited effectiveness, especially in view of the widespread use of private property to display materials.

Vote buying was widespread and rampant, despite considerable efforts to address it through COMELEC regulations and initiatives. The EU EOM observed several indications and received credible reports of vote buying through cash and goods, including 'bidding wars' among contestants.²² Several EU observers noted a visible spike in commercial activity shortly before and after election day, with interlocutors ascribing this to profits from sold votes. Among other schemes, popular e-payment applications G-Cash and Maya restricted options for money transfers including on election day to combat vote buying. Some EU EOM interlocutors opined that many candidates buy votes expecting to recoup their investment through 'kickbacks' from projects they sponsor once in office. In some instances, as candidates endeavour to secure support in a specific area, vote buying targets entire communities, rather than individual voters.

The playing field was significantly tilted in favour of incumbents. The EU EOM observed or received credible reports of countrywide partisan distribution of public benefits (*ayuda*), including cash and nutritional assistance, medical or funeral funding and educational grants. The *ayuda* assistance programmes are often funded through allocations in the national budget, including congressional insertions (discretionary funds added by legislators) that bypass existing restrictions, serving to bolster clientelism and more diffuse patronage.²³ Several EU observers also reported that incumbents across the country used official vehicles or offices for campaigning purposes.²⁴ Distribution of subsidised rice branded with President Marcos' initials (BBM) alongside with the provision of free Manila public transport on Labour Day weekend enjoyed extensive media coverage that amplified their appeal. Although Marcos was not campaigning, such an initiatives were seen as potentially influencing voters in favour of endorsed candidates. Following a request from COMELEC on 1 May, the Department of Agriculture (DA) paused the subsidised rice distribution programme, which resumed on 13 May.

The COMELEC launched over 800 investigations and issued over 200 show cause orders on grounds of vote buying and/or partisan distribution of *ayuda*,²⁵ with one HoR candidate being disqualified on vote buying charges. Several EU observers noted that efforts to curb vote buying remain insufficient, including by local police which in some areas may have been reluctant to pursue offenders tied to local dynastic families. The Philippine National Police (PNP) recorded 43 cases of vote buying between 11 January to 12 May, tagging 96 suspects and arresting 50 individuals.

²² EU observers witnessed vote buying or *ayuda* distribution in Bohol, Davao Oriental, La Union, Palawan, Quezon, Siquijor, Zamboanga City and Zamboanga del Sur provinces. Indications of vote buying were observed at five of the 98 observed campaign events.

²³ The Omnibus Election Code and COMELEC resolutions prohibit the distribution of *ayuda* or similar assistance within 45 and/or 10 days (depending on type of aid) before election day to prevent undue influence on voters.

²⁴ Use of vehicles was observed in the provinces of Albay, Benguet, Camarines Sur, Davao Oriental, Ilocos Sur, Misamis Oriental, Negros Oriental, Southern Leyte and Zamboanga del Sur.

²⁵ A show cause order is a directive issued by a court or authority requiring a person or entity to explain or justify why a certain action should not be taken against them.

Contrary to good practice, during the last two weeks of the campaign, some state institutions undertook actions with significant political ramifications. On 29 April, the Ombudsperson preventively suspended incumbent Cebu Governor Gwendolyn Garcia, who stood for re-election, over alleged misconduct in early 2024, despite regulations disallowing such measures within 90 days of an election.²⁶ On 30 April, the presidential administration announced a probe into a water distribution firm owned by the family of a Senate candidate endorsed by Vice President Duterte.

To level the playing field, review the legislation to close remaining loopholes and add provisions to explicitly prohibit the use of government aid (ayuda) for partisan purposes and the practice of putting politicians' names and faces on government funded projects and aid. Strengthen the existing monitoring measures and enforcement by independent state bodies, and introduce effective and dissuasive sanctions.

The COMELEC responded to complaints of discriminatory or degrading speech during the campaign by issuing additional show cause orders. While welcomed by many, penalties that include administrative disqualification for speech-related violations may be disproportionate, infringe on free expression, and challenge due process and equality before the law. One HoR candidate was disqualified for campaign remarks deemed sexist and discriminatory. EU observers in Cavite, Laguna, Leyte, Misamis Oriental, Pampanga, Southern Leyte and the National Capital Region (NCR) received reports of barriers in accessing public assembly venues and unequal treatment of candidates. A precarious security situation further challenged access to freedoms in some areas.

Election-related violence

Electoral violence continues to plague Philippine elections. While most EU observers described the campaign as calm, some reported intimidation, harassment and violence targeting local candidates, their teams and even election officials. The PNP's revised tally recorded 49 election-related incidents, including 25 shootings, 20 deaths and 31 serious injuries, mostly in BARMM and the Zamboanga Peninsula (Mindanao), and in the Cordillera Administrative Region (CAR) in Luzon. Violence spiked on election day, particularly in BARMM, where at least 10 fatalities occurred.

State authorities addressed elections-related violence in a concerted manner, with increased deployment of police and army personnel to ensure a peaceful and orderly process. The COMELEC also responded by facilitating local peace covenants and updating 'areas of concern'; two BARMM municipalities were placed under its control following violence, including the murder of an election official. A gun ban was enforced from 12 January to 11 June, with illegal firearm possession cited as the most frequent offence. The COMELEC enjoys the power to 'take control' of areas with heightened risks of electoral violence, during which time security forces act under its authority: this was the case in Buluan and Datu Odin Sinsuat, both located in the BARMM. The PNP reported that, between 11 January and 12 May, it has arrested 3,117 individuals for gun ban violations and confiscated a total of 3,204 firearms.

Inflammatory rhetoric and red-tagging were noted in the BARMM, Cebu, Davao, Benguet, La Union and the National Capital Region (NCR), with some stakeholders accusing the National Task Force to End Local Communist Armed Conflict of distributing defamatory materials.²⁷

Campaign finance

Existing regulations ban foreign and anonymous contributions, but do not limit individual donations. Spending limits, unchanged since 1991 are obsolete.²⁸ There is no interim reporting, but contestants must submit Statements of Contributions and Expenditures (SOCEs) to the COMELEC within 30 days after election day, which does not facilitate informed choice. The COMELEC piloted

²⁶ Section 62(c) of the Local Government Code of 1991 (Republic Act No. 7160).

²⁷ In their March 2025 complaint to the COMELEC, the *Makabayan* bloc accused the government task force of engaging in red-tagging and using state resources – including the Armed Forces of the Philippines (AFP) and PNP – to harass their candidates and supporters during the campaign.

²⁸ Spending limits are PHP 3 (EUR 0.05) per voter for parties and PHP 5 (EUR 0.08) for independent candidates.

electronic SOCE submissions and for the first time planned to publish them online, after it restructured its campaign finance department and bolstered capacity. In-kind donations must be monetised and third-party expenses included in candidates' SOCEs. There is no public funding for parties or campaigns, which some interlocutors believe could help level the playing field.

To foster transparency, accountability and more equal opportunity, review the campaign finance framework to set reasonable expenditure limits, make reporting public and strengthen the institutional capacity to oversee political and campaign finance.

Candidate materials displayed on private property and private events were sometimes used to bypass regulations; for example, EU observers were barred from observing campaign-like meetings labelled 'non-public' in Cebu and Puerto Princesa (Palawan). Several candidates told the EU EOM that obsolete spending limits prevent them from truthfully reporting campaign expenses. Some criticised the low caps as especially taxing on challengers facing incumbents who misuse state resources. The ban on pre-campaign spending is ineffective, with some prospective candidates incurring significant expenses before the official period, skewing the playing field.²⁹ Legal gaps, the COMELEC Political Finance Affairs Division's limited resources and capacity, as well as uneven enforcement undermined campaign finance transparency and equal opportunity for contestants.³⁰

X. Media

Senate-focused coverage, with extensive paid advertisements, dominated in major media.

Media environment

Philippines has a vibrant media environment with some 3,000 private media outlets. According to the data provided by the National Telecommunications Commission, 2,245 private broadcasters (372 AM and 1,147 FM stations, 726 TV stations) operated in the country by the end of 2024.³¹ There are various estimates concerning other types of media, with 300-500 online and with some 400 outlets in steadily declining print media segment. At the same time, many media outlets are perceived as politically controlled or affiliated. High Internet penetration contributes to the importance of online content, including social networks and particularly Facebook, which, in combination with television and radio, serve as primary sources of information.

The GMA network has a biggest audience share, while the franchise of its main competitor, the ABS-CBN, was not renewed in 2020. It continues to broadcast through various agreements with other broadcasters (such as *A2Z* and *Kapamilya*), nonetheless with significantly reduced production. As a result of what was widely seen as a politically motivated decision due to its critical stance against former President Duterte, an access to independent media, in particular at regional level, continues to be adversely affected.

There are three major state-owned media outlets, namely *the People's Television Network (PTV)*, *Intercontinental Broadcasting Corporation (IBC-13) Radyo Pilipinas* and *the Philippine News Agency (PNA)* that primarily serve as communication channels for the President and his administration, aimed to cover and promote official activities and programs. The state media structure is under executive oversight of the Presidential Communications Office that defines and controls policy direction, budget coordination and management appointments.

Long-standing challenges to journalists' work, such as economic fragility and intimidation, including "red-tagging", and impunity persist. Reportedly, these incidents, a major concern in the country known for its high levels of violence against reporters in the past, have continued also during the new presidential administration, with 184 incidents of attacks and threats against media workers

²⁹ In Penera vs. COMELEC (2019) the SC ruled that individuals are considered candidates only once the campaign had started, political advertising by prospective candidates prior to this is not subject to limits.

³⁰ The law includes dissuasive sanctions, such as fines, disqualification and imprisonment.

³¹ Source: National Telecommunications Commission (NTC).

between July 2022 and April 2025.³² Six journalists, including one during this campaign, were killed since last 2022 elections.³³ Continuing growing influence of social media, and a widespread self-censorship due to the overall atmosphere of insecurity, further diminishes voice of local journalism.

Freedom of media and journalists should be strictly upheld. Interference with their activities or their harassment under the pretext of existing legislation should not be tolerated. Effective protection of media against threats and intimidation should be further reinforced, including activities aimed at strengthening the legal awareness of the law enforcement agencies.

Notably, reflected also by the EOM interlocutors, the general atmosphere in the journalistic community, in particular on national level, has improved and the intensity of hostilities against media has decreased. Reporters Without Borders in its 2025 Press Freedom Index ranks the Philippines as 116th out of 180 countries. The country was ranked 147th in 2022. It is assessed as a country with difficult situation (the second lowest category).

Legal framework for the media

The Constitution guarantees freedom of the press, and overall, it was respected during the campaign. As reported by the UN Special Rapporteur on freedom of opinion and expression in 2024, "some legal provisions are not in line with international standards and good practice and would benefit from reform."³⁴ In addition, defamation is criminalised in the Penal Code and in the 2012 Cybercrime Prevention Act (CPA), with up to six years prison in the legacy media and up to eight in the online sphere. Criminalisation of defamation is incompatible with international standards.³⁵

Criminal defamation provisions, including for online activities, should be repealed in favour of civil sanctions designed to restore the reputation harmed. Sanctions should be strictly proportionate to the harm caused.

The Constitution guarantees the right to information, with the 2016 Executive Order No. 2 being a partial fulfilment of that right, however it is limited to the executive branch. In addition, several EU EOM interlocutors complained that the existing framework provides for overly broad or vaguely framed exemptions, thus further limiting access to the public information.

A legislation that protects the right to information of public interest should be considered. With an aim to strengthen transparency and confidence the law should prioritise the active publication and to provide for an effective and reasonable timeframe concerning requests.

There is no general law that applies to the media sector as a whole, but the industry benefits from self-regulated arrangements. The National Telecommunications Commission (NTC) operates as a technical media regulator,³⁶ whereas the election legislation vests a loose media oversight role to the COMELEC. It did not conduct any systemic media monitoring and performed its role based on complaints and on reports, mandatory submitted by the media to reflect paid advertisement allocation. The EU EOM was informed that during the campaign there were two media-related complaints, while the COMELEC did not initiate any proceeding against the media.

Media election coverage is regulated by the OEC and the Fair Elections Act. The latter stipulates that media "shall scrupulously report and interpret news, taking care not to suppress essential facts, nor to distort the truth by omission or improper emphasis." The law provides for specific time and space allocation of paid advertisements, with up to 120 and 180 minutes to each candidate or political party contesting a national seat by television and radio broadcasters, respectively.

³² <u>The State of Media Freedom in the Philippines 2025</u>, Center for Media Freedom and Responsibility.

³³ Source: <u>UNESCO observatory of killed journalists</u>. According to the observatory there were 118 journalists killed in the Philippines in the framework of their duties since 1993.

³⁴ Preliminary observations by the UN Special Rapporteur on freedom of opinion and expression, Ms Irene Khan, at the end of her visit to the Philippines, February 2024.

³⁵ Paragraph 47 of <u>General Comment No. 34 to Article 19 of the ICCPR</u>.

³⁶ It operates under the 1931 Radio Control Law and the 1995 Public Telecommunications Policy Act.

Media monitoring findings

On 11 April, the EU EOM begun its media monitoring of seven TV stations, six radio stations, five online news sources and three newspapers.³⁷

The EU EOM monitoring findings revealed that there was an active media coverage that, overall, provided with opportunities to make a more informed choice. State-funded media overwhelmingly focused on the authorities, predominantly President Marcos and his cabinet, including his initiative of the rice subsidies' rollout, as well as on the COMELEC through a weekly informative programme with the COMELEC representatives explaining various aspects of the electoral process. At the same time, both state broadcasters (*PTV* and *Radyo Pilipinas*) showed visibly critical stance towards former President Duterte and his daughter, Vice President Sara Duterte.

Major monitored broadcasters also significantly reflected activities of the authorities. In their election related reporting, the major networks GMA-7, ABS-CBN and TV5 covered primarily senatorial candidates, while SMNI adopted a different approach and showed clear preferential treatment of PDP-Laban. Most of the monitored online outlets offered its readers a comprehensive political coverage, including regular opinion sections. Rappler, known for its investigative reporting, provided also a more local-related election coverage.

However, local media at times limited their coverage of sensitive, including political issues, avoiding potential risks to their safety and integrity. The EU EOM observed that financial constraints, insecurity and reported lack of professional standards impacted the overall quality and reliability of the election coverage on local level, when financial power effectively often dictated campaign visibility on traditional media. In a wider perspective those long-standing issues remain an important hindrance for developing independent, analytical and critical local media. In this regard, the capacity of self-regulatory bodies, primarily the Philippine Association of Broadcasters (KBP) should be further supported with an aim to enhance professional and ethical standards

COMELEC encouraged media outlets to organise debates with Senate candidates, following similar initiatives in previous elections.³⁸ While there were several debates hosted by the local media and organisations with participation of local candidates, there were various organised also by the national media, however, all but one before the start of the official national campaign.³⁹ At the same time, numerous interview formats were promoted by major media for the Senate candidates, however, exclusively accessible through online segments of the broadcasters. While the interviews somewhat substituted lack of critical and analytical news reporting, most of the top-rated candidates opted not to take part, to detriment of the voters.

³⁷ The EOM monitors two state-funded broadcasters (*PTV* channel and *Radyo Pilipinas*), six private TV channels (*A2Z*, *GMA-7*, *Kapamilya*, *NET-25*, *SMNI* and *TV5*) and five private radio stations (*Bombo Radyo, Super Radyo, DZRH*, *RMN*, and *Teleradyo*). The EOM also monitors five websites *inquirer.net*, *manilatimes.net*, *mb.com.ph*, *philstar.com*, and *rappler.com*, as well as the Sunday editions of three daily newspapers *Manila Bulletin*, *Philippine Daily Inquirer*, *Philippine Star*. TV channels are monitored during their prime-time programming (18:00–24:00 hrs.), in radio stations main morning news programmes were monitored. In online media their political and opinion sections, and in newspapers full publications, were monitored.

³⁸ In 2016 presidential candidates were obliged to participate in the debates, while in 2022 presidential election the debates were organized by the COMELEC, however, without mandatory participation. For the 2025 midterm elections a decision to hold debates was solely at the media discretion.

³⁹ The Manila Times jointly with the DZRH organised a series of nine topical debates. Other debates in different formats were hosted by major broadcasting networks GMA, ABS-CBN (in cooperation with the San Beda University) and by the SMNI channel.

XI. Social Media and Digital Rights

Personality-driven online campaign with successful efforts to limit disinformation, marked by allegations of vote-buying and instances of red-tagging

Social media environment

Philippines social media environment is vivid, yet also divided along political dynasties and their supporters. Some 83.5 per cent of Filipino population have access to internet.⁴⁰ Most citizens, with a prominent fraction of younger voters, turn to social media to get information on politics and election-related matters. Digital literacy of the population is low to moderate.⁴¹ There are several fact-checking initiatives but verifying online news remains relatively uncommon among users.

Facebook remains the most widely used social media platform, with 93 per cent of internet users having an account, mostly because since 2013 it is free service with no data usage.⁴² TikTok follows, with 64 per cent of internet users registered, while 59 per cent are subscribed to YouTube. Instagram is used by 23 per cent of internet users to share their work. X is utilised by one in ten internet users, yet it remains a key platform for opinion leaders and politicians, especially during campaigns.⁴³ Among instant messaging platforms, Messenger and WhatsApp are the most popular, with political contenders forming numerous support groups and channels.

Disinformation had a limited impact on shaping the election campaign, even though EU EOM interlocutors expected the topic to be dominant. For instance, during the campaign, the main fact-checking initiatives, Vera Files and Rappler, reviewed 57 election related and eight voter-awareness-related posts. From the 57 election related posts, 11 focused on local issues, while 46 addressed nationwide matters. There are several reasons for this. First, a COMELEC tough stance against these issues and collaboration with 24 organisations,⁴⁴ was a positive step to curb the harmful content that contributed to identify and neutralise disinformation. During the election campaign, the COMELEC sent 1,326 requests for content removal to Meta, of which 94 per cent were approved within 24 hours. TikTok was actively eliminating harmful content and between 7 and 12May, it removed 4,100 posts that violated platform policies. It also and launched the Election Hub initiative, a page developed in collaboration with COMELEC, providing essential election facts, a guide on combating disinformation, and links to the websites of COMELEC, LENTE, and NAMFREL.

Another factor was Meta's two initiatives that enhanced the detection of harmful content: the implementation of an AI model designed to identify violations of "community standards" and an increase in paid detections by fact-checking organisations working with Meta. Finally, the relatively small number of disinformation messages, which contradicts media reports, stemmed from an apparent limited understanding of what disinformation is. The latter highlighted the need to implement extensive programs boosting digital literacy among the population. It is equally important for those who deal with the concept of disinformation, such as journalists and politicians.

Electronic media and outlets that shared information exclusively via social media played a positive role and generally avoided spreading harmful content, nevertheless there were signs of bias – often either in favour of or against a particular political candidacy or dynasty.⁴⁵ Moreover, while articles and videos generally maintained a high level of discussion quality, the same could not be said for comment sections and reactions, which induced the discussion on troll farms. EU EOM interlocutors noted that troll farms have become harder to detect due to their decentralised operations, unlike past tactics using identical messages and hashtags. The DICT reported several cases to Meta when coordinated narratives stemmed from a foreign source or when mass messages were identical, while

⁴⁰ <u>Digital 2025 report</u>.

⁴¹ Low digital literacy level in Philippines.

⁴² Facebook data free service, started in 2015.

⁴³ See Annex II, chart 1.

⁴⁴ Not only governmental agencies, but also CSOs and global tech companies.

⁴⁵ See Annex II, chart 11.

TikTok removed three troll farms. Despite broad agreement on the issue's scale, some groups like "Die Hard Duterte Fans" were seen as both trolling and expressing authentic political views.

Several issues were present during the election campaign, both in the media and among politicians: vote buying, closely connected to *ayuda*, and red-tagging. The phenomenon of online red-tagging was present during this election campaign, despite warnings and resolutions issued by COMELEC. The real-world repercussions of groups and individuals accusing others of communist affiliation were also highlighted in a report by Amnesty International, published in early April⁴⁶. Cases of online red-tagging were recorded by the EU EOM in its social media monitoring efforts. Warnings against vote buying were repeatedly issued by COMELEC throughout the campaign, usually resulting in show-cause orders. Accusations of vote buying appeared almost daily on social media, electronic media pages, and among politicians.

To counter red-tagging and online disinformation a sustainable support system for independent media and investigative journalism and fact checking should be further strengthened and maintained, alongside continued expansion of media and digital literacy programmes for all strata of society.

Legal and regulatory framework for social media and digital rights

The legal framework for social media and digital rights in the Philippines is complex and continuously evolving. While the Constitution enshrines freedom of expression, subsequent legislation has shaped its boundaries, particularly in the digital space. Over the years, laws have introduced new mechanisms for regulating online activity, sometimes sparking concerns among human rights organisations and activists about restrictions on free speech.

Efforts to expand digital rights include the Presidential Executive Order No. 2 (2016), which secures freedom of information, granting Filipinos access to publicly available data, including electronic records and computer-stored materials. EU EOM interlocutors stated that this attempt is not sufficient, as a more detailed law is needed. The Data Privacy Act provides legal protection for personal data and is overseen by the National Privacy Commission. EU EOM interlocutors stated that the Data Privacy Act is often used by the authorities to refuse access to information.

However, laws such as the CPA and the Anti-Terrorism Act (ATA) have introduced legal instruments that affect online freedom of the online discussion. The CPA, enacted in 2012, has been widely criticised for its provisions on libel, commonly referred to as "cyber libel," with harsher repercussions than prescribed by the Revised Penal Code. In 2023, the SC ruled that alleged online libel is punishable only under the CPA, rather than by the Penal Code. The ATA, passed in 2020 under President Duterte, faced vocal opposition both domestically and internationally. Critics argue that certain sections of the law, such as provisions on incitement to commit terrorism, create a "chilling effect" on free speech and association, as noted by the University of the Philippines Institute of Human Rights.

Social media monitoring results

Overall, from 28 March to 11 May the EU EOM social media monitoring unit assessed the tone and the content of 99,642 posts, among which 51,829 were election-related, attesting to the high volume of political debate. The campaign in the Philippines is traditionally personality-driven rather than topic-focused, and social media is no exception to this rule.⁴⁷ The vast majority of posts published by candidates contained the message "vote for me" (73.4 per cent of all posts). The next most common posts were endorsements of senatorial and HoR lists (17.1 per cent and 5.7 per cent, respectively). Most of the posts by the candidates were positive or neutral in tone (50.8 per cent and 48.5 per cent, respectively).

⁴⁶ <u>Amnesty International report</u>.

⁴⁷ See Annex II, chart 9a,

Apart from couple of posts COMELEC's online voter education attempts was a missed opportunity to inform the public, with only six out of 276 posts gained a larger audience. The *election day* schedule got over 321,000 reactions, and a precinct finder got over 94,000 reactions.⁴⁸ Four other entries posted just before the elections got between 10 and 40 thousand reactions. The rest of the posts garnered around 400 reactions on average, which is quite poor result for a page with over 1.5 million followers.⁴⁹

An analysis of campaign database revealed manipulations of number of the followers, with some candidates – senatorial and local – inflated their numbers by over a million⁵⁰. Though not illegal, this artificial expansion of the reach, especially just before the elections, amplify the importance of the candidate, potentially shaping voters' decision. Follow-up analysis showed not only number of followers increased, but also reach, comments and impressions.⁵¹

Global tech companies failed to enforce campaign silence rules,⁵² with paid political advertisement continuing to run on Facebook. While during both silence periods (17-18 April and 10-11 May) approximately half of the senatorial candidates refrained from being active online, 35 ads valued at PHP one million (approx. EUR 16,000) and 54 ads worth PHP 9 million (approx. 146,000 EUR) were still online during campaign silence periods, respectively. It is notable that campaigning online is not scrutinised under the law, as it is campaigning in traditional media, which creates an uneven playing field if a given candidate decides to run his or her ads during the campaign silence period.⁵³

In the week after the election all monitored actors posted over 63,000 times, while the EU EOM Social Media Monitoring Unit coded 15,819 posts and assessed 10,457 as election related. Two topics about the elections outcome dominated: final election results were observed in almost 3,200 posts and partial results – in 1,850. Proclamations to newly elected representatives were issued in 840 posts and internal affairs discussion (mainly about COMELEC performance): in 1,853. Most of the assessed posts were positive in tone.⁵⁴

XII. Participation of Women

Despite legal provisions and institutional efforts, women continued to participate as candidates at significantly lower rates than men.

The constitution upholds the equality before the law of women and men, guarantees citizens' equal access to opportunities for public service, particularly in the decision-making and policy-making processes in government. There are no legal barriers for the participation of women in elections as candidates or as voters, and while the legislation affords special provisions for the advancement of women, such as the Magna Carta of Women, the legal framework for elections does not contain affirmative action measures to promote women's political participation.

For the 2025 elections, COMELEC adopted a tough stance to address gender-based harassment during the campaign period, by qualifying discrimination and sexist remarks as electoral offence,⁵⁵ and reinforcing protections against gender-based harassment in both physical and digital campaign environments.⁵⁶ Sanctions may include imprisonment of up to six years, disqualification from running for office, and the suspension of suffrage rights. During the campaign period, several

⁴⁸ Both posts were pinned to the COMELEC's Facebook page, boosting the engagement.

⁴⁹ See Annex II, chart 10.

⁵⁰ Some candidates boosted their campaigns, by artificially increasing their followers counts, sometimes by 100,000 overnight. This analysis was conducted again on the full database after the elections, revealing even bigger followers' number manipulations.

⁵¹ See Annex II, chart 7a and 7b.

⁵² Campaign silence rules also apply to the online sphere, defining online election campaign in COMELEC Resolution 11086 and establishing campaign silence periods in Republic Act 7166.

⁵³ See Annex II, chart 12a and 12b,

⁵⁴ See Annex II, chart 13,

⁵⁵ <u>Resolution 11116</u> of February 2025.

⁵⁶ <u>Resolution 11127</u> of April 2025.

candidates received show cause orders for making sexist remarks, and one candidate was disqualified on these grounds. In addition, the COMELEC undertook several initiatives to promote women's participation, and launched voter education initiatives tailored specifically for women.

Despite legal guarantees and institutional efforts, women candidates continue to participate at significantly lower rates than men. In the senatorial race, 12 of the 66 candidates, or 18 per cent, were women. For the HoR, women constituted 22 per cent of the candidates. More broadly, out of the 41,000 candidates contesting over 18,000 seats of local administrations across the country, 22 per cent were women. Particularly concerning is the situation in BARMM, where only eight per cent of district representative candidates were women. Of the 155 party lists registered to participate in the 2025 elections, six focused exclusively on advancing women's welfare.

Following the elections, only three of the 12 newly elected senators are women, reducing the number of women in the 24-member Senate from seven to five, and in the HoR the number remains the same as in outgoing chamber. Only one party list representing women has access representation in the HoR with one seat (Nanay).

Temporary special measures could be introduced to achieve gender parity in elected and appointed positions. Incentives for political parties should also be considered to promote more women in leadership positions and as candidates for election.

XIII. Participation of Underrepresented Groups

Commendable efforts by COMELEC to improve inclusiveness, but gaps in accessibility, representation and ballot secrecy remain

Persons with disabilities

COMELEC introduced several initiatives to enhance electoral accessibility for Persons with Disabilities (PwDs). These include mobile registration units, voter education materials tailored to PwDs, and priority lanes at all voting centres. For the 2025 elections, COMELEC launched several nationwide arrangements for the first time. Early voting hours were introduced, allowing vulnerable voters to vote from 5:00 to 7:00 a.m. on 12 May 2025. Nearly 7,800 Accessible Polling Places (APPs) were established on the ground floors of voting centres to serve over 11.4 million registered voters aged over 60 and around 500,000 pre-registered PwDs. Additionally, 3,301 Priority Polling Places (PPPs) were set up for those who had not pre-registered at APPs, with Electoral Boards collecting ballots for later insertion into the appropriate ACMs, a procedure that undermine the right to a secret ballot.

PwDs and illiterate voters could be assisted by a person of their choice or by a member of the Electoral Board. Hearing-impaired voters were able to verify their selections using headphones connected to ACMs.

While COMELEC's efforts to facilitate the participation of PwDs are commendable and reflect a commitment to an inclusive electoral process, implementation was uneven, especially in remote areas where limited infrastructure hindered accessibility, according to EU observers.

Indigenous peoples

In January 2025, COMELEC and the National Commission on Indigenous Peoples (NCIP) signed a Memorandum of Agreement (MOA) to support the participation of Indigenous Cultural Communities (ICCs) in the 2025 elections. As a result, 64 Accessible Voting Centers (AVCs), 25 Exclusive Separate Polling Places (ESPPs) and 15 Clustered Separate Polling Places (CSPPs) were established in remote areas, enabling voting for some of the 951,870 registered voters who selfidentify as Indigenous Peoples (IPs). According to the COMELEC, culturally sensitive voter education was conducted in some areas in cooperation with civil society groups, including demonstrations of the ACMs for indigenous communities. Despite these efforts, significant barriers remain, including those stemming from structural inequalities. Although the 1997 Indigenous Peoples' Rights Act recognises indigenous peoples' rights, implementation gaps persist, especially in areas such as Mindanao, the Cordilleras and Northern Palawan. Limited election materials in native languages, poor infrastructure and weak coordination between local authorities and IP mandatory representatives continue to hinder meaningful participation.

While data is limited, only two party-list groups claimed to represent indigenous peoples, and very few candidates were from indigenous backgrounds. EU observers noted that many indigenous voters still travel long distances to polling stations, with communities rarely targeted in candidate outreach. Due to poverty and social exclusion, they remain particularly vulnerable to political pressure and inducements. Moreover, some indigenous groups are perceived as engaging in bloc voting, with traditional leadership thought to monopolise political decisions, including voter choice.

LGBTIQ community

The prohibition of discrimination based on gender and sexual orientation is enshrined in key legal instruments in the Philippines. However, national-level legislation specifically protecting the rights of members of the LGTBIQ community, most notably the long-stalled Sexual Orientation, Gender Identity, and Gender Expression (SOGIE) Equality Bill has yet to pass. In the absence of a national law, over 30 local government units have enacted anti-discrimination ordinances that provide some level of protection for members of the LGBTIQ community at the local level. Legal gender recognition remains unavailable, meaning transgender individuals cannot update their documents to reflect their gender identity, that may pose barriers to their political participation, particularly at the vertification of identity at polling precintcts. Transgender candidates need to be registered with their birth legal names that do not reflect their new identity. Also transgender voters may face problems of identification at polling stations.

No openly LGBTIQ party list was accredited for the 2025 elections. Several of the most voted partylist groups in the Philippines' 2025 elections included LGBTIQ rights in their platforms. For instance, *Akbayan* party list, which secured the highest number of votes, highlighted the eradication of gender-based discrimination as one of its key agenda points. Additionally, *Mamamayang* Liberal (ML) party list, that obtained one seat in the HoR, specifically listed the LGTBIQ community among the marginalised sectors it aimed to represent. Similarly, Gabriela Women's Party emphasised the passage of the SOGIE Equality Bill and other measures to protect the rights of women, as well as of lesbian, gay, bisexual, transexual, intersexual and queer, asexual people and others.

Young and first-time voters

Citizens aged 18 to 30, comprised 21,656,564 registered voters, 32 per cent of the total electorate. Moreover, together with the combined electoral weight of millennials (born 1981–1996) and generation Z (born 1997–2007) accounted for nearly 63 per cent of the voting-age population.

The Constitution explicitly recognises the "vital role of the youth in nation-building" and mandates the State to "promote and protect their physical, moral, spiritual, intellectual, and social well-being." Youth are however categorised as an underrepresented sector under Article XIII, Section 15 of the Constitution. To address this imbalance, the Constitution mandates the establishment of mechanisms to enhance the political voice of marginalised and underrepresented groups, including the youth, through the party-list system. Additionally, Republic Act No. 8044, or the *Youth in Nation-Building Act*, defines "youth" as those aged 15 to 30 and affirms the role of young people as key stakeholders in national development.

During the campaign several candidates sought the support of the youth sector and while there are not voter turnout figures broken down by age made available, their active participation was assessed as a key factor in the election by the COMELEC and elected senators in their proclamation speeches.

XV. Civil and International Election Observation

Insufficient guarantees for election observation undermined transparency and hindered scrutiny of voting procedures.

Legal framework for election observation

As is the case with other areas of the election framework, legal provisions for election observation are primarily established in the 1985 election code, which predates the Constitution, and complemented by several regulations, most recently the December 2024 *General Instructions for the Electoral Boards* and the March 2025 *Accreditation Guidelines for Domestic & International Election Observers*.⁵⁷

Despite the legal and regulatory provisions for observing voting procedures, as well as the Administrative Arrangement signed by the European Union, the COMELEC and the DFA guaranteeing EU observers' access to all electoral phases and locations, on 8 May the COMELEC informed the EU EOM that its observers would not be allowed to enter the polling precincts during voting. The COMELEC Chairman proceeded to brief the media to the same effect over the following days, asserting that the law did not allow it. The EU EOM notes that the election code and relevant regulations identify respectively political and civic organisation 'watchers', and 'other persons specifically authorised by the Commission', as individuals permitted inside polling places.⁵⁸ Furthermore, COMELEC resolutions granted accredited observers access to all stages of the electoral process.⁵⁹

As part of the recodification and consolidation of the legal framework for elections, the right of access to polling precincts should be made explicit for all duly accredited national and international election observers, not just those from citizen arms organisations. Likewise, the legal framework should ensure right of access for duly accredited candidate/ party representatives (poll watchers) from all contesting parties, not just those from dominant majority and minority parties.

The prohibited acts within a polling precinct listed in the March 2025 Accreditation Guidelines for Domestic & International Election Observers are ostensibly reasonable and based on the principles of non-interference, non-obstruction and respect for the electoral authority.⁶⁰ However, it is of concern in a context of inconsistently interpreted rules that these acts are defined as electoral offences carrying penalties of between one and six years' imprisonment, sanctions that appear entirely disproportionate and at odds with international principles. Given what is effectively legal uncertainty, such penalties may act as a strong disincentive to both national and international observers, to avoid otherwise legitimate actions which could be recast as an electoral offence. For example, the March 2025 COMELEC resolution on accrediting election observers prohibits observers from entering a precinct without the authorisation of the Electoral Board chairperson.⁶¹ However, on 8 May, the COMELEC Chairman told the press that entering a precinct even with the permission of the Electoral Board was an offence, further heightening confusion and concerns.⁶²

Election observation

The Philippines boasts two particularly experienced electoral civil society organisations: the National Citizens' Movement for Free Elections (NAMFREL) and the Parish Pastoral Council for Responsible Voting (PPCRV). Both have monitored elections in the Philippines for over 30 years, and both are now accredited as 'citizen arms' to the COMELEC, a status contemplated by the

⁵⁷ Resolutions <u>11076</u> and <u>11121</u> respectively.

⁵⁸ Article XV, Omnibus Election Code. Resolution 11076, section 33(k).

⁵⁹ Resolution 11121, section 15.

⁶⁰ Ibid, section 19.

⁶¹ Ibid, section 19(e).

⁶² Chairman George Garcia at the Meet the Manila Press, 8 May 2025.

Constitution which entails, in addition to oversight, support to the COMELEC in key areas such as voter education.

NAMFREL and PPCRV observed numerous aspects of electoral preparations, as well as deploying large numbers of volunteers on election day, although particularly in the case of PPCRV, who deployed over 300,000, many of these volunteers manned voter assistance desks, rather than observing procedures. Both PPCRV and NAMFREL both carried out a parallel vote tally, and in addition, NAMFREL carried out an audit of VVPAT vote receipts, for 60 precincts in 10 provinces, which was the maximum number of precincts agreed with the COMELEC.

For its part, the Legal Network for Truthful Elections (LENTE) was established almost 20 years ago and as a network of lawyers, paralegals and volunteers advocates for electoral reform as well as leading public education activities. LENTE deployed 1200 observers to voting centres on election day. They reported that on several occasions, both their volunteers and candidate representatives were prevented from accessing voting locations, including by security forces. All three organisations collaborate with the COMELEC to carry out the post-electoral Random Manual Audit (*see Voting, Counting and Tabulation of Results section*).

In addition, a number of smaller organisations also provide civic scrutiny of the elections. These include Kontra Daya (Against fraud), Vote Report PH and Democracy Watch PH, as well as a wide range of local and regional organisations, all functioning on a voluntary basis to contribute to voter education and scrutiny of the election administration and candidates.

The COMELEC invited a range of international bodies, including, the Asian Network for Free Elections (ANFREL), which launched an observation mission at the end of April, with 21 observers deployed for several weeks before election day.

XVI. Electoral Disputes

Timeframes for the resolution of disputes are not aligned with the electoral calendar, which limits effectiveness and the right to redress

Complaints and appeals

The legal framework establishes procedures for complaints and appeals that are consistent with international standards of judicial review and access to a second instance. The right to redress is well defined, permitting all electoral stakeholders, including voters, to submit complaints at any level of the election administration. Decisions may be appealed to higher election administration bodies. Decisions issued by the COMELEC are immediately enforceable but subject to judicial review by the SC, whose rulings are final.

In addition to its administrative role, the constitution and the election code vests the COMELEC with quasi-judicial authority during elections, meaning it can adjudicate electoral disputes, cancel or deny certificates of candidacy, disqualify candidates, and resolve controversies like a court.⁶³ COMELEC decisions can be challenged to the SC.

The COMELEC serves as the primary institution with jurisdiction over all pre-proclamation of results electoral disputes in all national and local elections, and retains exclusive original jurisdiction over all post-proclamation election contest involving provincial and city officials, while regional trial courts exercise jurisdiction over post-proclamation cases of elective municipal officials. Election disputes after the proclamation of winning candidates involving senators and members of the HoR are heard by the Senate Electoral Tribunal (SET) and HoR Electoral Tribunal (HRET), respectively. Each of these bodies comprises three SC justices and six legislators.

The composition of the Senate and House electoral tribunals raise concerns of conflict of interest and impartiality, as elected officials are involved in adjudicating disputes arising from their own

⁶³ Constitution, article IX-C, section 2(2); and election code, sections 6 and 78.
elections. Electoral tribunals are empowered to correct or annul results but do not possess the authority to order a new election; only COMELEC has the power to declare an election failure and call for a special election. Election protests can be submitted up to 10 days after results are proclaimed.

The timeline to resolve electoral disputes is not synchronised with the electoral calendar, undermining the right to timely and effective redress. For example, there were voter registration cases adjudicated as late as April 2025; several candidate registration disputes remained unresolved on election day; cases related to irregularities in the registration of parties resulted in the disqualified of a political party during the campaign and the suspension of the proclamation of another after it had win three seats in the election (*see Results and Post-Election Environment section*). Furthermore, there are no statutory deadlines for resolving election result disputes before the electoral tribunals and the Supreme Court, allowing cases to remain unresolved for years.

Deadlines for complaints and appeals should be adjusted to guarantee a timely and effective remedy. The legal timeframe for the resolution of electoral disputes should be reviewed to provide expeditious resolution in line with the electoral calendar.

Electoral offences

Article XXII of the electoral code prohibits a broad range of offences, including vote-buying and selling, terrorism, intimidation, breaches of campaign and campaign finance regulations, interference with election procedures, violations of ballot secrecy, tampering results, voting more than once, etc. In addition, the Revised Penal Code and other election laws include a wide number of electoral offences, such as grave coercion, electoral sabotage or assisting more than three voters on election day. Electoral offences are prosecuted through the regional trial courts, with investigations conducted by COMELEC and law enforcement agencies.

Two COMELEC resolutions expanded the scope of electoral offences to include sexist remarks, discriminatory conduct, and other forms of harassment (*see Participation of Women section*). While the intention to promote inclusivity is commendable, this expansion raises significant legal and constitutional concerns as well as on due process, as changes in criminal or quasi-criminal liability require congressional approval, and not an administrative action.

The sanctions imposed for election offences are notably severe and can be disproportionate. They include imprisonment of one to six years, disqualification from holding public office, and suspension of suffrage rights both as voters and as candidates. Such penalties, particularly for acts such as sexist remarks or discriminatory behaviour, are excessive and may violate the principles of proportionality enshrined in human rights standards, as they should be addressed through civil and administrative sanctions rather than criminal penalties that infringe fundamental political rights.

While addressing issues of discrimination and harassment in elections is essential, it must be pursued through legislative reform and proportionate sanctions that uphold the rights of all stakeholders. Another procedural concern involves the standard of evidence applied by COMELEC. While it operates on a "probable cause" standard to pursue electoral offences, Philippine courts require "proof beyond reasonable doubt" for conviction. This discrepancy risks undermining due process rights, as individuals may face prosecution based on a lower evidentiary threshold, despite the severe penalties involved.

Sanctions for electoral offences should be reviewed in line with the principle of proportionality to encourage enforcement and compliance.

XVII. Voting, Counting and Tabulation of Results

Well-administered counting and canvassing procedures, although inadequate provision for a secret vote and overcrowded precincts

Overview of voting

The EU EOM was unable to conduct a meaningful observation of voting procedures on election day in accordance with its established methodology, despite having prepared 226 observers to deploy to the 93,287 precincts in 37,588 voting centres (*see Civil and International Election Observation section*). Nonetheless, a limited number of EU observers were able to assess voting and reported that the most serious and persistent problem was an almost complete lack of voter secrecy. According to their observations corroborated by reports from ANFREL and NAMFREL,⁶⁴ this was primarily due to there being no provision for secrecy of vote beyond the inconsistent availability of 'secrecy folders' which were smaller than the ballots. In any case, the folders were insufficient to ensuring secrecy of vote, given that voters first marked ballots in full view, before queuing up in front of the ACMs, and then were often assisted in inserting their ballots.

In a context characterised by concerns about vote-buying, institutional enforcement of provision on secret ballot, alongside education of voters and electoral staff on the importance of vote secrecy, should be considered a key protector of a free vote. Overcrowding of precincts exacerbated difficulties around secrecy of vote, and further, was used as an explanation to keep out election observers and party representatives other than those from the denominated 'dominant majority' and 'dominant minority' parties.⁶⁵ The EU EOM notes that aside from some largely temporary difficulties with ACMs, the main reason for overcrowding may stem from the decision to 'cluster' precincts, effectively raising the limit of voters per voting location to 1,000.

The election administration should provide adequate means of voting in secret in terms of polling layout and booths, as well as train electoral boards and focus voter education on the importance of a secret vote. These considerations should also be given priority in special arrangements such as Local Absentee Voting, voting of underrepresented groups such as persons with disabilities and indigenous voters as well as voting from prisons, and procedures adapted accordingly.

Counting and announcement of results

The EU EOM observed closing and counting procedures in 84 clustered precincts, with procedures in 82 of them assessed positively. In eight precincts, the EU observers were denied access, following COMELEC instructions regarding the observation of polling (*see Citizen and International Election Observation section*).⁶⁶ The atmosphere in observed precincts was calm and conducive to the counting process. Some of those precincts experienced difficulties transmitting results, although most of these issues were resolved. Procedures were generally adhered to, and poll watchers and observers were able to follow the process without undue restrictions.

During the election night, confidence in the process was affected by delays in the availability of transmitted results, including for political parties, the media, and some civil society organisations via the so-called transparency servers. The COMELEC dashboard displayed incoming results in batches rather than through the expected continuous flow, raising questions about the directness of the transmission process. Results on the transparency server provided by COMELEC to the Media, NAMFREL and PPCRV displayed duplications, which COMELEC attributed to two software glitches related to the mishandled time setup of the system. COMELEC resolved these issues during

⁶⁴ Sources: ANFREL, <u>2025 Philippine National and Local Elections: Improved Transparency and Resilient Participation Amid Operational Challenges, 13 May 2025; NAMFREL Election Day Bulletin #2.</u>

⁶⁵ COMELEC designated the dominant majority and minority parties, defined by law as the main pro-administration and opposition groups, based on criteria such as candidate count, past performance and poll watcher capacity. For the 2025 elections, LAKAS-CMD and *Nacionalista*, both part of the pro-presidential alliance, were respectively named the dominant majority and minority parties.

⁶⁶ Two in Cagayan, two in Calabarzon, two in Ilocos and two in Soccsksargen.

the night. After the elections, PPCRV and NAMFREL were comparing transmitted results with those printed by ACMs and at the time of reporting there were no differences. As with several other issues, COMELEC's communication strategy was suboptimal and often delayed. However, this does not inherently mean the information provided was incorrect.

Canvassing of results

EU observers attended canvassing in 87 municipal centres and 50 provincial centres. They were refused access to two municipal canvassing centres, in Soccskargen and in BARMM. For the most part, canvassing was well-organised, calm and attended by party representatives, for whom screens displayed progress of results received. About half of attended municipal canvassing boards had to upload at least some results by USB as transmission was not successful. Canvassing boards shared copies of certificates of canvass (tabulated results) and statement of votes (disaggregated results) with party representatives, although this was in printed form, when an electronic exploitable format may have been more useful to them.

From 23 May, the COMELEC released the transmission and server logs, a transparency measure it committed to before the elections. However, it remained unknown whether or when the audit logs of the ACMs would be made public. The Random Manual Audit in 762 clustered precincts started two days after the elections and was expected to last 45 days. This process was intended to verify the accuracy of the ACMs through manual vote counting in a randomly selected sample of precincts. Overall, while the COMELEC appeared committed to transparency and preparation, including contingency planning, there was room for improvement in procedural details, correct information to public and implementation.

XVIII. Results and Post-Election Environment

Pro-presidential parties swept Congress, and dynasties dominated the party-lists, but opposition enjoyed unexpected gains, as public attention turned to impeachment trial and the 2028 elections.

The results of the elections defied many stakeholders' expectations and differed from pre-election public opinion surveys, leading to a lively public debate about shifting voter sentiments. In the Senate, seven of the original 12 *Alyansa* slate candidates won seats, however, two were endorsed by the Vice President during the campaign: Camille Villar and Imee Marcos. The *DuterTEN* slate won three seats, including first place, won by Christopher 'Bong' Go, who was re-elected on the highest number of votes ever recorded in a Senate election. The successful wins in second and fifth place by opposition figures Bam Aquino and Francis 'Kiko' Pangilinan were viewed as the biggest surprises of the 12 May vote.

In the HoR, the incumbent majority party Lakas CMD secured 103 seats, the highest number. The five pro-presidential *Alyansa* parties won 225 of the 254 single-mandate district seats and are expected to be joined by representatives from smaller parties and some independents. The Duterte-aligned Party of the City People (*Hugpong sa Tawong Lungsod*) won all three Davao City district seats, while PDP Laban, backing the Vice President, took two. The opposition Liberal Party and *Aksyon Demokratiko* secured six and three seats respectively.⁶⁷ A total of 54 parties gained representation among the 63 sectoral seats. Unexpectedly, opposition *Akbayan* led the vote, winning three seats. Duterte Youth and *Tingog Sinirangan* – the latter aligned with the Speaker Martin Romualdez – each also won three seats. Six parties took two seats each, and 43 parties won one seat apiece. Civil society groups noted that many parties are linked to political families, weakening

⁶⁷ Former President Rodrigo Duterte stood for and won the mayorship of Davao City. He secured over 660,000 votes, defeating his closest rival by a wide margin. His son, Sebastian Duterte, was elected vice mayor, and his eldest son, Paolo Duterte, retained his congressional seat. Despite his detention, Duterte remains legally qualified to assume office and was proclaimed winner on 13 May. The Department of the Interior and Local Government will determine if Duterte can fulfill his duties while incarcerated.

efforts to amplify underrepresented voices. Moreover, several winning groups are named after popular *ayuda* welfare programmes.

According to the COMELEC, turnout reached 81.65 per cent, the highest recorded in a national midterm election. Following clarifications on the number of 'overvotes' in the senatorial race (*see Election Administration section*), the number of invalid ballots in that specific race amounted to 2.55 per cent. COMELEC did not provide aggregated data on invalid/blank ballot for the other electoral races. The ACMs counted as invalid the ballots with marks exceeding the maximum number of candidates to be elected.

Most of the winners of the HoR district elections were proclaimed by their respective City or Provincial Board of Canvassers (CBOC/PBOC) on 12 and 13 May – the proclamation of one district representative (Marcy Teodoro, NUP, in Marikina second district) with a pending disqualification case was deferred until it resolution: the COMELEC had until 30 June to resolve all outstanding petitions. On 17 May, the COMELEC proclaimed the 12 winning Senators, and on 19 May, the 52 party-lists – the proclamation of the remaining two party-lists, Duterte Youth (three seats) and *Bagong Henerasyon* (one seat), was suspended pending the resolution of disqualification petitions, which, in the case of Duterte Youth, dated back to 2019. On 18 June 2025, the COMELEC's Second Division ruled on the matter, disqualifying Duterte Youth and cancelling its registration.⁶⁸ The party list has the right to file a motion for reconsideration.

Preparations for the impeachment trial of Vice President Sara Duterte commenced upon the resumption of the Senate session, with the presentation of the Articles of Impeachment held on 11 June. The trial is set to start on 30 July, two days after the Senate's inaugural session. Nine out of the eleven-member prosecutor panel from the Justice Committee of the HoR were returned to their seats – the remaining two are to be replaced by newcomers Leila de Lima (*Mamamayang Liberal*) and Chel Diokno (*Akbayan*), both noted opposition figures during Rodrigo Duterte's presidency. Several newly elected or re-elected members of Congress announced their intentions to stand for the positions of Senate President and Speaker of the HoR when the two chambers convene.

⁶⁸ <u>Resolution SP-19-009</u>. The petitioners argued that Duterte Youth had failed to comply with the required accreditation procedures in 2018 and lacked genuine intent to represent the youth sector. The decision was adopted by majority vote, with two commissioners in favour and one dissenting opinion.

XIX. Recommendations

(Priority recommendations in bold)

NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
			LEGAL FR/	AMEWORK	·	
						RULE OF LAW / TRANSPARENCY AND ACCESS TO INFORMATION
1	16	The legal framework is fragmented, and it lacks coherence. Nearly 50 per cent of the provisions of the election code are no longer applicable as they have been outdated by the Constitution, enacted two years after, and by subsequent laws. Specific provisions and entire sections of the electoral code that are no longer valid refer, for example, to the registration of voters and candidates, the campaign and campaign finance, voting and counting procedures, electoral offences etc. but the text of the code remain intact making it difficult to know if articles are still in place or have been overridden by later legislation.	The legal framework should be recodified, and the texts of the electoral code be consolidated and harmonised with existing election legislation so that discrepancies and inconsistencies are removed.	Amend: Omnibus Election Code, 1985 Synchronized National and Local Elections, 1991 Party List System Act, 1995 Automated Election System Law, 1997 Fair Elections Act, 2001 Overseas Voting Act, 2003 Accessible Polling Places Exclusively for PWD and Senior Citizens, 2013	Congress	 ICCPR, article 2.2: "Each State Party to the present Covenant undertakes to take the necessary staps, in accordance with its constitutional processes and with the provisions of the present Covenant, adopts such laws or other measures as may be necessary to give effect to the rights recognized in the present Covenant." ICCPR GC 34, para. 25: "A norm to be characterised as a "law, must be formulated with sufficient precision to enable an individual to regulate his or her conduct accordingly and it must be made accessible to the public." UNHRC Resolution 19/36 [Human rights, democracy and the rule of law], para. 16(c): "States to make continuous efforts to strengthen the rule of law and promote democracy by: ensuring that a sufficient degree of legal certainty and predictability is provided in the application of the law, in order to avoid arbitrariness."
		The right to vote is suspended for individuals sentenced to at least one year of imprisonment, extending for five	Remove blanket restrictions on the right to active and passive suffrage for convicted imprisoned	Amend:		RIGHT AND OPPORTUNITY TO VOTE / RIGHT AND OPPORTUNITY TO PARTICIPATE IN PUBLIC AFFAIRS AND HOLD OFFICE
2	21	years beyond the completion of their sentence. This suspension similarly applies to those definitively convicted of sedition, rebellion, violations of firearm laws, or crimes against national security. Maintaining restrictions on voting rights	similarly suspension, after a sentence is served. on al security.	Omnibus Election Code, 1985	Congress	ICCPR, article 25 (b) : "Every citizen shall have the right and the opportunity [] without unreasonable restrictions: to vote and be elected [] at genuine periodic elections which shall be by universal and equal suffrage."

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
		beyond the completion of sentences is inconsistent with international standards regarding suffrage rights. Those sentenced for insurrection, rebellion or a to a penalty of more that				ICCPR GC 25, para. 14 : "The grounds for deprivation [of the right to vote] should be objective and reasonable. If conviction for an offence is a basis for suspending the right to vote, the period of such suspension should be proportionate to the offence and the sentence."
		eighteen months or for a crime involving moral turpitude cannot run as candidates until five years after the sentence has been served or expunged.				ICCPR GC 25, para. 15: "If conviction for an offence is a basis for suspending the right to vote, the period of such suspension should be proportionate to the offence and the sentence."
		In addition, citizens found guilty of an election offence. contained in the electoral code are disqualified from holding public office and deprived of his/her suffrage rights. The suspension of the right to stand after a sentence is served is unreasonable and disproportionate in view of international standards.				ASEAN Human Rights Declaration, article 25 (1) : Every person who is a citizen of his or her country has the right to participate in the government of his or her country, either directly or indirectly through democratically elected representatives, in accordance with national law
						ASEAN Human Rights Declaration, article 25 (2) : "Every citizen has the right to vote in periodic and genuine elections, which should be held by universal and equal suffrage and by secret ballot, guaranteeing the free expression of the will of the electors, in accordance with national law".
	33 res nat obs tha scr	Election law has been interpreted restrictively such that the priority given in the electoral code to citizen arms organisations and representatives of the dominant majority and dominant minority parties has been made to imply that other groups do not have the right to access precincts during voting. This resulted in a lack of certainty for national and international election observers, and representatives other than the priority parties, limited scrutiny, transparency and confidence in the process	As part of the recodification and consolidation of the legal framework for elections, the right of access to polling precincts should be made explicit for all duly accredited national and international election observers, not just those from citizen arms organisations. Likewise, the legal			RULE OF LAW / TRANSPARENCY AND ACCESS TO INFORMATION / RIGHT TO PARTICIPATE IN PUBLIC AFFAIRS
3				Electoral reform should take the opportunity to make observation and party / candidate oversight rights explicit. COMELEC	ICCPR GC 34, para. 19: "To give effect to the right of access to information, States parties should proactively put in the public domain Government information of public interest. States parties should make every effort to ensure easy, prompt, effective and practical access to such information."	
			framework should ensure right of access for duly accredited candidate/ party representatives (poll watchers) from all contesting parties, not just those from dominant majority and			UNCAC, article 7.4: "Each State Party shall, in accordance with the fundamental principles of its domestic law, endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interests."

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
			minority parties.			ICCPR GC 25, para. 20: "The security of ballot boxes must be guaranteed, and votes should be counted in the presence of the candidates or their agents." UNHRC Resolution 19/36 [Human rights, democracy and the rule of law], para. 16(c): Calls upon States to make continuous efforts to strengthen the rule of law and promote democracy by [] Ensuring that a sufficient degree of legal certainty and predictability is provided in the application of the law, in order to avoid any arbitrariness;
			ELECTORAL AD	MINISTRATION		
4	17	In election years, Congress is in recess in February when COMELEC commissioners' mandates end, and the Commission on Appointments only vets presidential, appointments once it reconvenes after the elections. In such cases, commissioners, sometimes including the chairman, organise the elections after an exclusively presidential appointment, before having their candidacy scrutinised.	Appointments to the COMELEC should be timed to ensure they are vetted by the corresponding Congressional Commission before the appointed commissioners organise and oversee elections.		Government Congress	RULE OF LAW / GOOD PRACTICE ICCPR GC 25, para. 20: "An independent electoral authority should be established to supervise the electoral process and to ensure that it is conducted fairly, impartially and in accordance with established laws which are compatible with the Covenant."
5	19	The COMELEC did not appear to regard transparency or the promotion of confidence in the electoral process as an integral part of its responsibilities, and tended to respond to concerns either dismissively or punitively. Although various tests were conducted and not formally contested, their results were not publicly accessible, weakening transparency. There was also no public information regarding the types of tests that were conducted.	The COMELEC should ensure transparency in all its activities and phases of the electoral process. This should include but not be limited to the publication of the decisions on candidate registration, tests and certificates of the automated election system, campaign finance reports, and the publication of detailed election results.	No change in the legislation required	COMELEC	TRANSPARENCY AND ACCESS TO INFORMATION UNCAC, art. 7.4: "Each State Party shall, in accordance with the fundamental principles of its domestic law, endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interests." ICCPR GC 34, para. 19 "States parties should proactively put in the public domain Government information of public interest."

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
6	19	Despite historical trust in automated counting, there were numerous calls for a return to manual counting, from numerous civil society organisations as well as political parties from across the political spectrum, indicating the need to take measures to generate confidence. Although every voter is issued a receipt (VVPAT) confirming their selection, there is no established procedure to use these receipts to verify the results.	Improve transparency and confidence in the results by enabling timely scrutiny of voter receipts (VVPATs) on election night as a means of verifying the outputs from the ACM, thereby strengthening public trust.	COMELEC resolution	COMELEC	 TRANSPARENCY AND ACCESS TO INFORMATION ICCPR, art. 25(b): "Every citizen shall have the right and the opportunity to vote and to be elected at genuine periodic elections guaranteeing the free expression of the will of the electors." ICCPR GC 25, para. 20: "There should be independent scrutiny of the voting and counting process and access to judicial review or other equivalent processes so that electors have confidence in the security of the ballot and the counting of the votes." ICCPR GC 34 para. 19: "To give effect to the right of access to information, States parties should proactively put in the public domain Government information of public interest. States parties should make every effort to ensure easy, prompt, effective and practical access to such information." UNCAC, article 7.4: "Each State Party shall, in accordance with the fundamental principles of its domestic law, endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interests."
			ELECTION T	ECHNOLOGY		
7	21	During election night, confidence in the process was affected by delays in the availability of transmitted results, including for political parties, the media, and some civil society organisations — via the so-called transparency servers. The COMELEC dashboard displayed incoming results in batches rather than through the expected continuous flow, raising questions about the directness of the transmission process. The Final Testing and Sealing (FTS) did not include the transmission	Conduct a full nationwide mock election exercise of the functioning of the ACMs and results transmission system, ideally on a single day.	No change in the legislation required	COMELEC	 TRANSPARENCY AND ACCESS TO INFORMATION UNCAC, art. 7.4: "Each State Party shall, in accordance with the fundamental principles of its domestic law, endeavour to adopt, maintain and strengthen systems that promote transparency and prevent conflicts of interests." ICCPR GC 25, para. 20: "There should be independent scrutiny of the voting and counting process and access to judicial review or other equivalent processes so that electors have confidence in the security of the ballot and the counting of the votes."

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
		component. Other mock exercises conducted prior to FTS included only limited sample of clustered precincts.				
			VOTER REG	GISTRATION		
8	22	Although efforts were made to reach out to citizens to facilitate their registration, some were still unable to do so, and figures indicate many eligible citizens remain unregistered to vote.	Enhance universal suffrage by ensuring inclusion in the voter register of all eligible voters, with the aim of eliminating instances of under registration.	<u>Amend</u> : Omnibus Election Code (1985)	Government COMELEC Philippines Statistics Authority	RIGHT AND OPPORTUNITY TO VOTEICCPR, art. 25 (b): "Every citizen shall have the rightand the opportunity without unreasonablerestrictions: to vote [] at genuine periodic electionswhich shall be by universal and equal suffrage."ICCPR GC 25, para. 11: "States must take effectivemeasures to ensure that all persons entitled to vote areable to exercise that right. Where registration of votersis required, it should be facilitated and obstacles tosuch registration should not be imposed."
			REGISTRATION OF CANDIDA	ATES AND POLITICAL PARTI	ES	
9	23	Eligibility criteria is not in line with international standards committed to by the Philippines. Candidate registration requirements should be amended so as not to unduly limit the right of citizens to seek public office.	The requirements of being a natural born citizen and the residency period requirement for candidacy in national elections should be reconsidered to ensure that they are fully in line with international commitments and good practices on the right to stand.	<u>Amend</u> : Constitution, 1987	Congress	 RIGHT AND OPPORTUNITY TO PARTICIPATE IN PUBLIC AFFAIRS AND HOLD OFFICE ICCPR art.25(b) " Every citizen shall have the right and opportunity [] to vote and to be elected at genuine periodic elections." ASEAN Human Rights Declaration (AHRD), article 25 (b): art. 25 (b): "Every citizen has the right to vote in periodic and genuine elections, which should be held by universal and equal suffrage and by secret ballot, guaranteeing the free expression of the will of the electors, in accordance with national law." ICCPR GC 25, para. 3: " Distinctions between those who are entitled to citizenship by birth and those who acquire it by naturalisation may raise questions of compatibility with article 25." ICCPR GC 25, para. 15: "Persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as [] residence."

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
10	23	The legal definition of nuisance candidates and the ban of candidates that "puts the process in mockery and disrepute" affords COMELEC <i>de facto</i> powers when registering a candidate as decisions on eligibility are based on COMELEC's overall assessment of the candidate's character, experience, morals, and access to resources to conduct a campaign. Objective criteria should apply.	Decisions on the rejection of the registration of candidates should be based on objective criteria and should be spelled out in the legal framework.	<u>Amend</u> : COMELEC Regulations	COMELEC	RIGHT AND OPPORTUNITY TO PARTICIPATE IN PUBLIC AFFAIRS AND HOLD OFFICE / RULE OF LAW / TRANSPARENCY AND ACCESS TO INFORMATION ICCPR art.25(b): "Every citizen shall have the right and opportunity [] and without unreasonable restrictions [] to be elected at genuine periodic elections." ICCPR GC 25, para. 4: "Any conditions which apply to the exercise of the rights protected by article 25 should be based on objective and reasonable criteria." ICCPR GC 25, para. 15: Any restrictions on the right to stand for election [] must be justifiable on objective and reasonable criteria. UNHRC Resolution 19/36 [Human rights, democracy and the rule of law], para. 16(h): "Taking appropriate measures and steps to amend electoral laws in order to enable people to vote and participate in elections, without unreasonable restrictions."
	1	L	CAMPAIGN E	NVIRONMENT	I	
11	25	Political parties play a largely nominal role in the Philippines, with many lacking clear ideological orientation and generally only serving to facilitate cooperation among vested interests. Candidates' allegiances often shift even during campaigns, challenging the voters' ability to make informed choices The above was true during the 2025 pre-election period. Political power is concentrated in dynastic families, which civil society organisations estimate to have held four out of every five congressional seats in the outgoing convocation, including about two-thirds of party-list seats reserved for underrepresented sectors.	To foster accountability and programmatic politics, consideration could be given to supporting political party development, internal democratic processes and curbing party- switching.	<u>Amend</u> : Omnibus Election Code (1985) Fair Elections Act, Consider enacting a Political Party Development and Reform Act.	Congress COMELEC Political parties	 FREEDOM OF ASSOCIATION / UDHR, art. 20 (1): "Everyone has the right to freedom of peaceful assembly and association." ICCPR, art. 22: "Everyone shall have the right to freedom of association with others." ICCPR GC 25, para. 26: "The right to freedom of association, including the right to form and join organizations and associations concerned with political and public affairs, is an essential adjunct to the rights protected by article 25. Political parties and membership in parties play a significant role in the conduct of public affairs and the election process ."

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
12	26	Incumbents use their role in elected office to (1) insert themselves into the process of welfare benefit distribution, and (2) create additional aid programmes to benefit their constituents and voters ahead of elections (through 'congressional insertions'). <i>Ayuda</i> is effectively the misuse of state resources to buy votes. The EU EOM observed directly and received a high number of credible reports of partisan <i>ayuda</i> distribution during the campaign.	To level the playing field, review the legislation to close remaining loopholes and add provisions to explicitly prohibit the use of government aid (<i>ayuda</i>) for partisan purposes and the practice of putting politicians' names and faces on government funded projects and aid. Strengthen the existing monitoring measures and enforcement by independent state bodies, and introduce effective and dissuasive sanctions.	Amend the Omnibus Election Code, Sec. 261 Omnibus Election Code, Sec. 261(o) RA 3019, Anti-Graft Law Consider passing the 'Anti-Epal' Bill (officially titled as the "Anti- Signage of Public Works Act")	Congress COMELEC	 PREVENTION OF CORRUPTION / FAIRNESS IN THE ELECTION CAMPAIGN UNCAC, art. 17: "Each State Party shall adopt such legislative and other measures as may be necessary to establish as criminal offences, when committed intentionally, the embezzlement, misappropriation or other diversion by a public official for his or her benefit or for the benefit of another person or entity, of any property, public or private funds or securities or any other thing of value entrusted to the public official by virtue of his or her position." UNCAC, art. 19: Each State Party shall consider adopting such legislative and other measures as may be necessary to establish as a criminal offence, when committed intentionally, the abuse of functions or position, that is, the performance of or failure to perform an act, in violation of laws, by a public official in the 19 discharge of his or her functions, for the purpose of obtaining an undue advantage for himself or herself or for another person or entity. ICCPR GC 25, para.19: "Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind."
			CAMPAIG	N FINANCE		
13	27	Campaign expenditure limits have not been reviewed since they were instituted in 1991. They are widely skirted, with understated reporting. There are no caps on donations. There is no requirement to publish the Statements of Contributions and Expenditures (SOCEs) which candidates submit within 30 days of election day – though the COMELEC plans to do so this year. There is no interim reporting	To foster transparency, accountability and more equal opportunity, review the campaign finance framework to set reasonable expenditure limits, make reporting public and strengthen the institutional capacity to oversee political and campaign finance.	<u>Amend</u> : Omnibus Election Code, Fair Election Act, COMELEC resolutions. <u>Consider</u> : Enacting political party regulation.	Congress COMELEC	FAIRNESS IN THE ELECTION CAMPAIGN / PREVENTION OF CORRUPTION UNCAC, art.7.3: "Each State Party shall also consider taking appropriate legislative and administrative measures, consistent with the objectives of this Convention and in accordance with the fundamental principles of its domestic law, to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties." ICCPR GC 25, para. 19: "Voters should be able to form

NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
		requirement. Also, there is no requirement to use a dedicated bank account for income or expenses				opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind."
			ME	DIA		
	28 v F	Long-standing challenges to journalists' work, with numerous and regular incidents of intimidation, including "red- tagging", and impunity persist. As reported by the local Center for Freedom and Media Responsibility there were 184 reported incidents between July 2022 and April 2025.	Freedom of media and journalists should be strictly upheld. Interference with their activities or their harassment under the pretext of existing legislation should not be tolerated. Effective protection of media against threats and intimidation should be further reinforced, including activities aimed at strengthening the legal awareness of the law enforcement agencies.	<u>Amend:</u> 2020 Anti-Terrorism Act	Congress Law enforcement agencies	 FREEDOM OF OPINION AND EXPRESSION ICCPR, art. 19 (1): "Everyone shall have the right to hold opinions without interference." ICCPR, art. 19 (2): "Everyone shall have the right to freedom of expression []" ICCPR GC 34, para. 13: "A free, uncensored and unhindered press or other media is essential in any
14						society to ensure freedom of opinion and expression and the enjoyment of other Covenant rights. It constitutes one of the cornerstones of a democratic society. [] The free communication of information and ideas about public and political issues between citizens, candidates and elected representatives is essential. This implies a free press and other media able to comment on public issues without censorship or restraint and to inform public opinion []"
		Libel, including online, is a criminal offence punishable with imprisonment with multi-layer adversary effects, as it intimidates journalists, while causes a chilling effect on their activities as well	Criminal defamation provisions,	Amend:		 FREEDOM OF OPINION AND EXPRESSION ICCPR, art. 19 (1): "Everyone shall have the right to hold opinions without interference." ICCPR, art. 19 (2): "Everyone shall have the right to freedom of expression []."
15	28	as of the media outlets. Lawsuits are expensive, dragging on for years and consequently leading to self-censorship, inhibiting independent and critical reporting on politically sensitive issues. Neither such laws, nor their application accord with international standards for freedom of expression.	including for online activities, should be repealed in favour of civil sanctions designed to restore the reputation harmed. Sanctions should be strictly proportionate to the harm caused.	Revised 1930 Penal Code 2012 Cybercrime Prevention Act	Congress	ICCPR GC 34, para. 21: "[] when a state party imposes restrictions on the exercise of freedom of expression, these may not put in jeopardy the right itself." ICCPR GC 34, para. 47: "[] parties should consider the decriminalisation of defamation, and, in any case, the application of the criminal law should only be countenanced in the most serious of cases and imprisonment is never an appropriate penalty []"

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
16	28	Unimpeded access to government-held information is not legally guaranteed. President's 2016 Executive order Nr.2 on access to information does not have the status of a law and is applicable only to executive branch. In addition, many institutions, instead of promptly publishing information of public interest online, have introduced own bureaucratic procedures for requesting any data or documents. As such, it undermines implementation of constitutionally guaranteed right to public information and results in reduced scrutiny of candidates and impedes voters to make an informed choice.	A legislation that protects the right to information of public interest should be considered. With an aim to strengthen transparency and confidence the law should prioritise the active publication and to provide for an effective and reasonable timeframe concerning requests.	Enact: Freedom to Information Act <u>Amend/Repeal</u> 2016 Executive Order #2	Congress	FREEDOM OF OPINION AND EXPRESSION / TRANSPARENCY AND ACCESS TO INFORMATION ICCPR, art. 19 (2): "Everyone shall have the right to freedom of expression []" ICCPR GC 34, para. 19: "[] state parties should proactively put in the public domain Government information of public interest. State parties should [] ensure easy, prompt, effective and practical access to such information."
	<u> </u>		SOCIAL MEDIA AN	ID DIGITAL RIGHTS		
17	31	Red-tagging is a phenomenon that has been present in the Philippines for decades, with its scope expanding during the presidency of Rodrigo Duterte. Although red-tagging is officially prohibited (as reaffirmed by COMELEC Resolution 11116), it remains a serious issue that often begins online but has real-world repercussions. In 2024 the Supreme Court has declared that red-tagging, vilification, labelling, and guilt by association threaten a person's right to life, liberty, or security. Disinformation had a limited impact on shaping the election campaign, mainly due to establishing KKK task force by COMELEC. The task force comprised 24 organizations whose role was with	To counter red-tagging and online disinformation a sustainable support system for independent media and investigative journalism and fact checking should be further strengthened and maintained, alongside continued expansion of media and digital literacy programmes for all strata of society.	No change in the legislation required	COMELEC, CSOs, Social media platforms Media outlets Department of Information and Communicatio ns Technology (DICT)	 FREEDOM OF OPINION AND EXPRESSION / RIGHT TO SECURITY OF THE PERSON ICCPR GC 25, para. 19: "Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind." UN, OSCE, OAS, ACHPR Joint declaration on freedom of expression and "fake news", disinformation and propaganda, 6(a): "All stakeholders – including intermediaries, media outlets, civil society and academia – should be supported in developing participatory and transparent initiatives for creating a better understanding of the impact of disinformation and propaganda on democracy freedom of expression, journalism and civic space, as well as appropriate responses to these phenomena."

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
		identifying and neutralising disinformation. KKK task force worked closely with tech companies (Meta, TikTok) to counter disinformation.				
	•		PARTICIPATIO	ON OF WOMEN	-	
18	33	Women remain underrepresented in public life. The number women in elected positions is around 20 per cent. The legislation allows for the development of temporary measures to increase the number of women elected. BARMM election law includes a quota for women.	Temporary special measures could be introduced to achieve gender parity in elected and appointed positions. Incentives for political parties should also be considered to promote more women in leadership positions and as candidates for election.	Amend: Omnibus Election Code, 1985 Party List System Act, 1995	Congress	 WOMEN'S PARTICIPATION IN PUBLIC AFFAIRS/ EQUALITY BETWEEN MEN AND WOMEN / FREEDOM FROM DISCRIMINATION ICCPR, art. 3: "The States Parties to the present Covenant undertake to ensure the equal right of men and women to the enjoyment of all civil and political rights set forth in the present Covenant." ICCPR, art. 26: "The law shall prohibit any discrimination and guarantee to all persons equal and effective protection against discrimination on any ground such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status." CEDAW, art. 4 (1): "Adoption by States Parties of temporary special measures aimed at accelerating de facto equality between men and women shall not be considered discrimination." CEDAW, art. 7: "States Parties shall take all appropriate measures to eliminate discrimination against women in the political and public life of the country" CEDAW GC 23, para. 22: "The system of balloting, the distribution of seats in Parliament, the choice of district, all have a significant impact on the proportion of women elected to Parliament. Political parties must embrace the principles of equal opportunity and democracy and endeavour to balance the number of male and female candidates."
				L DISPUTES	T	
19	37	The timeline for complaints and appeals	Deadlines for complaints and	<u>Amend</u> :	Congress	RIGHT TO EFFECTIVE REMEDY

NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
		are not consistent with the electoral calendar. Complaints on the qualification of candidates remained unresolved after election day. Petitions against the results can be concluded years after election have been held.	appeals should be adjusted to guarantee a timely and effective remedy. The legal timeframe for the resolution of electoral disputes should be reviewed to provide expeditious resolution in line with the electoral calendar.	Omnibus Election Code, 1985 COMELEC Resolutions	COMELEC	ICCPR, art.2 (3) (a): "() ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy, notwithstanding that the violation has been committed by persons acting in an official capacity."
20	37	Sanctions for some election offences appear to be excessive, such as the disqualification of suspension of suffrage rights for failure to comply with Comelec guidelines, making sexist remarks during the campaign, damaging campaign material etc. Political rights, including the right to vote, stand for office, and participate in public affairs, should only be limited or suspended under exceptional circumstances, and only by a firm judicial decision with full due process guarantees.	Sanctions for electoral offences should be reviewed in line with the principle of proportionality to encourage enforcement and compliance.	Amend: Omnibus Election Code, 1985 Election laws COMELEC Resolutions	Congress COMELEC	 RIGHT TO EFFECTIVE REMEDY UDHR, art. 10: "Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him." ICCPR art. 2 (3) (a): "Each State Party to the present Covenant undertakes [] To ensure that any person whose rights or freedoms as herein recognized are violated shall have an effective remedy, notwithstanding that the violation has been committed by persons acting in an official capacity." ICCPR GC 25, para. 4: "Any conditions which apply to the exercise of the rights protected by article 25 should be based on objective and reasonable criteria." ICCPR GC 25, para. 15: "Persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements."
			VOTING, COUNTING	G AND TABULATION		
21	38	There was insufficient provision for a secret vote, and no voter education in this regard. Voting programmes such as Local Absentee Voting and voting from prison presented the same problems, as well as further vote secrecy jeopardies such as handing ballots over to superiors for later processing. Improved provisions for secrecy of vote	The election administration should provide adequate means of voting in secret in terms of polling layout and booths, as well as train electoral boards and focus voter education on the importance of a secret vote. These considerations should also be given priority in special arrangements such as Local	No change in the legislation required	COMELEC	SECRET BALLOT / RIGHT AND OPPORTUNITY TO VOTE / RIGHT TO SECURITY OF THE PERSON ICCPR, art. 25 (b): "Every citizen shall have the right and the opportunity [] to vote and to be elected at genuine periodic elections which [] shall be held by secret ballot, guaranteeing the free expression of the will of the electors." ICCPR GC 25, para. 19: "Voters should be able to form opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative

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NO.	FR page	CONTEXT	RECOMMENDATION (priority in bold)	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE BODY	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
		would contribute to a free vote, particularly in a context marked by concern about vote-buying and electoral coercion.	Absentee Voting, voting of underrepresented groups such as persons with disabilities and indigenous voters as well as voting from prisons, and procedures adapted accordingly.			 interference of any kind." ICCPR GC 25, para. 20: "States should take measures to guarantee the requirement of the secrecy of the vote during elections, including absentee voting, where such a system exists." AHRD, art. 25 (b): "Every citizen has the right to vote in periodic and genuine elections, which should be [] by secret ballot [].

Annexes

Annex I. EU EOM media monitoring results

EU Election Observation Mission, Media Monitoring

In the period from 11 April until 10 May 2025, the EU Election Observation Mission (EOM) monitored seven TV channels, six radio stations, five online media outlets and three newspapers. In addition, EOM also followed other media outlets and media-related developments.

Monitored media outlets were as follows:

Television:	<i>PTV</i> (state owned channel), <i>A2Z</i> (in collaboration with <i>ABS-CBN</i>), <i>GMA-7, Kapamilya</i> (in collaboration with <i>ABS/CBN</i>), <i>NET-25, SMNI</i> and <i>TV5</i> (private channels)
Radio:	Radyo Pilipinas (state owned station), Bombo Radyo, Super Radyo, DZRH, RMN and Teleradyo
Online:	<u>www.inquirer.net, www.manilatimes.net, www.mb.com.ph,</u> <u>www.philstar.com</u> and <u>www.rappler.com</u>

Newspapers: Manila Bulletin, Philippine Daily Inquirer, Philippine Star.

The monitoring included both quantitative and qualitative analysis. The quantitative analysis measured the total amount of time or space allocated to each contesting party and other political subjects; and also evaluated the tone of the coverage in which there were portrayed – positive, neutral or negative. The qualitative analysis assessed the performance of selected outlets against professional and ethical standards, such as balance, accuracy, timeliness, omission of information, advantage of incumbency, inflammatory language, etc.

Monitoring of state TV channel and six national private channels focused on prime time (18:00-24:00) programmes, with a specific focus on main evening news programmes. In the case of radio stations (one state broadcaster and five private stations), main news programmes within the morning were selected. Monitoring of online media focused on selected sections (politics, elections and opinions), while monitoring of newspapers encompassed whole publications of their most-circulated Sunday editions (these were quantiatively monitored also during the silence period on 11 May).

The enclosed charts show coverage of contestants, political parties as well as other political subjects during the official campaign, with top 20 political actors presented.

MEDIA MONITORING FINDINGS TELEVISION

[Charts 1-2] PRIME-TIME | Share of Political/Election-related Coverage POLITICAL/ELECTION COVERAGE | Formats



VOLUME OF POLITICAL AND ELECTORAL COVERAGE

Base Airtime: A2Z 18:50:58, GMA-7 16:02:41, Kapamilya 17:48:46, NET25 14:14:16, PTV (State) 15:23:28, SMNI 39:55:00, TV5 19:20:47,

POLITICAL AND ELECTORAL COVERAGE BY FORMAT



Base Airtime: A22 18:50:58, GMA-7 16:02:41, Kapamilya 17:48:46, NET25 14:14:16, PTV (State) 15:23:28, SMNI 39:55:00, TV5 19:20:47,

[Chart 2-3] PTV (State broadcaster) | NEWS coverage – Space and Tone (top 20 political actors)



Base Airtime: A2Z 04:33:59, GMA-7 04:41:36, Kapamilya 04:27:28, NET25 13:31:58, PTV (State) 14:05:59, SMNI 24:00:50, TV5 07:32:01,



Base Airtime: Alyansa Coalition 01:34:43, Government 05:10:22, PDP+ 00:00:44, COMELEC 00:43:36, Other authorities (PNP, AFP, PCG) 02:14:03, Pres. Administration 01:21:28, Indep. candidates 00:00:47, President Marcos 02:05:06, Vice-Presidents 00:13:43, Former President Duterte 00:04:18, Local Governments 00:35:40, ACT-CIS 00:00:00, AKO BICOL 00:00:22, CIBAC 00:00:00, BICOL SARO 00:00:00, TUPAD 00:00:00, Liberal Party 00:00:17, Solid North Party 00:00:00, Opposition (general) 00:00:50, Arangkada 00:00:00,

[Chart 4-5] <u>GMA-7 | NEWS Coverage – Space and Tone (top 20 political actors)</u>



Base Airtime: A2Z 04:33:59, GMA-7 04:41:36, Kapamilya 04:27:28, NET25 13:31:58, PTV (State) 14:05:59, SMNI 24:00:50, TV5 07:32:01,



Base Airtime: Alyansa Coalition 00:28:44, Government 01:00:40, PDP+ 00:13:52, COMELEC 00:39:34, Other authorities (PNP, AFP, PCG) 00:47:36, Pres. Administration 00:10:53, Indep. candidates 00:11:38, President Marcos 00:07:13, Vice-Presidents 00:12:18, Former President Duterte 00:03:22, Local Governments 00:39:26, ACT-CIS 00:00:00, AKO BICOL 00:00:00, CIBAC 00:00:00, BICOL SARO 00:00:00, TUPAD 00:00:00, Liberal Party 00:06:17, Solid North Party 00:00:00, Opposition (general) 00:00:33, Arangkada 00:00:00,

[Chart 6-7] TV5 | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: A2Z 04:33:59, GMA-7 04:41:36, Kapamilya 04:27:28, NET25 13:31:58, PTV (State) 14:05:59, SMNI 24:00:50, TV5 07:32:01,



Base Airtime: Alyansa Coalition 00:29:18, Government 01:42:30, PDP+ 00:12:22, COMELEC 00:43:15, Other authorities (PNP, AFP, PCG) 00:54:37, Pres. Administration 00:55:53, Indep. candidates 00:22:43, President Marcos 00:25:14, Vice-Presidents 00:45:36, Former President Duterte 00:06:28, Local Governments 00:51:10, ACT-CIS 00:00:00, AKO BICOL 00:00:00, CIBAC 00:00:00, BICOL SARO 00:00:00, TUPAD 00:00:00, Liberal Party 00:06:26, Solid North Party 00:00:00, Opposition (general) 00:01:29, Arangkada 00:00:00,

[Chart 8-9] A2Z (with ABS-CBN) | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: A2Z 04:33:59, GMA-7 04:41:36, Kapamilya 04:27:28, NET25 13:31:58, PTV (State) 14:05:59, SMNI 24:00:50, TV5 07:32:01,



Base Airtime: Alyansa Coalition 00:18:42, Government 01:12:20, PDP+ 00:03:41, COMELEC 00:49:41, Other authorities (PNP, AFP, PCG) 00:31:27, Pres. Administration 00:21:55, Indep. candidates 00:18:49, President Marcos 00:15:29, Vice-Presidents 00:15:02, Former President Dutete 00:07:07, Local Governments 00:14:50, ACT-CIS 00:00:03, AKO BICOL 00:00:00, CIBAC 00:01:36, BICOL SARO 00:00:00, TUPAD 00:00:00, Liberal Party 00:02:52, Solid North Party 00:00:00, Opposition (general) 00:00:25, Arangkada 00:00:00,

[Chart 10-11] KAPAMILYA (with ABS-CBN) | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: A2Z 04:33:59, GMA-7 04:41:36, Kapamilya 04:27:28, NET25 13:31:58, PTV (State) 14:05:59, SMNI 24:00:50, TV5 07:32:01,



Base Airtime: Alyansa Coalition 00:16:22, Government 01:04:16, PDP+ 00:04:34, COMELEC 00:39:38, Other authorities (PNP, AFP, PCG) 00:37:18, Pres. Administration 00:27:14, Indep. candidates 00:24:44, President Marcos 00:18:14, Vice-Presidents 00:12:48, Former President Duterte 00:06:43, Local Governments 00:12:50, ACT-CIS 00:00:00, AKO BICOL 00:00:00, CIBAC 00:00:00, BICOL SARO 00:00:00, TUPAD 00:00:00, Liberal Party 00:02:36, Solid North Party 00:00:00, Opposition (general) 00:00:11, Arangkada 00:00:00,

[Chart 12-13] NET25 | NEWS Coverage --- Space and Tone (top 20 political actors)



Base Airtime: A2Z 04:33:59, GMA-7 04:41:36, Kapamilya 04:27:28, NET25 13:31:58, PTV (State) 14:05:59, SMNI 24:00:50, TV5 07:32:01,



Base Airtime: Alyansa Coalition 01:10:01, Government 04:12:40, PDP+ 00:53:19, COMELEC 01:10:49, Other authorities (PNP, AFP, PCG) 01:48:19, Pres. Administration 01:28:13, Indep. candidates 00:08:49, President Marcos 00:55:37, Vice-Presidents 00:47:09, Former President Duterte 00:20:53, Local Governments 00:35:02, ACT-CIS 00:00:02, AKO BICOL 00:00:00, CIBAC 00:00:00, BICOL SARO 00:00:07, UPAD 00:00:00, (Liberal Party 00:00:42, Solid North Party 00:00:00, Opposition (general) 00:00:23, Arangkada 00:00:00,

[Chart 14-15] SMNI | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: A2Z 04:33:59, GMA-7 04:41:36, Kapamilya 04:27:28, NET25 13:31:58, PTV (State) 14:05:59, SMNI 24:00:50, TV5 07:32:01,



Base Airtime: Alyansa Coalition 00:47:19, Government 05:19:54, PDP+ 07:39:44, COMELEC 01:13:20, Other authorities (PNP, AFP, PCG) 00:26:21, Pres. Administration 01:15:30, Indep. candidates 00:12:29, President Marcos 00:36:28, Vice-Presidents 01:37:48, Former President Duterte 01:01:53, Local Governments 01:50:56, ACT-CIS 00:00:00, AKO BICOL 00:00:00, CIBAC 00:00:00, BICOL SARO 00:00:00, UIVAD 00:00:00, Liberal Party 00:02:14, Solid North Party 00:00:00, Opposition (general) 01:10:46, Arangkada 00:46:08,

MEDIA MONITORING FINDINGS

RADIO

[Chart 16] <u>RADYO PILIPINAS (State broadcaster)</u> | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: Bombo Radyo 09:08:34, DZRH 03:57:42, RMN 05:18:48, RPI (State) 07:33:22, Super Radyo 05:15:17, TeleRadyo 02:58:50,



Base Airtime: Other authorities (PNP, AFP, PCG) 00:37:05, Government 03:26:40, COMELEC 00:18:54, Senator (without affiliation) 00:05:01, Pres. Administration 01:02:38, President Marcos 01:02:23, Alyansa Coalition 00:08:45, Local Governments 00:35:12, Senate Majority Leader 00:001:6, PBBM 00:00:00, Vice-Presidents 00:01:00, Lower levels of Comelec 00:06:25, United Senior Citizens 00:00:00, Former President Duterte 00:01:14, TRABAHO 00:02:31, PDP+ 00:00:00, Opposition (general) 00:00:00, Indep. candidates 00:00:00, HoR Speaker 00:01:59, Representatives/Members of HR (only if without affiliation) 00:02:19,

[Chart 17] BOMBO RADYO | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: Bombo Radyo 09:08:34, DZRH 03:57:42, RMN 05:18:48, RPI (State) 07:33:22, Super Radyo 05:15:17, TeleRadyo 02:58:50,



Base Airtime: Other authorities (PNP, AFP, PCG) 04:20:47, Government 00:00:00, COMELEC 00:32:27, Senator (without affiliation) 00:45:32, Pres. Administration 00:26:34, President Marcos 00:00:45, Alyansa Coalition 00:00:00, Local Governments 00:48:40, Senate Majority Leader 00:23:57, PBBM 00:55:44, Vice-Presidents 00:24:42, Lower levels of Comelec 00:00:00, United Senior Citizens 00:11:14, Former President Duterte 00:09:24, TRABAHO 00:00:00, PDP+ 00:05:13, Opposition (general) 00:00:00, Indep. candidates 00:00:30, HoR Speaker 00:00:00, Representatives/Members of HR (only if without affiliation) 00:03:05,

[Chart 18] DZRH | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: Bombo Radyo 08:08:34, DZRH 03:57:42, RMN 05:18:48, RPI (State) 07:33:22, Super Radyo 05:15:17, TeleRadyo 02:58:50,



Base Airtime: Other authorities (PNP, AFP, PCG) 01:53:33, Government 00:00:00, COMELEC 00:15:53, Senator (without affiliation) 00:21:58, Pres. Administration 00:03:02, President Marcos 00:00:00, Alyansa Coalition 00:00:00, Local Governments 00:30:08, Senate Majority Leader 00:03:22, PBBM 00:11:54, Vice-Presidents 00:05:44, Lower levels of Comelec 00:00:00, United Senior Citizens 00:00:00, Former President Duterte 00:03:38, TRABAHO 00:23:40, PDP+ 00:00:00, Opposition (general) 00:00:00, Indep. candidates 00:00:00, HoR Speaker 00:03:30, Representatives/Members of HR (only if without affiliation) 00:01:20,

[Chart 19] <u>RMN</u> | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: Other authorities (PNP, AFP, PCG) 00:39:40, Government 01:59:22, COMBLEC 00:2714, Senator (without affiliation) 00:04:21, Pres. Administration 00:28:06, President Marcos 00:15:14, Alyansa Coalition 00:09:05, Local Governments 00:21:38, Senate Majority Leader 00:01:40, PBBM 00:00:00, Vice-Presidents 00:17:29, Lower levels of Comelec 00:10:05, United Senior Citizens 00:00:00, Former President Duterte 00:05:58, TRABAHO 00:00:00, PDP+ 00:02:03, Opposition (general) 00:03:00, Indep. candidates 00:07:13, HoR Speaker 00:03:48, Representatives/Members of HR (only if without affiliation) 00:02:52,

[Chart 20] SUPER RADYO | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: Bombo Radyo 09:08:34, DZRH 03:57:42, RMN 05:18:48, RPI (State) 07:33:22, Super Radyo 05:15:17, TeleRadyo 02:58:50.



Base Airtime: Other authorities (PNP, AFP, PCG) 00:44:59, Government 02:03:44, COMELEC 00:52:15, Senator (without affiliation) 00:13:48, Pres. Administration 00:19:52, President Marcos 00:12:01, Alyansa Coalition 00:04:01, Local Governments 00:09:58, Senate Majority Leader 00:00:00, PBBM 00:00:13, Vice-Presidents 00:09:31, Lower levels of Comelec 00:12:29, United Senior Citizens 00:00:00, Former President Duterte 00:06:41, TRABAHO 00:00:00, PDP+ 00:00:21, Opposition (general) 00:02:23, Indep. candidates 00:01:25, HoR Speaker 00:01:26, Representatives/Members of HR (only if without affiliation) 00:00:10,

[Chart 21] TELERADYO | NEWS Coverage – Space and Tone (top 20 political actors)



Base Airtime: Bombo Radyo 09:08:34, DZRH 03:57:42, RMN 05:18:48, RPI (State) 07:33:22, Super Radyo 05:15:17, TeleRadyo 02:58:50,



Base Arrime: Other authonities (PMP, APP, PCS) 003000, Government 005846, COMBUELC 001503, Sendor (without affiliation) 00:0409, Pres. Administration 0014/32, President Marcos 001358, Alyansa Coalition 00:0320, Local Governments 00:23:08, Senate Majority Leader 00:00:00, PBBM 00:00:00, Vice-Presidents 00:0158, Lower levels of Comelec 00:06:25, United Senior Citizens 00:00:00, Former President Duterte 00:02:40, TRABAHO 00:00:00, PDP+ 00:00:46, Opposition (general) 00:0214, Indep. candidates 00:01:30, HoR Speaker 00:00:18, Representatives/Members of HR (only if without affiliation) 00:0114,

MEDIA MONITORING FINDINGS

ONLINE MEDIA

[Chart 22] INQUIRER, MANILA BULLETIN, MANILA TIMES, PHILIPPINE STAR, RAPPLER | Coverage Space (top 20 actors)



Base Pixels: Inquirer (inquirer.net) 503,911,371.00, Manila Bulletin (mb.com.ph) 2,666,773,587.00, Manila Times (manilatimes.net) 4,956,103,120.00, Philippine Star (phistar.com) 2,799,716,843.00, Rappler (rappler.com) 7,283,011,607.00,

[Chart 23] INQUIRER | Coverage Tone (top 20 political actors)



Base Pixels: Alyansa Coalition 51,619,507.00, Government 86,835,442.00, Indep. candidates 14,749,739.00, President Marcos 27,145,753.00, Pres. Administration 31,896,863.00, Other authorities (PNP, AFP, PCG) 22,675,373.00, Vice-Presidents 83,499,125.00, Liberal Party 4,435,680.00, Local Governments 54,987,116.00, PDP+ 23,175,772.00, Former President Duterte 7,937,869.00, COMELEC 12,742,398.00, MAKABAYAN BLOC 26,918,616.00, President | 's Family 2,378,225.00, Governors 9,797,046.00, Senator (without affiliation) 18,909,836.00, HoR Speaker 10,261,620.00, UGB 0.00, Representatives/Members of HR (only if without affiliation) 13,330,948.00, Deputy Speakers of House 614,443.00,
[Chart 24] MANILA BULLETIN | Coverage Tone (top 20 political actors)



Base Pixels: Alyansa Coalition 398,127,841.00, Government 744,535,862.00, Indep. candidates 43,196,056.00, President Marcos 193,397,509.00, Pres. Administration 153,704,381.00, Other authorities (PNP, AFP, PCG) 272,226,479.00, Vice-Presidents 117,619,867.00, Liberal Party 92,483,547.00, Local Governments 287,183,432.00, PDP+ 81,738,793.00, Former President Duterte 51,838,413.00, COMELEC 46,176,761.00, MAKABAYAN BLOC 12,602,538.00, President | 's Family 30,791,537.00, Governors 5,967,108.00, Senator (without affiliation) 47,688,386.00, HoR Speakers of House 17,583,306.00,

[Chart 25] MANILA TIMES | Coverage Tone (top 20 political actors)



Base Pixels: Alyansa Coalition 496,151,230.00, Government 1,771,643,708.00, Indep. candidates 126,697,995.00, President Marcos 490,300,474.00, Pres. Administration 456,531,387.00, Other authorities (PNP, AFP, PCG) 213,079,956.00, Vice-Presidents 223,219,689.00, Liberal Party 43,852,888.00, Local Governments 318,476,420.00, PDP+ 174,629,523.00, Former President Duterte 207,933,910.00, COMELEC 103,013,459.00, MAKABAYAN BLOC 7,500,579.00, President | 's Family 102,495,287.00, Governors 51,050,415.00, Senator (without affiliation) 57,619,632.00, Hor Speaker 40,043,021.00, UGB 0.00, Representatives/Members of HR (only if without affiliation) 11,009,285.00, Deputy Speakers of House 60,854,262.00,

[Chart 26] PHILIPPINE STAR | Coverage Tone (top 20 political actors)



Base Pixels: Alyansa Coalition 381,775,137.00, Government 859,628,350.00, Indep. candidates 86,899,170.00, President Marcos 202,177,268.00, Pres. Administration 177,303,422.00, Other authorities (PNP, AFP, PCG) 254,176,606.00, Vice-Presidents 130,555,860.00, Liberal Party 73,116,555.00, Local Governments 153,755,214.00, PDP+ 1074,27,827.00, Former President Dutorte 119,970,832.00, COMELEC 11,935,181.00, MAKABAYAN BLOC 71,873,472.00, President ['s Family 53,113,130, Governors 90,851,200, Senator (without affiliation) 58,0547.00, Deputy Speakers of House 9,938,258.00, UGB 0.00, Representatives/Members of HR (only 11) without affiliation) 58,0547.00, Deputy Speakers of House 9,938,258.00

[Chart 27] <u>RAPPLER</u> | Coverage Tone (top 20 political actors)



Base Pixels: Alyansa Coalition 1,822,525,452.00, Government 988,495,958.00, Indep. candidates 1,317,088,307.00, President Marcos 283,751,617.00, Pres. Administration 222,336,719.00, Other authorities (PNP, AFP, PCG) 90,885,626.00, Vice-Presidents 285,089,271.00, Liberal Party 625,902,754.00, Local Governments 767,059,744.00, PDP+ 96,242,410.00, Former President Duterte 84,995,2164.00, COMELEC 125,525,767.00, MAKABAYAN BLOC 185,967,245.00, President 1's Family 50,629,083.00, Governors 116,397,552.00, Senator (without affiliation) 31,770,559.00, HoR Speaker 21,129,076.00, UGB 114,865,695.00, Representatives/Members of HR (only if without affiliation) 52,386,608.00, Deputy Speakers of House 0.00,

MEDIA MONITORING FINDINGS

NEWSPAPERS

Chart 28] MANILA BULLETIN, PHILIPPINE DAILY INQUIRER, PHILIPPINE STAR | Coverage Space (top 20 actors)

Newspap	pers Article Types	All ~		
13 April - 11	May 2025 06:00-09:00	- 17:00-20:00	⊕⊝ 🔍 🖑 🏚 =	=
Preside	ent Marcos 📕 Goveri	nment 🔳 Other autho	rities (PNP, AFP, PCG)	
	EC 📒 Local Governn	nents 🔳 Pres. Adminis	stration	
Former	President Duterte	HoR Speaker 📕 Alya	nsa Coalition	
	residents 📕 Indep. d			
		f HR (only if without affil	iation)	
			Ider Lower levels of Comelec	
			PDP+ Governors	
Fleside	ants runniy 🔲 Angko	asangga 🥌 Akbayan	BPF+ BOVEINOIS	
100.00			5%	
90.00	3%	3%	4%	
	3% 4%	4%	5%	
80.00	5%	6% 4%	376	
70.00	11%	9%		
60.00	5%	10%		
60.00	9%	4%	43%	
50.00		9%		
40.00				
10.00	34%			
30.00			13%	
20.00		21%		
		2170	9%	
10.00	19%		10%	
0.00		9%	5%	
	Manila Bulletin Private	PH Star Private	PHL Daily Inquirer Private	

Base cm: Manila Bulletin 38,663.46, PH Star 17,899.13, PHL Daily Inquirer 10,967.09,

ACRONYMS | Political subjects (actors) monitored during the election campaign

President Marcos President's family Presidential Administration Vice-Presidents	PRS PRF PAD VPR
Former presidents	FPR
Former President Duterte	FPRD
Government (ministers, deputies, secretaries of state)	GOV
Governor	GVP
Local Governments (if mentioned only in general / mayors, local executive)	LGOV
Local Governments from Metro Manila	LGMM
Local Governments from Cordillera Region	LGCO
Local Governments from Ilocos Region	LGIL
Local Governments from Cagayan Region	LGCG
Local Governments from Central Luzon Region	LGLU
Local Governments from Calabarzon Region	LGCL
Local Governments from MIMAROPA (Southwest Tagalog Region)	LGMI
Local Governments from Bicol Region	LGBI
Local Governments from Western Visayas	LGWV
Local Governments from Central Visayas	LGCV
Local Governments from Eastern Visayas	LGEV
Local Governments from Zamboanga Peninsula	LGZA
Local Governments from Northern Mindavao	LGNM
Local Governments from Davao Region	LGDA
Local Governments from SOCCKARGEN	LGSO
Local Governments from BARRM	LGBA
Local Governments from Caraga	LGCA

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Senate President Senate Majority Leader Senate Minority Leader	SEP	SMA SMI
Senator (only if without affiliation)	SEN	or in
Speaker of House of Representatives Deputy Speakers of House Representatives/Members of HR (only if without affiliation)	DHR	SHR REP
Commission on Elections Lower Level of Election Commissions	СОМ	LLEC
Other authorities (PHP/Philippine National Police, AFP/Armed Forces of Philippines, PCG/Philippine Coast Guard) Opposition (gen.)	ΟΡΟ	AUT

	CONTESTING PARTIES		
	COMELEC		
	http	s://comelec.gov.ph/php-tpls-attachments/2025NLE/COC_2025NLE/CLC2025_Partylist.pdf	
#	NAME ON BALLOT	NAME	CODE
		ALYANSA PARA SA BAGONG PILIPINAS (Lakas-CMD, Nacionalista, NPC, NUP, PFP)	ALY
		LIBERAL PARTY	LIP
		MAKABAYAN BLOC	MAK
		PDP+ (with affiliated politicians)	PDP
1	AA-KASOSYO PARTY	KASOSYO PRODUCER-CONSUMER EXCHANGE ASSOCIATION, INC.	AAKS
2	ABANG LINGKOD	ABANG LINGKOD INC.	ABAL
3	ABAMIN	ABANTE MINDANAO, INC.	ABAN
4	Nox	ABONO PARTYLIST	ABON
5	ABP	ANG BUMBERO NG PILIPINAS	ABP
6	ACT-CIS	ANTI-CRIME AND TERRORISM - COMMUNITY INVOLVEMENT AND SUPPORT, INC.	ACIS
7	ACT TEACHERS	ACT TEACHERS PARTY-LIST	ACT
8	AGAP	AGRICULTURAL SECTOR ALLIANCE OF THE PHILIPPINES	AGAP
9	True	AGIMAT NG MASA	AGIM
10	AGRI	AGRI-AGRA NA REPORMA PARA SA MAGSASAKA NG PILIPINAS	AGRI
11	AHON MAHIRAP	AHON MAHIRAP	AHON
12	AKAY NI SOL	AKAY NI SOLUSYON ORGANISASYON AT LABAN	ΑΚΑΥ
13	AKBAYAN	AKBAYAN CITIZENS' ACTION PARTY	AKB
14	AKO BISAYA	AKO BISAYA INC.	AKBI
15	AKSYON DAPAT	AKSYON DAPAT INCORPORATED	AKSY
16	ALONA	ALLIANCE OF ORGANIZATIONS, NETWORKS, AND ASSOCIATIONS OF THE PHILIPPINES	ALON
17	ANGKASANGGA	ANG KASANGGA NG MANGUNGUMA - OWA MANGUNGUMA	ANGK
18	AANGAT TAYO	AANGAT TAYO PARTYLIST	ANGT
19	ANGAT	AGRIKULTURA NGAYON GAWING AKMA AT TAMA	AGGT
20	AKTIBONG KAAGAPAY	AKTIBONG KAAGAPAY NG MGA MANGGAGAWA	AKTI
21	AKO OFW	ADVOCATES & KEEPERS ORGANIZATION OF OFW, INC	AOFW
22	APAT-DAPAT	ANG PROGRAMANG AASENSO TAUMBAYAN - DREAM, ACT, PARTICIPATE, ADVOCATE FOR SUSTAINABLE TRANSFORMATION	APAT
23	APEC	ASSOCIATION OF PHILIPPINE ELECTRIC COOPERATIVES	APEC
24	API PARTY	ABANTE PANGASINAN - ILOKANO PARTY	API

25	ARISE	ALLIANCE FOR RESILIENCE SUSTAINABILITY AND EMPOWERMENT	ARI
26	ARANGKADA PILIPINO	ARANGKADA PILIPINO	ARKD
27	ARTE	ADVOCATES FOR RETAIL, FASHION, TEXTILE, TRADITION, EVENTS AND CREATIVE SERVICES SECTOR	ARTE
28	ASAP NA	ALYANSA LABAN SA SUBSTANCE ABUSE PARA SA BAGONG PILIPINAS NATIN	ASAP
29	ASENSO PINOY	ASENSO PINOY	ASEN
30	A TEACHER	ADVOCACY FOR TEACHER EMPOWERMENT THROUGH ACTION COOPERATION AND HARMONY TOWARDS EDUCATIONAL REFORM	ATEA
31	AKO TANOD	AKO TANOD INCORPORATED	ATND
32	BAE	BABAE AKO PARA SA BAYAN INC.	BAE
33	BAGONG PILIPINAS	BAGONG MAUNLAD NA PILIPINAS	BAGP
34	BANAT	BANAT BARANGAY NATIN	BANA
35	BBM	BANGON BAGONG MINERO	BBM
36	BFF	BALIKATAN OF FILIPINO FAMILIES	BFF
37	BH - BAGONG HENERASYON	BAGONG HENERASYON	BHE
38	BHW	BARANGAY HEALTH WELLNESS	BHW
39	AKO BICOL	AKO BICOL POLITICAL PARTY	BICL
40	BICOL SARO	BICOL SARO	BICO
41	BIDA KATAGUMPAY	BAYAN ITAYO ANG DANGAL NG AGRIKULTURA KASAMA SA TAGUMPAY	BIDA
42	ABANTE BISDAK	ABANTE BISDAK	BISD
43	BG PARTY-LIST	BISAYA GYUD PARTY-LIST	BISG
44	BAYAN MUNA	BAYAN MUNA	BMU
45	BUNYOG	BUNYOG (PAGKAKAISA)	BNYG
46	BOSES PARTY-LIST	BOSES PARTY-LIST	BSS
47	BTS BAYANING TSUPER	BAYANING TSUPER	BTS
48	BUHAY	BUHAY HAYAAN YUMABONG	BUHY
49	CIBAC	CITIZENS' BATTLE AGAINST CORRUPTION	CIBC
50	CLICK PARTY	COMPUTER LITERACY INNOVATION CONNECTIVITY AND KNOWLEDGE	CLK
51	COOP-NATCCO	COOPERATIVE NATCCO NETWORK PARTY	COPN
52	CWS	CONSTRUCTION WORKERS SOLIDARITY INC.	CWS
53	DAMAYANG FILIPINO	DAMAYANG FILIPINO MOVEMENT, INCORPORATED	DAM
54	SULONG DIGNIDAD	SULONG DIGNIDAD REGIONAL POLITICAL PARTY	DGDD
55	DIWA	DEMOCRATIC INDEPENDENT WORKERS ASSOCIATION	DIWA
56	DUMPER PTDA	DUMPER PHILIPPINES TAXI DRIVERS ASSOCIATION, INC.	DUMP
57	DUTERTE YOUTH	DUTY TO ENERGIZE THE REPUBLIC THROUGH THE ENLIGHTENMENT OF THE YOUTH	DU30
58	EDUAKSYON	EDUAKSYON	EDU
59	EPANAW SAMBAYANAN	MINDANAO INDIGENOUS PEOPLES CONFERENCE FOR PEACE AND DEVELOPMENT	EPA
60	FPJ PANDAY BAYANIHAN	FPJ PANDAY BAYANIHAN PARTYLIST	FPJ
61	GABRIELA	GABRIELA WOMEN'S PARTY	GAB
62	GABAY	GABAY UGNAYAN PARA SA REPORMA AT OPORTUNIDAD	GBAY

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63	GILAS	GENERASYONG INIAALAY LAGI ANG SARILI	GLS
64	GP (GALING SA PUSO)	GALING SA PUSO PARTY-LIST	GPP
65	H.E.L.P. PILIPINAS	HEALTH, EDUCATION, LIVELIHOOD PROGRAM OF THE PHILIPPINES	HELP
66	HEAL PH	HEALTH ALLIANCE PH	НРН
67	HUGPONG FEDERAL	HUGPONG FEDERAL MOVEMENT OF THE PHILIPPINES, INC.	HUGF
68	HEALTH WORKERS	HEALTH WORKERS PARTY-LIST	HWP
69	AKO ILOCANO AKO	AKO ILOCANO AKO	ILC
70	ILOCANO DEFENDERS	ILOCANO DEFENDERS INC.	ILOD
71	USWAG ILONGGO	USWAG ILONGGO PARTY	ILOG
72	IPATUPAD	IPATUPAD FOR WORKERS, INC.	IPAT
73	JUAN PINOY	JUAN-PINAGKAISANG ORDINARYONG MAMAMAYAN PARA YUMABONG	JUAN
74	KABATAAN	KABATAAN PARTYLIST	КАВ
75	KALINGA	BUILDING THROUGH EASING POVERTY, INC.	KAL
76	KAMALAYAN	KALIPUNAN NG MARALITA AT MALAYANG MAMAMAYA, INC.	КАМА
77	KABABAIHAN	HANAY NG MGA KABABAIHAN AT KANILANG MGA KASANGGA SA LIPUNAN	KBBN
78	KABAYAN	KABALIKAT NG MAMAMAYAN	KBYN
79	KAMANGGAGAWA	KAMPIHAN NG MGA MARALITA AT MANGGAGAWA	KGGW
80	KALINGA	ADVOCACY FOR SOCIAL EMPOWERMENT AND NATION	KLNG
81	SoANAKALUSUGAN	ALAGAAN NATIN ATING KALUSUGAN INC.	KLSG
82	KM NGAYON NA	KILOS MAMAMAYAN NGAYON NA	KMN
83	ANG KOMADRONA	ANG KOMADRONA INC.	КОМА
84	KAUNLAD PINOY	KAISIPANG POSITIBO PARA SA KAUNLARAN NG PILIPINO	КРР
85	KASAMBAHAY	KASAMBAHAY TAYO, INC.	KSMB
86	MURANG KURYENTE	MURANG KURYENTE PARTYLIST	KURY
87	KUSUG TAUSUG	KUSUG TAUSUG	KUST
88	LANG KAWAL	LAANG KAWAL NG PILIPINAS	LKWL
89	LPGMA	LPG MARKETERS ASSOCIATION, INC.	LPG
90	LINGAP	LIGA NG NAGKAKAISANG MAHIHIRAP	LNGP
91	LUNAS	LUNGSOD AASENSO	LUNA
92	MAAGAP	MOVEMENT OF ACTIVE APOSTOLIC GUARDIANS ASSOCIATION OF THE PHILIPPINES	MAAG
93	PAMILYANG MAGSASAKA	PAMILYANG MAGSASAKA	MAGS
94	MAGBUBUKID	MAMAMAYAN PARA SA GOBYERNONG BUBUKLOD SA MGA ISIP AT DIWA NG MGA PILIPINO	MBKD
95	MAGDALO	MAGDALO PARA SA PILIPINO	MGDL
96	MAGSASAKA	MAGKAKASAMA SA SAKAHAN, KAUNLARAN	MGSK
97	MAHARLIKA	MAHARLIKANG PILIPINO PARTY	MHRL
98	MALASAKIT@BAYANIHAN	MALASAKIT AT BAYANIHAN FOUNDATION, INC.	MSKT
99	ML	MAMAMAYANG LIBERAL	MLI

100	MANILA TEACHERS	MANILA TEACHERS' SAVINGS AND LOAN ASSOCIATION, INC.	MNLT
101	MPBL	MAHARLIKANG PILIPINO SA BAGONG LIPUNAN	MPL
102	NANAY	NANAY	NNAY
103	OFW	ONE FILIPINOS WORLDWIDE PARTYLIST	OFW
104	1PACMAN	ONE PATRIOTIC COALITION OF MARGINALIZED NATIONALS INC.	OPAC
105	AKO PADAYON	AKO PADAYON PILIPINO PARTYLIST	PADA
106	PAMANA	IBALIK ANG KULTURANG PAMANA MOVEMENT	PAMA
107	PATROL	PUBLIC SAFETY ALLIANCE FOR TRANSFORMATION AND RULE OF LAW, INC.	PATR
108	PBA	PWERSA NG BAYANING ATLETA	РВА
109	PBBM	PILIPINAS BABANGON MULI	PBBM
110	PBP	PARTIDO SA BAG-ONG PILIPINO	PBP
111	PEOPLE'S CHAMP	PEOPLES CHAMP GUARDIANS PARTYLIST	РСМР
112	PINUNO	PINATATAG NA UGNAYAN PARA SA MGA OPORTUNIDAD SA PABAHAY NG MASA	PINU
113	PAMILYA KO	ΡΑΜΙLΥΑ ΚΟ	РКО
114	PAMILYA MUNA	ANG PAMILYA MUNA	PMLY
115	PINOY WORKERS	PEOPLE WORKING FOR THE DEVELOPMENT OF THE PHILIPPINES	PNWO
116	PINOY AKO	PINOYAKO	PNYK
117	PPP	PUWERSA NG PILIPINONG PANDAGAT	PPP
118	PROBINSYANO AKO	PROBINSYANO AKO	PRBA
119	PHILRECA	PHILIPPINE RURAL ELECTRIC COOPERATIVES ASSOCIATION, INC.	PRCA
120	PROMDI	ABAG PROMDI	PRDI
121	ANG PROBINSIYANO	ALYANSA NG MGA MAMAMAYANG PROBINSIYANO	PROB
122	KAPUSO PM	KABALIKAT PATUNGO SA UMUUNLAD NA SISTEMATIKO AT ORGANISADONG PANGKABUHAYAN	PUSO
123	PUSONG PINOY	PUSONG PINOY	PUSP
124	P3PWD	KOMUNIDAD NG PAMILYA PASYENTE AT PERSONS WITH DISABILITIES	PWD
125	RAM	REBOLUSONARYONG ALYANSANG MAKABANSA	RAM
126	BATANG QUIAPO	SULONG MGA BATANG QUIAPO	QUIA
127	SAGIP	SOCIAL AMELIORATION & GENUINE INTERVENTION ON POVERTY	SAGP
128	SBP	SERBISYO SA BAYAN PARTY	SBP
129	SENIOR CITIZENS	COALITION OF ASSOCIATIONS OF SENIOR CITIZENS IN THE PHILIPPINES	SCTS
130	SOLID NORTH PARTY	SOLIDARITY OF NORTHERN LUZON PEOPLE'S PARTY	SNOR
131	SOLO PARENTS	SOLO PARENTS	SOLO
132	SSS-GSIS PENSYONADO	SSS-GSIS PENSYONADO	SSS
133	SWERTE	SOLO PARENT WORKING FOR ECONOMIC RIGHTS AND OTHER THRUSTS FOR EQUALITY	SWER
134	TGP	TALINO AT GALING NG PINOY	TGP
135	ТІСТОК	TULONG IPAMAHAGI SA COMMUNIDAD TUNGO ONSA KAUNLARAN	тіст
136	ANG TINIG NG SENIORS	ANG TINIG NG SENIOR CITIZENS SA FILIPINAS, INC.	TIN
137	TINGOG	TINGOG SINIRANGAN	TNGG
138	TODA AKSYON	TOWARDS DEVELOPMENT AND ACTION	TODA

139	TRABAHO	TAGAPAGTAGUYOD NG MGA REPORMA AT ADHIKAING BABALIKAT AT HAHANGO SA MGA OPORTUNIDAD PARA SA MGA PILIPINO	TRBH
140	TURISMO	TURISMO ISULONG MO	TRSM
141	TUTOK TO WIN	TUTOK TO WIN	ттк
142	TUCP	TRADE UNION CONGRESS PARTY	TUCP
143	TULUNGAN TAYO	TULUNGAN TAYO	TULU
144	TUPAD	TUPAD	TUPD
145	UGB	UNYON NG MGA GABAY NG BAYAN	UGB
146	UNITED FRONTLINERS	UNITED FRONTLINERS OF THE PHILIPPINES	UNIF
147	UNITED SENIOR CITIZENS	UNITED SENIOR CITIZENS KOALITION NG PILIPINAS	USC
148	VENDORS	VENDOR SAMAHAN NG MGA MANININDANG PILIPINO	VEND
149	WAGE HIKE	PARTIDO TRABAHO AT WAGE HIKE	WAGE
150	WIFI	WALANG IWANAN SA FREE INTERNET, INC.	WIFI
151	1AGILA	1 AGILA-ALALAYANG AGILA PARA SA BAYAN, INC.	1AGL
152	ONE COOP	AURORA INTEGRATED MULTI-PURPOSE COOPERATIVE (AIMCOOP)	1C00
153	1MUNTI	1MUNTI	1MUN
154	1-RIDER PARTY-LIST	ANG BUKLOD NG MGA MOTORISTA NG PILIPINAS	1RID
155	1TAHANAN	1TAHANAN INC.	1TAH
156	4K	KABABAIHAN KABALIKATAN PARA SA KAPAKANAN AT KAUNLARAN NG BAYAN	4KK
157	4PS	PAGTIBAYIN AT PALAGUIN ANG PANGKABUHAYANG PILIPINO	4PS

Independent candidates	IND	
Independent candidates from Metro Manila		INMM
Independent candidates from Cordillera Region	INCO	
Independent candidates from Ilocos Region		INIL
Independent candidates from Cagayan Region	INCG	
Independent candidates from Central Luzon Region		INLU
Independent candidates from Calabarzon Region		INCL
Independent candidates from MIMAROPA (Southwest Tagalog Region)	INMI	
Independent candidates from Bicol Region		INBI
Independent candidates from Western Visayas	INWV	
Independent candidates from Central Visayas	INCV	
Independent candidates from Eastern Visayas	INEV	
Independent candidates from Zamboanga Peninsula		INZA

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Independent candidates from Northern Mindavao	INNM
Independent candidates from Davao Region	INDA
Independent candidates from SOCCKARGEN	INSO
Independent candidates from BARRM	INBA
Independent candidates from Caraga	INCA

Annex II. EU EOM social media monitoring results

Philippines has a total population of approximately 116.8 million. Some 83.5 per cent of Filipino have access to internet, with some 77.7 per cent of them having at least one social media account. There are over 84.3 million mobile phones registered in the country. The most popular social media platforms are Facebook (90.8 million users), TikTok (62.3 million users) and YouTube (57.7 million users) followed by Instagram (22.9 million) and X TikTok (9.3 million).



Chart 1. Social media users / population of the Philippines

The EU EOM monitored an indicative set of social media accounts, profiles, groups, and pages, with a nationwide relevance, to capture key campaign trends across various online platforms. The selection of accounts and topics the mission analysed was made

after assessing the prospective impact a certain political actor actions might have on political participation. Among the platforms mainly Facebook had the potential to affect the discourse, hence the activity on this platform was in mission's monitoring focus. Additionally, YouTube and Instagram was taken into account, with some additional

Table 1. The social media monitoring and data collection/visualisation tools used		
Social Listening	SentiOne, Gerulata	
tools	Sentione, Gerulata	
Paid Advertising	Meta Ads Library,	
Monitoring	WhoTargetsMe	
Content		
verification tools	Google Lens, TinEye	
Visualisation	DataWrapper, SankeyMatic,	
visualisation	Gephi	

analysis on X and TikTok communications also have been assessed. The EU EOM social media monitoring unit comprised six locally recruited social media monitors, enforced by two social media analyst assistants, each of whom was fluent in at least two out of the

main dominant languages: English, Filipino (Tagalog), Ilocano, Cebuano, Hiligaynon or Maguindanao. The mission used following tools to extract data from social media platforms: SentiOne and Gerulata for extracting data from Facebook, YouTube, Instagram, X and TikTok. The data downloaded from social networks cover the entire campaign period, campaign silence, as well as one week following the announcement of results. Data visualisations were made by using DataWrapper, SankeyMatic and Gephi.

Campaign online

The EU EOM observed and assessed communication on total of 2.305 social media accounts, including 1.496 accounts for candidates, 469 accounts for parties, 168 for influencers, 105 accounts of state institutions, 50 for electronic media outlets, and 17 of CSO's. The sample was selected considering following criterions:

- The reach and impact of the page/group/account on the political agenda (number of followers min. 3000, interaction rate per post, quotation level in traditional media and sum of shares).
- The content of the page/group/account (are topics covering social, political, and electoral issues, is the content original or is it primarily re-shared, is the content controversial, etc.).
- The dominant language used on the page or by the social media influencer was also considered to obtain a balanced sample of digital content in English, Filipino or four other locally used languages
- Political dynasty leaning

Chart 2. Monitored social media channels - total

Monitored social media accounts						
	Total	Facebook	Instagram	Youtube	TikTok	х
Contestants	1,496	1,207	137	38	58	56
Political parties	469	170	84	71	107	37
Influencers	168	153	6	3	4	2
Official bodies	105	28	20	20	11	26
Electronic media outets	50	42	2	1	4	1
Civil Society Organisations	17	16	1	0	0	0

Not every observed actor had every type of account on a particular online platform. The statistics in Chart 3 refer to the total number of observed accounts. Facebook accounts accounted for the largest proportion of observed social media accounts, followed by X.

Number of posts by most influential candidates

Chart 3. Type of posts for political contestants

Type of the post			
Facebook Post	28,404		
Facebook Video	11,422		
X Tweet or video	2,821		
Other	134		

Candidates were using mostly Facebook to pass their messages: either using posts (usually with the photo album attached) or Facebook video. As the chart above shows, even if X is not widely used by the public, politicians tend to employ this social media platform to pass messages.

Chart 4. Type of posts for political contestants



This table presents data on Facebook posts containing video content, categorised by duration. The largest share belongs to videos lasting one to five minutes, making up 39.6 per cent of the total. Shorter videos, under one minute, represent 22.6 per cent. Meanwhile, longer videos, between five and 10 minutes, account for 10.4 per cent, while those exceeding 10 minutes comprise 11.7 per cent. Notably, videos above 25 minutes constitute 7.7 per cent of posts, and livestreams make up 8.0 per cent. The data suggests that short videos (up to five minutes) dominate Facebook video content. Very often posted videos were very short snippets filmed during the campaign, shot from inside a car, capturing crowds of voters, showing the distribution of goods, or depicting a candidate strolling through the streets – a format not suitable for passing any meaningful campaign message.



Chart 5. Number of posts for political contestants (15 top ones)

The record-holder for the number of posts published between 28 March and 11 May was Kiko Pangilinan, whose social media accounts registered nearly 900 posts and entries. This averages 19 posts per day, though it's important to note that some contained identical content but were shared across

different platforms. Bong Go ranked second, posting a total of 433 posts, averaging about nine per day. Closing the top 15 politicians publishing the most content during this period was the Cardema couple, who were running in local elections and jointly manage a Facebook page (they posted 265 posts in total – around 6 per day).

Chart 6. Number of impressions, comments and shares (10 top ones)

Chart 6 shows the average values of impressions, comments, and shares for the ten politicians who posted the most. As seen, Bong Go (number one on the list of Senate election winners) leads in this category with an



average engagement level of 6,200 impressions. In second place is Bam Aquino (number two on the list of Senate election winners), followed by Kiko Pangilinan in third, with an

average engagement level of 2,000. It is worth noting that although Bam Aquino's result is lower than Bong Go's, his posts ultimately had the potential to reach a greater number of voters, as they were shared, on average, by 50 more people. The least engaging candidate among the top ten most frequent posters was Henry Balbin (Kay Balbin Panatag Ka), who was not elected on the position of Provincial Board Member. Despite publishing 356 posts, he averaged only 10 impressions per post.

Chart 7a. Examples of boosting number of Facebook followers







The database analysis revealed evidence of artificial growth of the number of the followers. Chart 7a presenting four such cases where, over the 44-day monitoring period⁶⁹, the number of Facebook followers increased by more than a million. In each instance, the initial follower count was relatively moderate, and no campaign activities could have led to such a significant rise in followers. A larger follower count resulted in an increase in impressions across all analysed cases and, though not as substantially, also in the number of shares and comments. The highest percentage difference was recorded by Jimmy Labampa (councillor candidate from Taguig), whose usual average number of impressions before boosting was 122, whereas afterward it was ten times higher.

⁵⁹ between 28 March and 11 May

Chart8 illustrates the distribution of election-related and non-election-related posts across various actors. Candidates and political parties overwhelmingly focused on election content, with 93.3 per cent and 96.6 per cent of their posts, respectively, dedicated to the topic.



Chart 8. Percentage of the election related posts

Civil society organisations lean more toward non-election topics, with just 29.3 per cent of their content tied to elections. Electronic media shows even less election-focused engagement, with only 12.4 per cent of posts related to the subject. Influencers equitably divided their attention between election-related topics and other issues, with 44.0 per cent of their posts covering election matters and 56.0 per cent discussing other topics.





Candidates largely ran a positive election campaign, focusing on a message that could be summed up as "vote for me". This supports the final report's body text that the campaign was personality-driven rather than addressing other possible voter concerns such as healthcare, education, or security. Since the 12 May elections covered multiple levels, some candidates also directed messages toward voters about other candidates aligned with them, resulting in a significant share of secondary topics related to senatorial or House of Representatives races. Non-campaign topics and content unrelated to voting for specific candidates were marginal within this group.



Chart 9b. Topics for online media in social media

Regarding electronic media, nearly 36 per cent of posts assigned a topic were related to promoting a specific candidate's campaign message. One-quarter of the posts focused on politics in general, while 16 per cent covered internal affairs, such as economy or healthcare. As for secondary topics, the largest share was dedicated to campaigning for a particular candidate, accounting for almost 28 per cent. The second most discussed topic was the arrest and trial of Rodrigo Duterte (nearly 13 per cent). Almost the same number of posts covered COMELEC's work.



Chart 10. COMELEC voter education online (28.03 – 11.05)

COMELEC's approach to voter education through social media appears to be of limited scope. Of the 391 posts published on

Facebook between 28 March and 11 May, only six reached a wider audience, with two ("Voting hours reminder" and "Precinct finder") being pinned by the Commission to the Facebook page, thereby increasing their visibility. The remaining 385 posts received a total of 155 thousand likes, averaging just 400 likes and 176 shares per post. Considering the number of COMELEC followers on Facebook, this level of engagement indicates that only one follower on every 10 thousand shared with others COMELEC's online voter education materials.

Chart 12a. Campaign spendings

Meta Ad Library spendings (EUR)					
11.02 - 11.05					
	11.02 - 11.05	% of total spendings			
Abby Binay	543,020.62	0.36			
Camille Villar	443,598.02	0.3			
Kiko Pangilinan	295,773.39	0.2			
Bam Aquino	199,782.98	0.13			
Ramon Bong Revilla, Jr.	174,218.8	0.12			
Ping Lacson	163,627.75	0.11			
Ben Tulfo	141,078.48	0.09			
Manny Pacquiao	99,624.71	0.07			
Benhur Abalos	73,469.5	0.05			
Bong Go	52,191.15	0.04			
Bato dela Rosa	28,170.16	0.02			
Francis Tolentino	25,289.36	0.02			
Imee Marcos	13,959.68	0.01			
Atty Angelo de Alban	13,430.2	0.01			
Jimmy Bondoc	12,084.15	0.01			
data collected with "Who	- Targets Me"				

Using "Who Targets Me" system⁷⁰ EU EOM was able to assess spending on the campaign on Facebook for main senatorial contestants. Total spendings for the online campaign for the prospective Senators was 149 million peso (2.352.110 EUR). Chart 10 shows top 15 senatorial contenders that spent the most on the online campaign. EU EOM was able to check also the level

of spendings during the pre-election campaign silence. Total of 54 ads were still active for that period, for the sum of over nine million peso (approximately 142 thousand EUR). 17,6 per cent of this amount was spent by Ping Lacson followed by Bam Aquino and Many Pacquiao.



Chart 12b. Campaign spendings – campaign silence

⁷⁰ WhoTargetsMe is a non-for-profit organisation and software provider, enabling user-friendly analyse of the political spending data online.





Dedicated net analysis software (Gephi) was used to visualise the connections between major electronic media outlets and politicians. The analysis considered the strength of connections (how frequently a media outlet published materials about a politician), represented by the thickness of the arrows, and sentiment (positive – green, negative – red), indicated by the color of the arrows. The total number of mentions of a politician was encoded by the size of the politician's bubble, while the total number of articles about any politician was reflected in the size of the media outlet's bubble.

As observed, the most frequently discussed politician was Sara Duterte, with major electronic media showing a predominance of positive mentions over negative ones. Imee Marcos ranked second, though two red arrows indicate that some media outlets had a higher share of negative mentions.

Chart 11b. Net analysis (ABS CBN – politicians)



In this regard, an interesting aspect is the analysis of posts published by private outlet ABS-CBN, which feature mentions of the incumbent president, his sister, the vice president, and – somewhat less frequently – Camille Villar in almost equal measure. While the network generally portrayed Ferdinand Marcos (as well as Camille Villar) positively and Sara Duterte in a moderately positive light, it also frequently mentioned Imee Marcos, though in a negative context.



Imee Marcos was portrayed in a negative light not only by ABS-CBN but also – though less frequently – by Philippine Star and the smaller outlet News Watch Plus. There were also online media where rather positive mentions of this politician could be found, such as News5, Bilyonaro, Politiko, and Rappler. However, they published content about her less frequently than the outlets where negative coverage predominated.

In light of the network analysis linking sentiment to mentions of individual politicians, the imbalance in the previously discussed topics becomes clearer. Some media

engaged either in favor of or against certain politicians' campaigns and this analysis

suggests that rather than having isolated articles supporting or criticising a given candidate, some electronic media outlets may be biased.

13.05 - 18.05						
	total	politicians	media	influencers	party	CSO
Final results	32.1	51	23	29	30.2	0
Partial results	18.4	22	14.4	15.7	49.2	4.7
Current politics	16	6.7	18.4	27.3	4	0.9
Internal affairs	15.4	5.4	23.3	13.9	8.1	1.9
Proclamations	8.2	10	10.1	3.4	2.2	0.9
Other	9.8	4.9	10.8	10.7	6.3	91.6

Chart 13. Post electoral topics

Among the topics discussed immediately after the elections, those related to the results both partial and final were the most dominant, collectively accounting for more than half of all

coded posts. The high percentage in the "other" category among CSOs stems from the large number of posts concerning election process monitoring, particularly by PPCRV and NAMFREL.

Annex III. Election results

Senate

No.	NAME	PARTY	ALLIANCE	VOTES	%
1.	GO, Christopher 'Bong'	PDP-Laban	DuterTEN	27,121,073	6.33%
2.	AQUINO, Paolo Benigno IV 'Bam'	KNP	KiBam	20,971,899	4.89%
3.	DELA ROSA, Ronald 'Bato'	PDP-Laban	DuterTEN	20,773,946	4.85%
4.	TULFO, Erwin	Lakas	Alyansa	17,118,881	4.00%
5.	PANGILINAN, Francis	Liberal	KiBam	15,343,229	3.58%
6.	MARCOLETA, Rodante	Independent	DuterTEN	15,250,723	3.56%
7.	LACSON, Panfilo 'Ping'	Independent	Alyansa	15,106,111	3.53%
8.	SOTTO, Vicente III 'Tito'	NPC	Alyansa	14,832,996	3.46%
9.	CAYETANO, Pilar Juliana 'Pia'	Nacionalista	Alyansa	14,573,430	3.40%
10.	VILLAR, Camille	Nacionalista	Alyansa/DuterTEN*	13,651,274	3.19%
11.	LAPID, Manuel 'Lito'	NPC	Alyansa	13,394,102	3.13%
12.	MARCOS, Maria Imelda 'Imee'	Nacionalista	Alyansa/DuterTEN*	13,339,227	3.11%

* Senator Camille Villar remained formally part of Alyansa but was also endorsed by the DuterTEN shortly before election day. Senator Imee Marcos was originally part of Alyansa but later formally withdrew from the coalition and was endorsed by the DuterTen

House of Representatives – Single Mandate District Representatives

POLITICAL PARTY	ALLIANCE	VOTES	%	SEATS
Lakas–CMD	Alyansa	16,596,698	32.87	103
National Unity Party (NUP)	Alyansa	6,080,987	12.05	31
Nationalist People's Coalition (NPC)	Alyansa	5,974,201	11.83	31
Partido Federal ng Pilipinas (NPC)	Alyansa	5,286,538	10.47	27
Nacionalista Party (NP)	Alyansa	4,724,803	9.36	22
Independents		4,371,611	8.66	11
Liberal Party (LP)	Liberal (KiBam)	1,555,941	3.08	6
Aksyon Demokratiko		1,341,540	2.66	3
* Hugpong sa Tawong Lungsod (HTL) [PDP Laban]	PDP (Duterte)	542,710	1.07	3
Partido Demokratiko Pilipino (PDP Laban)	PDP (Duterte)	666,067	1.32	2
Laban ng Demokratikong Pilipino (LDP)		314,981	0.62	2
Pwersa ng Masang Pilipino (PMP)		269,949	0.53	2
* Makatizens United Party		150,189	0.30	2
People's Reform Party (PRP)		292,665	0.58	1
United Nationalist Alliance (UNA)		142,655	0.28	1
*United Negros Alliance [NUP]		130,023	0.26	1
Centrist Democratic Party of the Philippines		127,646	0.25	1
*Partido Navoteño [NPC]		116,622	0.23	1
One Cebu [Lakas]		104,768	0.21	1
One Cebu [NPC]		74,936	0.15	1
*Adelante Zamboanga Party		100,035	0.20	1
*Asenso Manileño		70,780	0.14	1
TOTAL		49,036,345	97.12%	254

* Connotes a 'local party'; affiliation with national-level party is marked by the latter's name in brackets.

Party-List Representatives

No.	PARTY LIST	VOTES	%	SEATS
1.	Akbayan Citizen's Action Party	2,779,621	6.63	3
2.	Duterte Youth*	2,338,564	5.57	3
3.	Tingog Party List	1,822,708	4.34	3
4.	4Ps Partylist	1,469,571	3.50	2
5.	ACT-CIS Partylist	1,239,930	2.96	2
6.	Ako Bicol	1,073,119	2.56	2
7.	Uswag Ilonggo	777,754	1.85	1
8.	Solid North Party	765,322	1.82	1
9.	Trabaho Partylist	709,283	1.69	1
10.	Citizens' Battle Against Corruption	593,911	1.42	1
11.	Malasakit @ Bayanihan	580,100	1.38	1
12.	Senior Citizens Partylist	577,753	1.38	1
13.	Puwersa ng Pilipinong Pandagat	575,762	1.37	1
14.	Mamamayang Liberal (ML)	547,949	1.31	1
15.	FPJ Panday Bayanihan Partylist	538,003	1.28	1
16.	United Senior Citizens Partylist	533,913	1.27	1
17.	4K Partylist	521,592	1.24	1
18.	LPG Marketers Association	517,833	1.23	1
19.	Coop-NATCCO	509,913	1.22	1
20.	Ako Bisaya	477,796	1.14	1
21.	Construction Workers Solidarity	477,517	1.14	1
22.	Pinoy Workers	475,985	1.13	1
23.	AGAP Partylist	469,412	1.12	1
24.	Asenso Pinoy	423,133	1.01	1
25.	Agimat Partylist	420,813	1.00	1
26.	TGP Partylist	407,922	0.97	1
27.	SAGIP Partylist	405,297	0.97	1
28.	Alona Partylist	393,684	0.94	1
29.	1-Rider Partylist	385,700	0.92	1
30.	Kamanggagawa	382,657	0.91	1
31.	GP Party	381,880	0.91	1
32.	Kamalayan	381,437	0.91	1
33.	Bicol Saro	366,177	0.87	1
34.	Kusug Tausug	365,916	0.87	1
35.	Alliance of Concerned Teachers	353,631	0.84	1
36.	One Coop	334,098	0.80	1
37.	KM Ngayon Na	324,405	0.77	1
38.	Abante Mindanao	320,349	0.76	1
39.	Bagong Henerasyon*	319,803	0.76	1
40.	Trade Union Congress Party	314,814	0.75	1
41.	Kabataan	312,344	0.74	1
42.	APEC Partylist	310,427	0.74	1
43.	Magbubukid	310,289	0.74	1

44.	1 Tahanan	309,761	0.74	1
45.	Ako Ilocano Ako	301,406	0.72	1
46.	Manila Teachers Party-List	301,291	0.72	1
47.	Nanay	293,430	0.70	1
48.	Kapuso PM	293,149	0.70	1
49.	SSS-GSIS Pensyonado	290,359	0.69	1
50.	DUMPER Partylist	279,532	0.67	1
51.	Abang Lingkod	274,735	0.65	1
52.	Pusong Pinoy	266,623	0.64	1
53.	Swerte	261,379	0.62	1
54.	Philreca Party-List	261,045	0.62	1
55.	Gabriela Women's Party	256,522	0.62	-
56.	Abono	254,402	0.61	-
57.	Ang Probinsyano	250,555	0.60	-
58.	Murang Kuryente	247,526	0.59	-

* Not yet officially proclaimed by the COMELEC because of pending election cases. If either or both partylists lose their disqualification cases, the next four party-lists (in grey) shall be proclaimed in their stead.

Annex IV. BARMM parliamentary elections

The first-ever elections of members of the BARMM Parliament were initially scheduled for 2022 and then rescheduled to 12 May 2025. They were subsequently postponed to 13 October 2025 to enable the reappropriation of the district seats previously allotted to the Sulu province after the Supreme Court declared its inclusion unconstitutional.⁷¹ In March 2025, President Marcos Jr. appointed Abdulraof Macacua as the new Interim Chief Minister of the Bangsamoro Transition Authority (BTA), replacing Ahod 'Al Haj Murad' Ebrahim, and reappointed 58 of the 80-member parliament, with 21 new members joining.⁷²

The BARMM party landscape features a mix of regional and national parties and alliances. Relationships between clans and political parties are fluid, where the latter can legitimise dynastic rule. Interim authorities are dominated by the United Bangsamoro Justice Party (UBJP), linked to the Moro Islamic Liberation Front (MILF). It is allied nationally with the PFP, led by President Marcos Jr. Emerging parties include Sulong Islam sa Ating Panahon (SIAP), a UBJP breakaway; Mahardika, connected to the Moro National Liberation Front (MNLF); and Bangsamoro Peoples Party (BPP), led by a Basilan representative who won the provincial governor race. Opposing UBJP is the Bangsamoro Grand Coalition (BGC), which previously united clan leaders and parties challenging MILF's dominance. In late 2024, several clans left the BGC to partner with the UBJP.

The 12 May elections reaffirmed that local political dynasties remain the principal power brokers in the BARMM. While some entrenched families lost grip key positions, they were largely replaced by competitors who largely represent other existing or rising political clans. There were isolated cases of non-clan candidates gaining ground, however: e.g. the newly elected Vice Governor of Maguindanao del Sur has a background in religious leadership. His victory underlines an important development, where influence derives from community service rather than kinship.⁷³

A crucial catalyst for potential change is the Bangsamoro Local Government Code, passed in September 2023. For the first time, legislation prohibits immediate family members (up to the second degree of consanguinity or affinity) of incumbent officials from seeking local elective positions in the same province, city, municipality or village – these provisions are expected to apply starting in the 2028 elections.

EU EOM observers reported a mixed incidence of vote buying and misuse of resources, including ayuda aid during the campaign, noting that informal arrangement among community leaders were more significant than transactions involving individuals. Use of official vehicles or official venues for the purposes of the campaign was noted in some instances. The overall environment was underpinned by fear and security concerns negatively affecting access to freedoms, with some candidates displaying reluctance to campaign in areas deemed as their opponents' strongholds.

Election related violence was more pronounced than elsewhere in the country, with a bulk of the areas of 'grave concern' identified by the COMELEC and the PNP located in BARMM.⁷⁴ The COMELEC placed the cities of Datu Odin Sinsuat (Maguindanao del Norte) and Buluan

⁷¹ Sulu inhabitants rejected the Bangsamoro Organic Law a referendum in 2019. In September 2024, the Supreme Court ruled that Sulu province should be excluded from BARMM, citing its "no" vote in the 2019 plebiscite. <u>Decisions GR. 242255, 243246 and 243693</u>.

⁷² At least six of the 21 new appointments represent entrenched or emerging political families.

⁷³ Unlike the former Autonomous Region in Muslim Mindanao, the BARMM integrates Islamic values into its governance. The Regional Darul Ifta, or Islamic Advisory Council, plays an institutionalized role by issuing religious guidance, or 'fatwas,' advising on policy and supporting some government programmes.

⁷⁴ Of the 36 areas classified as hotspots, 30 were in the BARMM, including 20 in the Lanao del Sur province.

(Maguindanao del Sur) under its control.⁷⁵ To address last-minute withdrawals of electoral board members in fear of intimidation, election administration trained approximately 500 police officers to serve as polling staff who may be deployed at short notice. The competition between UBJP and BGC, as well as among various clans, has heightened political tensions and contributed to election-related violence, including targeted assassinations by unidentified gunmen. The persistence of private armed groups linked to clans remains a major challenge to peaceful and credible elections.

On election day, attacks increased with at least 10 reported killings; for instance, the convoy of UBJP deputy-gubernatorial candidate Hisham Nando was attacked by gunfire with one person wounded. The peace covenants that were signed before or during the campaign were viewed to have had limited significance. Campaign rhetoric was mostly peaceful, with one noted exception at an UBJP rally in Lanao del Sur.

The leadership shakeup in the BARMM expanded the role of clans in the interim authority while reducing the number of seats held by women from 15 to 10. Women fared poorly in the 12 May elections in BARMM overall; one exception was the election of Dimple Mastura (Lakas CMD) as representative in Maguindanao del Norte, where she defeated a UBJP candidate.

The Indigenous People's Democratic Party (IPDP), a party representing indigenous groups in the BARMM, was among six regional political parties whose petitions for accreditation by the COMELEC were denied. The party fell short of the required number of organised municipalities in Lanao del Sur, where the indigenous communities they represent are limited. Lack of resources was cited to EU EOM observers as the key reason for difficulties mobilising IP communities. Nonetheless, at the local level, several individuals identifying as indigenous peoples were elected to councillor posts in some provinces.

Legal considerations

The Bangsamoro Transition Authority (BTA) has until 28 August 2025 to deliberate and redistribute the regional parliamentary seats, before the parliament adjourns Two bills are currently under consideration: the most recent proposes allocating nine seats to Lanao del Sur and two to the Special Geographic Area,⁷⁶ while an earlier text suggests ten seats for Lanao del Sur and one for the Special Geographic Area.⁷⁷ In the absence of new legislation prior to the elections, the Bangsamoro Parliament will comprise only 73 members instead of the intended 80, with 25 district representatives (a reduction from 32), 40 party-list members, and eight sectoral representatives.

Unless the national Congress enacts new legislation postponing the elections, the 13 October 2025 date is legally binding, and the elections will proceed with 73 seats. The COMELEC has confirmed that the elections will proceed on 13 October 2025, irrespective of whether the seats for Sulu province are reallocated, as these elections form part of the 2025 national and local electoral cycle and are therefore not considered special elections. The election will rely on the same voter register used for the 12 May National Midterm and Local Elections. Consequently, individuals who turn 18 between those dates will remain disenfranchised, unless COMELEC decides to open a specific period for voter registration.

Key preparations the elections include candidate registration, completed in November 2024, with no new filings or substitutions allowed except in cases of death or disqualification. Voter registration

⁷⁵ Section 52 of the Omnibus Election Codes grants COMELEC the power to "exercise direct and immediate supervision and control over national and local officials or employees, including members of any national or local law enforcement agency and instrumentality". The placement of Datu Odin Sinsuat under COMELEC control followed the targeted killing of an election official and her husband.

⁷⁶ Bangasamoro Parliament Bill 351 of April 2025.

⁷⁷ Bangsamoro <u>Parliament Bill 347</u> of February 2025.

is limited to those already registered for the 2025 national and local elections. Ballot printing, initially begun in January 2025, is expected to resume and be completed by July–August.

Finally, the Independent Election Monitoring Center for BARMM and Sulu (IEMC-BARMM & Sulu) has been launched to enhance transparency and security during the elections, providing a platform for CSOs and election stakeholders to monitor the process and address potential issues.

