European Union
Election Observation Mission

ZAMBIA 2026

Final Report



General Elections

13 August 2026

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LIST OF ACRONYMS

ACHPR	African Charter on Human and Peoples' Rights
ACHPR–PW	Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa
AoR	Area of Responsibility
AU	African Union
BVR	Biometric Voter Registration
CC	Constitutional Court
CCA	Cyber Security and Cyber Crimes Act, 2021
CCMG	Christian Churches Monitoring Group
CEDAW	Convention on the Elimination of all Forms of Discrimination against Women
CEO	Chief Electoral Officer
CMC	Conflict Management Committee
CO	Chief Observer
COMESA	Common Market for Eastern and Southern Africa
CRPD	Convention on the Rights of Persons with Disabilities
CSO	Civil Society Organisations
DCO	Deputy Chief Observer
DEO	District Electoral Officer
DNRPC	Department of National Registration, Passport and Citizenship
DRO	Deputy Returning Officer
DSZ	Democracy Strengthening in Zambia
ECA	Electoral Commissions of Zambia Act
ECoC	Electoral Code of Conduct
ECZ	Electoral Commission of Zambia
EEM	Election Experts Mission
EFM	Election Follow–up Mission
EPA	Electoral Process Act
EU DPR	EU Data Protection Regulation
EU EOM	EU Election Observation Mission
EUR	Euro
FDD	Forum for Democracy and Development
IBA	Independent Broadcasting Authority
ICCPR	International Covenant on Civil and Political Rights
ICERD	International Convention on the Elimination of Racial Discrimination
ICPRW	International Convention on the Political Rights of Women
ICT	Information and communications technology
IDP	Internally displaced person
JCC	Judicial Complaints Committee
JSC	Judicial Service Commission
LAZ	Law Association of Zambia

LGET	Local Government Election Tribunals
LSTO	Local Short–Term Observer
LTO	Long–Term Observer
MDC	Movement for Democratic Change
MIB	Ministry of Information and Broadcasting
MISA	Media Institute of Southern Africa
MMD	Movement for Multiparty Democracy
MMPR	Mixed Member Proportional Representation
MZGM	Make Zambia Great Movement
NA	National Assembly
NDF	National Dialogue Forum
NDI	National Democratic Institute
NRC	National registration card
PEO	Provincial Electoral Officer
PF	Patriotic Front
POA	The Public Order Act
PPLC	Political Party Liaison Committee
PRISCA	Prison Care and Counselling Association
PRVT	Process and Results Verification Transparency
PVT	Parallel Vote Tabulation
PwD	Persons with Disabilities
RO	Returning Officer
SACCORD	Southern African Centre for Constructive Resolution of Disputes
SADC	Southern African Development Community
SNS	Social Network Sites
SOP	Standard operating procedure
TIZ	Transparency International Zambia
UN	United Nations
UNCAC	United Nations Convention against Corruption
UNDP	United Nations Development Programme
UPND	United Party for National Development
USAID	United States Agency for International Development
ZAFOD	Zambia Federation of Disability Organizations
ZANIS	Zambia News and Information Services
ZCID	Zambia Centre for Inter–Party Dialogue
ZCSA	Zambian Cyber Security Agency
ZICTA	Zambia Information and Communications Technology Authority
ZNBC	Zambia National Broadcasting Corporation
ZNWL	Zambia National Women's Lobby
ZMW	Zambian Kwacha

I. EXECUTIVE SUMMARY

The 13 August 2026 general elections were a test of citizens' democratic expectations for the future. While the elections were competitive with numerous candidates standing at all levels, fundamental democratic rights were restricted, especially those of assembly and expression. Key incumbency advantages blurred the line between state and party, creating an uneven playing field. While election day was calm overall, the situation deteriorated following the nationwide six-hour suspension in counting and announcement of results ordered by the Electoral Commission of Zambia (ECZ). At totalling centres, EU Election Observation Mission (EOM) observers saw tabulation procedures deteriorate, with less public scrutiny after that point. Serious incidents and procedural irregularities were noted by the EU EOM during the totalling process, impacting its transparency and credibility. The ECZ declared the presidential results on 18 August, but no full publicly available results have been posted by them, undermining transparency.

The post-election period gave credence to concerns about the shrinking democratic space, growing signs of government control, and the inadequate respect for fundamental rights and due process. The environment was tense and turbulent, defined by a sequence of opaque security-related actions. A raid by joint security forces on a property linked to the opposition leader on 14 August resulted in the death of one former government minister and the arrest of 11 key opposition figures. This was followed by further arrests, including of the main opposition candidate, Brian Mundubile, and his running mate, Makebi Zulu, both were charged with treason and later sedition.

The prolonged lack of official information surrounding the raid and subsequent arrests and the lethal use of force, which was purported to be motivated by national security considerations, created the space for speculation and mounting public anxiety over who had been targeted, their whereabouts, and the charges against them. The physical shutdown of access to the courts from 24 to 26 August led to a curtailment of access to justice and electoral due process for two out of the seven constitutionally provided days for filing petitions. Constitutional imperatives to ensure that technicalities do not impede access to justice were not adequately safeguarded. The lack of a timely, clearly communicated alternative mechanism for filing presidential petitions also raised broader concerns regarding public confidence in state institutions, the judiciary and the rule of law.

While the elections were conducted under a newly amended legal framework that provided an adequate basis to conduct democratic elections, significant changes to the electoral system were enacted as late as only three months before polling, contrary to international and regional good practice, which reduced awareness of them. The amendments, along with other recent law reforms, created new legal uncertainties surrounding effective inclusion of underrepresented groups such as women, youth and persons with disability (PwD) and the exercise of fundamental freedoms. Crucially, constitutionally mandated laws on political parties and on political finance were not enacted, undermining transparency, public accountability and a level playing field.

The elections were generally well-prepared by the ECZ, but there is an urgent need for strengthened transparency and accountability mechanisms. Despite a compressed timeframe due to late changes in the law, the ECZ managed operations until voting day in line with its schedule and legal timelines. Delays in the publication of guidelines and regulations, however, contributed to uncertainty over procedures to be followed, especially regarding election day procedures and the use of technology. Delayed regulations, erroneous training materials, and

uncertainty over candidate withdrawals exposed shortcomings in the ECZ's work. Public information stands in need of improvement. Late accreditation procedures effectively meant that long-term observation methodologies were not fully accommodated and fundamentally impacted the activities of citizen observer groups and the EU EOM.

Voter registration was inclusive and has seen improvements, but the process lacks adequate robustness and continuous efforts. Some interlocutors criticised the late deployment of staff and technical difficulties with the digital kits during the voter registration process. These limitations in registration rates became apparent as the ECZ only reached 50 per cent of its target of 3.5 million new voter registrations. ECZ improvements included an online pre-registration portal enabling registered voters to also electronically inspect the Provisional Register of Voters.

Voters were offered a genuine and competitive choice of contestants with 14 presidential candidates (of whom only one was a woman). Candidate registration was inclusive, transparent, and timely. A record number of independent candidates contested NA seats, many after failing to secure party nominations. The lack of legal status for alliances left scope for uncertainty and a lack of transparency and accountability for both candidates and voters.

The election campaign was defined by an unlevel playing field and police bias. For the first time, the ECZ introduced a campaign calendar for presidential candidates, with the aim of reducing potential violence. However, the calendar did not apply to the incumbent president and vice-president and restricted other candidates' freedom of movement and ability to campaign. The unlevel playing field was further distorted by misuse of state resources and the blurring of state functions and campaigning. Campaign-related violence, 'cadreism' (the involvement of violent groups traditionally associated with political movements), and police bias and detentions were commonplace during the campaign.

The media was able to operate with relative freedom throughout the campaign. Yet, there was a chilling effect created by insecurity related to revisions of cyber laws in 2025. This led to an increase in self-censorship, as reported by many interlocutors, and one prominent journalist's arrest. The EU EOM conducted a comprehensive qualitative and quantitative monitoring of 10 outlets showing the media environment during elections to be characterised by overwhelmingly biased state-owned media coverage (96.2 and 90.5 per cent of airtime in favour of UPND on ZNBC TV and Radio, respectively).

On social media platforms, false claims and discreditation of opponents persist amidst growing self-censorship resulting from restrictive cyber laws. Social media extended the main candidates' reach and offered those with less resources a low-cost alternative to rallies and paid broadcast. Ethnic and violent language was relatively limited during the campaign as noted in EU EOM monitoring but did increase in the immediate post-election period. The iVerify platform was consistent and professional in debunking false claims. Although numerous, false claims did not show signs of coordinated and structured effort. Responsibility for identifying speech offences and countering disinformation should rest outside the security sector.

Although significant legal reforms were undertaken in late 2025 and early 2026, by the time the EU EOM 2026 was deployed, there was limited action on the 22 recommendations made by the EU EOM 2021. This underscored a lack of effective political effort on key issues and enduring gaps. Positively, an Access to Information (ATI) law was enacted in 2023 and the offence of criminal defamation of the president was repealed in 2022, reflecting two key

recommendations of the EU EOM 2021, but the impacts were muted by a lack of effective implementation and other restrictive laws and practices.

Women's participation as candidates in these elections was minimal. They contested at only nine per cent across all levels of elections with no women candidates standing in more than half of constituencies. Interlocutors reported gender-based harassment against some candidates. Although there were 20 reserved seats created for women in the parliament, women's candidacy rates for the directly elected seats remained very low, with the reserved seats possibly a contributing factor. The increase in seats won was only marginal, highlighting the need for parties to nominate more women in constituency contests. Further concerted efforts are needed to promote women's participation and remove discriminatory measures.

Although fifteen parliamentary seats are now reserved for young people, legal gaps regarding internal party selection and gender balance continue to impede equitable political participation. Furthermore, while youth were active during the election, notably in the social media space, persistent unemployment and political exploitation appeared to contribute to some degree of youth disengagement, highlighting the need for comprehensive structural reforms. The absence of age-disaggregated electoral data further hinders comprehensive analysis of youth participation.

Persons with disabilities continued to face significant political and societal marginalisation, despite some progress in the creation of five proportional representation reserved seats, although it was unclear which disability groups would be represented and how they would be selected. They struggle with societal prejudice, a lack of independent access to polling locations and participation in public and political life. A lack of concerted effort to meaningfully redress marginalisation persists, as demonstrated by aspects of recent law reforms.

Citizen observer organisations conducting both long- and short-term observation were active and professional. Despite this, the capacity of citizen and international observer groups to apply their methodologies was hampered by new and last-minute administrative accreditation procedures and some *ad hoc* requests. This constrained opportunities for long-term observation according to internationally accepted observation methodologies.

The EU EOM observed the opening of 39 polling stations (PS), voting in 419 PS, counting in 38 PS and tabulation at 64 totalling centres. Election day was calm overall, with polling staff efficiently facilitating voting in polling stations observed by the EU EOM. The counting of the ballots at PS was transparent where the EU EOM observed, conducted in the presence of party and candidate agents. The ECZ provided limited public information during election day, with only two online posts and two press briefings in the evening.

On 14 August, the ECZ unexpectedly declared a nationwide suspension of counting and announcement of results, to be reviewed within 24 hours. While suspension was lifted after six-hours, the scale of security concerns stated to underpin the decision was insufficiently explained. A deteriorating tabulation process after this point saw many procedural omissions and a lack of integrity safeguards as observed by EU EOM that should be explained to citizens. Local observers further flagged results inconsistencies. The uncertainties were compounded by the absence of polling station results published centrally by the ECZ.

Recommendations

The EU EOM offers 13 recommendations for improving the way elections are organised, managed, and conducted in Zambia. Of these, eight are priority recommendations:

1. ***Revise the electoral legal framework well before elections***, through an inclusive, consultative, and expert-driven process, to remove gaps and inconsistencies, enhance transparency and legal predictability, and to better align with international commitments.
2. ***Ensure transparency throughout the electoral process*** in line with international standards in decision-making and access to key information of public interest for all stakeholders. This would include publication of all relevant regulatory instruments.
3. ***Protect freedom of assembly and equal campaign opportunities*** for all contestants by discontinuing the role of the ECZ in issuing campaign timetables, ensuring that the pre-eminent role of regulating campaign schedules lies with contestants.
4. ***Disengage state-owned media*** from direct government control and convert ZNBC into a genuine public service broadcaster with editorial independence and balanced programming.
5. ***Align the Cyber Security and Cyber Crimes Acts with international commitments*** on freedom of expression and privacy of communication.
6. ***Promote the public accountability of electoral authorities by guaranteeing the right of unhindered access of observers*** to all aspects of the electoral process, underpinned by a timely, transparent and less burdensome accreditation process.
7. ***Guarantee effective access to due process in electoral matters***. Measures would include realistic timelines for petitions in all court jurisdictions, including access and filing by alternate means, consistency in rights of appeal before and after elections, and adopting appropriate evidentiary standards.
8. ***Protect the will of the voter and the integrity of elections*** by ensuring consistent arrangements for maintaining transparency during the results tabulation, such as projection of data entry and prompt online posting of complete, PS-disaggregated preliminary and final results, in an easily usable format.

II. INTRODUCTION

The European Union (EU) deployed an Election Observation Mission (EOM) to observe the 13 August 2026 general elections in Zambia following an invitation from the Ministry of Foreign Affairs and International Cooperation of the Republic of Zambia. The EOM was present from 29 June to 1 September 2026.

The EU EOM was led by the Chief Observer, Michael McNamara, Member of the European Parliament from Ireland. The EU EOM comprised a core team of 11 experts based in Lusaka and 32 long-term observers who arrived on 10 July and deployed to all 10 provinces of the country. 32 short-term observers were present from 5 to 18 August and deployed throughout the country.

For the election day, the EU EOM was reinforced with 12 locally recruited observers from diplomatic representations of EU Member States. In total, the EU EOM deployed 100 observers from 26 EU Member States, as well as from partner countries Canada and Norway. In addition, a delegation of seven Members of the European Parliament (MEPs) was led by Reinhold Lopatka, MEP from Austria.

The mission's mandate was to observe all aspects of the electoral process and assess the extent to which the elections complied with international and regional commitments for elections that Zambia adhered to, as well as with national legislation. The EU EOM is independent in its

findings and conclusions. The mission followed an established methodology and adhered to the "Declaration of Principles for International Election Observation", endorsed under United Nations auspices in October 2005 and now espoused by over 50 organisations.

III. POLITICAL CONTEXT

The 13 August 2026 general elections to elect the president, members of the National Assembly, mayors and local councillors took place amid a shrinking democratic space and growing signs of government overreach. Civil society organisations and opposition parties accused the government of arbitrary and selective enforcement of the Public Order Act and cyber laws, and of imposing significant restrictions on the fundamental freedoms of assembly, association, movement and expression, which are essential to a genuine democratic process.

Significant constitutional reforms adopted in 2025 introduced important changes to the electoral system, including the enlargement of the National Assembly (NA), an associated constituency delimitation process leading to an increase in their number, introduction of elements of proportional representation with reserved seats for vulnerable groups, and the reshaping of local councils. Constitutional changes were criticised and controversial among electoral stakeholders and led to at least one court challenge.[1]

Although there was a consultation process, many stakeholders considered that the incumbent-driven reform process was designed to influence the elections' outcome, with a limited space for adequate, timely and meaningful public consultation, alongside unresolved concerns over inclusion of women, youth and PwD affected by the reserved seat process. A Constitutional Court (CC) ruling regarding the reform process triggered a revision in government's approach and appointment of a Technical Committee on Constitutional Amendments (TCCA) to conduct nationwide consultations.[2]

The incumbent President Hichilema sought a second term as candidate of the UPND Alliance, a coalition of around 15 parties led by his United Party for National Development (UPND). The opposition was active but divided and the pre-election period was marked by obstacles to opposition parties' efforts to mobilise supporters. After loss of power in 2021, the leading opposition party Patriotic Front (PF) collapsed due to leadership disputes, factionalism, the death of former President Edgar Lungu, and administrative and judicial decisions that affected its capacity to operate. As a result, the PF did not field any candidates.

Instead, Brian Mundubile, formerly of the PF, was adopted as presidential candidate for the National Reconciliation Party for Unity and Prosperity (NRPUP) shortly before the official nomination period in May. After joining forces with Makebi Zulu of the Pamodzi Alliance, a rival former PF faction, Mr. Mundubile emerged as the main opposition candidate and created a strong momentum for the opposition shortly before the elections. He represented the Tonse-Pamodzi Alliance, a coalition of smaller parties, many with roots in the former PF and relying on the PF structures throughout the country. Several opposition parties (Citizens First, Socialist Party) fielded their own candidates. Despite 14 presidential candidates nominated, the contest was dominated by Mr. Hichilema and Mr. Mundubile.

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1 Munir Zulu and Anor v Attorney General (2025/CCZ/009) [2025] ZMCC 12 (27 June 2025)

2 The Government withdrew the draft bill just ahead of the Court issuing its ruling that public consultations were a key requirement of constitutional reforms processes.

Alongside the president, citizens were to elect 266 NA members, including 40 reserved seats, 116 mayors / council chairpersons and 1,858 councillors. A record number of independent candidates contested NA seats, many after failing to secure party nominations. Many parties formed alliances to field a joint presidential candidate and to agree on distribution of NA candidates. However, these alliances remained unstable, had no formal legal status, and candidacies were legally linked only to their respective party.

Zambian voters saw the elections as an opportunity to express their primary concerns related to economic hardship, unemployment, and rising living costs. Positive macroeconomic developments, including reduced inflation and the restructuring of government debt have not translated into tangible improvement of living standards for all. President Hichilema sought a second mandate to continue his reform agenda and deliver on job creation and social development, while the opposition criticised the government over economic hardship and authoritarian tendencies.

IV. IMPLEMENTATION OF PREVIOUS EU EOM RECOMMENDATIONS

The EU EOM 2021 Final Report offered 22 recommendations including 6 priorities to state authorities and other electoral stakeholders aimed to improve various aspects of election processes. The 2024 EU Election Follow Up Mission noted limited progress on those recommendations, while also underscoring that all remained relevant.

Out of the 22 recommendations, only 1, namely, to enact a law on Access to Information, was implemented. A recommendation to decriminalise the offence of defamation of the president was adopted, but the impact was muted by similar offences included in other laws, like the new Cyber Crimes and Cyber Security Acts.

No effective action was taken on six priority recommendations to adopt political party legislation, to revise the cost and educational conditions of candidacy, to remove undue campaign privileges for incumbents, to implement comprehensive campaign finance accountability, and to formalise cooperation between the ECZ, civil society and main social media platforms in relation to harmful online activities. In relation to the priority recommendation on the public order act, while a Public Gathering Bill was passed by the National Assembly, the Public Order Act remained on the statute books for the 2026 elections.

Partial implementation was noted on four recommendations, with some improvements in voter education efforts, revisions of conditions for rescheduling polling post nominations, additional polling premises, and new but inactive laws for state media. The remaining 10 recommendations were not adopted, including to decentralise ECZ structures, to guarantee independent, transparent delimitation of electoral boundaries, to set reasonable limits on hourly paid political advertising on broadcast media, and to embed in ECZ regulations transparent, timely and inclusive procedures for accreditations of observers, party agents and media.

Various EU EOM Final Reports since 2001 reiterated several key recommendations, including measures to promote a level playing field for campaigns, repealing the Public Order Act to better protect fundamental freedoms of assembly and movement, and enacting effective political finance law. Other recurring recommendations aimed to enhance stakeholder trust, included transparent constituency delimitation procedures, prompt publication of polling station level results, and to cease recording voter identification numbers on ballot paper

counterfoils. All previous EU EOMs called for the transformation of the ZNBC into a genuine public service broadcaster and for concerted efforts for effective equal participation for women. None of these key measures have been implemented.

V. LEGAL FRAMEWORK

An adequate legal framework was complicated by late reforms, contributing to legal unpredictability in addition to existing gaps and weaknesses.

International and Regional Principles and Commitments

Zambia is a state party to the key United Nations (UN) and African regional instruments pertinent to the conduct of democratic elections.[3] It also subscribes to various political declarations on inclusion and good governance.[4] Accordingly, the state must ensure the right and opportunity to participate freely in public affairs and government, directly or through freely chosen representatives. This includes key obligations to eliminate discrimination against women in political and public life.[5] The state is bound to ensure the right to vote by universal and equal suffrage and secret ballot, and to stand in genuine inclusive elections conducted by independent, and impartial national electoral bodies. The state also undertakes to facilitate full cycle observation of elections and ensure a political environment free of violence, intimidation, and discrimination, as well as guaranteeing an impartial and independent judiciary.

During the 2026 elections, various compliance shortcomings were observed with Zambia's undertakings either due to some gaps in regulations or because of arbitrary administrative actions. Legal deficiencies included severe penalties for derogatory speech based primarily on the identity of an impugned person.[6] Significant gender representation gaps endure,[7] though implementation of gender parity must never be treated as subsidiary to other priorities.[8] Oversight and public disclosure of campaign finance remains a fundamental area where Zambia is yet to properly regulate.[9] Importantly, on at least two occasions during the post-election day period, "security concerns" were invoked, restricting access to key election

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[3] Zambia is a member of the United Nations (UN), African Union (AU), Commonwealth (CW), Southern African Development Community (SADC) and the Common Market for Eastern and Southern Africa (COMESA). Key UN commitments are the International Covenant on Civil and Political Rights (ICCPR), the International Convention on the Elimination of Racial Discrimination (ICERD), the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), the Convention on the Rights of Persons with Disabilities (CRPD) and the UN Convention against Corruption (UNCAC). African Union treaties include African Charter on Human and Peoples' Rights (ACHPR), the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (ACHPR-PW), the African Charter on Democracy, Elections and Governance (ACDEG), the AU Convention on Preventing and Combating Corruption (AUCCC). SADC commitments include the Protocol on Gender and Development (SADC-PGD) and the Protocol against Corruption (SADC -PC). International treaties need to be passed into domestic law to have binding force in the courts.

[4] E.g. The Lusaka Commonwealth Declaration on Racism and Racial Prejudice 1979; Harare Commonwealth Declaration 1991; SADC Principles and Guidelines Governing Democratic Elections (Revised 2015) (SADC Principles).

[5] CEDAW, Article 7.

[6] UN Human Rights Committee (HRC) General Comment (GC) No. 34 (Article 19, freedom of expression) singles out Zambia in its concluding observations (*CCPR/ZMB/CO/3, para. 25*).

[7] In the SADC-PGD, member states commit to achieving at least 50 percent women in political decision-making positions, including legislatures and electoral administrations. Under CEDAW GC No. 40, achieving parity-based representation by 2030 is a binding, non-subsidiary requirement.

[8] CEDAW General Comment No. 40

[9] UNCAC, Article 7(3) - administrative measures to enhance transparency in the funding of candidates for public office and political parties.

procedures without clear justifications.[10] Amid various allegations of security threats, there were incidents of arrests of journalists and political opponents for treason, sedition, or breach of official secrets laws, at times raising concerns around the proportionality and necessity of such actions. Zambia was also an early signatory of the Malabo Convention,[11] in force since 2023, yet in 2025 the state enacted cyber laws that do not align with that convention's standards on free speech.

The constitutionally designated Human Rights Commission (HRC) and Anti-Corruption Commission (ACC), aim to support the implementation of treaty commitments, enhance transparency and accountability, and promote the protection of fundamental freedoms. At key stages of the 2026 elections, the HRC was instrumental in advocating for accountability and issued statements calling for compliance with the Constitutional rights of persons detained without charge and due process and more effective police co-operation in that regard.[12] Still, both bodies' operational capacity and effectiveness could be enhanced through more robust legal and budgetary independence and mechanisms. [13]

Constitutional Human Rights

The Constitution (as amended in 2016) provides a broad, rights-protective framework, including fundamental freedoms of expression, assembly, association and movement, the right to personal liberty and protection of the law. However, contrary to international commitments, freedom of opinion may be curbed based on "public morality".[14]

Some affirmative steps were made with regards to the right to seek information, a key component of freedom of expression, with the enactment of the Access to Information (ATI) Act in 2023,[15] and the repeal in 2022 of the offence of criminal defamation of the president. However, their impact was muted as defamation remains a criminal offence in the 2025 Cyber Crimes Act.[16] The law reintroduces criminal liability for reputationally damaging statements made online, there is a continued use of Penal Code provisions on sedition,[17] and the Public Order Act (POA) also entails arbitrary implementation.

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[10] A state may not treat human rights as subsidiary to national security without clearly defined legal limits, including strict proportionality including applying less intrusive measures to achieve the same protective function.

[11] African Union Convention on Cyber Security and Personal Data Protection.

[12] See e.g. https://hrc.org.zm/wp-content/uploads/2026/08/Hrc-Statement-over-closure-of-Court-permises-24.08.2026.pdf

[13] The ACC and the HRC are established under their own legislation of 2012 and 1996 respectively. The ACC is viewed as weakened by a lack of accountability to parliament, dependency on the prosecution service to take cases, and weak sanctioning framework. Although the HRC issued strong statements calling for accountability and due process in the aftermath of the elections, they lack power to compel police compliance and disclosures. A new law for the HRC enacted in 2024, with potential to strengthen the institution, has yet to be commenced. The Ministry of Justice may promote adherence to and observance of international law to contribute to good governance.

[14] "[…] article 19 requires protection of the right to hold opinions without interference. This is a right to which the Covenant permits no exception or restriction.

[15] The ATI gives effect to the right to access information as guaranteed under the United Nations Convention against Corruption and the African Charter on Human and Peoples' Rights, designating the HRC as the institution responsible for oversight, including hearing and determining appeals against decisions of information holders, with further recourse to the High Court.

[16] The Law Association of Zambia (LAZ) filed a petition before the High Court challenging the 2025 Cyber Security and Cyber Crimes Acts on the grounds that the laws grant excessive surveillance and search powers that risk chilling free expression and political debate. No ruling had been issued as of the Mission's departure.

[17] Section 60 prescribes a penalty of up to seven years imprisonment for seditious intention.

Institutional safeguards were somewhat strengthened in 2024, as the Human Rights Commission (HRC) Act broadened the HRC's mandate, alongside its existing constitutional functions to include monitoring compliance with the ATI Act. However, the EU EOM noted credible reports of ATI requests facing undue hurdles or institutional silence. The 2024 amendments also empowered the HRC to institute proceedings before courts. The ATI's accompanying regulations were finalised in March 2026, formally bringing the ATI into operation, a positive legislative development that has yet to be matched by effective implementation. As the enforcement authority for access to information, the HRC stated that it has been publicly monitoring compliance with the law since it came into operation in 2025. The EU EOM was directly informed of multiple formal requests for information submitted under the Act.

Multiple detentions during the pre- and post-election period raised significant human rights concerns. The existing formal avenues for redress, including *habeas corpus* applications to the High Court, complaints to the HRC and constitutional due process guarantees on arrest, proved difficult to invoke. The HRC's constitutional mandate to investigate such matters was undermined by limited enforcement powers and inconsistent cooperation from the police. The pattern of arrests raises significant concerns, with cases in which individuals were not brought before a court within 24 hours of arrest, as required by law, restricting the right to liberty and contrary to the prohibition of arbitrary arrest and detention.[18]

The closure of courts nationwide in the final days of the constitutionally mandated presidential petition filing window raised serious concerns regarding the practical accessibility of judicial redress and rule of law mechanisms. The absence of a judiciary-led public explanation on either the security rationale or a reopening timetable, left stakeholders unable to receive judicial remedy on these constitutionally time-bound proceedings.

Electoral Legislation

The domestic electoral legal framework offers an adequate basis to conduct democratic elections. However, several gaps, weaknesses, and ambiguities impact transparency, independence, and legal predictability. There are important legal vacuums, notably on contestants' financial accountability and the meaningful inclusion of women, youth, and persons with disabilities (PwD). Also, major legal reforms enacted late in the electoral cycle, contrary to best international practice, contributed to uncertainty and added further complexities to the law.

The 1991 Constitution, the Electoral Process Act (EPA) with an embedded Electoral Code of Conduct, and the Electoral Commission of Zambia Act (ECA) constitute the bedrock of the framework.[19] Together with other regulatory instruments, they govern election administration by the ECZ and define the rights and duties of stakeholders.[20] Various other laws governing information, media, and public gatherings also have implications for participation.[21] Crucially,

[18] Article 9 of the ICCPR further guarantees the right to be informed of the reasons for arrest and the right to challenge the lawfulness of detention before a court. Article 6 of the African Charter on Human and Peoples' Rights, to which Zambia is a State Party, affirms the same due process guarantees at the regional level.

[19] These instruments have been variously amended since 2016. The Constitution (as amended in 2016). The Electoral Process Act (EPA) (2016). The EPA (Amendment) Act 2026. The ECZ was established by the Constitution in 1996 and the Electoral Commission of Zambia Act No. 25 of 2016 (as amended by the Electoral Commission Act (amendment) No, 5 of 2019).

[20] ECZ Regulations database

[21] Access to Information Act (ATI) 24 of 2023, ZNBC Act, 26 of 2025 and the Independent Broadcasting Authority (IBA) Act 25 of 2025, Public Order Act 1955, Cyber Security Act 3 of 2025 and Cyber Crimes Act 4 of 2025.

constitutionally mandated laws on political parties and political finance remain unenacted, undermining transparency, public accountability, and the scope for a level playing field.[22]

Reforms in 2025, adapted after a Constitutional Court intervention,[23] entailed key changes to the Constitution and later to the Electoral Process Act in 2026.[24] The amendments increased National Assembly membership by introducing 70 new single-seat constituencies and reserved seats for marginalised groups.[25] Among some positive measures aimed at a level playing field, government ministers now resign 90 days before elections. Still, members of parliament who are no longer sitting due to dissolution are deemed to serve right up to the election eve.[26]

These legal enactments came as late as three months before polling, contrary to international and regional best practice regarding the timing of substantive legal reforms.[27] The late reforms introduced new legal uncertainties, including discrimination and unequal treatment of appointees to reserved seats due to an unrestricted power of recall by the political party to whom the MP belongs. This power of recall also seems to go against constitutional grounds of vacancy, while the reserved seat mechanism gave no opportunity for voters to understand who would represent them before elections.

The changes also introduced a potential future complexity where a presidential election goes to a second round. Parliament must convene before reserved-seat members can be assigned, which can only happen following a president's inauguration. Further, the new law mandates that the Constitutional Court must fully trial, hear, deliberate, and write a final, unappealable presidential election petition within a restrictive 14 days of filing. This strict time constraint stands in conflict with the constitutional right to a fair hearing. Other incoherencies in due process include the absence of High Court appeals to nominations petitions, although results petitions remain appealable.

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[22] Such legislation emerged in various draft stages since 2017 but never came before parliament. On 2 April 2026, the Constitutional Court ordered the government to enact legislation for political parties within 12 months, noting its absence was unconstitutional. Legal Resources Foundation Ltd v The Attorney General (2025/CCZ/0020) [2026] ZMCC 9 (2 April 2026).

[23] After its initiation, the Constitutional court ruled the Bill 7 process unconstitutional. Although the decision emerges only a day after the bill was withdrawn, the decision was perceived as forcing the Executive to change tack and appoint a Technical Committee on Constitutional Amendments (TCCA) for nationwide consultations. The TCCA process had just a month to work and lacked a clear legal framework. Its REPORT was published on 5 December, only 10 days before Bill 7 passed and thus limiting time for public scrutiny. Munir Zulu and Celestine Mukandila v Attorney General (2025/12/2015-CCZ-009) and The Law Association of Zambia v The Speaker of The National Assembly (2025/CCZ/0015) [2025] ZMCC 24 (28 November 2025). Civil Society organisations also criticised of the governments approach.

[24] Constitution of Zambia (Amendment) Act, 2025 Act No. 13 of 2025. The act was initiated by government as Bill 7 and published in the Government Gazette just prior to submission to the NA in May 2025. See also, Electoral Process (Amendment) Act, 2026 (Act 12)

[25] The reforms were passed on 15 December 2025 by 100 per cent of attendees or 135 (of 167 members) (81%), with no objections or abstentions) , drawing allegations of parliamentary vote-buying. One allegation was reportedly raised as complaint to the ACC. The governing UPND party won 82 of the 156 constituency seats in 2021. The new total maximum membership increases from 167 to 280. See below, *Electoral System.*

[26] Members of parliament (MPs) were also reinstated to local councils, reversing previous legal exclusions and raising new concerns for devolution of powers and conflicts of interest. The Constitution (2016) (Article 153) excluded MPs from local councils to promote decentralisation.

[27] SADC principles (e.g. sections 4.1 and 7.1) encourage adherence to best practices internationally. Several regional approaches (e.g. ECOWAS) propose limiting substantive legal reforms within six months before an election. The Venice Commission suggests a cut-off of up to one year prior.

Various aspects of the recent reforms required some revisions to bring them into line with the Constitution, some of which were pending during the course of the elections.[28] This includes the handling of the death of a candidate before polling and the procedures for dealing with reserved seats at the local council level. Finally, other issues gave rise to uncertainty and inspired actions seeking judicial clarity, including the impacts of various candidates and presidential running mates withdrawing after nominations. The Constitutional Court noted that the electoral calendar operated to prevent legal challenges to independent candidates, advising revised timelines to avoid such legal loopholes.[29]

RECOMMENDATION: Revise the electoral legal framework well before elections, through an inclusive, consultative, and expert-driven process, to remove gaps and inconsistencies, enhance transparency and legal predictability, and to better align with international commitments.

Electoral System and Constituency Delimitation

The presidential election is conducted on a joint ticket with a presidential running mate, and the winner requires an absolute majority (50 per cent plus one) of the valid vote. If no candidate reaches the threshold, the law foresees a second-round vote within 37 days.[30] The unicameral parliament (NA) seats are filled through a combination of first-past-the-post (FPTP) contests in 226 single seat constituencies and, for the first time in 2026, a party-list system for 40 reserved seats (20 for women, 15 for youth, and 5 for persons with disability), allocated through proportional representation (PR) based on presidential candidates' results nationally in the first round.[31] The reserved seats are allotted to political parties after the declaration of presidential results but only assigned to the successful parties' candidates after the presidential inauguration.[32] The president may also nominate up to 11 additional NA members, but without clearly defined selection criteria.[33] Local contests, including for district level council chairpersons/ mayors and ward-based councillors, are conducted on a first-past-the post (FPTP) basis. The 2025 legal reforms also introduced reserved seats on local councils, set at 18 per cent of each council size and varying between a statutory minimum of three such seats, rising to seven in the largest councils.[34]

A central pillar of the 2025 constitutional reforms was the enlargement of the NA and, by necessity, the delimitation of the required 70 new FPTP constituencies. The ECZ is constitutionally mandated to review, name and delimit constituencies and ward boundaries at

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[28] The EU EOM sought access to revised regulations but was unable to obtain same.

[29] Zambian Civil Liberties Union and Ors v Attorney General and Anor (2026/CCZ/010) [2026] ZMCC 22 (31 July 2026)

[30] The second-round schedule overlaps with the timeline for distributing reserved seats and inauguration of a new parliament, meaning in a second-round scenario parliament could be inaugurated without reserved seats holders being appointed.

[31] The parliamentary electoral system is constitutionally designated as a Mixed Member Proportional Representation System (Article 47(2) as inserted by Act 13). Each category of reserved seat has its own quota determined by dividing the total valid presidential vote by the relevant number of seats in each category. A highest remainder method applies to the allotment. Political parties that do not reach the threshold, do not qualify for any reserved seats even if they achieve the highest remainder.

[32] Seats must be allotted to designated candidates no later than 7 days after inauguration.

[33] The number of nominees increased from 8 under the Act 13 reforms. The final three members of the NA include the Vice President, Speaker and First Deputy Speaker.

[34] The electoral systems for the various elective offices are constitutionally prescribed, with some elaboration in electoral law and regulations.

least every 10 years. This had not been carried out since the adoption of the 2016 Constitution.[35] The 2025 reforms entailed the ECZ having to act within a restricted timeframe before the 2026 polls. The new constituencies were announced at the end of April 2026 with less than four months to the elections and barely four weeks before the official start of the campaign.[36] Although the ECZ decisions seemed broadly accepted, EU EOM interlocutors often complained of inadequate public consultation and were frequently sceptical as to how the ECZ reached its decisions given the absence of public access to the granular data or relevant preparatory reports.[37]

The ECZ has limited capacity to achieve broad national equal representation as the criteria delimiting boundaries must follow specific constitutionally mandated criteria. These considerations include history, diversity, cohesiveness, population density and projections, and geographical considerations, as well as means of communication. Electoral areas must also remain within administrative districts, which are, in turn, confined within provinces. Efforts to achieve an approximate population equality across constituencies and wards is constrained by the need to ensure adequate representation for urban and sparsely populated areas. Such complexities contribute to an enduring inequality of the vote contrary to international standards. While the 2026 delimitations reduced the number of voters per seat in some urban areas, the overall impact saw only marginal overall improvement in the equality of the vote – meaning that, significant gaps persist between the most and least populated districts.[38]

RECOMMENDATION: Strengthen protections for the equality of the vote by adopting clear, transparent and genuinely consultative mechanisms for delimitation of electoral boundaries underpinned by the timely and transparent publication of all materially relevant data and decision-informing report.

VI. ELECTORAL ADMINISTRATION

Conduct of elections highlighted scope for strengthened transparency and accountability mechanisms.

Structure and Composition of the Election Administration

Most stakeholders expressed confidence in the effectiveness of the ECZ and trust in the impartiality of the institution, especially at local levels, prior to the elections. A compressed timeframe due to late changes in the law put pressure on the ECZ in implementing these elections. It also led to delays in the publication of guidelines and regulations, contributing to uncertainty over procedures to be followed, especially regarding election day procedures and the use of technology. Delayed regulations, erroneous training materials, and uncertainty stemming from candidate withdrawals exposed shortcomings in the ECZ's work.

The ECZ has the mandate for voter and candidate registration, constituency boundary delimitation, and voter education. Furthermore, it is to provide information and advice to state institutions on electoral matters, as well as conducting research, and to liaise with political

[35] Following a detailed review in 2019, the ECZ proposed new boundary delimitations of constituencies, wards and of polling districts, including an increase of the number of national assembly constituencies to 246. These and revised proposals were not adopted in time for the 2021 elections.

[36] The ECZ notified of its decision on Facebook, but the link to official notice on the parliamentary webpage was not working at the date of writing.

[37] See for example – CCMG report

[38] For example, several constituencies in North-Western province showed less than 15,000 registered voters, while in several urban areas, notably Lusaka, there were significantly higher densities of voters per constituency – in some cases as high as 125,000.

parties. In addition, the ECZ has the legal authority to issue regulations and guidelines and a duty to enforce the code of electoral conduct embedded in the EPA. The ECZ must ensure that electoral processes are non-discriminatory, transparent and credible.

The ECZ is composed of five members appointed by the president, subject to ratification by the NA, for a seven-year term, renewable once.[39] The current ECZ composition, appointed between 2020 and 2026, comprises two women, including the chairperson. A chief electoral officer (CEO), appointed by the commissioners, is responsible for the ECZ management and administration and for implementing its decisions, supported by a permanent secretariat, with professional staff. Some opposition parties publicly expressed concerns about the ECZ's independence stemming from the presidential nomination of all commissioners. Independence and impartiality of an election administration are crucial elements of international standards for democratic elections.[40] However, the appointment system of commissioners has been in place since the establishment of the ECZ.

Although the Constitution provides for decentralised, permanent structures at the provincial and district levels, these are not in place, purportedly due to a lack of financial resources. Consequently, the ECZ relied on local administration in preparing and conducting elections at lower levels. The 10 provincial electoral officers and the 116 district electoral officers (DEOs), employees of the local administration, are thus double-hatted and report to the CEO as well as to the Ministry of Local Government. DEOs appointed returning officers on the ECZ's behalf in each constituency.

EU EOM observers assessed the ECZ staff at district and constituency level as professional and impartial. Fully decentralised ECZ structures could enhance the overall conduct of the election process. The ECZ is primarily financed by the treasury, receives its budget from parliament, and submits an audited annual report to the president. Budgetary allocations are released in phases rather than as a single lump sum. Additional funding comes from candidate nomination fees and international donor support for specific technical projects.

Following the recent legal changes, the creation of 70 new constituencies has increased the budgetary requirements for the 2026 elections, necessitating additional electoral staff, training, voter education and information, and materials. While the election administration was sufficiently resourced for the 2026 elections with a budget of ZMW 2.2 billion (approximately EUR 100 million, or EUR 11 per registered voter), ECZ financial independence could be increased through a lump-sum allocation by parliament, thereby enhancing the financial independence of the ECZ.

Administration of the Election

The ECZ has considerable powers to implement its mandate, yet its transparency and accountability mechanisms could be further strengthened. As the commission's statutory

[39] The commission consists of a chairperson, a vice-chairperson, and up to three other members. The chairperson and vice-chairperson must be current or former judges of a superior court or meet the qualifications to hold such an office. All members must hold at least a recognised degree and possess proven knowledge and experience in fields such as election management, finance, governance, public administration, or law.

[40] In General Comment No. 25 to ICCPR, the UN Human Rights Committee advises that an independent electoral authority should be established to supervise the electoral process. See also Commonwealth Secretariat, Organising Free and Fair Elections at Cost-Effective Levels, p.44: "*Behind any successful recruitment policy for election officials is the recognition that the appointees must not only be fair-minded and impartial in their dealings with the public and political parties but that they must be perceived to be so by all concerned*."

meetings are closed to the public, there is no systematic information sharing on the meeting proceedings or decisions, thus not enhancing transparency. ECZ communication and information sharing was widely visible but not detailed. Its communication strategy would have benefitted from being more comprehensive and by promptly publishing information of public interest, explaining the intricacies of the electoral process to all citizens while emphasizing impartiality and transparency. Since the start of the campaign until election day, the ECZ shared 196 posts on Facebook with general information, including 47 press statements and public notices. This was the main channel of communication, generating solid engagement. While the ECZ website provided some useful information, it was not always up-to-date, complete or in usable formats. Publication of information about key electoral procedures and precise data would have notably enhanced the certainty and transparency of the process.[41]

RECOMMENDATION: Ensure transparency throughout the electoral process in line with international standards in decision-making and access to key information of public interest for all stakeholders. This would include publication of all relevant regulatory instruments.

Positively, the ECZ displayed openness by engaging with stakeholders in all steps of the electoral process, including at district level, as noted by EU EOM observers. According to the Electoral Code of Conduct, the ECZ should have met political parties regularly to discuss election-related matters, yet it only conducted three national stakeholder meetings in the last weeks prior to the elections, despite repeated requests from different stakeholders.[42] Some interlocutors emphasized that more dialogue could have facilitated information sharing and engendered trust. Protecting a robust democratic culture requires active stakeholder engagement and effective public communication.

Technical preparations broadly followed the electoral calendar, despite the tight timeline, which was due to the late start of the electoral reform process and significant changes to the electoral legal framework.[43] ECZ preparations were generally efficient and timely but, for some processes, timelines were only made public at short notice.

Between 30 June and 24 July, the printing of ballot papers in Dubai was completed. The ECZ invited political parties, candidates, citizen observers, and the media to observe the printing process at their own expense, and stakeholders noted transparency in the ballot printing and verification process. Although there were some delays, including for the arrival of ballot papers in country and the training of polling station staff, these did not impact the election process. Distribution of election materials was organised from the district level starting on 11 August, including with helicopters to reach remote areas.

Early in the electoral process, the ECZ introduced several positive measures. It increased the number of polling stations (PS) from 12,152 to 13,529 and deployed new technological

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41 In General Comment No. 34 to ICCPR, para. 19, the UN Human Rights Committee advises that "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." See also African Commission on Human and Peoples Rights, Guidelines on Access to Information and Elections in Africa, para 16: "The proactive disclosure of information by an Election Management Body is required at all stages of the electoral process."

42 ECZ national stakeholder engagement with political parties on ballot paper verification on 28 July, briefing of political parties on election day procedures on 7 August, and briefing of civil society organisation on election day procedures on 10 August.

43 While not a member of the DoP, article 4 of the ICGLR Protocol on Democracy and Good Governance proscribes that "*No substantial reform of the electoral law should occur during the six months preceding the elections*."

solutions to improve voter registration and identification. However, it also increased the maximum number of voters per PS to 1,000 and in the end did not use the voter verification device (VVD) on election day for reasons not explained. Further increasing the number of PS and reducing the number of voters per PS could have contributed to a speedier and more efficient voting process, significantly reducing the waiting time for voters in the queue. On election day, EU EOM observers also noted an insufficient number of voting booths in most PS, which further contributed to a lengthy voting process.

For these elections, the ECZ recruited over 81,000 polling staff. Recruitment procedures were inconsistently followed in the districts according to EU EOM observers, and notable communication gaps on polling staff selection reduced transparency and accountability of the recruitment process. An inclusive and publicly accountable mechanism for selecting candidates to the posts of presiding officers and polling staff based on public and clear criteria of evaluation of merits and qualifications could ensure greater independence and efficiency of the recruitment process.[44] Trainings for poll workers observed by the EU EOM were mostly assessed as comprehensive and professional, but observers noted that trainers often relied only on lectures, without use of practical exercises that could have enhanced the transfer and retention of knowledge.

Voter Education

The ECZ voter education campaign was generally comprehensive and inclusive, using a multi-faceted approach including videos, leaflets, and voter guides, distributed through digital channels, traditional media and in-person community meetings. The ECZ intensified its voter information campaign from June onwards. This was of importance given the recent changes to the electoral law. Yet, ECZ voter education material on allocation of council-level reserved seats did not reflect the new electoral law, an error that created voter uncertainty. Enacting changes to the law earlier in the electoral cycle would have allowed for better time to prepare administration, voter education, and training materials with updated and correct information.[45]

Positively, the ECZ produced educational materials and targeted messages in seven local languages as well as a search tool on its website to identify polling stations. Voters could also verify their polling station by phone or mobile app. EU EOM observers noted voter information was more limited in rural communities. The ECZ recruited 3,736 voter education facilitators, two for each ward. A majority were women and 290 were PwD. Some Civil Society Organisations (CSOs) were conducting voter education, but fewer than in the past due to cuts to international funding for electoral support.

The uncertainties due to the late changes in the law also highlighted the importance of continuous civic education among the electorate,[46] which several interlocutors reported that

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[44] Commonwealth Secretariat, Organising Free and Fair Elections at Cost-Effective Levels, p.44: "Behind any successful recruitment policy for election officials is the recognition that the appointees must not only be fair-minded and impartial in their dealings with the public and political parties but that they must be perceived to be so by all concerned."

[45] SADC Principles and Guidelines Governing Democratic Elections, 7.1.1(c), encourages Member States ensure adherence to best practices internationally. This includes that the legal framework is finalised early enough to allow for voter education. While not a member of the DoP, article 4 of the ICGLR Protocol on Democracy and Good Governance proscribes that "*No substantial reform of the electoral law should occur during the six months preceding the elections*."

[46] African Charter on Democracy, Elections and Governance (ACDEG), article 31.2: "State Parties shall ensure systematic and comprehensive civic education in order to encourage full participation […] in democracy and development processes."

they felt was lacking, covering the electoral system, the role of political parties and elected representatives, and particularly the need for women's participation in political and public life. Consideration could be given to conducting such programmes between electoral cycles and utilising opportunities for cooperation with educational institutions and civil society organisations.

VII. VOTER REGISTRATION

Inclusive voter registration process, requiring more continuous efforts.

The Right to Vote

The right to vote is available to all citizens 18 or older by 30 April 2026, the cut-off date for these elections.[47] They must also hold a national registration card (NRC) issued for free by the Ministry of Home Affairs.[48] Citizens who legally lack mental capacity cannot vote.[49] The law allows convicted prisoners to vote, in line with international standards. Opportunities for a special vote (voting at a polling station other than the one where the voter is originally assigned) apply to electoral staff and security personnel on duty on election day. Zambia has an active and continuous voter registration system, compiled and maintained by the ECZ. It certified and published the voter register on 4 May, with 8,786,300 voters (25 per cent increase since 2021).[50] Women account for 53 per cent and 46 per cent are youth (18-34 years), a decline in the proportion of the voter register that youth comprised at the last election.[51]

Voter Registration Procedures

The electoral law provides the explicit mandate for the ECZ to conduct voter registration on a continuous basis. For the first time, in June 2022, 10 continuous voter registration centres were established, one per province, with 20 more added in various districts in June 2025. Citizens could register in person at any registration centre specifying the polling station where they intended to cast their vote on election day, which was then included on the voter card. During the continuous voter registration, 172,483 new voters registered. The ECZ suspended its continuous registration in August 2025, as the geographical distance for citizens to registration centres coupled with limited civic education did not yield significant numbers, only representing a 2.5 per cent increase. To increase registration rates, the ECZ conducted a nationwide mobile voter registration drive from October to November 2025, using a biometric voter registration system that captured biographic, biometric and voting data, as well as the scanned NRC of each voter.[52] The exercise aimed to register new voters, replace lost or damaged voter cards, update data, transfer voters to another polling station and remove deceased citizens from the register.[53] Yet, the ECZ only reached 50 per cent of its target of 3.5

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47 Citizens who turned 18 between the date of the final voter register certification (30 April) and the election date (13 August) were not included in the voter register.

48 The NRC, issued by the Ministry of Home Affairs' Directorate of National Registration, Passports and Citizenship, is the primary legal identity document for Zambian citizens and a prerequisite for voter registration. Zambian citizens aged 16 have a legal duty to obtain an NRC. NRCs are issued free of charge at district registration offices for first-time registration.

49 Mental Health Act of 2019, s 4.

50 Voter registration rates vary significantly from the national average 25 percent increase in Muchinga (+8.5 per cent) as well as in Southern (+41.1 per cent) and Western province (+40.7 per cent).

51 In the 2021 elections youth accounted for 54 per cent of registered voters.

52 The ECZ deployed 2,141 registration kits to cover some 12,150 registration centres in a six-phase mobile exercise.

53 Beyond new entries, the ECZ processed 1,832,368 updates, including transfers of polling stations and card replacements.

million new voter registrations. More continuous voter registration efforts would, therefore, be desirable to enhance citizen participation.[54]

EU EOM observers reported that stakeholders and citizens generally expressed confidence in the accuracy of the voter register. Yet, some interlocutors criticised logistical difficulties in the voter registration process, including the deployment of registration kits and staff, which impacted the ability of ECZ to increase registration rates. ECZ improvements included an online pre-registration portal that enabled registered voters to also electronically inspect the provisional voter register.

The provisional voter register was available for inspection from 9 to 23 February to allow for corrections and objections. The revised electoral law reduced the time for inspection from 90 to 14 days, significantly reducing the time during which citizens had an opportunity to check their details and make any necessary updates or corrections.

VIII. REGISTRATION OF CANDIDATES

Candidate registration was inclusive and timely, but opaque intra-party practices and a missing legal framework for parties and alliances weakened accountability.

The Right to Stand

The right to stand for election includes specific age, citizenship, and educational requirements, and is broadly inclusive. The law offers certain accountability and affirmative action measures, for example by prohibiting councillors to simultaneously serve as MPs, preventing a candidate from standing in more than one list in the same constituency, and through reduced nomination fees for women, youth and PwD candidates. Still, women were largely underrepresented as candidates, suggesting a need for further affirmative actions. All candidates must possess a minimum academic Grade 12 certificate or its equivalent, which can exclude otherwise competent candidates and does not align with Zambia's non-discrimination commitments.[55]

To contest for the presidential office and as running mate, an eligible candidate must be a registered voter who is a citizen by birth or descent, fluent in English, ordinarily resident in Zambia, at least 35 years of age, and supported by at least 100 registered voters from each of the 10 provinces. To contest NA, and as mayor and council chairperson, the minimum age is 21 years, while local ward councillor candidates must be at least 19 years old. Across all these elective roles, candidates must declare assets and liabilities and pay prescribed election fees.

Disqualifications are mostly harmonised across all elective offices, except that a holder of dual citizenship may not contest a presidential election. Prohibitions on candidacy apply to undischarged bankrupts, those serving or who recently served a lengthy term of imprisonment.

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[54] In General Comment No. 25 to ICCPR, para. 11, the UN Human Rights Committee advises that "States must take effective measures to ensure that all persons entitled to vote are able to exercise that right. Where registration of voters is required, it should be facilitated." See also SADC Parliamentary Forum, Norms and Standards for Elections, recommendation 1(ii): "There should be provisions and practical arrangements for continuous voter registration." And EISA and Electoral Commission Forum of SADC Countries: Principles for Election Management, Monitoring, and Observation in the SADC Region, p. 15: "Eligible voters should be provided with a continuous and accessible voter registration facility."

[55] UDHR, article 21, para. 2, "…equal access to public service…." ICCPR; HRC GC 25, para. 15, "Persons who are otherwise eligible to stand for election should not be excluded by unreasonable or discriminatory requirements such as education, residence or descent, or by reason of political affiliation...". The EU EOM 2021 recommended removing this requirement to align with international standards, but there is general agreement among interlocutors that this requirement is generally positive and should be maintained. The proof of education must be certified by the Examination Council of Zambia in advance.

Active public, constitutional, and judicial office holders and election administrators must resign to seek election. Other key disqualifiers include dismissal from public office for gross misconduct within the preceding five years or being disqualified by a court or the ECZ due to corruption, malpractice, or key breaches of the Electoral Code of Conduct. Some restrictions also apply in relation to limiting mental or physical disabilities, notably where the individual lacks legal capacity under mental health legislation, and where a disability is such that it renders the individual incapable of performing the functions required of elective office.[56]

Registration of Candidates

Initially, 30 presidential candidates paid nomination fees, but only 15 filed applications between 18 and 22 May. The ECZ approved 14 presidential nominees, representing 13 parties and one independent, in a process that was transparent and timely; one candidate was rejected for failing to meet legal requirements. Only one candidate was a woman. The ECZ published the candidate lists for the presidential election on 29 June, for NA as well as mayoral/council chairperson elections on 22 July, and for the councillor election on 28 July. Amongst the 29 political parties standing, UPND and NRPUP accounted for most candidates across the presidential, parliamentary, and local levels. UPND fielded candidates in every NA constituency and council/mayoral race, and in 99 per cent of wards. NRPUP contested 68 per cent of NA constituencies, 72 per cent of council/mayoral chairs, and 62 per cent of wards. Eight NA seats were uncontested (all went to UPND, half in newly created constituencies), along with 6 council/mayoral seats (all UPND) and 179 ward seats (97 per cent UPND). The average number of NA candidates in contested constituencies (4.3) allowed for genuinely competitive choice.

Many candidates stood as independents (37 per cent for NA, 34 per cent for mayors/chairs, and 24 per cent for councillors), largely as a result of weak intra-party democracy and practical obstacles facing smaller parties. All party candidates had to submit adoption certificates, newly required to be signed by both their party secretary general and president, which was harder to meet for smaller parties with limited organisational capacity and presence in regions; several told the EU EOM they had encouraged their candidates to run as independents instead.

Parties and candidates described a chaotic nomination and adoption process to the EU EOM, driven by opaque adoption procedures and intra-party conflicts, mainly within UPND and, to a lesser extent, the former PF. Some candidates discovered only at the nomination stage that their party had adopted multiple candidates for the same contest, so they could not file. Others reported that candidates who won the most votes in ward-level primaries were not adopted by the national selection committee. They also cited candidates being bribed to withdraw, facing intimidation, having supporters, whose endorsement is a nomination requirement, physically obstructed from reaching nomination centres, and police detention being used to prevent some candidates from filing. However, few petitions were filed against the process.

Candidate lists for the new PR list reserved seats only had to be submitted no later than fourteen days after the president's swearing in, and in the weeks leading up to the elections, the main contesting parties told the EU EOM they had not yet begun compiling them. Their allocation is based on the presidential results of the first round, a unique feature of this electoral system. Thus, voters did not have the opportunity to know who will represent them under the PR system at the time of election, reducing transparency.

[56] Facilitative procedures/ option for voting by persons with physical disabilities are largely aligned with the CPRD. However blanket restrictions based on mental capacity do not seem to align with the position adopted by the CPRD Committee in its General Comment No. 6 (2018), while the medical model of restrictions to office holding are also not aligned with the human rights approach of the Convention.

One presidential candidate and three running mates withdrew after ballot printing had begun. Xavier Chungu (Liberal Democratic Party), a former head of the security services, had been in police custody since 28 May on sedition and official secrets-related charges. After being denied bail, he withdrew his candidacy on 13 July, citing the impossibility of campaigning from detention. The ECZ subsequently announced that due to the withdrawal, votes cast for him would be considered invalid. The withdrawal of the vice-presidential running mates after the printing of ballot papers began, led to a legal action; the Constitutional Court ruled that a loss of the running mate does not affect the validity of the presidential candidacy.[57] Another presidential candidate told the EU EOM he faced pressure to withdraw in favour of the incumbent but remained in the race.

Registration of Political Parties

The Constitution of Zambia provides for the structure, character, regulation, and funding of political parties, but the relevant provision has never been operationalised. A draft Political Parties Act has been under discussion since 2017 but never passed into law, thus the Societies Act from 1958 remains the only mechanism governing political parties. Recent court rulings may spur action in the next parliament.[58] The lack of dedicated legislation, with parties currently registered under the outdated Societies Act as clubs, was seen by stakeholders as significantly contributing to their instability, factionalism, and institutional weakness. Some newly established parties also found the registration process lengthy and bureaucratic; it took them 10 months to 2 years to move through the administrative process.

Political alliances are widely used by smaller parties to pool voter support, campaign jointly, negotiate the distribution of NA candidates, and put forward a common presidential candidate. However, they lack legal status, and formal candidate sponsorship and participation in elections remain linked to legally recognised political parties alone. This created an accountability gap between the coalitions voters see on the campaign trail and the single party actually accountable for the mandate won, also leaving alliances vulnerable to unravelling once that mandate is secured. This played out in the 2026 elections, when the relatively newly established NRPUP formally adopted Mr. Mundubile, fielded candidates in 68 per cent of constituencies, and campaigned under the Tonse-Pamodzi Alliance, using its leading figures to appeal to the former PF voter base. After the elections, in which NRPUP won about 27 per cent of parliamentary seats but lost the presidential race, it announced its withdrawal from the alliance and that it would not petition the outcome of the presidential elections, leaving Mr. Mundubile, who had already announced his intention to dispute the results, without party support.

The combination of weak internal party democracy, opaque nomination and adoption processes, and the missing legal framework for political parties and alliances undermine transparency and accountability towards both candidates and voters. While future legal reform may address these structural gaps, internal party practices are unlikely to improve through legislation alone. Strengthening and sustaining a culture of good practice in candidate selection, internal democratic processes, and transparent decision-making, through well-funded, expert-led capacity-building programmes delivered in coordination with concerned civil society organisations, is crucial to address these structural weaknesses.

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[57] Isaac Mwanza v Electoral Commission of Zambia and Anor (2026/CCZ/0012) [2026] ZMCC 21 (31 July 2026)

[58] Legal Resources Foundation Limited v The Attorney General (2025/CCZ/0020) [2026] ZMCC 9 (2 April 2026)

IX. CAMPAIGN ENVIRONMENT

Election Campaign

An active campaign offered voters a genuine choice, but on an unlevel playing field shaped by a restrictive timetable, incumbency advantages and deteriorating security environment for the opposition.

The campaign period ran officially from 23 May to 12 August and was marked by an unlevel playing field, with significant disparities in resources and incumbency advantages that favoured the ruling party. The election campaign was limited overall, and its intensity varied by region: the main candidates held large-scale rallies, while others relied more on roadshows, smaller events, and door-to-door meetings. Still, the campaigns of the UPND and the Tonse-Pamodzi Alliance/NRPUP meant voters had the opportunity to vote for differing platforms, including those opposing the government.

The ECZ for the first time introduced a campaign timetable for presidential contestants, a practice previously used at district level, aimed at preventing potential tensions among political stakeholders. On 18 June, citing a lack of order in the conduct of presidential campaigns, the ECZ suspended candidates' scheduled programmes from 19 June, requiring them thereafter to campaign strictly in accordance with the new timetable, effective 23 June. The accompanying guidelines specified that candidates may visit each province only once, required them to notify District Electoral Officers and the police at least 24 hours before meetings and to vacate districts once activities concluded. Notably, the president and vice-president were exempt from the campaign timetable, free to campaign at any time and in any location, which resulted in the suspension of scheduled opposition candidates' campaigns there.

Most presidential candidates met by the EU EOM stated they were not meaningfully consulted on the timetable, which allowed each candidate to campaign for only a five-day period once per province. Given vast distances, poor road conditions and limited budgets, this seriously hampered parties' ability to campaign. Nine candidates noted that unscheduled president/VP visits caused their campaign events to be blocked, cancelled or resulted in police-ordered suspensions. This caused campaign slots in many cases to be irreparably lost.

On 12 July, police blocked Citizens First candidate Harry Kalaba's campaign activities in Nakonde, including his Radio Chete FM programme, citing President Hichilema's visit to the district. Muchinga Province police confirmed to the EU EOM that all other candidates' activities were suspended for the duration of the president's visit, from 12 to 14 July. One candidate told the EU EOM that on two separate occasions, after their allotted slot in a province had ended, they were forced to leave at night because the owners of the lodge where they were staying were intimidated by police. On another occasion, the ECZ agreed to let candidates swap slots, but the notice did not reach the police in time, and the candidate concerned was denied the opportunity to campaign.[59]

The design and application of the timetable, exempting the president and vice-president while imposing rigid constraints on other candidates, denied them equal campaigning opportunities

[59] The incident concerned Given Katuta in Luapula 5 August.

and restricted their freedom of movement and assembly, contrary to law[60] as well as regional and international standards.[61]

RECOMMENDATION: Protect freedom of assembly and equal campaign opportunities for all contestants by discontinuing the role of the ECZ in issuing campaign timetables, ensuring that the pre-eminent role of regulating campaign schedules lies with contestants.

The campaign period was marked by incidents of violence, often linked to 'cadreism' (violent groups traditionally associated with political movements), resulting in at least two deaths, injuries, and property destruction, alongside a deteriorating security environment for opposition actors that raised serious due process concerns. One incident led to a prolonged suspension of campaign for NRPUP.[62]

Various EU EOM stakeholders, including opposition parties and CSOs, complained of police obstruction, inaction and political bias, despite a legal requirement to remain neutral.[63] In several cases, police justified their interventions, including halting opposition events, by citing non-compliance with campaign rules. However, the EU EOM noted disproportionate action in several instances, including the blocking or obstruction of campaign events and the deployment of tear gas.[64] Interlocutors also told the EU EOM of police passivity in investigating incidents affecting the opposition, and of difficulties they faced in filing complaints.[65]

Starting at the end of July, security forces carried out a string of arrests of opposition figures, including senior members of the NRPUP/Tonse-Pamodzi Alliance campaign team.[66] Authorities initially provided little or no information on these arrests, including the whereabouts of those detained, prompting opposition claims that members had disappeared or been abducted by unknown persons. The EU EOM itself witnessed a person being seized on the morning of 9 August by armed personnel in an unmarked car and plain clothes, lending

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60 The ECoC stipulates the right to campaign freely, subject to conditions mostly set out in the ECoC.

61 ICCPR Art 21, 25; ICCPR Art 12.1 "Everyone lawfully within the territory of a State shall, within that territory, have the right to liberty of movement and freedom"; African Charter on Human and People's Rights Art 11, 12.1; African Charter on Democracy, Elections and Governance Art 6; SADC Principles and Guidelines Governing Democratic Elections 2004: 7.4 (Safeguard the human and civil liberties of all citizens, including freedom of movement, assembly, association, expression, and campaigning. Also, UDHR Art 20.

62 On 29 June, a UPND cadre was stabbed and killed during a clash with NRPUP cadres in Kaputa District, prompting the ECZ to suspend the NRPUP's campaign in the constituency until 22 July, two days after NRPUP sought a court challenge.

63 The ECoC Art. 6 requires police to remain neutral and to refrain from disrupting lawful campaign activities.

64 Tear gas was deployed during Tonse-Pamodzi Alliance campaign events on 16 July in Kalingalinga and 5 August in Mongu, their convoy was blocked on 26 July in Chambishi. Citizens First campaigns were suspended in Muchinga and Eastern provinces, respectively, due to visits by the president or vice-president, affecting even non-venue events such as radio appearances, and obstructed on several occasions in Copperbelt and North-Western provinces.

65 One independent candidate in Lusaka province reported five separate incidents, some of which were serious enough to cause hospitalisation of her team members, and repeated failures to file complaints with the local police or obtain an OB number, the legal reference code proving that an incident has been formally reported and recorded.

66 Arrests included NRPUP Deputy Secretary General Kennedy Kamba on 27 July; three Zambian nationals accused of undergoing foreign military-style training on 1 August; businessman Harry Valden Findlay on 4 August; campaign administrator Martha Lungu Mwitumwa and blogger Hannah Katontoka on 9 August; and Tonse spokesperson George Chisanga, national campaign manager Japhen Mwakalombe, and senior official Sebastian Kopulande around 10–11 August. Separately, 17 members of Mr. Mundubile's campaign and security team, including musicians 'Chester' and Felix Mangani Phiri and comedian Winston Ngosa, were detained in Mongu on 5 August and are facing various charges, including riotous behaviour and possession of offensive weapons.

credence to these concerns. A framing of the initial opposition arrests as related to a private militia endangering public safety and constitutional order first appeared on UPND social media on 4 August,[67] ahead of a more coherent narrative from state authorities along the same lines.

On 12 August, the Ministry of Home Affairs and Internal Security announced that a joint team of defence and security agencies was behind the apprehension of suspects linked to an alleged plot to interfere with Zambia's electoral system. The HRC repeatedly called on the Zambia Police Service and other authorities to act impartially, investigate all reported incidents of political violence regardless of political affiliation, and ensure strict adherence to due process, including the constitutionally and internationally guaranteed rights to personal liberty and protection from arbitrary arrest and detention.[68]

On the eve of election day, the HRC stated that it was actively monitoring arrests and detentions involving political candidates, supporters, journalists and other actors and was in receipt of some complaints that have been filed by representatives of some of the affected persons, while other cases are being investigated under the Commission's own motion having established that all the suspects had been detained for periods exceeding the prescribed lawful period of 24 hours within which a suspect may be held without being presented before a court of competent jurisdiction and encouraged members of the public to actively report violations of human rights during and after the electoral process to its monitors on the ground.

High spending by UPND and administrative hurdles for other contestants further distorted the campaign playing field.[69] The use of government or government-related facilities and transport for campaigning is prohibited, except for the president and vice-president acting in connection with their offices, though no clear guidance distinguishes official duties from campaigning. Two distinct but related issues arose in this context: misuse of state resources, and a broader blurring of state and party functions.

During the campaign period, the incumbent toured all 116 districts under the label of ‘working visits’ or ‘community engagement meetings’, holding large campaign rallies in every province in connection with these visits. The EU EOM directly observed the misuse of state resources at such events, mainly in the form of vehicles, government staff and/or government facilities, in eight provinces.[70]

Blurring of state and party functions was evident in UPND’s repeated instrumentalisation of government social programmes and public sector recruitment for campaign purposes. On 14 July, the Civil Service Commission announced the opening of 2,600 health worker positions. The EU EOM subsequently noted the president promoting the recruitment of volunteer nurses at 28 rallies, going further at 15 of these by announcing that attending volunteer nurses and teachers would be employed, and instructing local leaders to record names for recruitment.[71]

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67 UPND official Facebook page post on 04.08.2026, 10.21 AM, retrieved 25.08.2026.

68 For example, HRC statements from 5 August, 12 August, 19 August published on their Facebook page.

69 Examples of such were reported difficulties in getting rally/venue permits from the police or the legal dispute around using the candle as a symbol for independent candidates, see *Election Petitions* below.

70 Luapula, Southern, Central, North-Western, Muchinga, Northern, Copperbelt, Eastern

71 Such announcements were made during rallies in Isoka, Mpulungu, Mbala, Mungwi, Chienge, Kawambwa, Chisamba, Siavonga, Livingstone, Mwomboshi, Mufulira, Kalulushi, Chambishi, Luanshya, and Masaiti.

The EU EOM directly observed nurses attending these rallies and providing their details on three occasions.[72] In 18 campaign speeches, the president promised continuity and expansion of the social cash transfer programme, often paired with the 'cash for work' scheme. In at least two rallies local leaders were instructed to record the names of unenrolled but eligible people to be added to the programme.[73] On 1 August, at a University of Zambia student march to State House, the president announced an immediate increase in student accommodation allowances from K3,900 to K5,850, with the Higher Education Loans and Scholarships Board confirming payment processing had begun just three days later, on 4 August. Around the same time, several student organisation leaders publicly endorsed President Hichilema.[74] Such blurring of state and campaign functions is at odds with international and regional commitments.[75]

RECOMMENDATION: Implement transparency, accountability, and a level playing field by removing undue incumbency advantages and prohibiting the misuse of state resources, including by third parties.

Campaign Finance

The EU EOM noted a high degree of monetisation in the campaign, with candidates providing, and voters expecting, direct payments, gifts, or food, a practice inflated by poverty and one that further reduced transparency. Voter inducement is explicitly prohibited, but the EU EOM observed indications of it in one third of observed campaign events across nine provinces, mainly by UPND, including publicly announced cash handouts.[76] Notably, on 4 August, during a rally in Chambishi, the president ordered the national electricity company ZESCO to connect 16,000 households in Chambishi's Kwa Kabaso area to the grid, to lower their charges, and promised to personally cover the cost of the connection fees, combining voter inducement with the use of government power for campaign purposes.

Political and campaign finance lacks a coherent legal framework. Financial disclosure rules are scattered across several laws, with no integrated approach to auditing, transparency, or accountability. Political parties must file annual returns with the Registrar of Societies, but there is no robust mechanism for scrutinising funding sources. Candidates must declare assets and liabilities but are not required to disclose campaign income or expenditure. The ECZ is under no obligation to publish nomination financial declarations, and it did not do so. Detailed rules on third-party and in-kind donations, income, and expenditure are absent.

This absence of regulation reflects a lack of political will across the political spectrum, particularly on disclosure. While some parties called for greater transparency, others feared their donors could be targeted if disclosed, and some smaller parties called instead for state funding to level the playing field. As a result, the funding sources and expenditure of parties, candidates, and third parties remain unknown to voters.

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[72] Observed on 2 August in Chipata North, 4 August in Ndola and 5 August in Kitwe. An attendance register of volunteer nurses was compiled at one of these events and handed over to the local UPND representative, who confirmed this to the EU EOM.

[73] Observed during rallies on 4 August in Lufwanyama and 5 August in Masaiti.

[74] This included leaders of National Council of Students Union (NACOSU), University of Zambia Students' Union (UNZASU), and Zambia National Students' Union (ZANASU).

[75] Banjul Charter, arts. 13(2) & (3), UNCAC, art. 17, ICCPR, HRC GC 25, para. 19

[76] The EU EOM also observed the distribution of fuel, food, clothing etc. during campaign events.

RECOMMENDATION: Promote transparency and accountability through comprehensive political and campaign finance rules including standardised and timely reporting and disclosure requirements underpinned by robust sanctions for non-compliance.

X. MEDIA

Media Environment

An open media environment characterised by increased self-censorship and heavily biased state-owned media coverage that limited access of voters to information on political choices.

The media landscape is diverse and vibrant and includes a range of public and private media at the national, municipal and community levels. According to the Independent Broadcasting Authority (IBA), there are 201 radio stations and 58 television (TV) stations currently operating in the country. Traditional media play a significant role in informing, educating, and shaping public opinion, particularly in rural areas where internet penetration remains lower than in urban centres.

Radio is the most influential form of media, with the widest geographical reach and highest audience penetration. Broadcasts are delivered in English and several local languages. Out of the 201 licensed radio stations operating in the country, 108 are community broadcasters. Community radio stations are widely trusted and serve local populations with news, civic education, agriculture, health, and governance information. Television broadcasting is largely concentrated in urban areas, with national reach increasingly enabled through digital terrestrial transmission and online platforms.

The state-owned Zambia National Broadcasting Corporation (ZNBC) is the largest broadcasting institution in the country. It operates six TV channels and four radio services. ZNBC has the widest terrestrial broadcast reach in Zambia, serving audiences across all ten provinces of the country and remaining as a key source of official government information. Both ZNBC TV and Radio lack political independence, as their directors are appointed directly by the Minister of Information and Media, and function more as government media than as a public service broadcaster.

The state also owns two daily newspapers: Zambia Daily Mail (50,000 print copies daily) and Times of Zambia (30,000 print copies daily). The print media market is completed by the private newspapers News Diggers!, Daily Nation and The Mast. Print media has experienced declining circulation but remains influential among policymakers and urban readers. Most newspapers operate through both print and digital platforms.

After years of control of both state-owned and private media by the former PF administration, resulting in the shutdown of media outlets and the dismissal of outspoken journalists, the situation for the media in Zambia has improved since 2021. According to 2026 Reporters Without Borders' World Press Freedom Index, Zambia has climbed 43 places in the rankings during the past six years, moving from position 120 (2020) to 77 out of a total of 180 countries. Interference has decreased and media are operating more freely.

Despite this improvement, the absence of fully implemented legal reforms continues to expose the press to ongoing threats of harassment and physical intimidation by political actors. Statutes such as the State Security Act and the Penal Code still grant the state powers to penalise critical reporting and punish defamation with libel offences and prison sentences, respectively. Similarly, recent legal reforms, such as the Cyber Security Act (CSA) and the Cyber Crimes

Act (CCA) have had a chilling effect on the environment and have led to increased self-censorship.

The Media Institute of Southern Africa (MISA) in Zambia recorded a total of 13 media-related incidents during the 2026 general elections, including cases involving assaults, arrests and harassment against journalists. These incidents highlight the continuing challenges faced by journalists and media houses and represent risks to independent journalism during the electoral period. From their side, EU observers reported cases of local radio stations being intimidated by political parties' cadres for broadcasting content from the political opposition in Mazabuka, Monze, Namwala (Southern Province), Mansa (Luapula) and Chinsali (Muchinga).

Legal Framework

The Constitution guarantees freedom of expression (Article 20) and establishes that "a political party and a candidate contesting an election shall have access to the media, especially during election campaigns" (Article 50). However, the Penal Code and the CCA contain restrictive provisions not in line with fundamental freedoms in the Constitution and international standards for freedom of expression. The legal framework for traditional media is primarily governed by the ZNBC Act (2002) and the IBA Act (2002, as amended in 2010). IBA is the statutory broadcasting regulator. Its primary responsibilities include licensing, setting content and technical standards, and monitoring legal compliance. Its role is to promote professional, impartial and responsible broadcasting.

Currently, there is a new IBA Act (No. 25 of 2025) which awaits a commencement order from the Minister of Information and Media. Under the new Act, the Authority will regulate ZNBC (in addition to private media) and other public service broadcasting through a Charter. The new law also expands IBA's powers to license and regulate online broadcasting, including podcasts and digital media, and to introduce licensing discretion that allows the Authority to "establish a need" for a service before inviting license applications.

Similarly, a new ZNBC Act (No. 26 of 2025) awaits the signature of the Minister of Information and Media for finalising specific regulations and subsequent enforcement. The new law aims to transform ZNBC into an independent public broadcaster with balanced programming, serving the public interest and supported by an independent board with sustainable funding sources. Both ZNBC and IBA's Boards are currently appointed by the Minister of Information, which undermines the independence of the institutions and makes them vulnerable to political interference.

The main provisions on media duties during an election campaign period are set out in the Electoral Code of Conduct of the EPA (Section 107), IBA's Standard Operating Procedures (SOP) and the IBA's 2026 Election Coverage Guidelines.

According to provisions in the EPA's Code of Conduct, print and electronic media shall provide fair and balanced reporting of the campaigns, meetings, rallies and press conferences of all registered political parties and candidates. The Code establishes also that the public television, radio and electronic media are to allocate public airtime equally to all political parties and candidates for their political broadcasts, and that the ECZ shall prescribe the amount of airtime in any given language to be allocated to contestants.

In addition, the Code establishes that media should report election news in an accurate manner and not incite violence or advocate hatred; conduct interviews with candidates with fairness

(both in style and amount of time) and refrain from broadcasting their own political opinions, unless clearly identified as such. Other provisions in the Code refer to the obligation of broadcasters to inform the public of the source of any public opinion poll and indicate the margin of error. On polling day, media are not to broadcast any campaign interviews for political parties or independent candidates or predict results. The EPA has no provisions for campaign expenditure limits in media, at odds with international good practice.

From its side, the IBA developed the 2026 Election Coverage Guidelines to promote balanced, fair and equitable election coverage by broadcasters. The document established guidelines for conducting fair interviews with candidates; equitable treatment on free and paid advertising and political debates; coverage of polling day and broadcasting of election results and opinion polls, among others. It also covered handling of complaints by the IBA. In case of breach of the guidelines, the Authority could apply provisions in the IBA Act or other penalties as verbal and/or written warning; fast track hearing, appeal to the high court or "any other penalty the Board may deem fit".

IBA's regulatory approach during the election period was primarily corrective rather than punitive. IBA undertook a nationwide monitoring throughout the official campaign engaging 73 part-time media monitors, each stationed in 1 of 73 districts across 10 provinces. Where monitoring identified a potential breach of the electoral broadcasting guidelines, the IBA sent a letter to the concerned broadcaster to draw attention to the issue and encourage corrective action and compliance. The objective was to promote adherence to the guidelines and improve broadcasting standards during the election period rather than imposing punishment.

Media Monitoring Findings

From 15 July to 12 August the EU EOM monitored 10 national media outlets,[77] including both public and private media, to assess whether parties and candidates had access to the media and whether the information provided to the citizens was presented in a neutral and balanced way. The results of the monitoring revealed that the electoral coverage of the campaign period largely focused on the two main contenders, with state-owned media giving an overwhelming advantage to the ruling party despite its legal obligations to equal coverage.

Contrary to provisions in the EPA's Code of Conduct, the national broadcaster, ZNBC, did not allocate public airtime equally to all political parties and candidates. Positively, ZNBC ran special election programmes with presidential running mates, and with parliamentary and mayoral candidates. Election coverage in its news bulletins, however, was inordinately biased in favour of UPND and the president, limiting the access of voters to information on the different political choices.

RECOMMENDATION: Disengage state-owned media from direct government control and convert ZNBC into a genuine public service broadcaster with editorial independence and balanced programming.

[77] The sample included four radio stations (ZNBC Radio 1, Hot FM, Power FM, Phoenix FM), three TV stations (ZNBC TV1, Diamond TV and Prime TV) and three newspapers (*Zambia Daily Mail*, *Daily Nation* and *News Diggers!*). For radio and TV stations, prime time programmes and main news bulletins aired from 6h to 13h and from 18h to 22h were monitored.

EU EOM media monitoring results show that, during the analysed period, UPND received 96.2 and 90.5 per cent of airtime, respectively, in election-related news on ZNBC's TV 1 and Radio 1, whereas NRPUP gained only 2.1 per cent of coverage on ZNBC TV1 and 6.4 per cent on ZNBC Radio 1. Regarding the tone of the coverage, 57 and 41 per cent of the coverage received by UPND on TV 1 and Radio 1, respectively, was in positive tone, whereas 59 and 15 per cent of the coverage received by NRPUP on TV 1 and Radio 1, respectively, was in negative tone and 41 and 85 per cent was in neutral tone (*see media monitoring charts 1 to 4, Annex 2*).

UPND presidential candidate, President Hichilema, had 98.8 per cent of the total direct speech (equivalent to 12 hours and 16 minutes) within the news on ZNBC TV1 and 98.9 per cent (3 hours and 22 minutes) on ZNBC Radio 1, while NRPUP presidential candidate, Mr. Mundubile, did not enjoy any direct speech, neither on national TV nor on national radio during the entire monitoring period (*see media monitoring charts 5 and 6, Annex 2*). In addition, ZNBC TV 1 broadcast the president's live campaign rallies daily. The ECZ did not take any actions to try to correct ZNBC's biased coverage and only the Media Institute of Southern Africa (MISA) in Zambia sent a written letter to the national broadcaster raising concerns about the matter.

Similarly, the state-owned newspaper, Zambia Daily Mail, also favoured the ruling party by allocating 85.4 per cent of its election-related news during the monitoring period to UPND and 11.4 per cent of newspaper coverage to NRPUP. The tone of the coverage received by UPND on Zambia Daily Mail was overall positive (61 per cent of the coverage), whereas NRPUP did not receive any coverage of a positive tone and had 40 per cent of the coverage in negative tone and 60 per cent in neutral tone (*see media monitoring charts 7 and 8, Annex 2*).

While private media were accessible to all political parties, only those with sufficient financial resources could pay for participation in political broadcasts. News bulletins in the private media focused mainly on rallies, lacking in-depth analysis. The tone of the reports was mainly neutral and without instances of derogatory speech or incitement to violence detected by the EU EOM. Four out of the seven private media monitored by the EU EOM provided equitable coverage of the campaign in their news. Diamond TV, Hot FM, Daily Nation and News Diggers! gave access to the main contenders in a balanced or reasonably balanced way, whereas Phoenix FM, Power FM and Prime TV showed different degrees of imbalance in favour of UPND and the president (*see all media monitoring results in Annex 2*).

UPND was the party that demonstrated the greatest financial capacity to purchase airtime and space for political advertising in the media. The ruling party was the only contestant to purchase airtime on ZNBC TV1 during the analysed period, whereas on ZNBC Radio 1, UPND accounted for 97.5 per cent of all political advertising, compared to 2.5 per cent for NRPUP. Similarly, UPND was the only party to purchase advertising space in Zambia Daily Mail, Daily Nation and News Diggers!. By contrast, NRPUP dominated political advertising on Hot FM, accounting for 99.4 per cent of all political adverts, while UPND accounted for the remaining 0.6 per cent (*see media monitoring chart 28 to 37 Annex 2*). Woman candidates received very little coverage in the media: only 3.5 per cent of total coverage in news and election-related programmes on the three TV stations monitored, and 5.2 per cent of total coverage on the four radio stations monitored (*see charts 38 and 39, Annex 2*).

XI. SOCIAL MEDIA AND DIGITAL RIGHTS

Restrictive laws unduly narrowed political debate online without protecting voters from disinformation; the online campaign mirrored the uneven playing field offline.

Social Media Environment

Social media was a major channel for information throughout the election period. Despite the widespread chilling effect of the cyber laws, social media platforms allowed candidates, voters and civil society organisations to circulate and receive information, and to document problems.[78] This mattered in a context where traditional media presence was uneven across the country, coverage was costly, and institutional communication was lacking.

Zambians go online mainly through mobile devices though overall connectivity remains moderate. DataReportal puts social media use at roughly one in five inhabitants, or 4.1 million. Digital gaps persisted, particularly affecting older people, women and girls. Unaffordability and discontinuous coverage further limited access, especially in rural areas. Radio remains the leading source of political information nationwide, but EU EOM observers noted that Facebook community forums, local influencers and community radio pages carried significant weight locally.[79] Facebook and WhatsApp are the most widely used platforms.

The online environment remained accessible during the election period.[80] However, parties and CSOs encountered connectivity failures and bounced emails at critical moments. At least one citizen observer group found the platform built to collect observations repeatedly inaccessible on election day, obliging its technical team to relocate the platform, rename it and issue fresh credentials. This impeded the observation and intimidated accredited observers. During the closure of the Constitutional Court, parties and CSOs reported emails bouncing back from the Court, obstructing communication. Disruption to online access during elections and lack of subsequent information is at odds with the African Commission on Human and Peoples' Rights (ACHPR) Resolution 580.[81]

Disinformation was rampant, spreading quickly and reaching widely. It was however largely unstructured, circulating between clusters of mutually reinforcing pages, with a growing presence of doctored videos and pictures. Public capacity to distinguish false from true claims was limited and digital literacy initiatives, a mix of public and private projects, were few.[82] The electoral process, the ECZ, and the authorities were frequent targets of disinformation, nationally and locally. Candidates from both major political forces and government figures were both targets and sources of false claims. Pro-opposition figures based abroad widely circulated and amplified disinformation narratives. In Lusaka, the ECZ, factcheckers and media debunked false information. However, local ECZ offices reported challenges to the EU EOM in countering rumours and false claims at scale.

iVerify, a UNDP fact-checking mechanism coordinated by the Panos Institute Southern Africa, was consistent and professional in debunking false claims and fostering information integrity.[83] Access to public information, however, including from ECZ and the police, was cumbersome,

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78 This included teargassing of Brian Mundubile's roadshow, violent incidents during campaign events, incidents during the tallying of ballots.

79 For example The FACE of Manyinga, Chipata My City, Kafue Reports, North-Western My Home.

80 Following the partial internet shutdown experienced during Zambia's 2021 general elections, Chapter One Foundation monitored Zambia's internet during the 2026 election period, covering fifty-seven websites, four instant-messaging applications, and network performance.

81 ACHPR Resolution 580 calls for states to refrain from "*ordering the interruption of telecommunications services" or "disrupting access […] before, during or after the elections*", and to "*require telecommunications and internet service providers to inform users of potential disruptions*".

82 This included government-led programmes like SMART Zambia institute or the digital learning hub in North-Western Provincial Library in Solwezi, supported by a private mining company.

83 This included claims about issues around ballots and the ECZ, poll staff recruitment, the president, the government, the police, internet shutdowns, fake opinion polls, and opposition figures.

hampering verification of allegations, and became noticeably harder in the days following the elections. This pointed to shortcomings in the implementation of the Access to Information Act contrary to Zambia's international obligations.[84]

The multistakeholder National Action Coalition on Information Integrity (NAC), designed to bring together the ECZ, authorities, law enforcement and CSOs, did not fully deliver on its objectives to mitigate disinformation and raise public awareness. The coalition notably brought together CSOs litigating against restrictive cyber laws and the agencies enforcing those laws, a contradiction that limited what it could achieve. Such an initiative was nonetheless commendable and should be encouraged.[85]

Churches could be an additional valuable contributor to the NAC, and social media platforms should be associated. Church bodies have called publicly for peace, respect for freedom of expression and responsibility on the part of political leaders on social media. Combined with their reach across the country, this made them well placed to contribute.[86] Despite early engagement with local authorities and the ECZ, several interlocutors reported that social media platforms, especially Meta, lacked responsiveness in tackling disinformation ahead of and after the elections, contrary to their responsibilities.[87] Platforms alone control the systems that determine amplification, and no coalition without their involvement can materially change how far disinformation travels, and ultimately, protect voters' ability to freely form opinions.

The EU EOM and its observers were themselves targets of disinformation. This involved photographs of observers and the EU flag used out of context, fabricated quotes, impersonation of the mission via a forged statement, all circulating widely on Facebook and WhatsApp. Some items reported to Facebook were removed, but the same content was reproduced and continued to circulate elsewhere. Despite direct contact, Meta had not provided substantive response to the Mission on the application of its own community standards by the end of the mission.[88]

Legal Framework

EU EOM interlocutors across the country broadly acknowledged the need to address harmful online speech. The response adopted, however, appeared disproportionate and misaligned with international and regional standards.

Despite constitutional guarantees, provisions of the 2025 cyber laws unduly curtailed online expression and political debate. Digital rights advocates criticised the enactment of the cyber laws with minimal transparency and public participation. Both Acts are the subject of pending court cases challenging the constitutionality of several provisions. The CCA defines cybercrime broadly and criminalises a range of activities in vague terms that grants wide latitude to the law enforcement officers. In particular, the law criminalises speech deemed

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84 See General Comment No. 34, para. 19: "To give effect to the right of access to information, […] States parties should make every effort to ensure easy, prompt, effective and practical access" to public information. See also Guidelines on Access to Information and Elections in Africa, para. 13 to 19 for election management bodies, on proactive disclosure of information, and para. 24 for law enforcement agencies, on communication of any reported election related crimes.

85 UN Report on Freedom of expression and elections in the digital age, para. 105: "*States should develop multifaceted, multi-stakeholder, human rights-based strategies to counter electoral disinformation*."

86 See Joint pastoral statement of the three church mother bodies, 23 August 2026.

87 The UN Guiding Principles on Business and Human Rights places a responsibility on platforms to conduct human rights due diligence (see principles 13 (b) and 17), even more ahead of elections: A/HRC/59/50 UN Report on Freedom of expression and elections in the digital age, para. 67; 85; 109; 110.

88 Initial request to Meta regarding removal of false information was sent on 16 August.

"false information" that causes "public ridicule" or "damage to the reputation".[89] Such a broad wording is contrary to international and regional standards.[90] It also falls outside the scope of cybercrime legislation as defined by the Malabo Convention.

Law enforcement agencies issued repeated warnings against online speech deemed to undermine state institutions. Media reported several convictions for online posting under the cyber laws before the campaign and arrests both before and during it. Arrests included two presidential candidates in March and at least one parliamentary candidate.[91] Among arrests reported in the media, speech deemed insulting to the president featured repeatedly. This contributed to widespread self-censorship, with the sentence "I do not have a lawyer" becoming a common substitute for political comment.

The Cyber Security Act (CSA) allows, among others, for real-time surveillance and interception of communications without proper judicial oversight. The law additionally requires every electronic communications service provider to install facilities capable of real time and full-time monitoring for interception of communications, at odds with international standards.[92]

RECOMMENDATION: Align the Cyber Security and the Cyber Crimes Acts with international commitments on freedom of expression and privacy of communication.

The CSA establishes the Zambia Cyber Security Agency (ZCSA) within the Office of the president, with its leadership presidentially appointed. During the campaign, the ZCSA supported police investigations into speech offences, including cases concerning criticism of the president and the ECZ. Placing investigative powers over political speech in a body answerable to the president, with no institutional oversight, does not ensure adequate safeguards against its use to suppress criticism of that office. The Malabo Convention requires States to establish clear accountability in matters of cyber security and to define institutional roles and responsibilities in precise terms.[93]

ZCSA's support in investigations displaced the Agency's mandate towards speech offences rather than cyber security incidents and threats, as foreseen by the CSA.[94] This additionally fell short of the Malabo Convention requirements on cybercrime legislation.[95] The Convention further limits content-related offences to a closed list that does not include insult or harassment of a public officeholder.[96]

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89 See section 22 of the Cyber Crimes Act.

90 Declaration of principles on Freedom of Expression and Access to Information in Africa (ACHPR Declaration, 2019), principle 22: "*States shall repeal laws that criminalise sedition, insult and publication of false news.*" GC No. 34 to the ICCPR para. 25 further states that "*a norm, to be characterized as a "law", must be formulated with sufficient precision to enable an individual to regulate his or her conduct accordingly*".

91 See arrest of Fred M'membe, arrest of Brian Mundubile.

92 See ICCPR, art. 17, GC No. 16 to the ICCPR, para. 3. The ACHPR Declaration, 2019, principle 41, also requires States to "*only engage in targeted communication surveillance that is authorised by law, that conforms with international human rights law and standards, and that is premised on specific and reasonable suspicion.*"

93 AU Convention on cyber security and personal data protection (The Malabo Convention). 27(1).

94 Cyber Security Act, articles 1; 4; 18.

95 The Malabo Convention, art. 25(3), confines cybercrime legislation to "*offences affecting the confidentiality, integrity, availability and survival of ICT systems, the data they process and the underlying network infrastructure*."

96 *Ibid*, art. 29(3) limits content related offences to child sexual abuse material, racist and xenophobic material, threats and insults on protected categories. GC 25 to the ICCPR, para. 19: "*Voters should be able to form*

RECOMMENDATION: Restrict the mandate of the Zambia Cyber Security Agency to cyber security and make its exercise subject to independent oversight. Responsibility for identifying speech offences and countering disinformation would rest outside the security sector.

At the end of July, an SMS sent to beneficiaries of the Social Cash Transfer programme urged recipients to vote for the incumbent in order to protect the programme. This pointed to a gap between the protections set out in the Data Protection Act and their enforcement.[97] The Ministry of Community Development and Social Services denied having sent the message. The Office of the Data Protection Commissioner, fully operational only since 2025, opened an investigation but had not concluded it before elections.

The EPA defined campaign messages broadly enough to cover online expression, but neither the Act nor ECZ regulations addressed online campaigning, leaving third party campaigning and online paid advertising unregulated.

Social Media Monitoring Findings

The EU EOM monitored 794 accounts and channels across Facebook, TikTok, X and YouTube. Over 20,000 posts published on Facebook from 21 May to 13 August were quantitatively and qualitatively analysed, as well as 4,000 comments (*see Annex 3, social media monitoring results)*.

Online as well as offline, the presidential campaign was dominated by two candidates. The President's advantage was the size of his audience, with 2.3 million followers against his challenger's 480,000. Brian Mundubile nonetheless performed better on various metrics (*see Annex 3, tables 4 and 5*).[98] His content overall was more engaging and it travelled further.

Both candidates actively posted campaign videos and wide-angle crowd images, conveying size and support. These images were sometimes at odds with EU EOM observations of events. Both favoured campaign activity over policy. The incumbent campaigned on his record, infrastructure and education, and on promised jobs; the NRPUP candidate built his around mobilisation, promises of new infrastructure and grievance, based on the disruption of his rallies (*see Annex 3, charts 2 and 3)*.

Part of the campaign was carried by non-contestant pages, following divergent strategies (*see Annex 3, charts 9 and 10)*. The UPND's network was organised and overarching, present at every level from the country's most-followed influencers down to community pages: institutional accounts, state, local, and pseudo media, party and fan pages and celebrity accounts, all amplifying the president's messages.[99] The owners of some told the EU EOM that they had been paid to cover the incumbent favourably; yet no payment was disclosed.[100] The

opinions independently, free of violence or threat of violence, compulsion, inducement or manipulative interference of any kind."

97 The Data Protection Act provides for consent-based data processing.

98 See Annex 3, tables 4 and 5. Mr. Mundubile's content cumulated 31.76 million views against 11.91 million for the president.

99 Among institutional accounts, the State House covered the campaign extensively, and to a lesser extent, the EU EOM identified five ministry pages and twenty local administration pages sharing campaign material of the president.

100 UN Report on Freedom of expression and elections in the digital age, para. 114 states that "*Platforms should set requirements for transparency by social media influencers to disclose paid or in-kind affiliations with candidates or campaigns.*"

NRPUP's campaign was more organic, resting on clusters of like-minded pages, media and pseudo-media outlets, fan pages, former PF members and bloggers. Fewer in number, those pages were more active, divisive and engaging. Several circulated disinformation extensively.

Competing narratives saturated the online environment, mixing legitimate claims with forged documents, unsubstantiated assertions, propaganda and conspiracy theories. Both candidates regularly discredited their opponent: one in five of the president's posts targeted Mr. Mundubile or the Tonse Alliance, and one in four of Mr. Mundubile's targeted the president or the police. Discreditation was even more frequent on supporter pages (*see Annex 3, tables 7-8, charts 11-12)*.[101] NRPUP-supportive pages relied on allegations of rigging and corruption, appeals to religion, and personal attacks; UPND-supportive pages on fearmongering, sarcasm and name-calling. Ethnically divisive and violent language remained limited in volume across the public Facebook pages monitored but rose as elections approached and again after the election day. This spanned AI-generated images, anonymous videos and recordings of radio phone-ins by bloggers, and included intimidation, insults, incitement to violence and an announcement that the President would be "gunned down". Some of this content breached Meta's own community standards and was later removed.

Among parliamentary and local government candidates, volume and reach diverged sharply (*see Annex 3, charts 6-7)*.[102] The ruling party dominated both races, followed by independent candidates. Overall, women were most visible in the parliamentary race, at 41 per cent of coded posts, but drew only a sixth of the engagement men did. Policy featured more than in the presidential campaign and mirrored the level of the race: water and sanitation locally, infrastructure, education and social cash transfers at constituency level. Discreditation was less visible, yet adversarial speech was noticeable, including in songs played at rallies.

Political advertising on Facebook was limited in spending and concentrated in the last two weeks of the campaign. The space was not competitive: of just over EUR 30,000 supporting the two main competitors, 99 per cent was spent in support of UPND, 94 per cent of which was taken by two pages alone: the party account UPND Zambia and the campaign page 'Salt Sana' Movement, which named neither the party nor the candidate. Both spend per advert and reach exceeded anything achieved by the NRPUP. Most adverts urged voters to turn out, but several attacked Mr. Mundubile directly. Disclaimers were applied inconsistently, resulting in removals (*see Annex 3, chart 8, table 6)*.

Facebook pages of traditional and online media pages featured among the most-followed pages (*see Annex 3, charts 13 to 16*). In the EU EOM monitoring of social media pages of media outlets, the president was mentioned more often and more favourably than the main opposition candidate, benefiting from extensive coverage by the state broadcaster ZNBC and the private online outlet Mwebantu, though posts featuring Mr. Mundubile drew more engagement. The same asymmetry ran through paid advertising. The UPND bought reach through volume, placing adverts across large and numerous media pages, while the NRPUP ran few, but each travelled further.[103] Labelling of adverts by media was inconsistent, with comparable content treated differently from one page to another, limiting transparency.

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[101] Discreditation was present in 33 and 39 per cent of the posts shared by pro-government and pro-opposition pages. See Annex 3, tables 7 and 8, and charts 11 and 12.

[102] The EU EOM monitored 47 parliamentary and 26 mayoral and local government candidates.

[103] Of 497 posts labelled as political adverts, a third named the UPND as advertiser against 4 per cent for the NRPUP, while 54 per cent named none at all.

The EU EOM selected 11 women and 10 men of comparable status and analysed almost 4,000 comments directed at them to be able to compare tone and messaging by gender (*see Annex 3, tables 9-10).*[104] Abuse against women was both more frequent and more severe. Both genders were criticised on competence and alleged corruption, but 49 per cent of the abuse against women rested on marital status, motherhood, appearance or witchcraft. Marital status alone accounted for 39 per cent but formed only 1 per cent of the abuse against men. Witchcraft was alleged against five of the eleven women (*see Annex 3, charts 17 to 20)*. The register also varied with the target's standing: Faith Musonda, a journalist and a widow, faced personal and sexualised attacks, while the ECZ Chairperson was rarely insulted, most abusive comments targeting her were accusations of rigging the elections. The EU EOM recorded one rape threat and two sexual assaults comments.

XII. PARTICIPATION OF WOMEN

Women remained largely excluded from candidacy and political leadership.

Despite international and regional commitments, including the 50 per cent target for equal representation under the SADC protocol on gender and development, women remain severely underrepresented in political life across political parties, candidacy and elected office. The constitution provides that the electoral system ensures gender equity in the National Assembly and local councils but no specific measures to achieve this are prescribed in legislation. The Gender Equity and Equality Commission, established in 2015,[105] remains inactive, which limits women's access to a dedicated institutional mechanism for redress. Furthermore, the 20 PR reserve seats for women, allocated post-election, appear to have discouraged constituency nominations, as parties reportedly withheld women in favour of these lists. This was compounded by a recall provision allowing parties to replace these MPs at will, raising concerns for their independence.

Women's participation as candidates in these elections was minimal; 9 per cent across all levels, mostly as UPND nominees or independents.[106] Women hold prominent positions in state institutions, but their representation in elected bodies remains low. While the country has ratified key international and regional women's rights instruments,[107] implementation remains incomplete. Of the 13 political parties that nominated presidential candidates, all were led by men; the only female contender, Given Katuta, stood as an independent.[108] Among the 14 presidential running mates, only 4 were women. There were no women candidates in more than half of constituencies.[109] According to interlocutors, this was driven primarily by high campaign costs, non-transparent party adoption processes, limited party support, and entrenched cultural norms.

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[104] Women included candidates, a politician, two bloggers, a journalist, a blogger-commentator and the Chairperson of the ECZ; men included a presidential candidate, four parliamentary candidates, a politician, a presidential adviser, a media personality and two influencers.

[105] The Gender Equity and Equality Act No. 22 of 2015 establishes the Gender Equity and Equality Commission to promote compliance and address complaints, operating alongside constitutional non-discrimination guarantees under Articles 8 and 266.

[106] Some 300 women were contesting seats at all levels, with 45 parliamentary and 1 presidential candidate. National Assembly candidacy stood at 12.5 per cent, Mayoral/Chair candidacy at 10.9 per cent, and Ward Councillor candidacy at 8.5 per cent

[107] Zambia has ratified the 1979 Convention on the Elimination of All Forms of Discrimination Against Women and is party to the 1997 SADC Declaration on Gender and Development at regional level.

[108] Ms Katuta finished sixth in the race with 7,574 votes, as per unofficial results published by the Zambia 2026 Election Tracker at https://elections.elucive.co/

[109] 132 out of 226 constituencies (some 58 per cent) had no women candidates at all.

Gender-focused civil society organisations voiced concern over the low women's candidacy rates despite constitutional reforms, highlighting the need for parties to make further efforts to nominate women in constituency races. They also noted reports of violence, intimidation, and coercion targeting women aspirants within some parties' nomination processes. EU EOM observers received similar reports of violence against women in elections in 6 of the 10 provinces, including a woman candidate detained while filing nomination papers, and cases of candidates' withdrawals reportedly linked to violence and sextortion (a form of blackmail based on sexual exploitation for political gain). In Western Province, an independent candidate publicly alleged she was offered a PR-list place to step down; her account gained wide traction on social media.

There are 32 women elected in the new parliament, 12 more than in 2021, making up 14.2 per cent of the 226 FPTP seats, up from 12.8 per cent. At the local level, women won 15 of the 116 mayoral and council chairperson seats or about 13 per cent. Women candidates continue to face significant barriers such as high campaign costs, educational requirements,[110] limited party support, and online and offline harassment and violence. Reduced nomination fees apply for women, youth and PwD candidates. However, some contestants and CSOs still considered the fees excessive[111]. A high incidence of withdrawal among women candidates has also been attributed to violence against women in elections (VAWE) and sextortion[112]. Lifeline/Childline Zambia established a 24-hour hotline for tracking VAWE cases. CCMG also had a VAWE monitoring component. Underreporting remains a concern, attributed by interlocutors to insufficient awareness, weak mechanisms for documenting cases, and victims' fear of identifying perpetrators with political influence. Most incidents reportedly occur online, in the form of harassment and hateful comments.

Gender-focused CSOs met with by the EU EOM attributed the low participation of women to the absence of a Political Parties Act, funding shortfalls, and intra-party obstruction. In 6 of the 10 provinces, cases of intimidation and/or derogatory speech directed at women candidates were reported by interlocutors to the EU EOM. The Zambia National Women's Lobby (ZNWL) and the NGO Coordinating Council trained female candidates on campaign techniques and resource mobilisation. They also printed campaign materials for selected female candidates from different parties and lobbied major parties to nominate women for at least 30 per cent of their candidates.

Women turned out in large numbers as campaign supporters but remained marginal as speakers. Women were not targeted separately as voters. At EU EOM-observed events, women made up roughly half of attendees but only some 20 per cent of speakers;[113] several events had no women speakers. Female candidates received minimal media coverage during the campaign. Overall, while women were well represented in some election administration roles, this did not extend to electoral politics more broadly.

RECOMMENDATION: Implement affirmative action measures for genuine, effective and equal inclusion of women, youth and persons with disability in line with international and regional commitments to avoid discrimination in candidacy and mandate.

[110] Given educational and financial constraints, women were especially affected by requirements to hold a secondary school leaving certificate (Grade 12).

[111] Fees vary from ZMW 100,000 (EUR 4,500 approx.) for male presidential candidates to ZMW 500 (EUR 22 approx.). 1 ZMW is approx. EUR 0.045.

[112] Lifeline/Childline hotline identified only five reported cases of VAWE in the last six months, although out of 30,000 calls received monthly, some 60 per cent are attributed to gender-based violence.

[113] Women were speakers at 42 of 208 (20 per cent) campaign events observed by EU EOM.

XIII. PARTICIPATION OF YOUTH AND PERSONS WITH DISABILITIES

Significant political and societal marginalisation, despite some progress in legal reforms with accessibility mandates.

The recent electoral reforms reserved 15 seats in the National Assembly for youth (and at least one on each council), yet implementation gaps and broader socio-economic hurdles limit meaningful inclusion.[114] The framework lacks guidelines for party candidate selection and to guarantee gender balance.[115] Despite youth comprising nearly half of registered voters, there was a proportional decrease from 2021.[116] While youth were active, economic frustration and unemployment appeared as factors contributing to some youth apathy in 2026.[117] While young people served as voter education facilitators and monitored elections digitally (where youth were the most active cohort on social media)[118] addressing systemic barriers requires stronger legal protections and targeted civic engagement to achieve genuine representation.

The World Health Organisation estimates some 2 million Zambians, 11 to 15 per cent of the population, live with disabilities. Of these, only several hundred thousand are registered with the statutory Zambia Agency for Persons with Disabilities (ZAPD),[119] and just 20,162 were registered to vote, reflecting severe systemic marginalisation. Despite a 2012 Persons with Disabilities (PwD) Act, aimed to give effect to international commitments,[120] PwD continue to face significant challenges including societal prejudice, underrepresentation, and barriers to independent access to polling.

The overall legal framework provides a strong theoretical foundation for inclusion and political participation of persons with disabilities. Inclusion is protected through various legal tiers,

[114] Among them for example, a youth is defined as between 18 and 34 years old in the Constitution (article 266). However, Section 36D(2) of the EPA (as amended) mandates that candidates must remain below 35 for the entire parliamentary term, thus seemingly restricting candidate eligibility to younger individuals at the time of nomination.

[115] Act 13 reserved 15 parliamentary seats for youth as well as at least one seat at each local government level, but Act 12 leaves candidate selection to party discretion without requiring gender parity

[116] Citizens under 35 are estimated to make up over 80% of Zambia's population but just 46.3% of the 8.78 million registered voters in 2026, In 2021 that figure was in excess of 50% of the Voter Register. EU EOM social media monitoring showed youth to be the most active cohort especially on Facebook where they account for 70 percent of users.

[117] Domestic observer and youth organisations, among them Global Platform Zambia cited economic disillusionment, widespread youth unemployment, political exploitation, as well as localised election violence as key drivers of a seeming reduced voter turnout in that cohort. In the pre-electoral period, youth mobilisation was particularly visible at party campaign events. At 51 campaign events observed by the EU EOM, youth made up just over half of all attendees, or 53.2 per cent overall.

[118] For example, Youth-led CSOs, including Girls Gone Political, and Young Women in Action, conducted digital campaigns and workshops to promote youth leadership and voting

[119] The 2026 Persons with Disabilities (Amendment) Act reduced the ZAPD board from 17 members to 7, leaving just one seat for PWD organisation representatives.

[120] Regional standards, alongside UN commitments, include the Protocol to the African Charter on PWD (2018), mandating equal political participation through accessible polling and civic education, and the SADC Charter of Fundamental Social Rights and Protocol on Gender and Development, requiring enabling environments and legislation tailored to PWD' needs.

including the Constitution,[121] 2012 Persons with Disabilities Act,[122] EPA,[123] and 2023 ATI.[124] Following constitutional amendments in 2025, the Mixed Member Proportional Representation (MMPR) system reserves 5 NA seats for this group. Political parties must include registered candidates in the disability category on their lists. At local government level, at least one council seat must be held by a person with a disability, part of an 18 per cent allocation for women, youth, and PwD.

Under the MMPR, PwD candidates on reserved-seat lists for the NA or a council must hold a ZAPD registration certificate under the 2012 Persons with Disabilities Act. To qualify, an individual must meet the legal definition of a person with a disability, including having a permanent physical, mental, intellectual, or sensory impairment. This requires applicants to obtain a medical certificate to accompany the application.

As such, the law operates on a medical rather than a social model of disability, which is envisaged by the CRPD (Convention on the Rights of Persons with Disability). Local advocacy organisations criticise the continued application of the medical model, which they consider explains the disparity between the estimated PwD population and the far smaller number registered to vote. Additionally, candidates with disabilities contesting reserved seats, like others in this category, face unequal treatment, as a power of recall applies only to reserved-seat parliamentarians, not to those elected First-Past-the-Post.

To facilitate the exercise of the franchise, the law provides specific measures for polling day including assisted voting,[125] protection for secrecy of the ballot,[126] and special votes for voters who cannot reach their registered polling station due to physical infirmity.

In its electoral preparation, the ECZ involved some 30 PwD organisations to assess the accessibility, usability, and appropriateness of its electoral and voter education materials. EU EOM observers noted an absence of targeted voter education with materials lacking "easy read" formats or sign language, and a failure by most political party manifestos to address their needs.

XIV. CITIZEN AND INTERNATIONAL ELECTION OBSERVATION

Active citizen and international observer groups hampered by administrative procedures, limiting opportunities for long-term observation.

The election law provides a basis for citizen and international observation. Only ECZ-accredited observers can observe the electoral process, subject to the Electoral Code of Conduct in the election law. However, ECZ administrative procedures do not foresee accreditation for long-term observation, despite such requirements in its guidelines. The ECZ issued initial

[121] The Constitution defines human dignity, equality, and inclusiveness as fundamental values, guarantees every citizen the right to exercise political rights, and mandates PWD representation across all levels of public service.

[122] The Act requires that the government ensure PWD can effectively participate in public life, including the opportunity to vote and be elected, and explicitly includes mental and intellectual disabilities within its definition of disability.

[123] The EPA provides the legal basis for assisted voting for individuals with physical disabilities.

[124] The ATI requires information holders to take reasonable steps to provide information in accessible formats, visual, audio, or readable, where a requester's disability prevents use of standard formats.

[125] Voters with physical disabilities may be assisted by a person of their choice, aged at least 18, or absent one, by a presiding officer, in the presence of observers or candidate agents to ensure impartiality.

[126] Any person providing assistance is legally bound to maintain the secrecy of the vote.

accreditation guidelines on 13 May. Yet, the opening of accreditation on 21 July was too late to adequately accommodate long-term methodologies and fundamentally impacted citizen observers and the EU EOM. This meant that the EU EOM was delayed by over 10 days in its standard operations in the provinces, as accreditation was required to interact with lower-level election management bodies.

For the first time, the ECZ used an online accreditation system, but due to technical difficulties, the ECZ moved to a hybrid online/paper-based format on the day of its launch. The new system was slow and limited the number and geographical reach of observers, notably for results centres, including at national level. Uncertainty on procedures and several additional *ad hoc* administrative hurdles, including in-person observer verification, further delayed the process. Two of the main citizen observer organisations, the Christian Churches Monitoring Group (CCMG) and the Zambia Federation of Disability Organisations (ZAFOD), also issued statements about their concern regarding late and critical changes to the accreditation process.[127] A less restrictive approach, particularly with respect to the deployment of observers and duration of observation, would facilitate a more enabling environment for election observation, contributing to transparency and integrity of the process.

RECOMMENDATION: Promote the public accountability of electoral authorities by guaranteeing the right of unhindered access of observers to all aspects of the electoral process, underpinned by a timely, transparent and less burdensome accreditation process.

Several citizen observer groups monitored different aspects of the elections and regularly issued pre-election reports, contributing to transparency and awareness of the process. CCMG, an alliance of faith-based organisations, deployed 330 long-term observers to monitor voter registration, constituency delimitation and the campaign environment. On election day, some 1,650 CCMG accredited observers conducted a process and results verification for transparency (PRVT) of a statistically representative PS sample of polling stations.

CCMG published its verification report for the presidential election on 20 August, after the ECZ had announced presidential results and declared a winner, noting disparities between its findings and the official results in 30 constituencies, where "the official turnout is well outside the upper limit (more than 10 per cent) of the PRVT estimates".[128] It further stated that "the PRVT estimates clearly show that President Hichilema received the most presidential votes and more than the 50% threshold, but it also demonstrates that for 30 constituencies, votes were added, artificially increasing turnout and undermining the integrity of the process… Importantly, however, the variances identified do not alter the overall outcome of the presidential election".

An alternative parallel vote tabulation (PVT) report was issued by a consortium of CSOs led by the Southern African Centre for Constructive Resolution of Disputes (SACCORD), on 24 August, which broadly confirmed the ECZ results announced. Initially, the consortium informed the EU EOM that a planned PVT could not go ahead because of lack of funding. However, information on the methodology of this PVT remained scarce, calling into question its credibility.

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[127] See https://ccmgzambia.org/ccmg-raises-concern-over-accreditation-of-monitors-and-observers-ahead-of-13-august-polls/

[128] CCMG Independent Assessment of the Accuracy of the Official Results for the 2026 Presidential Election, p.3.

Transparency International Zambia monitored election integrity with a focus on anti-corruption and campaign finance. They deployed 156 LTOs (one in each of the old constituencies) and 70 STOs on election day in the new constituencies. Since early July, ZAFOD deployed 20 LTOs across the 10 provinces and 80 STOs monitored accessibility of polling stations and processes on election day. The Zambia National Women's Lobby deployed 270 STOs across three provinces (Central, Southern, and Lusaka). The Human Rights Commission deployed 175 monitors on election day. Other organisations and alliances fielded observers but lacked resources for in-depth training and robust reporting.

The ECZ conducted a briefing for international observer missions on 8 August and for citizen observer groups on 10 August. Other international observation missions present included the African Union, jointly with the Common Market for Eastern and Southern Africa (COMESA), the Southern African Development Community (SADC) and its Electoral Commissions Forum (SADC-ECF), and the International Conference of the Great Lakes Region.

XV. ELECTORAL DISPUTES

Various mechanisms for dispute resolution and alternative interventions, with scope to develop clearer rules and timelines.

The EPA mandates ECZ to constitute Conflict Management Committees (CMCs) at national and district level to mediate electoral disputes within 24 hours of receipt. Where a complaint discloses a criminal offence, the matter is referred to the police. ECZ's guidance limits CMC membership to one representative per registered political party, leaving independent candidates, a significant share of contestants in this cycle, without representation on committees mediating disputes to which they may be party. While CMCs were in place in most districts across the country and helped diffuse tensions or resolve minor disputes between parties, their performance and effectiveness varied greatly, with EU EOM observers receiving claims of CMC inefficiency and jurisdictional ambiguities.[129] The most common complaints dealt with were campaign timetable breaches, destruction or removal of campaign materials, intimidation, and defamatory conduct or insults.

The Constitution assigns ECZ the role of settling minor electoral disputes, while the ECZ Act grants it authority to adjudicate administrative disputes arising from the organisation, administration, or conduct of elections. In enforcing the Electoral Code of Conduct, ECZ may act on its own initiative, reprimanding political parties, candidates, or other stakeholders, or imposing administrative measures of unspecified scope on any person, candidate, or political party. The 2026 EPA replaced the ECZ's power to disqualify a political party or candidate for breach of the Electoral Code of Conduct with a power to suspend. ECZ invoked this power during the campaign following two campaign-related deaths in Kaputa and Mazabuka, imposing an indefinite suspension of an opposition political party amounting to a *de facto* disqualification. [130] Further, the EPA does not specify a threshold of severity for Electoral Code of Conduct breaches warranting suspension, which leaves room for arbitrary application.

[129] Claims of CMC inefficiency were received in several districts, including Kafue, Chilanga, Chinsali, Mpika, Mkushi, Kabompo, Zambezi, Solwezi and Mansa. CMC members attributed this to budget constraints restricting hearing frequency. EU EOM observers further noted jurisdictional ambiguities. For instance, the CMC in Chilanga District, which stated it refers only cases of direct violence to police, also referred a poster-removal complaint, unlike the CMC in Kafue District, which resolved similar cases without referral.

[130] On 3 July, ECZ imposed an indefinite suspension on NRPUP's campaign activities in Kaputa Constituency, citing alleged party involvement in electoral violence. NRPUP challenged the suspension before the Lusaka High Court, arguing it had been imposed without a prior hearing. ECZ lifted the suspension on 22 July, citing police confirmation that the situation had normalised, before the court ruled on the application.

Other state bodies, including the Anti-Corruption Commission (ACC) and the Human Rights Commission (HRC), also receive and handle complaints, directly, online, through toll-free lines, and via provincial and district offices and monitors. The HRC received 54 election-related complaints, 5 concerning candidate nominations. Both bodies collaborate with the ECZ to determine the appropriate institution for investigative or other action, and cooperate on sensitisation regarding corruption, bribery, hate speech, and gender-based violence; the HRC has also operationalised an early-warning mechanism for identified hot spots.

Election Petitions

Challenges to the results of presidential, National Assembly and council elections are taken by way of petitions before the Constitutional Court (CC), the High Court and the Local Government Elections Tribunals respectively, with rights of appeal in each case, except presidential petitions, which are heard and decided by the CC with no right of further appeal. Presidential petition procedures faced disruption following the declaration of results, highlighting the need for administrative clarity (see below).

Among several CC cases in the pre-election period, six challenged ECZ decisions; and four were dismissed without merit.[131] One ruling clarified the constitutional timeline for party members to contest as independents, and another held that post-nomination withdrawal does not collapse the joint ticket. A pending case seeking to compel ECZ to ensure gender equality among nominations may shape future candidate quotas.

Of six cases brought before the High Court on parliamentary candidacy matters, three were dismissed; one overturned ECZ's withdrawal of a previously allocated ballot symbol from five independent candidates[132]; one awarded a petitioner ZMW 1.5 million (EUR 75,000) in damages for arbitrary police detention that impeded his nomination filing; and one, concerning alleged campaign rule breaches, remained active as of the EU EOM's departure. The long-standing absence of appellate review on nomination petitions was not addressed. Some clarity has been introduced into the timeline for determining presidential election petitions.[133]

Electoral Offences

Electoral offences are set out in the EPA. The Penal Code provides the basis for general criminal offences and their sanctions. EPA creates a wide range of electoral offences.[134] Additional offences, mostly related to campaigning, are specified in the Electoral Code of Conduct. The police and, in the case of a corrupt practice, the ACC investigate and initiate prosecutions in the magistrates' courts. Electoral offences can also be raised in a post-election petition and can result in an election being nullified but the bar is very high.

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[131] These include People's Pact for the Country's Transformation v. ECZ over the delimitation of new constituencies; People's Pact for the Country's Transformation v. ECZ over the adoption-certificate signature requirement; Isaac Mwanza and the Consortium of Civil Society v. Dolika Banda, Dr Fred M'membe and ECZ over the joint presidential ticket; and Charles Longwe v. Batuke Imenda, Hakainde Hichilema and ECZ over the UPND presidential nomination.

[132] On 27 June, the High Court ruled that ECZ had acted illegally in revoking the "Candle" symbol already allocated to independent candidates.

[133] The 2025 constitutional amendment strengthened Article 103(2), clarifying that the Constitutional Court's 14-day window for presidential election petitions requires the Court to both hear and determine the petition, not merely commence the hearing, addressing an ambiguity that in 2016 saw a petition dismissed on procedural grounds before its merits could be considered.

[134] These include illegal practices such as bribery, impersonation, undue influence, publishing false statements about candidates, submission of forged documents for nomination, inciting disorderly conduct at an election meeting and illegal practices related to the poll. Sentences range of up to seven years in prison, or a fine of up to K280,000 (€12,650).

The EU EOM received consistent claims from interlocutors of police bias favouring the ruling party across most provinces observed. Observers also received reports of police unwillingness to formally register complaints, linked to a perceived reluctance to act against the ruling party.

RECOMMENDATION: Guarantee effective access to due process in electoral matters. Measures would include realistic timelines for petitions in all court jurisdictions, including access and filing by alternate means, consistency in rights of appeal before and after elections, and adopting appropriate evidentiary standards.

XVI. VOTING, COUNTING AND TABULATION OF RESULTS

Transparent voting procedures throughout a calm election day, but lack of respect for procedures during tabulation and lack of prompt publication of results decreased accountability.

Overview of Voting

On Election Day, 100 EU EOM observers visited 419 polling stations (PS) (representing 3.1 per cent of all PS established for these elections) in 113 of the 226 constituencies in all 10 provinces of Zambia to observe voting and counting. Of these polling stations observed, 214 were in urban areas, 197 in rural areas and 8 were correctional facilities. The EU EOM observed the opening of 39 PS, voting in 419 PS, counting in 38 PS and tabulation at 64 totalling centres. Election day was calm overall, with polling staff efficiently facilitating voting in polling stations observed by the EU EOM. The opening of PS was calm and transparent, despite long queues. Most PS observed opened on time, with 9 experiencing substantial delays, due to organisational difficulties. In one PS observed not all necessary materials were present. Still, opening procedures were followed in almost all polling stations observed.

Voting was efficiently and transparently managed, and EU EOM assessments were positive in 98 per cent of PS observed, with PS staff implementing voting procedures effectively. Overcrowding was noted in 9 per cent. As well, observers noted tensions in 10 PS visited.
As a security measure, indelible ink was used to mark voters' thumbs to prevent multiple voting. Yet, checks for traces of ink prior to voting were not consistently conducted in 26 per cent of observed PS. Insufficient or missing voter information materials were reported in 52 per cent of PS observed, while essential material, including insufficient numbers of voting booths, was missing in 25 per cent of PS.

In most PS observed (bar Central province), and despite a lack of legal provision, voter card numbers were written down on ballot paper counterfoils, potentially compromising the secrecy of the vote. The ECZ could revise its handbooks and training material, so that this is avoided in future processes. Secrecy was not guaranteed in 24 per cent of PS observed, due to the positioning of voting booths and the layouts of PS. In 20 observations, voters were seen voting together in the same voting booth. In 18 per cent of PS, voters were turned away for not being on the voter register in that PS. Just 42 per cent of the polling stations observed were accessible to people with reduced mobility and 33 per cent of PS had unsuitable layouts for these voters.

The overall transparency and integrity of the voting process was enhanced by the consistent presence of polling agents and citizen observers during voting and counting, as well as the unimpeded access of media, as observed by the EU EOM. At least one citizen observer was present in 42 per cent of observations. Party agents were present in 99 per cent of the PS observed, with UPND, NRPUP and independent candidates fielding the biggest share. Citizen observers and party agents could monitor the process without restrictions.

Among PS staff encountered, only 38 per cent of presiding officers, some 40 per cent of assistant presiding officers, and 14 per cent of returning officers were women.

Counting

The EU EOM assessed closing procedures in 38 PS observed as slow but transparent. Yet, counting procedures were only partially implemented. Only 53 per cent of observed PS closed on time, with the remainder closing late due to late openings. In over one-third of observations, unused ballots were not counted before the ballot boxes were opened, which is an important security feature. In most observations, PS staff determined the number of ballot papers cast before counting votes for candidates in line with procedures. However, in 10 PS, the number of ballots found in the ballot box did not correspond to the number of ballots issued. The validity of ballots was determined in a consistent manner in 35 of PS observed. Polling staff had difficulty in completing the result forms in 11 PS. Observers and party agents could not observe without restrictions in 3 PS.

Tabulation of Results

Polling station results tabulation took place in 226 totalling centres (TC) at constituency level and concluded on 19 August with the declaration of the mayoral race for Lusaka. Communication shortcomings appeared on election day and during the announcement of results: while engagement with ECZ social media peaked, with 63 per cent of all interactions concentrated in that single week, the ECZ provided limited public information during election day, with only two online posts and two public statements on isolated delays in the opening of PS and the start of counting on election evening.

On 14 August 2026, the day after elections, the ECZ suspended the counting and announcement of election results nationwide from 12:00 to 18:00. This was stated to be due to violent incidents targeting polling staff and, in some instances, allegations of ballot box theft. As no further details were provided on the locations and how systematic or isolated these incidents were, this seemed a disproportionate response and contributed significantly to uncertainty, informational gaps and heightened political tensions. Transparent communication by the ECZ at this stage would have enhanced the integrity of the results management process.

The EU EOM had observers present for the tabulation in 64 TC on election night and the following days; almost all of them were adequate for the reception of election materials. Until the suspension, results tabulation was assessed as positively in 93 per cent of the EOM's observations. Polling agents and citizen observers were present in almost all totalling centres observed and followed results entry. Police and/or military was present in almost all TC.

The EU EOM did not observe during the period of suspension. However, after the lifting of the suspension, late on 14 August, EU EOM observers assessed that the overall conduct of tabulation deteriorated significantly. At this point, the transparency of the results tabulation was assessed by EU EOM observers as 'bad' or 'very bad' on a four-point scale in 12 per cent of totalling centres observed, an increase by 5 percentage points, indicating that tabulation procedures would benefit from a review to strengthen transparency and integrity safeguards, in line with international standards.[135] In a high number, the totalling centres staff failed to record

[135] In its GC No. 25 (1996) to the ICCPR, the UN HRC has emphasised the importance of independent scrutiny of the voting and counting process and the electors' confidence in the security of the ballot and the counting of the votes (see para. 20). See also art. 4(2) of the IPU Declaration on Criteria for Free and Fair Elections (1994), urging states to ensure the integrity of the process for counting votes.

the results on the tally sheet as soon as they were announced by the returning officer, as prescribed by the electoral process regulations.[136]

The number of observations in which totalling centres staff ensured that the figures entered in the digital results management kit corresponded with those on the tally sheet dropped after the suspension.[137] EU EOM observers reported extended breaks during the results tabulation process in almost half of observations, as the returning officers seemed to wait and receive instructions before announcing results. Further, a heavy military presence in totalling centres following the suspension was reportedly intimidating to most interlocutors and resulted in the number of party agents and citizen observers present at totalling centres being lower than before.

RECOMMENDATION: Protect the will of the voter and the integrity of elections by ensuring consistent arrangements for maintaining transparency during the results tabulation, such as projection of data entry and prompt online posting of complete, PS-disaggregated preliminary and final results, in an easily usable format.

The EU EOM also received reports of violent incidents at some totalling centres. In Lusaka, an armed group attacked the totalling centre in Makeni and took almost all polling stations result forms on 15 August. In Central province, various stakeholders reported to EU EOM observers that unidentified assailants raided two out of three totalling centres in Kabwe on 16 August, fundamentally disrupting the tabulation process.

XVII. RESULTS AND POST-ELECTION ENVIRONMENT

Interruptions of tabulation and access to courts amid unspecified security concerns as well as security forces raids against opposition candidates diminished transparency and contributed to uncertainty

Publication of Results

Having launched a results website the day before elections, the ECZ did not publish preliminary results on it, reducing access to information of public interest. On election day, the ECZ confirmed during a press briefing that they would not publish disaggregated polling stations results, despite it being an important measure of transparency as it allows everyone to compare polling station results to those announced by the ECZ. [138]

The ECZ started to read out partial results for the presidential contest per constituency at Mulungushi national results centre late in the evening of 14 August. Preliminary results for NA, mayoral/council chairperson and councillor elections were declared by returning officers (ROs) in the days following the election, after information from all PS in the constituency were entered in the ECZ results management system. The ECZ declared preliminary presidential results at 02:40 AM, in the middle of the night on 18 August and announced a turnout of 57 per cent. The number of rejected/invalid ballots was 2.5 per cent. After the declaration of presidential results, the ECZ continued to abstain from providing information on the other three

[136] This was the case in 42 per cent of observations, compared to 30 per cent pre-suspension.
[137] This was true in 81 per cent of observations, compared to 100 per cent prior to the suspension.
[138] EPA, article 125 (2): "Without prejudice to the generality of subsection (1), the Commission may, by statutory instrument, make regulations providing for (...) the declaration, notification and publication of the results of an election."

contests, limiting its communication to one notice.[139] The official NA and mayoral/council chair election results were published on the ECZ Facebook page on 4 September.

PR seat allocations announced by the ECZ on 18 September showed the UPND was allotted 32 seats (or 80%) of the 40 available while NRPUP was allotted only 8 seats, or 20 per cent. The party distribution of reserved seats demonstrates disparities from the codified formula for calculating and allocating PR seats to political parties set out in the EPA. The ECZ did not provide data on the allocation, increasing confusion on the distribution of PR seats.

In one constituency, Lumezi North (Eastern province), a NA by-election should be held within 30 days, due to the death of a candidate. Further, in Mbala district (Northern Province), a mayoral by-election should be held within 90 days, due to the death of a candidate.

Post-Election Developments

The immediate post-election period was tense and turbulent, defined by a sequence of opaque security-related actions. The nationwide suspension of counting and tallying on 14 August caused speculation and heightened political tension. The same day, Mr. Mundubile made a public statement that NRPUP's Parallel Vote Tabulation (PVT) showed he had won the election. Later that evening, there were rumours of an incident in Lusaka, which later proved to be a raid by joint security forces on a property linked to Mr. Mundubile in Kabulonga, resulting in gunfire, leaving one person dead and 11 arrested.[140]

The prolonged lack of official information surrounding the raid created space for speculation and mounting public anxiety over who had been targeted, arrested, injured, or killed. Authorities later described the raid as a joint operation to apprehend suspected militia; an allegation Mr. Mundubile has disputed. Police only confirmed Mr. Kafwaya's death five days later, following his family's and other public calls for information about his whereabouts.

On 19 August, the UN High Commissioner for Human Rights expressed concern at reports of arrests and detentions of opposition members in Zambia and urged authorities to "stop arresting people arbitrarily and to uphold fully the due process rights of all those detained."[141]
Arrests of opposition figures continued on 19 and 20 August, with the detention of the Tonse Alliance Secretary General, and a former Constitutional Court judge, who was reportedly assisting Mr. Mundubile with his petition. Following the raid, Mr. Mundubile and his running mate, Makebi Zulu, took refuge in the UN compound in Lusaka. After negotiations facilitated by Zambia's church mother bodies, the two left the compound on 27 August. Later that day, police confirmed they had been placed in custody and subsequently charged with treason.

On 2 September, the UN Special Rapporteur on freedom of assembly and association expressed grave concern over the deteriorating democratic and human rights environment in Zambia, calling on the Government to "cease the criminalisation of political dissent" and referring to "concocted charges of treason" and "charges that were often disproportionate and legally

[139] Despite tabulation having been concluded, the RO for Mandevu constituency (Lusaka district) had not declared the NA seat, following an attack on the totalling centre and the destruction of results management kits. On 28 August, the ECZ announced that a by-election would be held for this constituency.

[140] Mutotwe Kafwaya, former Lunte MP and Cabinet Minister of Transport and Communications, was killed in the raid. Among the arrested were George Chisanga, Tonse-Pamodzi Alliance presidential spokesperson, and Trevor Mwamba, Anglican bishop and UNIP President.

[141] https://www.ohchr.org/en/statements-and-speeches/2026/08/zambia-turk-expresses-concern-over-arrests-opposition-members

ambiguous."[142] Further, the HRC urged the Zambia Police Service and the National Prosecution Authority on 3 September to ensure prompt due process for all persons held in prolonged detention and stated that it was closely monitoring cases involving at least 84 persons arrested or detained in connection with election-related incidents and security operations.

The Zambian High Court on 14 September ordered the immediate release of 43 people who were being held at Chelstone Police Station for 21 days without being charged, ruling that their continued detention was unlawful.

The ECZ declared President Hichilema winner on 18 August with 60.5 per cent of the vote against Mr. Mundubile's 37.9 per cent. In his national address the same day, the president called for unity and pledged to govern on behalf of the whole country, including those who voted for the opposition. However, when meeting with youth at the Community House the next day, he warned that "militias masquerading as political parties" planning to steal the elections could be shut down, remarks that some opposition parties interpreted as threats.

The preliminary results of the parliamentary elections showed that including the PR and the appointees and *ex officio* seats, UPND received about 62.5 per cent and NRPUP 27.3 per cent of the 278 seats. Further, independents got 7.2 per cent of seats, while the Resolute Party won 5 seats, Citizens First 2, and ZMP 1; the remaining two seats will be decided in upcoming by-elections. Given that a certain number of the independents initially aspired for a UPND ticket, it is likely that UPND will have two thirds of the seats required to push forward any constitutional reforms. While NRPUP have stated that they will lead the opposition and 'provide checks and balances', their leaving of the Tonse-Pamodzi alliance and distancing from their presidential candidate increases the likelihood of further division.

Reactions to the announced presidential results were mixed. The deepest divide emerged within the Tonse-Pamodzi Alliance, where the NRPUP leadership and the Resolute Party, an alliance member, quickly accepted the results, while Mr. Mundubile rejected them and vowed to dispute the outcome. NRPUP also announced its withdrawal from the alliance, effectively causing its collapse. Elsewhere, Harry Kalaba of Citizens First called the process deeply flawed and demanded an independent review, while other opposition parties, such as the Democratic Progressive Party and the Christian Democratic Party, accepted the results.

Court Closures

Due process rights relating to disputed election outcomes suffered an unprecedented blockage following sudden court closures based on unspecified security concerns, entailing damaged trust in the judiciary and the tarnishing of Zambia's democratic credentials.

The legal timeline for the filing of petitions challenging the results of the presidential elections commenced on 19 August, opening a seven-day window for complainants to deliver the necessary papers with the Constitutional Court registry by close of business on 25 August. Despite indications of a split in opposition approaches to election results, Brian Mundubile promptly declared his intention to lodge a petition. Thereafter, allegations quickly emerged of efforts to frustrate opposition petition preparations, including rumours of intimidation of legal professionals and of the, later confirmed, 20 August unexplained detention of former constitutional court justice Ann Sitali, reportedly retained to advise on the petition.

[142] Statement by Gina Romero, the Special Rapporteur on the rights to freedom of assembly and of association, 2 September 2026. https://www.ohchr.org/en/press-releases/2026/09/zambia-special-rapporteur-urges-immediate-end-post-election-crackdown-and

On the morning of 24 August, approximately 33 hours prior to the deadline, the Lusaka superior courts complex was cordoned off by police and military personnel. Shortly after 09.00 a.m., the Chief Administrator of the Judiciary (CAJ) issued a memorandum directing all staff not to report for work for security reasons and advising that guidance would follow once the situation was contained. Subsequently, the Inspector General of Police, notified of an ongoing security risk assessment with other security agencies in key government premises across the country, urged the public to comply with security instructions. As news spread of countrywide court closures, effectively blocking opportunities for filing petitions, prominent civil society organisations,[143] released statements expressing grave concerns and condemning the unprecedented shutdown of the judiciary at a constitutionally sensitive moment. The Law Association of Zambia (LAZ) underlined the prejudicing of due process rights and called for transparency, an urgent restoration of access to the courts, and arrangements necessary to preserve constitutional rights.

The CAJ issued a further statement on the evening of 24 August clarifying the operating hours of the Constitutional Court registry from 08:30 to 18:00 and specifying that as at closing time on that date, no petition was filed. Without clear directives for alternate filing mechanisms, some legal practitioners started to try and make direct contact with senior judges.

On 25 August, the courts remained cordoned off by police and military personnel. That afternoon, the Judiciary Deputy Director of Corporate Communications (JDC), issued a statement that the Chief Justice (CJ) received to his private email a "peoples' presidential petition' from a "member of the public".[144] The statement acknowledged the mode of communication of official court documents, but noted the manner was 'highly irregular'. However, it also confirmed that the Chief Justice exceptionally, using his administrative powers, referred the matter to the Constitutional Court for consideration on the filing.

Shortly thereafter, pre-empting any judicial pronouncement, the Secretary to the Cabinet issued his own press release stating that the petition period had ended, that the judiciary had not received a petition, and that the inauguration of the President would proceed on 1 September. On 26 August, the JDC issued a further statement that as of 18.00 on 25 August – no petition was before the Constitutional Court. On 27 August, the courts reopened. LAZ promptly issued a further statement citing its efforts to engage the judiciary and obtain clarity related to the court closures but noting it did not receive "the meaningful and comprehensive explanation that the circumstances required".[145] They underlined that for three days, ordinary access to courts and registries was interrupted without an alternative mechanism communicated for dealing with all urgent applications, filings and procedural deadlines.

The sequence of events resulted in a denial of access to justice and legally prescribed electoral due process and a disregard of clear constitutional imperatives to ensure technicalities do not impede access to justice. The failure to communicate and provide a timely effective mechanism to overcome the blockage raised serious concerns regarding effective access to judicial remedies and due process. The prominent rule-of-law CSO, Chapter One Foundation, has filed a complaint to the HRC alleging violations of the right to access to justice.

Complaints Relating to the Election Results

[143] Among others, TIZ, CCMG, Chapter One Foundation, and NGOCC

[144] Although not officially announced, one petitioner seeking to file by alternate means was a prominent public interest litigator and lawyer, Linda Kasonde, founder of LCK Freedom Foundation.

[145] https://www.facebook.com/share/p/1By8Zn6nNd/

The right to contest the outcome of results in parliamentary and local government elections followed from the constituency-based declaration of results. Petitioners had 14 days to file their contestations against NA results in the High Court and 7 days to lodge their objections to the results of local council elections with Local Government Election Tribunals. While decisions on objection in both jurisdictions are appealable to the Constitutional Court, the timelines for decisions making in the first instance are 90 days in the High Court and 30 Days in the Local Government Election Tribunals (LGETs). According to information provided by the High Court Registry, 67 petitions against NA results were filed within the 14 day-time limit. Some 90 cases challenging the results of local elections were received within the mandated timeframe by LGETs nationwide.

XVIII. RECOMMENDATIONS

NO.	FR page #	CONTEXT	RECOMMENDATION	SUGGESTED CHANGE IN LEGAL FRAMEWORK	RESPONSIBLE INSTITUTION	RELEVANT INTERNATIONAL PRINCIPLE / COMMITMENT
LEGAL FRAMEWORK						
1	17	The legal framework was overall adequate for the conduct of election, but several gaps, weaknesses and inconsistencies entail misalignment with international commitments and leave it vulnerable to legal challenges. This includes discriminatory provisions impacting reserved seats, uncertain timelines for some processes including nominations, and potential overlaps of second rounds with the NA inaugurations and the participation of reserved seat members. Key measures and rules for accountability and genuine inclusion are absent. Significant reforms were enacted late contrary to best practices and impacting transparency. Regulations required updating and several	**Revise the electoral legal framework well before elections, through an inclusive, consultative, and expert-driven process, to remove gaps and inconsistencies, enhance transparency and legal predictability, and to better align with international commitments.**	Constitution Electoral Law Regulations	Executive National Assembly Civil Society Election Legal Reform Experts	**Rule of Law.** **Right and opportunity to participate in public affairs and hold office** **ICCPR, art. 25:** "*Every citizen shall have the right and the opportunity... without unreasonable restriction... to be elected*". **ICCPR, HRC 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"* and *"The exercise of these rights by citizens may not be suspended or excluded except on grounds which are established by law".* **ICCPR, HRC 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."* **UNCAC, art. 7(4)**: *"Each State Party shall, […] adopt, maintain and strengthen*

		aspects were in conflict with law and constitution				*systems that promote transparency and prevent conflicts of interest."* **Southern African Development Community (SADC) Treaty, art 4(c),** *binds all member states to uphold "human rights, democracy and the rule of law".* **SADC Principles and Guidelines Governing Democratic Elections,** *"Fair (elections)" means 'electoral processes that are conducted in conformity with established rules and regulations, managed by an impartial, non-partisan professional and competent Electoral Management Body (EMB); in an atmosphere characterised by respect for the rule of law; guaranteed rights of protection for citizens through the electoral law and the constitution and reasonable opportunities for voters to transmit and receive voter information; defined by equitable access to financial and material resources for all political parties and independent candidates in accordance with the national laws; and where there is no violence, intimidation or discrimination based on race, gender, ethnicity, religious or other considerations specified in these SADC Principles and Guidelines Governing Democratic Elections.*

2	18	EU EOM interlocutors noted a lack of genuine timely and detailed consultations on the delimitation process, in which decisions were published by the ECZ but without public access to granular data or reports underpinning the decisions. The ECZ is also constrained by certain constitutional requirements in carrying out its mandate. Following the 2026 delimitation exercises, the EU EOM noted some improvements for the weight of the vote in specific areas, particularly large Urban areas, but overall, the impact on the equality of the vote nationally was limited. For example, several constituencies in the North-Western province showed less than 15,000 registered voters, while in several urban areas, notably Lusaka, there were significantly higher densities of voters per constituency – in some cases as high as 125,000.	Strengthen protections for the equality of the vote by adopting clear, transparent and genuinely consultative mechanisms for delimitation of electoral boundaries underpinned by the timely and transparent publication of all materially relevant data and decision-informing reports.	Legislation Regulation	Executive National Assembly ECZ	**Genuine elections that reflect the free expression of the will of voters** **ICCPR, HRC GC 25, para. 21:** *"... within the framework of each State's electoral system, the vote of one elector should be equal to the vote of another. The drawing of electoral boundaries and the method of allocating votes should not distort the distribution of voters or discriminate against any group and should not exclude or restrict unreasonably the right of citizens to choose their representatives freely."* **ICCPR, HRC GC 25, para. 7:** *"(...) Participation through freely chosen representatives is exercised through voting processes which must be established by laws that are in accordance with paragraph (b)"; paragraph 18: "State reports should describe the legal provisions which establish the conditions for holding elective public office, and any limitations and qualifications which apply to particular offices"*

ELECTORAL ADMINISTRATION						
3	20	ECZ communication and information sharing was noticeable but not detailed. Its communication strategy would have benefitted from being more comprehensive and by promptly publishing information of public interest, explaining the intricacies of the electoral process to all citizens while emphasizing impartiality and transparency. While the ECZ website provided some useful information, it was not always up-to-date, complete or in usable formats. Publication of information about key electoral procedures and precise data would have notably enhanced the certainty and transparency of the process.	**Ensure transparency throughout the electoral process in line with international standards in decision-making and access to key information of public interest for all stakeholders. This would include the publication of all relevant regulatory instruments.**	ECZ regulations and procedures	ECZ	**Transparency and access to information** **ICCPR, article 19, HRC GC 34, para 19:** *"States parties should proactively put in the public domain Government information of public interest."* **UNCAC, art. 7.4:** *"Each State Party shall […] endeavour to adopt, maintain and strengthen systems that promote transparency."* **ACDEG, chapter 2, art. 2, objective 10:** *"Promote the establishment of the necessary conditions to foster citizen participation, transparency, access to information, […] and accountability in the management of public affairs."* **ACHPR, Guidelines on Access to Information and Elections in Africa, para 3:** *"The presumption is that all information held by relevant electoral stakeholders is subject to full disclosure."* **ACHPR, Guidelines on Access to Information and Elections in Africa, para 16:** *"The proactive disclosure of information by an Election Management Body is required at all stages of the electoral process."* **SADC Principles and Guidelines Governing Democratic Elections, art. 4.1.6:** *"Promote necessary conditions to foster transparency, […], access to information by all citizens."*

CAMPAIGN ENVIRONMENT						
4	27	The Electoral Code of Conduct (ECoC) requires parties and candidates to adhere to the ECZ's election timetable when campaigning, to avoid campaign-related conflicts. For the first time, a timetable was strictly enforced for the presidential race, exempting the president and vice-president while imposing rigid constraints on other candidates, who were limited to a five-day campaign period per province, after which they had to leave the province. Unscheduled president/VP visits further caused candidates' events to be blocked or cancelled, denying them equal campaigning opportunities and restricting their freedom of movement and assembly.	**Protect freedom of assembly and equal campaign opportunities for all contestants by discontinuing the role of the ECZ in issuing campaign timetables, ensuring that the pre-eminent role of regulating campaign schedules lies with contestants.**	Electoral Code of Conduct	ECZ	**Equal opportunities, freedom of assembly** **African Charter on Human and People's Rights art. 11:** *"Every individual shall have the right to assemble freely with others…"* and **art. 12.1:** *"Every individual shall have the right to freedom of movement…"* **African Charter on Democracy, Elections and Governance art. 6:** *"State Parties shall ensure that citizens enjoy fundamental freedoms and human rights taking into account their universality, interdependence and indivisibility."* and **art. 10:** *"State Parties shall protect the right to equality before the law and equal protection by the law as a fundamental precondition for a just and democratic society."* **SADC Principles and Guidelines Governing Democratic Elections** **4.1.2** *"Member states […] commit to […] ensure that all citizens enjoy fundamental freedoms and human rights, including freedom of association, assembly and expression"* **ICCPR, art. 12.1:** *"Everyone […] shall […] have the right to liberty of movement […]"* and **art. 21:** *"The right of peaceful assembly shall be recognized."*
5	29	Unclear or absent regulation enabled multiple forms of incumbency advantage and	Implement transparency, accountability, and a level playing field by removing undue		Executive	**Transparency and accountability, prevention of corruption**

		undermined transparency and accountability across the political spectrum. The ECoC's prohibition on using government resources for campaigning does not clearly distinguish official duties from campaign activity, and the EU EOM directly observed misuse of state resources, such as vehicles, staff, and facilities, during campaign events in eight provinces. This blurring of state and party functions extended to public programmes and recruitment being instrumentalised for campaign purposes, exemplified by the president's directives on nurse and teacher recruitment and cash transfer schemes at multiple rallies.	incumbency advantages and prohibiting the misuse of state resources, including by third parties.	Electoral Code of Conduct New Legislation	Parliament ECZ	**AUCPCC, art. 10** *"Each State Party shall adopt legislative and other measures which proscribe the use of funds acquired through illegal and corrupt practices to finance political parties; and incorporate the principle of transparency into funding of political parties."* **UNCAC, art. 7(3):** *"Each State Party shall also consider taking appropriate legislative and administrative measures […] to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties."* and **art. 7(4):** *"Each State Party shall […] endeavour to adopt, maintain and strengthen systems that promote transparency."* **UNCAC, art. 17:** *"[…] 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."* **ICCPR, HRC GC 25, para. 19:** *"…Persons entitled to vote must be free to vote for any candidate for election… without undue influence or coercion of any kind which may distort or inhibit the free expression of the elector's will. Voters should be able to form opinions independently, free of […] or manipulative interference of any kind."*

CAMPAIGN FINANCE						
6	30	Political and campaign finance lacks a coherent legal framework. Financial disclosure rules are scattered across several laws, with no integrated approach to auditing, transparency, or accountability. There are no meaningful disclosure requirements for parties, candidates, or third parties, meaning that funding sources and expenditure across the political spectrum remained opaque to voters. Voter inducement, though explicitly prohibited, was observed by the EU EOM in a third of monitored campaign events, contributing to an unlevel playing field.	Promote transparency and accountability through comprehensive political and campaign finance rules including standardised and timely reporting and disclosure requirements underpinned by robust sanctions for non-compliance.	New Legislation	Parliament	**Transparency and accountability, prevention of corruption** **AUCPCC, art. 10** *"Each State Party shall adopt legislative and other measures which proscribe the use of funds acquired through illegal and corrupt practices to finance political parties; and incorporate the principle of transparency into funding of political parties."* **UNCAC, art. 7(3):** *"Each State Party shall also consider taking appropriate legislative and administrative measures […] to enhance transparency in the funding of candidatures for elected public office and, where applicable, the funding of political parties."* and **art. 7(4):** *"Each State Party shall […] endeavour to adopt, maintain and strengthen systems that promote transparency."* **ICCPR, HRC GC 25, para. 19:** *"…Persons entitled to vote must be free to vote for any candidate … without undue influence or coercion... Voters should be able to form opinions independently, free of … inducement... Reasonable limitations on campaign expenditure may be justified where this is necessary to ensure that the free choice of voters is not undermined or the democratic process distorted by the disproportionate expenditure on* behalf of any candidate or party."

MEDIA						
7	32	Contrary to provisions in the EPA's Code of Conduct, the national broadcaster, ZNBC, did not allocate public airtime equally to all political parties and candidates. …/… Election coverage in its news bulletins, however, was inordinately biased in favour of UPND and the president, limiting the access of voters to information on the different political choices.	**Disengage state-owned media from direct government control and convert ZNBC into genuine public service broadcaster with editorial independence and balanced programming.**	Enforcement of the new ZNBC Act (No 26 of 2025).	Ministry of Information and Media	**Freedom of expression** **ICCPR, HRC GC, 34, para. 16:** "*States parties should ensure that public broadcasting services operate in an independent manner. In this regard, States parties should guarantee their independence and editorial freedom. They should provide funding in a manner that does not undermine their independence*." **AU Declaration of Principles of Freedom of Expression and Access to Information in Africa, Principle 11.2** "*State and government-controlled broadcasters shall be transformed into public service broadcasters, accountable to the public through the legislature or other mechanism for public accountability*."
SOCIAL MEDIA AND DIGITAL RIGHTS						
8	36	Provisions of the 2025 cyber laws unduly curtailed online expression and political debate. The Cyber Crimes Act defines cybercrime broadly and criminalises a range of activities in vague terms that grants wide latitude to the law enforcement officers. Media reported several convictions for online posting under the cyber laws before the campaign and arrests both before and during it.	**Align the Cyber Security and Cyber Crimes Acts with international commitments on freedom of expression and privacy of communication.**	Cyber Crimes Act Cyber Security Act	National Assembly	**Freedom of opinion and expression** **ACHPR Declaration of principles on Freedom of Expression and Access to Information in Africa, Principle 22:** "*States shall repeal laws that criminalise sedition, insult and publication of false news."* **ICCPR, HRC GC 34, para. 25** *"a norm, to be characterized as a "law", must be formulated with sufficient precision to enable an individual to regulate his or her conduct accordingly*".

						Right to privacy **ICCPR, art. 17, HRC GC 16, para. 3. ACHPR Declaration, 2019, principle 41**, also requires States to "*only engage in targeted communication surveillance that is authorised by law, that conforms with international human rights law and standards, and that is premised on specific and reasonable suspicion.*"
9	37	Placing investigative powers over political speech in a body answerable to the president, with no institutional oversight, does not ensure adequate safeguards against its use to suppress criticism of that office. ZCSA's support in investigations displaced the Agency's mandate towards speech offences rather than cyber security incidents and threats, as foreseen by the Cyber Security Act.	Restrict the mandate of the Zambia Cyber Security Agency to cyber security and make its exercise subject to independent oversight. Responsibility for identifying speech offences and countering disinformation would rest outside the security sector.	Cyber Security Act	National Assembly	**Freedom of opinion and expression** **AU Convention on cyber security and personal data protection, art. 27(1)b. ii.** "*State Parties shall take the necessary measures to: Establish clear accountability in matters of cyber security at all levels of Government by defining the roles and responsibilities in precise terms.*" and **art. 25(3),** confines cybercrime legislation to "*offences affecting the confidentiality, integrity, availability and survival of ICT systems, the data they process and the underlying network infrastructure*."
PARTICIPATION OF WOMEN & OTHER MARGINALISED GROUPS						
10	41	While the state has the sovereign right to choose its electoral systems, the measure it adopts to include underrepresented groups must not unduly discriminate against such groups and must protect the fundamental principles of equality. In adopting	Implement affirmative action measures for genuine, effective and equal inclusion of women, youth and persons with disability in line with international and regional commitments to avoid discrimination in candidacy and mandate.	Constitution EPA ECZ Regulations	Executive National Assembly	**Participation in public affairs / Equality between men and women** **ICCPR, art. 3**: *"The equal right of men and women...to enjoyment of all...political rights";* **CEDAW, art 7(b)** *"To participate in the formulation of government policy and the*

		its PR system for women, youth and persons with disabilities, only those candidates who take such seats are exposed to an unrestricted power of recall unlike other candidates, rendering them especially vulnerable to pressure. The recall also appears to conflict with constitutional rules for vacating NA seats.			Gender Division CSO	*implementation thereof and to hold public office and perform all public functions at all levels of government […].* **ICCPR, art. 25***: "Every citizen shall have the right and the opportunity...without unreasonable restrictions...(a) To take part in the conduct of public affairs, directly or through freely chosen representatives...";* **ICCPR, art. 26:** *"All persons are equal before the law and are entitled without any discrimination to the equal protection of the law";* **ICCPR HRC GC 25, para. 18***: "The legal grounds and procedures for the removal of elected office holders should be described";* **African Charter on Human and Peoples' Rights, art. 13(1):** *"Every citizen shall have the right to participate freely in the government of his country, either directly or through freely chosen representatives in accordance with the provisions of the law."*
ELECTION OBSERVATION						
11	43	ECZ administrative procedures do not foresee accreditation for long-term observation, despite such requirements in its guidelines. The ECZ issued initial accreditation guidelines on 13 May. Yet, the opening of accreditation on 21 July was too late to adequately	**Ensure the public accountability of electoral authorities by guaranteeing the right of unhindered access of observers to all aspects of the electoral process, underpinned by a timely, transparent and less burdensome accreditation process.**	ECZ regulations and procedures	ECZ	**Transparency and accountability** **ICCPR, GC 25, para.20: "***There should be independent scrutiny of the voting and counting process… so that electors have confidence in the security of the ballot and the counting of the votes."* **ACDEG, art. 22: "***State Parties shall create a conducive environment for*

		accommodate long-term methodologies and fundamentally impacted citizen observers and the EU EOM.				*independent and impartial national monitoring or observation mechanisms."* **SADC Principles and Guidelines Governing Democratic Elections, art. 5.1.7: "***Ensure timely accreditation of observers in accordance with national laws as appropriate."* **EISA and Electoral Commission Forum of SADC Countries: Principles for Election Management, Monitoring, and Observation in the SADC Region, p. 31:** *"The EMB must ensure that the accreditation process for observers and monitors is speedy, efficient and non-discriminatory."*
ELECTORAL DISPUTES						
12	46	Certain petition types, including on nominations, could not be appealed according to High Court Rules. The timelines for various petitions challenging results varies widely, notably there is only a 7-day window to prepare extensive documentation for a Presidential petition, only 14 days to fully hear, and decide the matter. Petitions generally face an intermediate (high) standard of proof that militates against petitioners. The courts were closed seemingly	**Guarantee effective access to due process in electoral matters. Measures would include realistic timelines for petitions in all court jurisdictions, including access and filing by alternate means, consistency in rights of appeal before and after elections, and adopting appropriate evidentiary standards.**	EPA	Judiciary Parliament (in consultation with legal practitioners (e.g., Law Association)	**Right to an effective remedy** **ICCPR, art. 2(3)(a).** *"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, HRC GC 25, para. 9:** *"Elections must be conducted (…) within a framework of laws guaranteeing the effective exercise of voting rights."*

		arbitrarily during a crucial stage of the petitions timeline, depriving access to electoral justice without an alternate mechanism clearly provided or communicated.				
VOTING, COUNTING, TABULATION						
13	48	After the lifting of the suspension, late on 14 August, EU EOM observers assessed that the overall conduct of tabulation deteriorated significantly, indicating that tabulation procedures would benefit from a review to strengthen transparency and integrity safeguards, in line with international standards.	**Protect the will of the voter and the integrity of elections by ensuring consistent arrangements for maintaining transparency during the results tabulation, such as projection of data entry and prompt online posting of complete, PS-disaggregated preliminary and final results, in an easily usable format.**	ECZ regulations and procedures	ECZ	**Transparency and access to information ICCPR, article 19, HRC GC 34, para 19:** *"States parties should proactively put in the public domain Government information of public interest."* **UNCAC, art. 7.4:** *"Each State Party shall […] endeavour to adopt, maintain and strengthen systems that promote transparency."* **ACDEG, chapter 2, art. 2, objective 10:** *"Promote the establishment of the necessary conditions to foster citizen participation, transparency, access to information, […] and accountability in the management of public affairs."* **ACHPR, Guidelines on Access to Information and Elections in Africa, para 16:** *"The proactive disclosure of information by an Election Management Body is required at all stages of the electoral process."* **ACHPR, Guidelines on Access to Information and Elections in Africa, para 18:** *"On Election Day and results announcement day(s), the Election Management Body shall proactively disclose […] Election results by polling*

						station, which shall be conspicuously posted at each voting station and in publicly accessible electronic and online formats." **SADC Principles and Guidelines Governing Democratic Elections, art. 4.1.6:** *"Promote necessary conditions to foster transparency, […], access to information by all citizens."*

ANNEX 1 – ELECTION RESULTS

At the time of the final report being issued, full election results had still not been published by the ECZ.

ANNEX 2 – MEDIA MONITORING FINDINGS

Methodological parameters

From 15 July to 12 August 2026, the EU EOM monitored a sample of 10 broadcast and print media to assess whether political parties and candidates had access to the media and whether the information provided to the citizens was presented in a neutral and balanced way. Media monitoring included quantitative and qualitative analysis of the coverage of the campaign and other socio-political issues, assessing the amount of airtime and space allocated to candidates, political parties and other politically relevant subjects, as well as evaluating the tone of the coverage and the gender balance across the media landscape.

The media monitoring aimed at providing reliable data on the distribution of airtime and space to relevant political actors. The monitoring sample included the state-owned broadcaster, Zambia National Broadcasting Corporations (ZNBC), two private TV channels, three private radio stations and three newspapers (one state-owned and two private). All were selected based on their reach and audience.

The media outlets monitored by the EU EOM were as follows:

Three TV channels were monitored daily from 6:00h to 13:00h, and from 18:00h to 22:00h:

• ZNBC TV1 (state-owned), Diamond TV and Prime TV (private).

Four radio stations were monitored daily from 6:00h to 13:00h, and from 18:00h to 22:00h:

• ZNBC Radio 1 (state-owned), Hot FM, Phoenix FM and Power FM (private).

Three daily newspapers were monitored:

• Zambia Daily Mail (state-owned), Daily Nation and News Diggers! (private).

How to read the charts

The donut charts show the share of airtime and space (in percentage) allocated to the contesting political parties and the presidential candidates, by media outlet, as well as the share of direct speech of the candidates. The bar/column charts show the tone of the coverage (negative, neutral, positive) by media outlet. The time is monitored in seconds for the electronic media and converted in hh:mm:ss (direct speech), and the space is measured in cm^2 for print media.

STATE-OWNED MEDIA

Contrary to provisions in the EPA's Code of Conduct, the national broadcaster, ZNBC, did not allocate public airtime equally to all political parties and candidates. Election coverage in its news bulletins was inordinately biased in favour of UPND and the president. Similarly, the state-owned newspaper, Zambia Daily Mail, also favoured the ruling party.

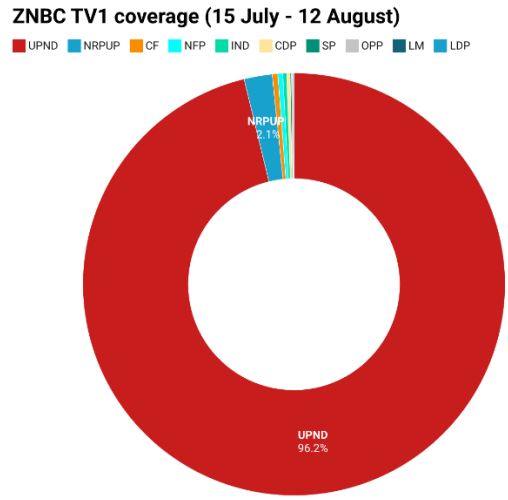


Chart 1

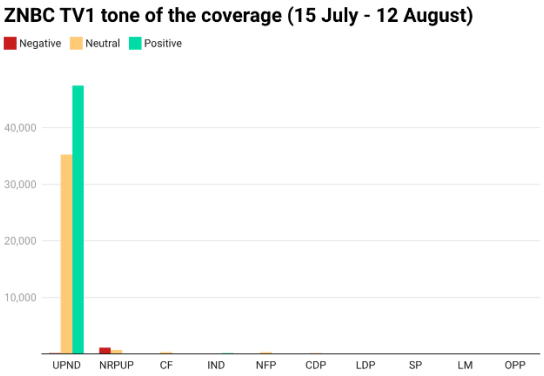


Chart 2

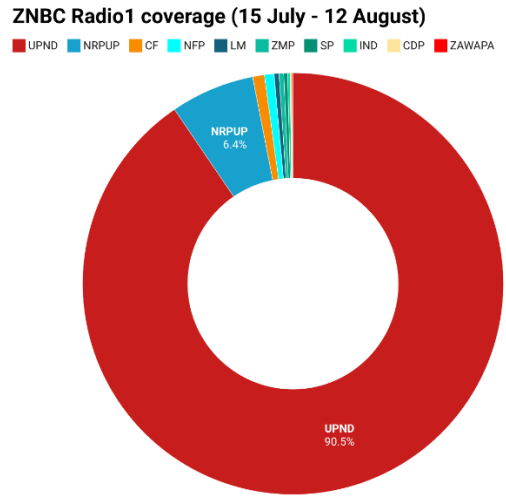


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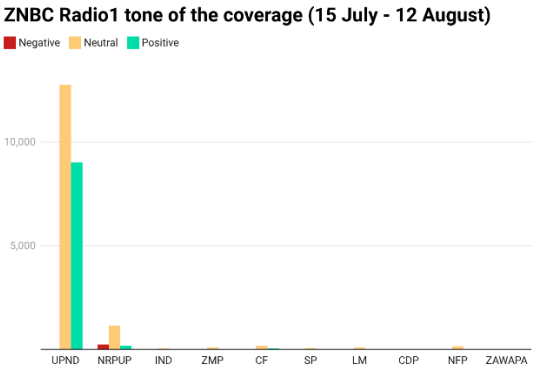


Chart 4

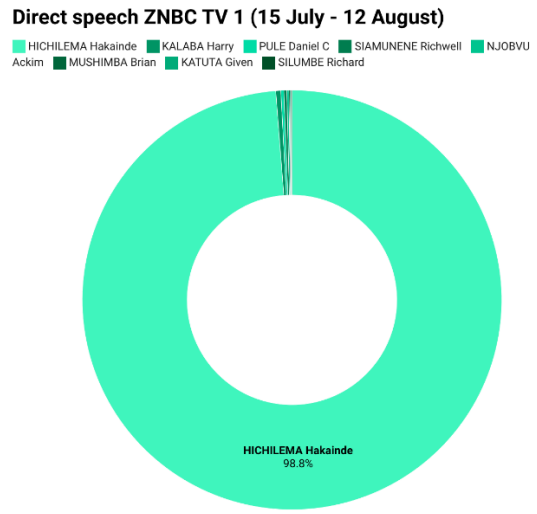


Chart 5

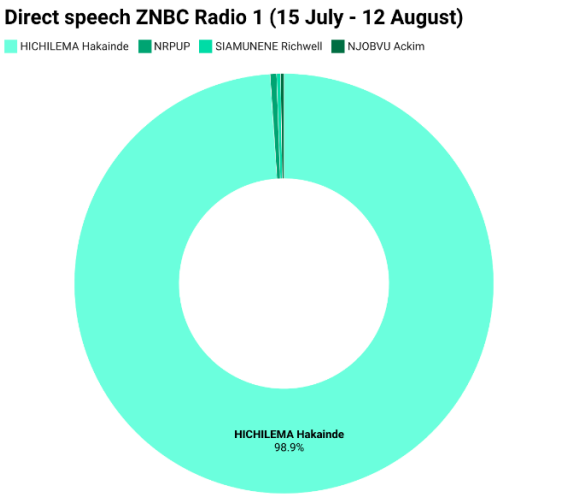


Chart 6

ZNBC TV1 – Direct Speech by Actor

Rank	Actor	Direct Speech (seconds)	Direct Speech (HH:MM:SS)
1	HICHILEMA Hakainde S	44216	12:16:56
2	KALABA Harry	173	00:02:53
3	PULE Daniel C	103	00:01:43
4	SIAMUNENE Richwell	101	00:01:41
5	NJOBVU Ackim	72	00:01:12
6	MUSHIMBA Brian	37	00:00:37
7	KATUTA Given	34	00:00:34
8	SILUMBE Richard	34	00:00:34

ZNBC Radio 1 – Direct Speech by Actor

Rank	Actor	Direct Speech (seconds)	Direct Speech (HH:MM:SS)
1	HICHILEMA Hakainde S	12140	03:22:20
2	SIAMUNENE Richwell	37	00:00:37
3	NJOBVU Ackim	32	00:00:32

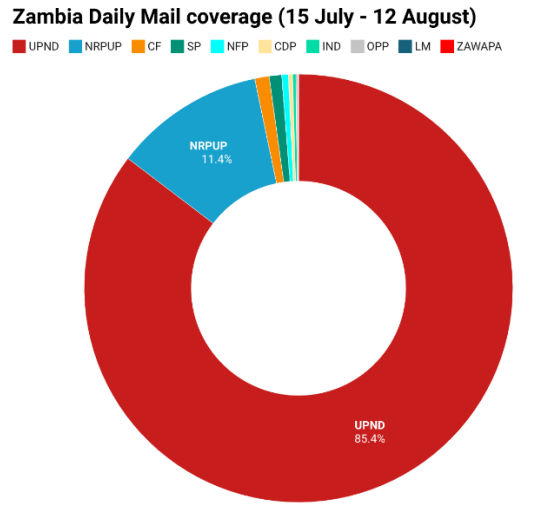


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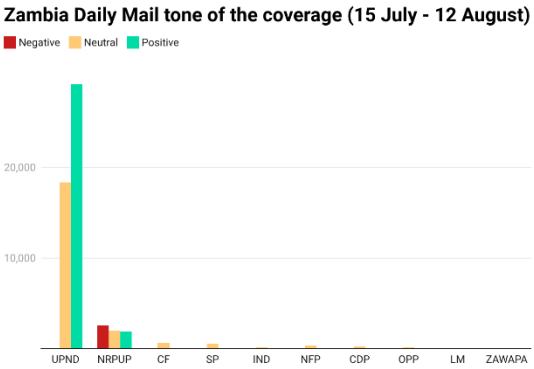


Chart 8

PRIVATE MEDIA

Four out of the seven private media monitored by the EU EOM provided equitable coverage of the campaign in their news. Diamond TV, Hot FM, Daily Nation and News Diggers! gave access to the main contenders in a balanced or reasonably balanced way, whereas Phoenix FM, Power FM and Prime TV showed different degrees of imbalance in favour of UPND.

TV

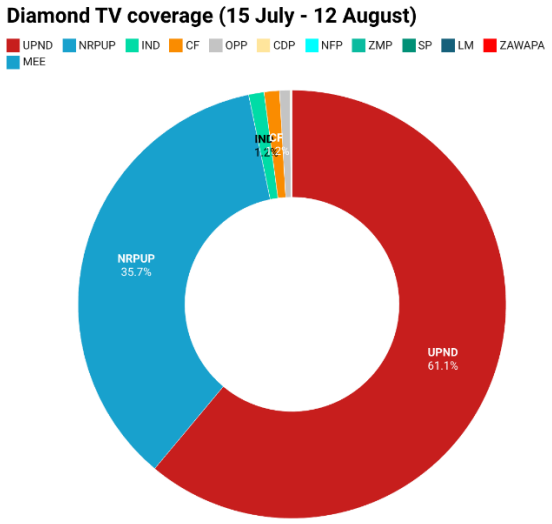


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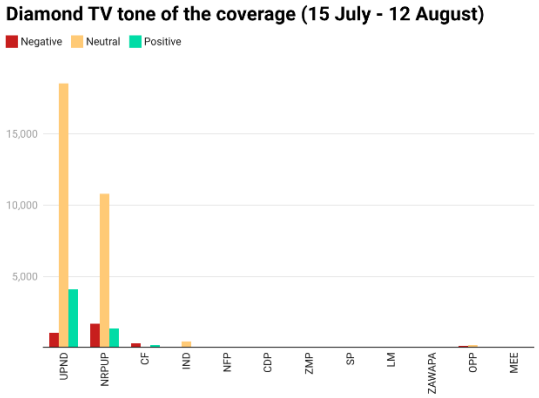


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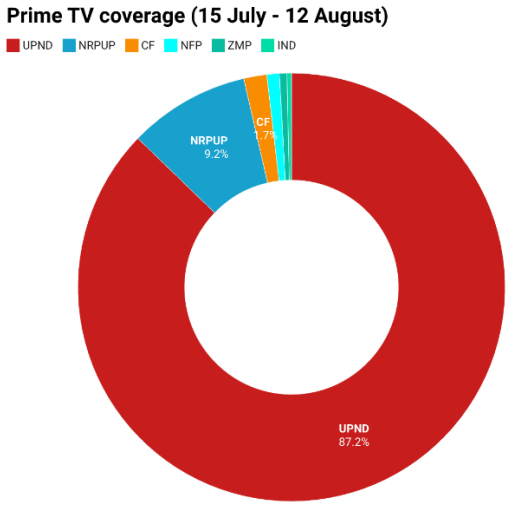


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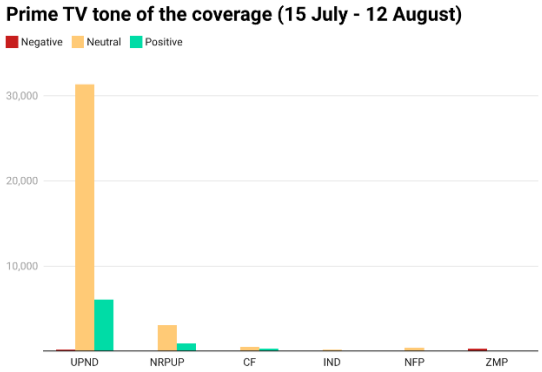


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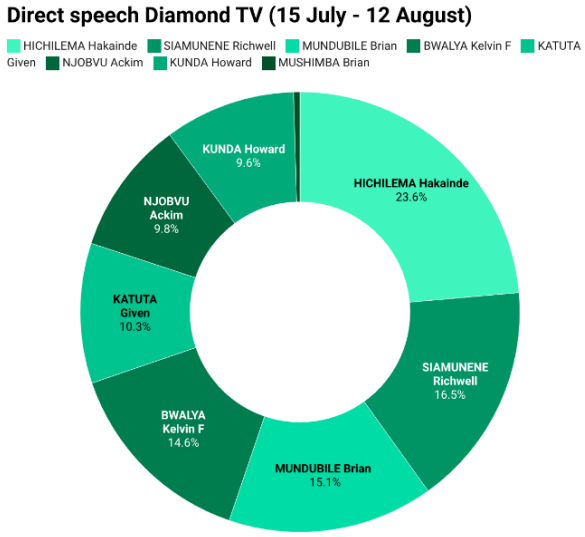


Chart 13

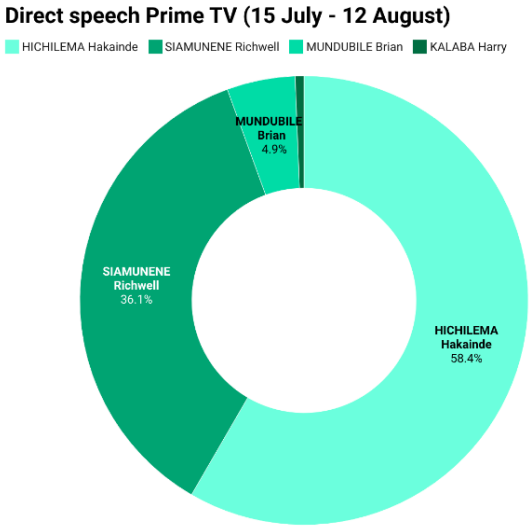


Chart 14

Diamond TV – Direct Speech by Actor

Rank	Actor	Direct Speech (seconds)	Direct Speech (HH:MM:SS)
1	HICHILEMA Hakainde S	3697	01:01:37
2	SIAMUNENE Richwell	2587	00:43:07
3	MUNDUBILE Brian M	2369	00:39:29
4	BWALYA Kelvin F	2280	00:38:00
5	KATUTA Given	1612	00:26:52
6	NJOBVU Ackim	1542	00:25:42
7	KUNDA Howard	1509	00:25:09
12	MUSHIMBA Brian	74	00:01:14

Prime TV – Direct Speech by Actor

Rank	Actor	Direct Speech (seconds)	Direct Speech (HH:MM:SS)
1	HICHILEMA Hakainde S	15051	04:10:51
2	SIAMUNENE Richwell	9305	02:35:05
3	MUNDUBILE Brian M	1269	00:21:09
6	KALABA Harry	163	00:02:43

RADIO

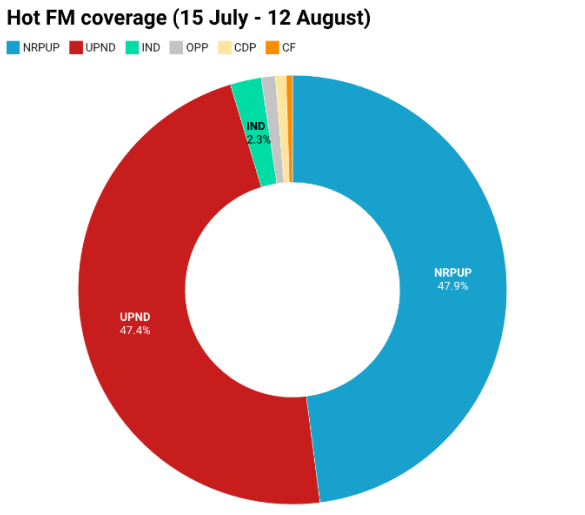


Chart 15

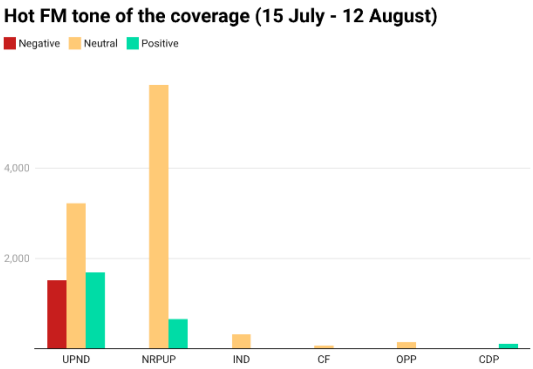


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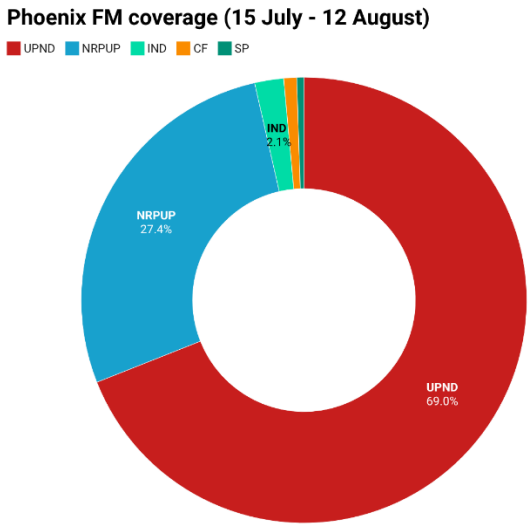


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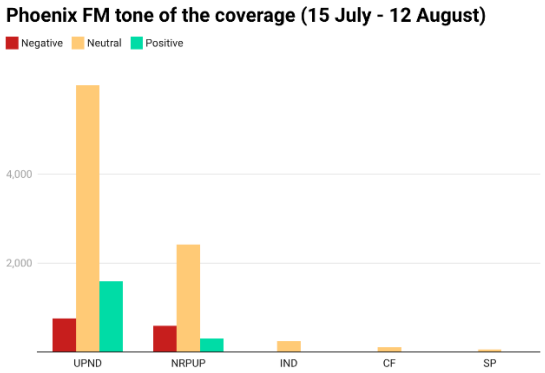


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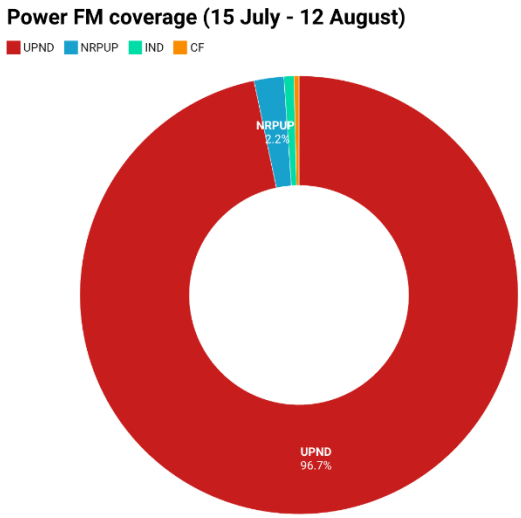


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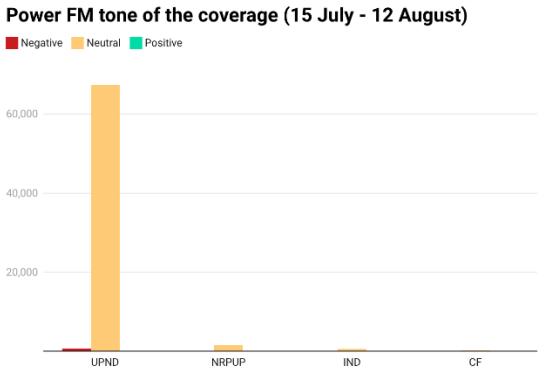


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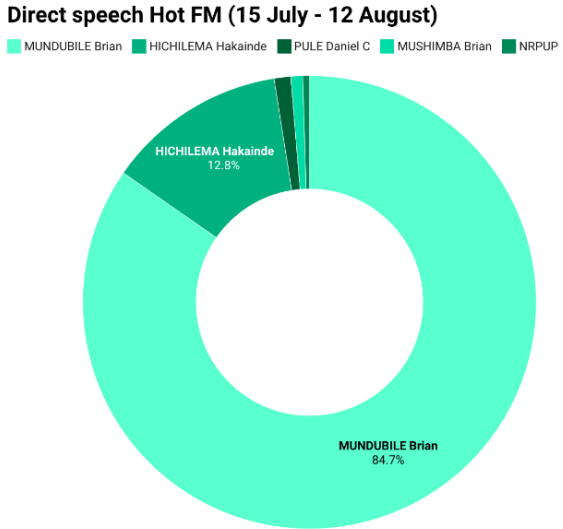


Chart 21

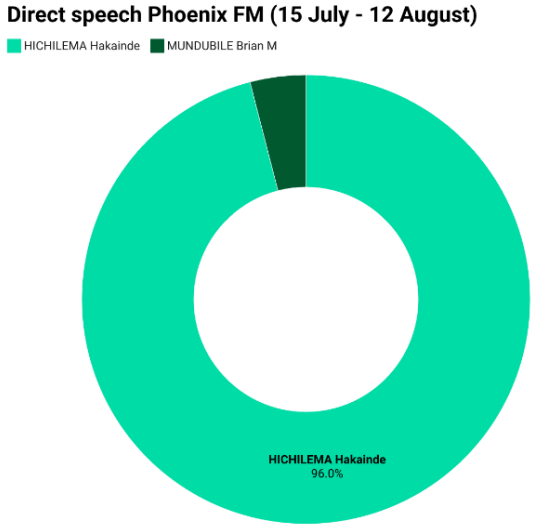


Chart 22

Hot Radio – Direct Speech by Actor

Rank	Actor	Direct Speech (seconds)	Direct Speech (HH:MM:SS)
1	MUNDUBILE Brian M	7654	02:07:34
2	HICHILEMA Hakainde S	1159	00:19:19
4	PULE Daniel C	107	00:01:47
5	MUSHIMBA Brian	76	00:01:16
6	NRPUP	43	00:00:43

Phoenix Radio – Direct Speech by Actor

Rank	Actor	Direct Speech (seconds)	Direct Speech (HH:MM:SS)
1	HICHILEMA Hakainde S	7572	02:06:12
3	MUNDUBILE Brian M	317	00:05:17

Direct speech Power FM (15 July - 12 August)

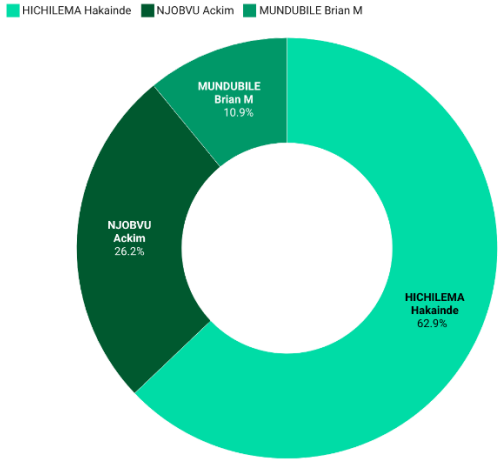


Chart 23

Power FM – Direct Speech by Actor

Rank	Actor	Direct Speech (seconds)	Direct Speech (HH:MM:SS)
1	HICHILEMA Hakainde S	161	00:02:41
4	NJOBVU Ackim	67	00:01:07
5	MUNDUBILE Brian M	28	00:00:28

NEWSPAPERS

Daily Nation coverage (15 July - 12 August)

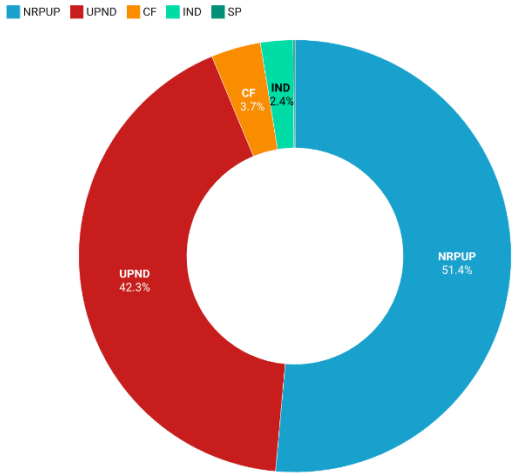


Chart 24

Daily Nation tone of the coverage (15 July - 12 August)

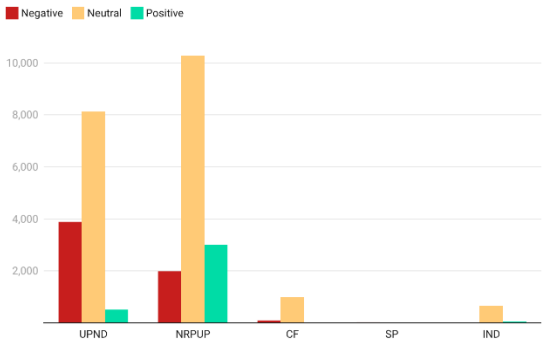


Chart 25

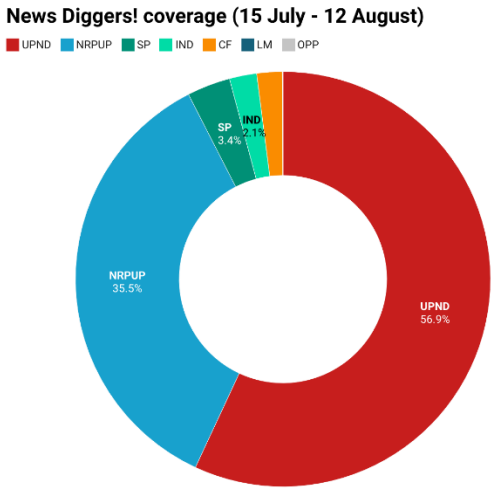


Chart 26

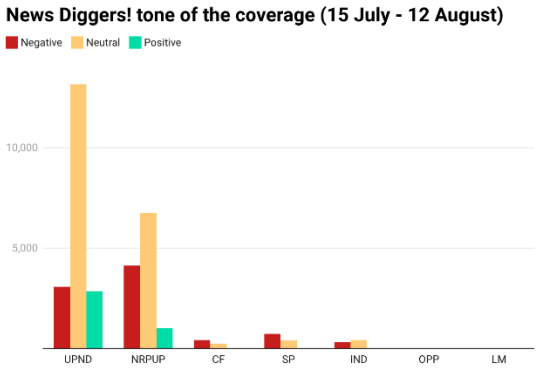


Chart 27

ADVERTISING

UPND was the party that demonstrated the greatest financial capacity to purchase airtime and space for political advertising. The ruling party was the only contestant to purchase airtime on ZNBC TV1, whereas on ZNBC Radio 1, UPND accounted for 97.5 per cent of all political advertising, compared with 2.5 per cent for NRPUP. Similarly, UPND was the only party to purchase advertising space in Zambia Daily Mail, Daily Nation, and News Diggers!. By contrast, NRPUP dominated political advertising on Hot FM, accounting for 99.4 per cent of all political adverts, while UPND accounted for the remaining 0.6 per cent.

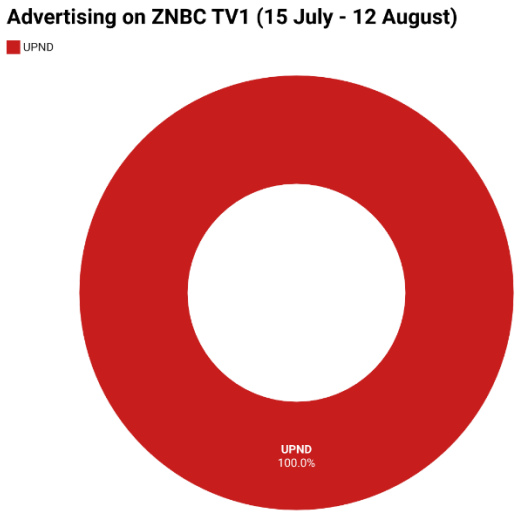


Chart 28

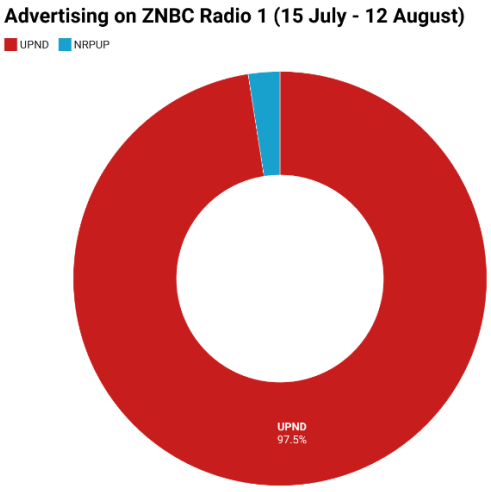


Chart 29

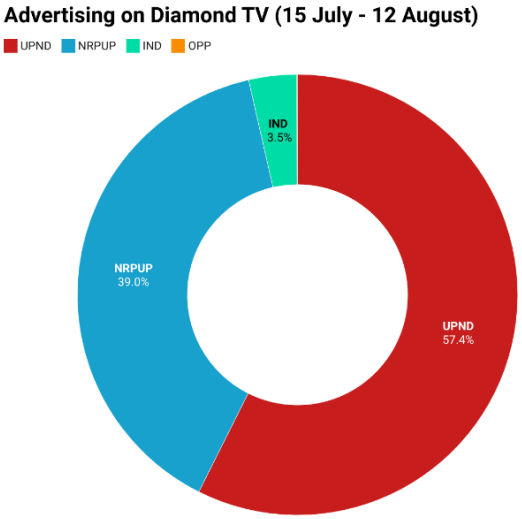


Chart 30

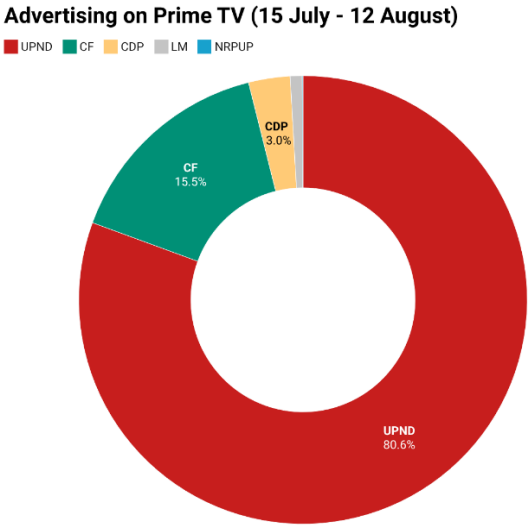


Chart 31

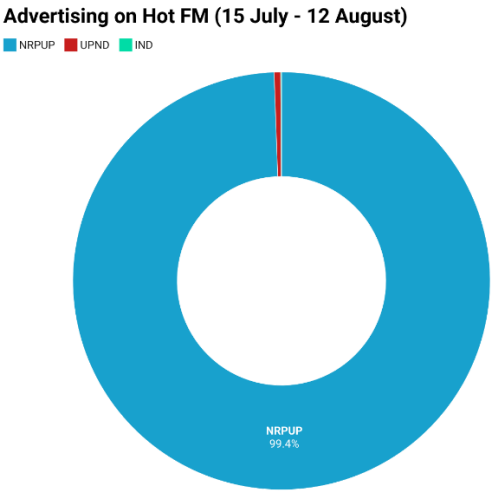


Chart 32

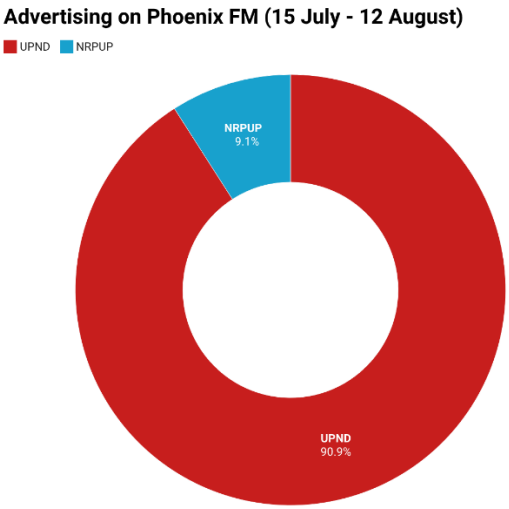


Chart 33

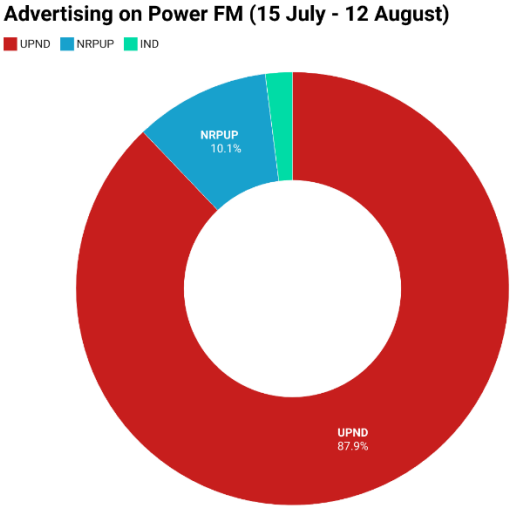


Chart 34

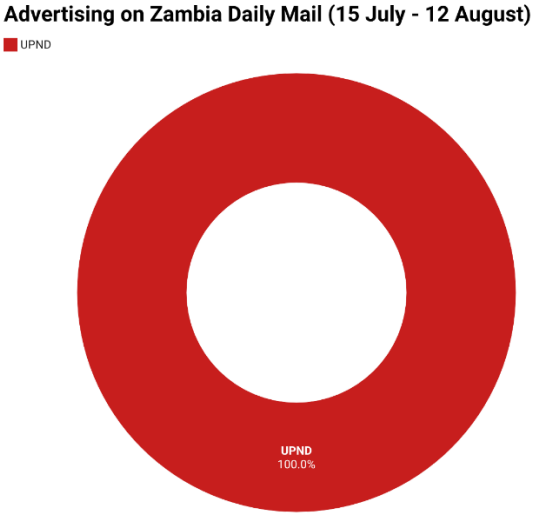


Chart 35

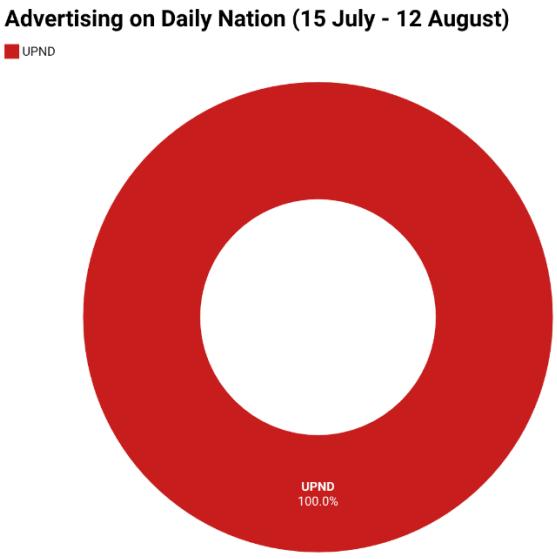


Chart 36

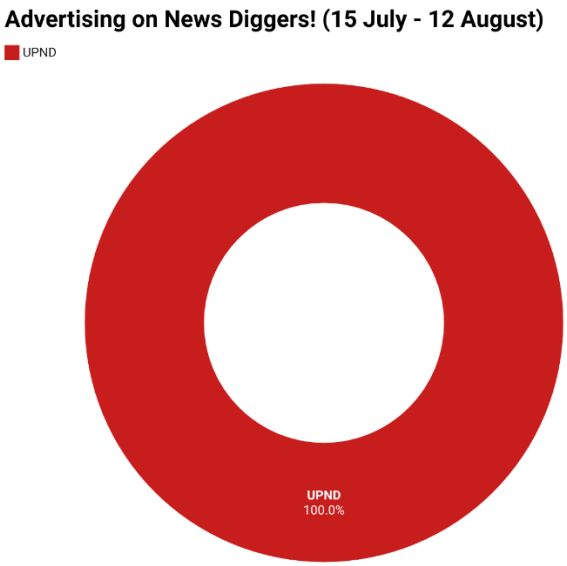


Chart 37

GENDER

Woman candidates received very little coverage in the media: only 3.5 per cent of total coverage in news and election-related programmes on the three TV stations monitored, and 5.2 per cent of total coverage on the four radio stations monitored.

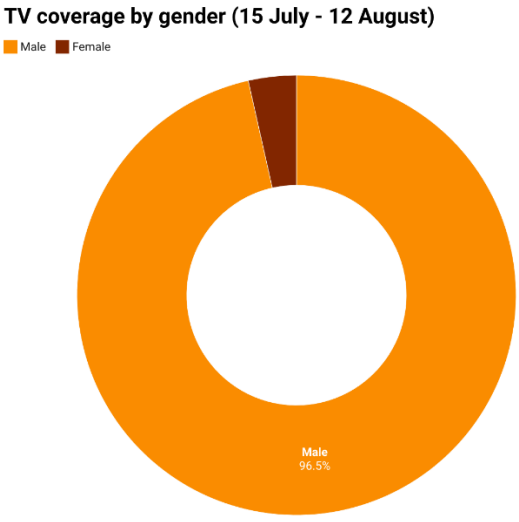


Chart 38

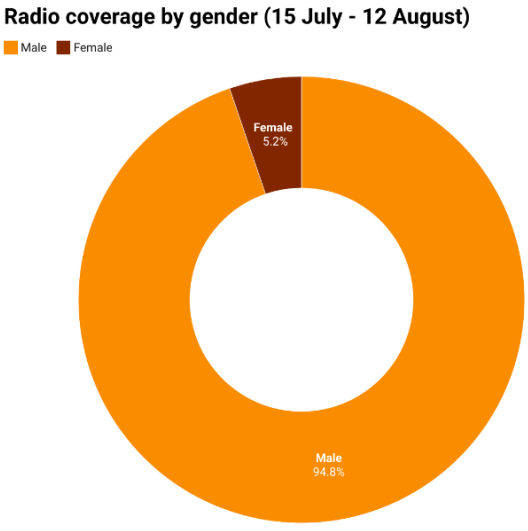


Chart 39

ANNEX 3 – SOCIAL MEDIA MONITORING FINDINGS

1. Methodology

The EU EOM Zambia 2026 applied different and complementary approaches and techniques to analyse online platforms and to gather information on online election-related content[146]. These methods include quantitative and qualitative data analysis, legal analysis, meetings with relevant stakeholders, cooperation with different EU EOM members.

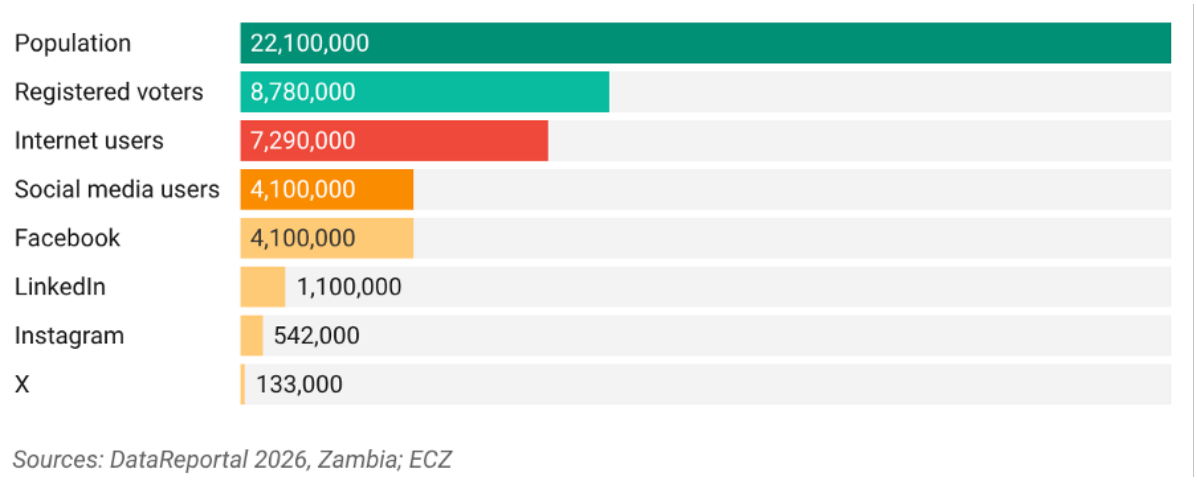
The EU EOM selected and analysed an indicative set of accounts, groups, pages and topics with a nationwide and local relevance, to map communication strategies, capture key campaign trends on the monitored platforms, and assess information integrity. Messages in English, Nyanja, Bemba, and Tonga were analysed.

The EU EOM used a variety of tools to deliver a quantitative and qualitative data analysis of online campaigns and election-related content. This included Juno, by Gerulata, to scrape data from a selected list of channels, complemented by Who Targets Me on paid political advertising. The EOM also drew on Metabase for querying and exploratory review of the dataset, and on Python, specifically the pandas library for data manipulation and Matplotlib for chart generation, where the analysis required transformations or chart types beyond the scope of Datawrapper.

2. Social media environment

One in three Zambians is an internet user and one in five uses social media. Facebook was the dominant platform. TikTok is gaining momentum but only few candidates used it regularly. The use of WhatsApp was widespread, although not monitored by the EU EOM. No data was publicly available for Tiktok or WhatsApp.

Chart 1. Social media users by platforms



Sources: DataReportal 2026, Zambia; ECZ

3. Scope of the EU EOM Zambia 2026 social media monitoring

146 Messaging networks, such as WhatsApp, Telegram, Viber or Messenger are not included in the scope of the EU EOMs methodology due to data protection and privacy matters. However, EOMs may include relevant information coming from national and international credible organisations that specialise in monitoring online platforms and networks.

The EU EOM mapped and monitored 794 channels across Facebook, TikTok, X and Youtube. Facebook being the over-dominant platform in Zambia, the EU EOM focused its content analysis on this platform. Some 24,687 posts published on Facebook from 21 May, to 13 August, were quantitatively and qualitatively analysed, as well as 3,851 comments.

Table 1. Social media accounts mapped out, by category and platform

Category	Facebook	X	TikTok	YouTube	Total
Electoral Commission (ECZ)	1	1	1	1	4
Presidential candidates	12	11	10	7	40
Political parties and non-contesting politicians	39	9	22	6	76
Media houses	65	27	26	29	147
Pseudo-media and partisan blogs	83	7	15	9	114
Social media influencers	38	20	30	23	111
State actors	33	17	3	12	65
Civil society organisations	32	26	16	16	90
Parliamentary candidates	23	17	19	20	79
Local government candidates	13	0	19	10	42
Religious bodies	5	3	0	3	11
Diaspora	4	4	3	4	15
Total	**348**	**142**	**164**	**140**	**794**

Bars show each category's share of the largest category total (media houses, 147).

The social media monitoring was designed to assess how narratives circulated online during the campaign, looking at both messages and messengers: the candidates' online strategies and campaign topics, the role of pages supporting them, and the prevalence of harmful content. The sample of accounts was selected to capture six dimensions:

- the campaigns of four presidential candidates (Hakainde Hichilema, Brian Mundubile, Fred M'membe and Harry Kalaba), chosen for their weight in the political debate and their reach on Facebook, measured by followers and interactions;
- the campaigns of a selection of parliamentary and local government candidates, chosen on the basis of the competitiveness of their constituency, their weight in the political debate and their reach on Facebook;
- the role of non-contestant pages in the campaign and the wider political discourse, selected according to their reach on Facebook, the nature of their content, their influence on the debate and their political affiliation;
- paid advertising;
- the election-related posts of traditional and online media pages;
- gender-based discrimination, assessed through the comments received by a selection of prominent women and men, referred to as the "targets".

Each type of monitoring was designed to answer a general research question derived from the EU EOM's mandate. Depending on the volume of content, posts were either analysed in full or sampled for qualitative analysis; sampling combined the most engaging posts with a random

selection, so as to capture both the diversity of views expressed online and the content that reached the widest audience (Table 2).

Table 2. Campaign-period monitoring: posts analysed

Group of pages	Research question	Period	Sampling	Posts
ECZ	How did the ECZ communicate on Facebook during the election period?	21 May - 13 August	All posts	196
Pro-government and pro-opposition pages	What type of content did the UPND- and NRPUP-supportive pages share? How did they share it?	21 May - 13 August	All election-related posts	14,292
Media	To what extent did the media cover the two main presidential candidates and their parties?	21 May - 13 August	All election-related posts	7,979
Presidential candidates (4)	How did the main presidential candidates campaign online?	1 July - 13 August	All posts	838
Parliamentary candidates	To what extent, and on which topics, did a selection of parliamentary candidates campaign online?	1 July - 13 August	Most engaging posts + random sampling	724
Local government candidates	To what extent, and on which topics, did a selection of local government candidates campaign online?	1 July - 13 August	Most engaging posts + random sampling	658

The monitoring of comments focused on the most engaging posts shared by the selected targets, as these attract the largest volume of reactions. Comments were then sampled on the basis of their content, and only those directly addressing the author of the post, whether supportive or critical, were retained for analysis. This excluded exchanges between commenters and off-topic remarks, so as to isolate the criticism and attacks aimed at the targets themselves.

Table 3. Comment monitoring: gendered criticism and attacks

Group of pages	Research question	Period	Sampling	Comments
11 women	What forms of criticism and attack are women subjected to online?	15 July - 13 August	Comments directly addressing the target	2,198
10 men	What forms of criticism and attack are men subjected to online?	15 July - 13 August	Comments directly addressing the target	1,653

In addition, the EU EOM analysed some 68 speeches delivered by the president during his campaign rallies from 1 July till 12 August 2026.

4. Election contestants campaign online

4.1. Presidential candidates

Although most presidential candidates maintain an online presence, only four had a significant footprint online, and the president was the only one with significant followership on the platforms monitored.

- **Activity and engagement of four presidential candidates**

The two tables (4 and 5) compare the Facebook presence of the four presidential candidates during the campaign. Mr Hichilema commanded by far the largest audience, with 2.4 million followers at the end of the campaign, and was also the most active poster. Mr Mundubile, however, with less than a third of that following, was the only candidate whose audience grew significantly over the period (+56 per cent) and generated a comparable volume of interactions, more shares and nearly three times as many views, giving him an engagement rate per post four times higher than the incumbent's. Mr M'membe and Kalaba trailed on every indicator.

Table 4. Facebook activity of the four presidential candidates, 1 July - 13 August

Candidate	Followers 7 July	Followers 13 Aug.	Follower growth	Total posts	Posts per day
Hakainde Hichilema	2,300,000	2,400,000	+4%	301	7.2
Brian Mundubile	480,000	751,000	+56%	268	6.2
Fred M'membe	444,000	453,000	+2%	218	5.1
Harry Kalaba	920,000	932,000	+1%	77	2.0

Bars are scaled to the highest value in each column.

Table 5. Engagement with the four presidential candidates' Facebook pages, 1 July - 13 August

Candidate	Interactions	Comments	Shares	Engagement rate per post	Total views
Hakainde Hichilema	5,362,052	642,188	62,186	0.77%	11,910,000
Brian Mundubile	4,123,128	557,790	81,939	3.20%	31,476,000
Fred M'membe	155,349	23,436	950	0.16%	534,800
Harry Kalaba	221,165	29,021	2,408	0.31%	577,500

Engagement rate per post: interactions per post divided by followers. Bars are scaled to the highest value in each column.

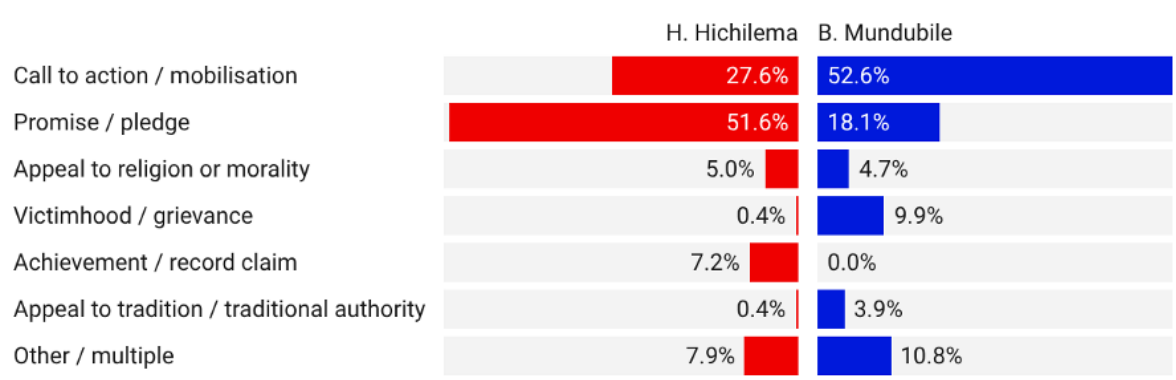
Mr Mundubile's performance reflected the mobilising character of his campaign and content and the growth of his follower base. It was also likely to owe some of it to algorithmic amplification: his posts provoked more reactions, both supportive and hostile, and were therefore distributed more widely by the platform that rewards such content. In addition, the cyber laws may have led users to refrain from commenting on the President's page, resulting in fewer reactions and, in turn, less algorithmic amplification.

- **Content of the campaign: what the two main candidates said and how**

The four charts below (2-3-4-5) compare the Facebook campaign posts of the two main presidential candidates from 1 July to 13 August on four dimensions: the rhetorics employed, the policy topics addressed, the overall sentiment of the posts and the use of discreditation. All

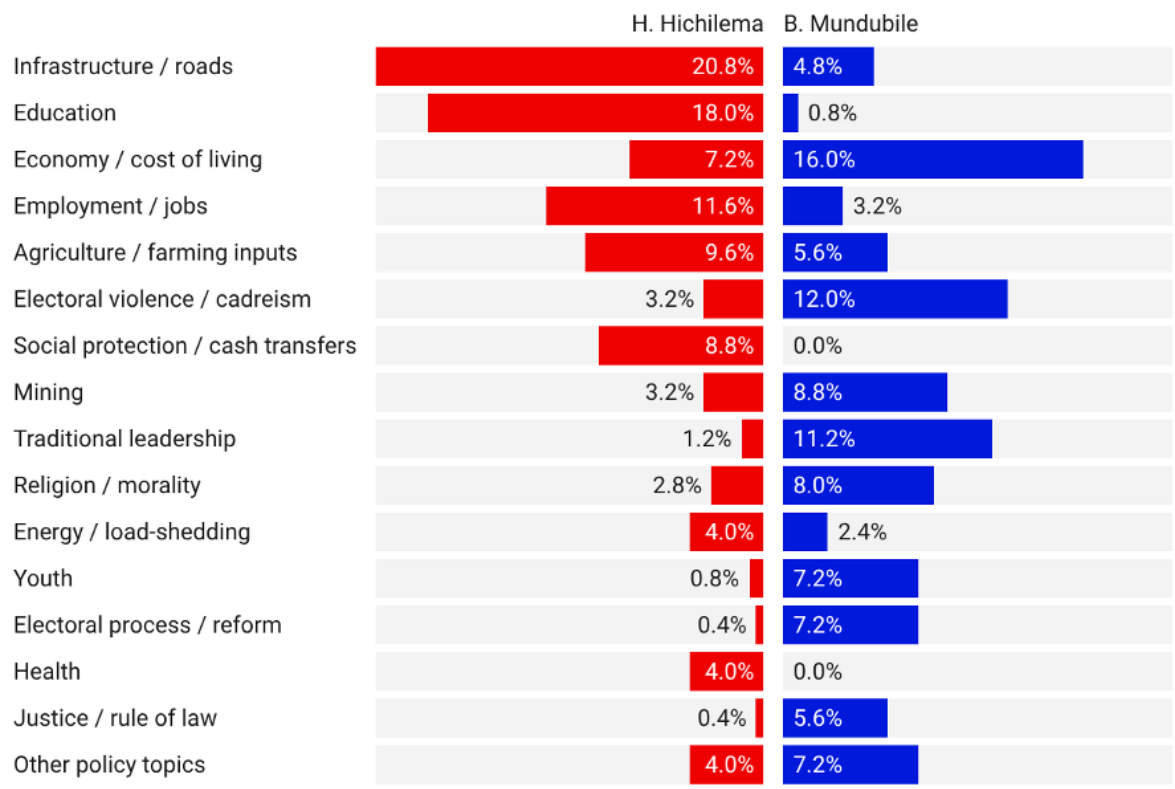
figures are expressed as a percentage of each candidate's campaign posts (Mr Hichilema: 286 campaign posts; Mr Mundubile: 251 campaign posts).

Chart 2. Rhetoric used in campaign posts



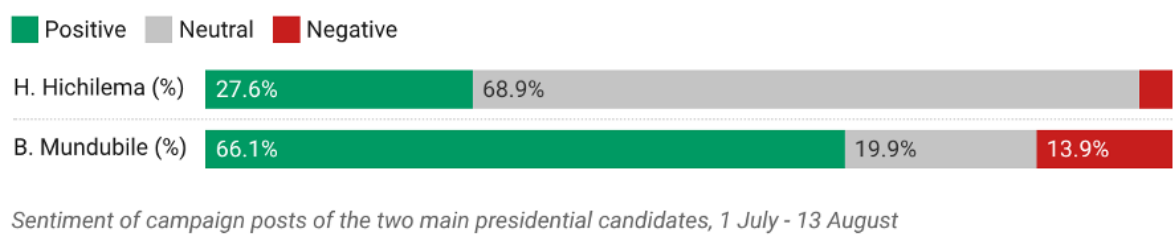
Rhetoric used in campaign posts by the two main presidential candidates, 1 July - 13 August

Chart 3. Main policy topic of campaign posts



Main policy topic of campaign posts of the two main presidential candidates, 1 July - 13 August

Chart 4. Sentiment of campaign posts

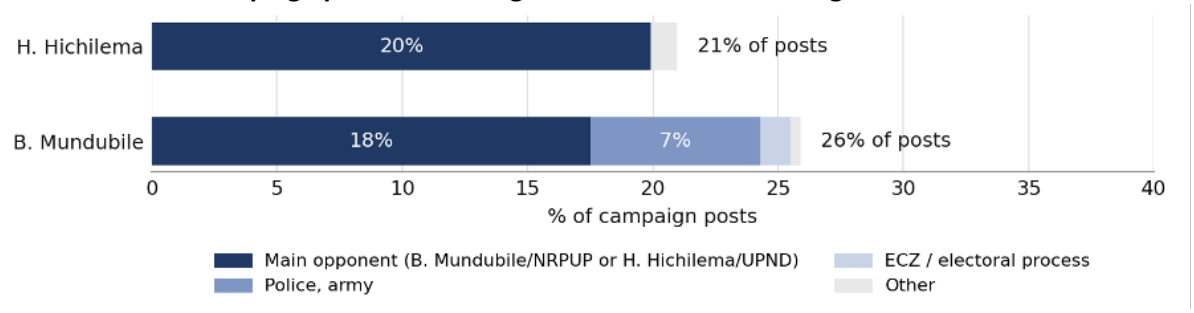


Sentiment of campaign posts of the two main presidential candidates, 1 July - 13 August

Mr Hichilema's posts were mostly neutral as they were descriptive and repetitive, chronicling his rallies and official engagements in a factual register. However, the president's speeches,

shared as videos, did include emotional appeals, both celebratory and hostile, but the accompanying text, which is what the sentiment coding captured, remained factual.

Chart 5. Share of campaign posts containing discreditation and its targets

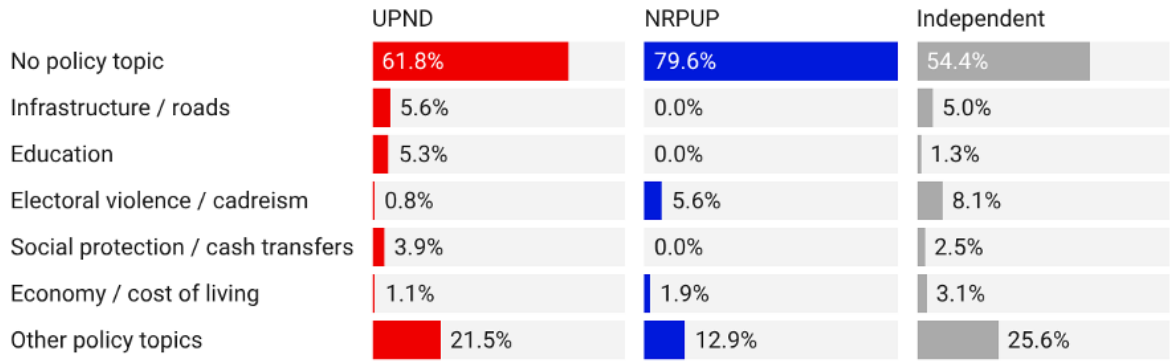


Share of campaign posts containing discreditation and its targets, 1 July - 13 August

4.2. Parliamentary and local government candidates

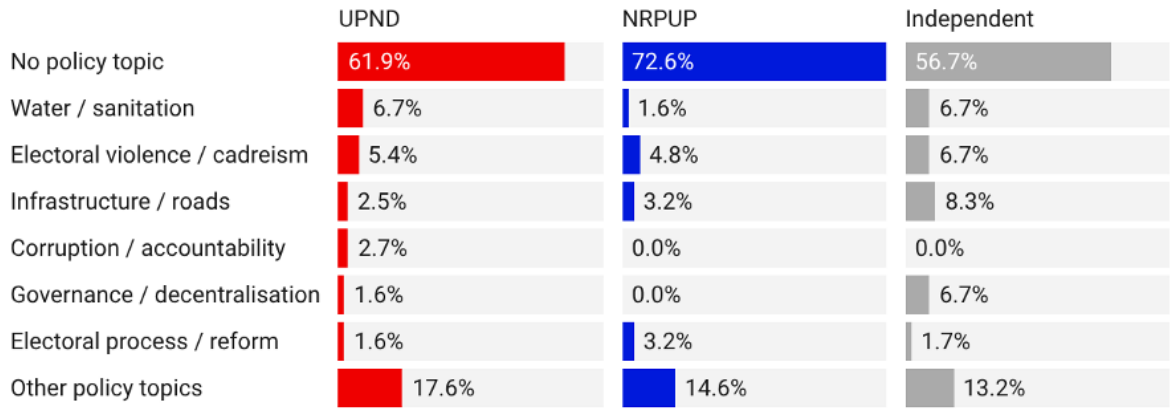
The two charts below (6-7) compare the Facebook campaign posts of a selection of 47 parliamentary and 26 local government candidates from 1 July to 13 August on two dimensions: the rhetorics used and the policy topics addressed.

Chart 6. Main policy topic in campaign posts of parliamentary candidates



Main policy topic in campaign posts of parliamentary candidates, 1 July - 13 August. UPND: 320 posts; NRPUP: 42; Ind.: 48.

Chart 7. Main policy topic in campaign posts of local government candidates

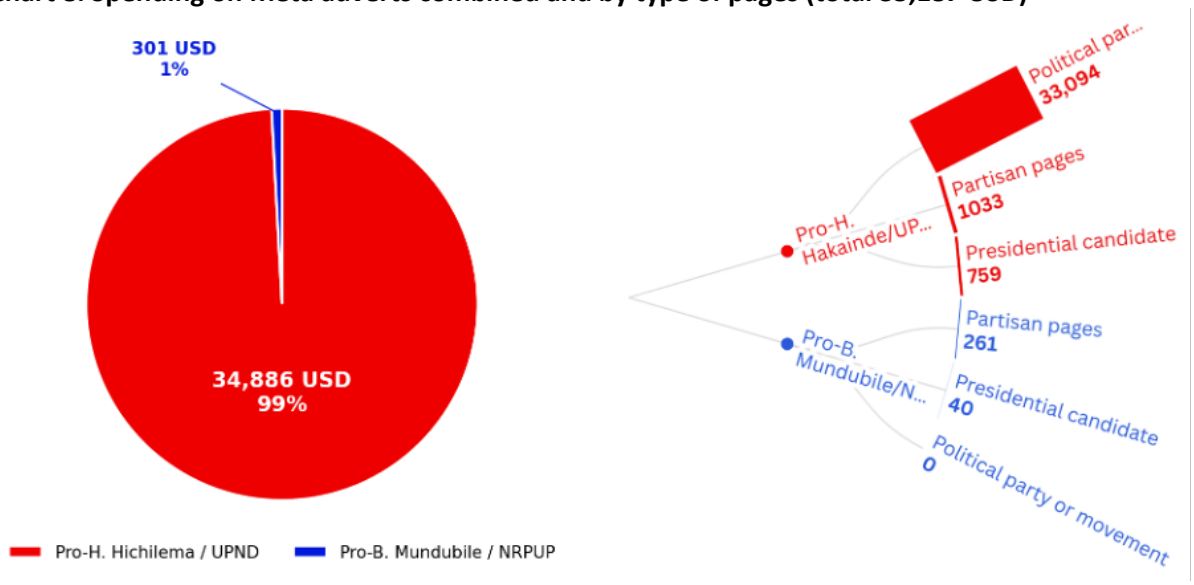


Main policy topic in campaign posts of local government candidates, 1 July - 13 August. UPND: 446 posts; NRPUP: 62; Ind.: 60.

5. Advertising

Spending on Meta adverts was almost entirely one-sided. Of the USD 35,187 identified in Meta's Ad Library over the campaign, USD 34,886 (99 per cent) was spent to promote Mr Hichilema and the UPND, against USD 301 for Mr Mundubile and the NRPUP (Chart 8). On the incumbent's side, two pages supporting the president accounted for 94 per cent of the total spending (Table 6). The opposition's spending came exclusively from partisan pages and the candidate's own page, with no advertising attributed to the party. Ads running without disclaimers were excluded from the analysis.

Chart 8. Spending on Meta adverts combined and by type of pages (total 35,187 USD)



Spending on Meta adverts for the two main presidential candidates and parties, 21 May - 12 August. Total 35,187 USD.

Table 6. Meta adverts of the two parties and movement pages supporting Mr Hichilema

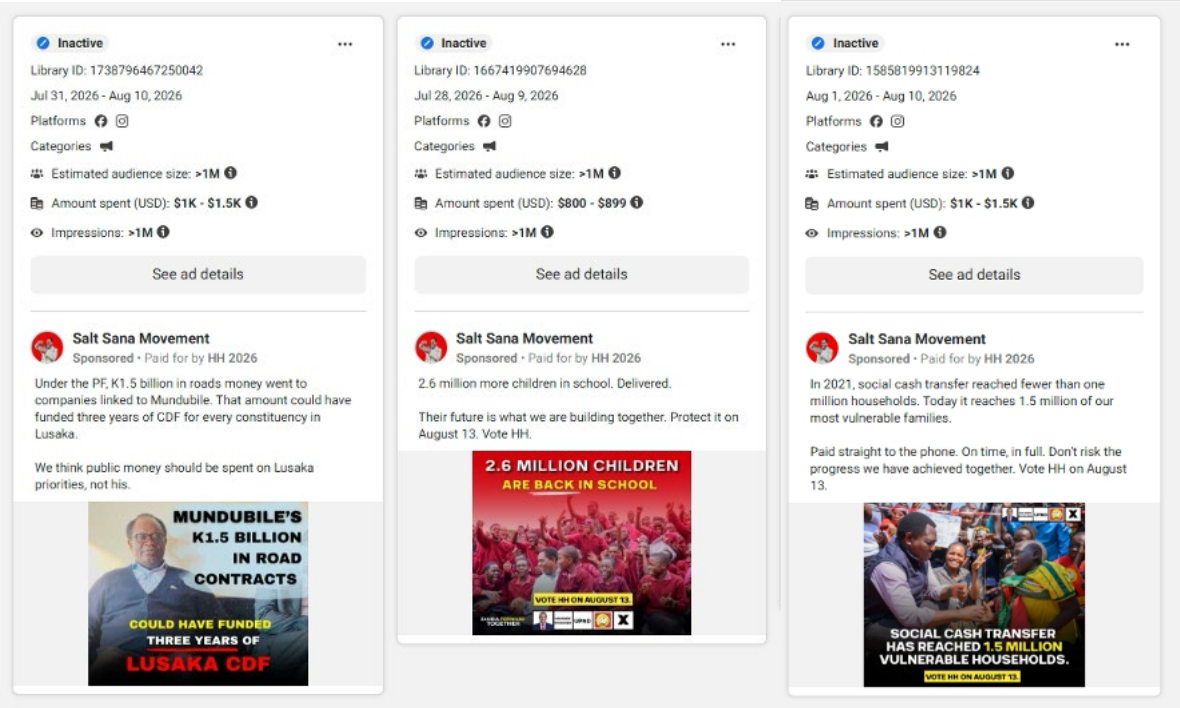
Party / group	Advertiser	Days active	Total spend (USD)
United Party for National Development	Salt Sana Movement	32	24,327
United Party for National Development	UPND Zambia	17	8,767
Total			**33,094**

Source: Meta Ad Library, provided by Who Targets Me. Bars are proportional to the value in each column.

Spending on the two party and movement pages supporting Mr Hichilema, 21 May - 12 August. Total 33,094 USD.

Adverts from the Salt Sana Movement combined a record-based message, highlighting free education, the Constituency Development Fund and social cash transfers, with negative content, including accusations of corruption against the opponent and fear-mongering content about the consequences of a change of government (Image 1).

Image 1. Screenshots of adverts supporting Mr Hichilema and criticizing Mr Mundubile.



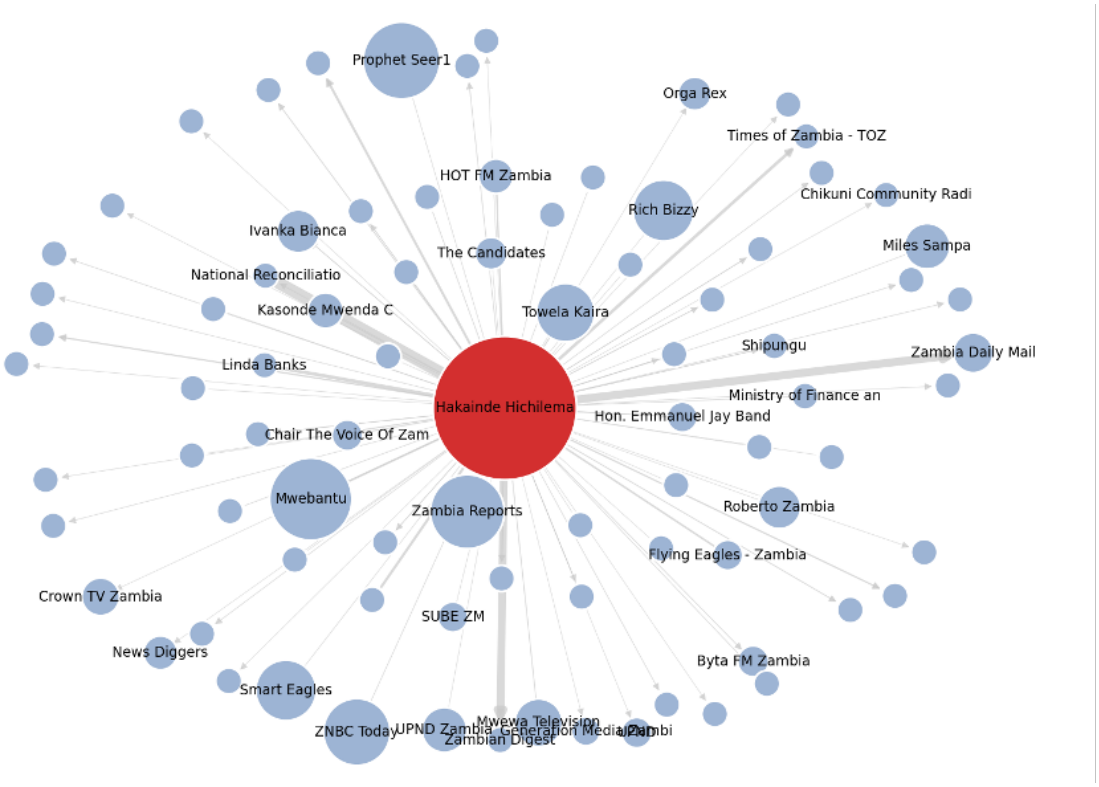
6. Network of pages amplifying presidential candidates' content

From 21 May to 13 August, the EU EOM conducted a quantitative analysis of the network of pages mentioning Mr Hichilema and Mr Mundubile, covering 14,292 posts. President Hichilema sat at the centre of a larger network dominated by major mainstream and state-aligned media outlets. Mr Mundubile's network was smaller and more partisan, relying on a handful of high-reach pages that at times used campaign hashtags to amplify his content.

6.1. Hakainde Hichilema's network: dense and centered on him

The network around President Hichilema (Chart 9) was dense and centered tightly on him, carried by a mix of large mainstream outlets and a busy layer of smaller aligned pages. The pages that spread his content most formed a clear and identifiable group, led by Zambia Reports, Mwebantu, UPND Zambia and ZNBC Today. In addition, pages supportive of his opponent also mentioned the incumbent, meaning that mentions alone did not show support, and part of this content was negative in tone or discrediting.

Chart 9. Hakainde Hichilema's network: pages connected to him by mentions and content flow



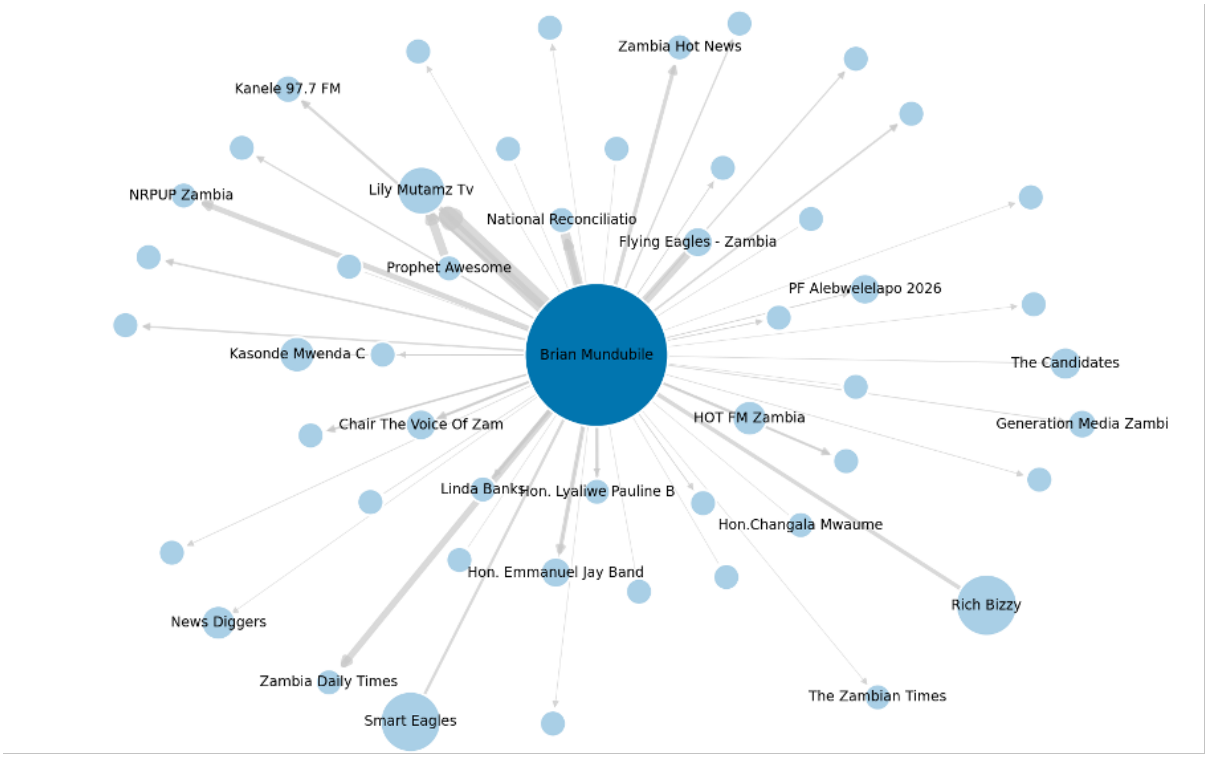
The central red node is the candidate; lighter nodes are connected pages, sized by their follower count.

6.2. Brian Mundubile's network: limited and relying on a few very active pages

Mr Mundubile's network (Chart 10) was smaller and more tightly bound than the president's network. It was carried less by mainstream outlets and more by opposition aligned pages, community radio and campaign accounts. It made visible use of campaign hashtags between a few like-minded pages, which pointed to unautomated coordination promotion efforts around his brand.

The major feature of his network was that a few pages alone carried its content to very large audiences. Lily Mutamz TV alone drew more than four million interactions on its partisan content, the highest in either candidate network. Hon. Emmanuel Jay Banda drew over two million and Chair The Voice Of Zambia over one million.

Chart 10. Brian Mundubile's network: pages connected to him by mentions and content flow



The central blue node is the candidate; lighter nodes are connected pages, sized by their follower count.

7. Campaign by non-contestant pages

Between 1 July and 13 August, the EU EOM carried out a detailed qualitative assessment of 3,692 posts published by pro-government and pro-opposition pages. Although a larger number of well-organised pages amplified the incumbent's campaign, the pages supporting Mr Mundubile were more active, and their content reached a wider audience, with roughly 50 per cent more interactions per post (Table 7). They also published a higher share of discrediting and misleading content. Almost half of the posts on pro-government pages focused on campaign activities (Table 8). Part of those pages thus operated as amplifiers of the incumbent's presence rather than as vehicles for conviction, drawing noticeably less engagement.

Table 7. Volume and engagement of pro-government and pro-opposition pages, 1 July - 13 August

	Pro-government pages	Pro-opposition pages
Pages monitored	25	19
Posts collected	1,567	2,125
Total interactions	3,214,851	6,695,034
Interactions per post	2,052	3,151
Reactions per post	*1,788*	*2,674*
Comments per post	*236*	*422*
Shares per post	*28*	*54*

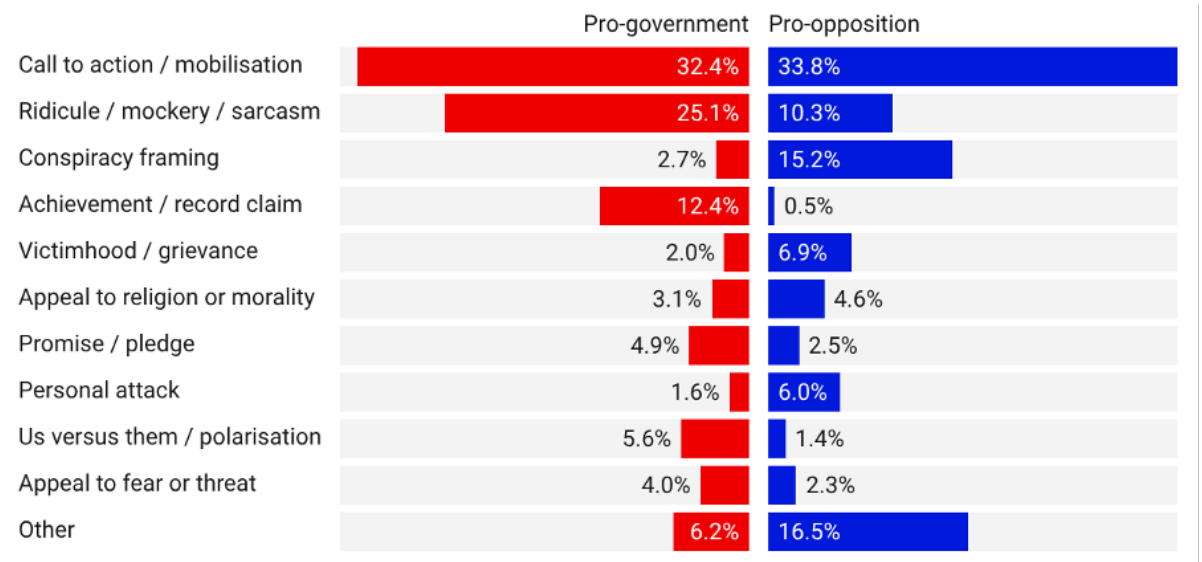
Source: all posts collected (3,692) from the monitored pages from 1 July till 13 August. Per-post figures are rounded to the nearest unit. Bars compare the two groups within each row.

Table 8. Content of pro-government and pro-opposition pages, 1 July - 13 August

Share of posts containing:	Pro-government pages	Pro-opposition pages
Discreditation	33.4%	39.2%
Misleading content	20.8%	38.1%
Violent or insulting language	2.6%	2.1%
Campaign activity	49.1%	37.8%
Policy topic	14.7%	20.1%
Endorsement of a candidate	8.3%	18.6%

Beyond mobilisation messages, which accounted for a third of posts on both sides, the rhetoric of supportive pages was largely polarising (Chart 11). Ridicule, conspiracy framing, personal attacks, appeals to fear and "us versus them" framing together made up 39 per cent of pro-government posts and 35 per cent of pro-opposition posts. The two networks differed in their preferred register, however: pro-government pages relied on mockery and sarcasm (25 per cent) and on claims about the President's record (12 per cent), while pro-opposition pages leaned on conspiracy framing (15 per cent), grievance (7 per cent) and personal attacks (6 per cent).

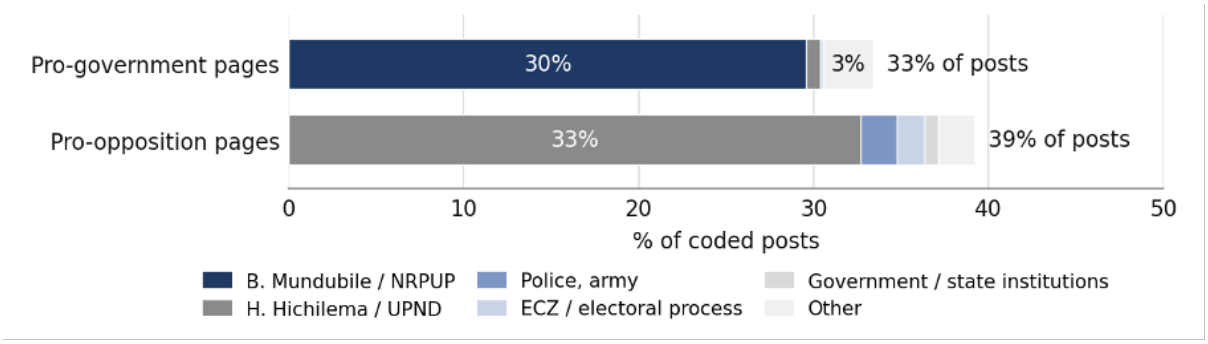
Chart 11. Rhetoric of pro-government and pro-opposition posts



Pro-government and pro-opposition posts, 1 July - 13 August. Posts with no rhetoric identified: 212 pro-government, 198 pro-opposition

Both pro-government and pro-opposition pages shared discreditation, targeting first their main opponent. Pages supporting Mr Mundubile also shared discrediting content targeting the ECZ, the government and the police (Chart 12).

Chart 12. Share of pro-government and pro-opposition posts containing discreditation and its targets



Discreditation in pro-government and pro-opposition posts, 1 July - 13 August.

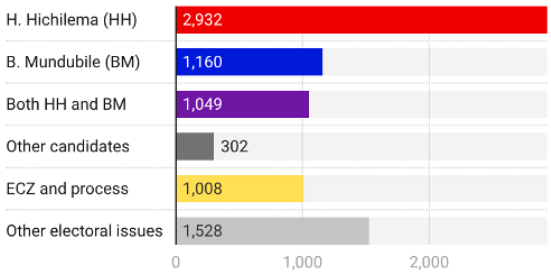
8. Mainstream and online media

From 21 May till 13 August, the EU EOM analysed 7,979 posts from traditional and online media, as well as blogs on Facebook, that drove large audiences.[147]

The pro Hakainde Hichilema group was led by the state and government cluster, namely ZNBC, ZNBC Today, ZANIS, the Ministry of Information and Media and the Zambia Daily Mail, joined by large private pages such as Mwebantu and Kalemba.

The pages leaning toward Mr Mundubile were led by Zambian Eye News and Zambian Whistleblower. The coverage was dominated by the president. (Chart 13).

Chart 13. What the mainstream and online media focused on



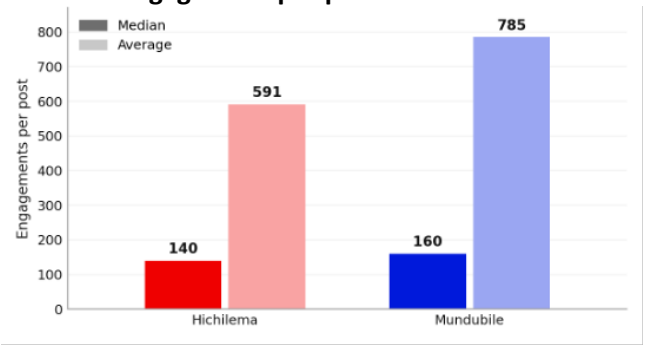
What the mainstream and online media focused on: number of election-related posts from 21 May to 13 August (7,979 posts).

Chart: EU EOM Zambia 2026

Although President Hichilema was covered far more often, Mr Mundubile's posts drew more engagement per post (Chart 14).

Additionally, it included a small number of posts with exceptionally high engagement that drove up his overall figures, with, in particular, posts on the teargassing of his roadshow on 16 July.

Chart 14. Engagement per post for each candidate



Engagement per post covering Mr Hichilema and Mr Mundubile shared by mainstream and online media, 21 May - 13 August.

The tone differed between the two candidates. President Hichilema's positive coverage was driven largely by the state and government aligned pages. Brian Mundubile's problem was first visibility but he also received negative coverage across the whole period. His negative posts outnumbered his positive ones by almost three to one (Chart 15).

147 This included among others ZNBC Today, Mwebantu, Diamond TV Online, Prime Television Zambia, Kalemba, HOT FM Zambia, Power FM Zambia, Camnet TV, Kwithu FM 93.3, Zambia Daily Mail, Zambian Whistleblower, Zambian Eye News, Linda Banks.

Chart 15. Sentiment in the posts covering each candidate

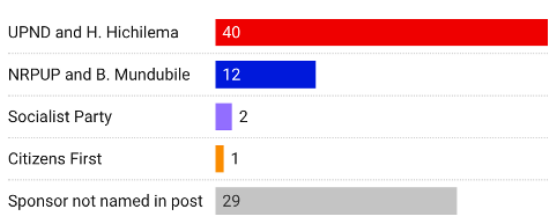


Sentiment of the posts of mainstream and online media covering the two main presidential candidates, 21 May - 13 August

Of the 84 posts carrying a paid-advertising label on the monitored media pages, almost half (40) promoted the UPND and Mr Hichilema (Chart 16).

Paid content in addition was concentrated in a handful of outlets. Mwebantu alone ran 33 labelled adverts, and with Diamond TV Online it accounted for half of all sponsored posts.

Chart 16. The 84 labelled paid advert posts by sponsor



The 84 labelled paid advert posts by sponsor, 21 May - 13 August

Some coverage carried no paid-advertising label yet was editorially identical to the labelled adverts. The true volume and cost of campaign advertising were therefore most probably higher than recorded, and the improper labelling left readers unable to distinguish sponsored content from independent reporting.

9. Attacks and gender-based discrimination

From 15 July to 13 August, the EU EOM analysed the comments posted on the Facebook pages of 11 prominent women, selected for their visibility, their place in public discourse and the size of their audience on Facebook. Ten men with comparable profiles were monitored in parallel as a control group. Only comments addressing the target directly were retained for analysis.

Of the 2,198 comments analysed for the women, 50.7 per cent contained harmful content, against 37.5 per cent of the 1,653 comments analysed for the men (Chart 17). Among the harmful comments, 18.4 per cent of those directed at women had a gendered component, against 5.6 per cent of those directed at men (Chart 18).

The forms of harmful content are pretty similar for women and men. Degrading irony and sarcasm dominate in both cases (45.1% and 46.0% of harmful comments), followed by insults and bullying (29.9% and 31.6%) and accusations (20.5% and 19.8%). These three categories together account for over 95 per cent of harmful comments regardless of the target's sex. Sexist stereotyping, however, is almost exclusively directed at women (Chart 19).

Personal attacks made up roughly a third of harmful comments for both women and men; the rest targeted the recipient's perceived political affiliation or function rather than the person. Within personal attacks, however, the gender gap is stark. Men were attacked almost exclusively on their competence (82 per cent); women were attacked as much on their private lives, marital status and alleged infidelity (39 per cent) as on their competence (44 per cent), a ground almost never used against men (1 per cent). Sexist stereotypes, sexual harassment and rape threats, though rare, were directed only at women (Chart 20).

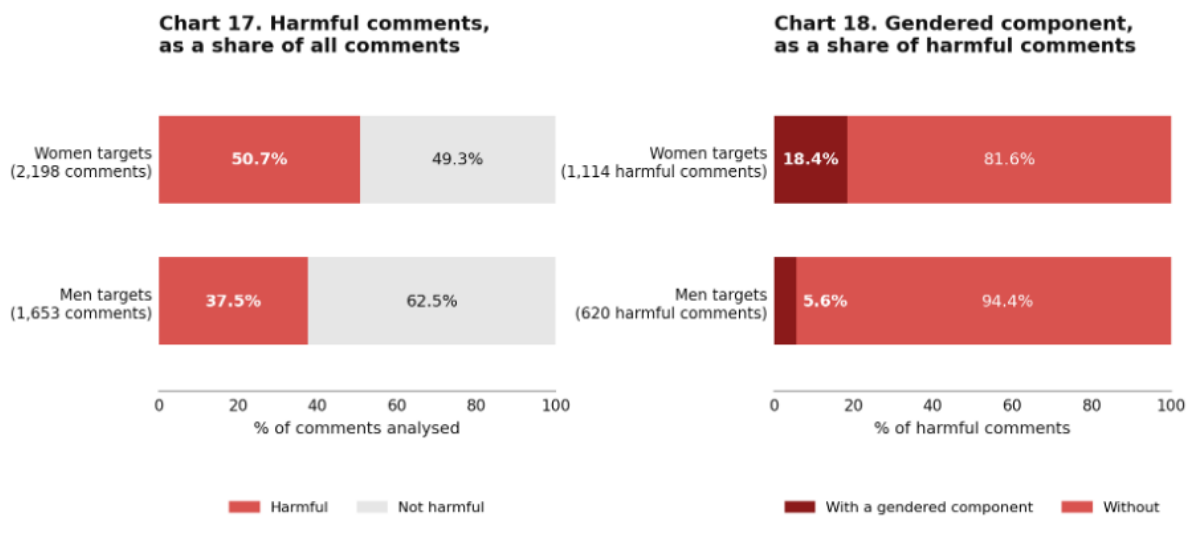
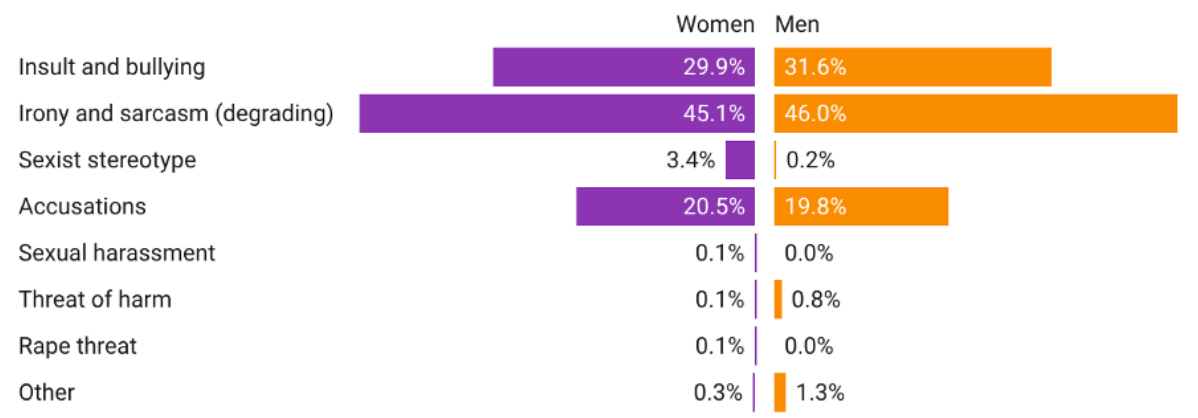
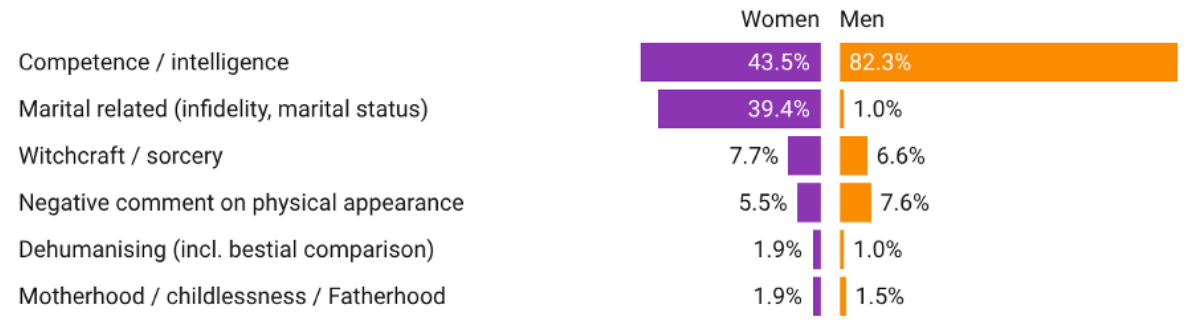


Chart 19. Forms of harmful content in comments received by women and men



Forms of harmful content in comments received by men and women, 15 July - 13 August. Women: 1,115 comments; men: 620 comments.

Chart 20. Basis of personal attacks in harmful comments



Basis of personal attacks among harmful comments, including with a gender-based component, 15 July - 13 August. Women: 363 comments; men: 198 comments.

Table 9. Women targets selected for the monitoring of comments

Target	Role	Affiliation	Followers	Harmful comments*	Main form of harmful content
Given Katuta Mwelwa	Pres. candidate	Ind.	151,000	41.3%	Irony and sarcasm
Charity Chanda Lumpa	Parl. candidate	RP	6,400	12.5%	Irony and sarcasm
Sylvia Masebo	Parl. candidate	UPND	35,000	67.9%	Irony and sarcasm
Chilando Chitangala	Parl. candidate	RP	25,000	13.2%	Irony and sarcasm
Jean Kapata	Parl. candidate	RP	35,000	16.0%	Irony and sarcasm
Chishala Kateka	Politician	NRPUP	68,000	64.3%	Irony and sarcasm
Barbrah Musamba Chama	Political and economic blogger	UPND	67,000	12.6%	Insult and bullying
Lily Mutambo	Blogger/influencer	NRPUP	968,000	47.3%	Irony and sarcasm
Chair The Voice of Zambia	Blogger/influencer	NRPUP	397,000	46.0%	Irony and sarcasm
Faith Musonda	Journalist	NRPUP	202,000	83.7%	Insult and bullying
Mwangala Zaloumis	ECZ Chairperson	N/A	263,000	47.5%	Accusations

All accounts on Facebook. Followers as of the start of the monitoring period. Main form of harmful content is the most frequent one observed.
** Share of harmful comments among the comments analysed for each target, from undermining to violent comments.*

Table 10. Men targets selected for the monitoring of comments

Target	Role	Affiliation	Followers	Harmful comments*	Main form of harmful content
Brian Mushimba	Pres. candidate	OPP	46,000	30.9%	Irony and sarcasm
Msaiwale Wally Josephat	Parl. candidate	UPND	6,900	0.0%	–
Garry Nkombo	Parl. candidate	Ind.	383,000	19.4%	Irony and sarcasm
Chriseddy Bwanga Mwila	Parl. candidate	Ind.	95,000	3.8%	Irony and sarcasm
Christopher Shakafuswa	Parl. candidate	UPND	17,000	35.4%	Irony and sarcasm
Ken Dumbo	Media personality	UPND	1,100,000	73.5%	Insult and bullying
Emmanuel Jay Banda	Politician	NRPUP	343,000	56.6%	Accusations
Danson Lungu	Influencer/blogger	NRPUP	202,000	15.9%	Irony and sarcasm
Jito Kayumba	Pres. Advisor on Economics	UPND	307,000	19.5%	Irony and sarcasm
Emmanuel Mwamba	Influencer	NRPUP	360,000	52.7%	Irony and sarcasm

*All accounts on Facebook. Followers as of the start of the monitoring period. Main form of harmful content is the most frequent one observed; no harmful comments were identified for Msaiwale Wally Josephat. * Share of harmful comments among the comments analysed for each target, from undermining to violent comments.*

ANNEX 4 – TABULATION CASE STUDIES

Makeni Constituency, Lusaka District, Lusaka Province

EU EOM observers visited Makeni constituency totalling centre in Lusaka province twice, on the two mornings of 14 August and 15 August (pre- and post-suspension). During both observations, they documented NRPUP polling agents being present; UPND party agents were present only during the second observation. While there were no unauthorised people noted during the first observation, in the second one they observed unauthorised people inside the totalling centre (police officers not on duty, military, state and local officials), although they had not been requested by the RO, which is the only legal reason for them to be present.

Seals on the election materials were always present during the first observation and in most cases (but not always) during the second one. During the second observation, EU EOM observers noticed a prolonged break due to some of the presiding officers being nowhere to be found. The EU EOM observers' overall evaluation of the process was very good for the first visit. The second observation was described as "general messiness" and concluded with the remark that "it was hard to distinguish between rubbish and processed forms".

In the evening of 15 August, an armed group attacked the Makeni totalling centre and took almost all the polling station results forms on the evening of 15 August. The EU EOM observers received reports that three to four armed men with guns entered the totalling room and took all the results forms. In the ensuing chase by police present onsite, some forms were dropped and left behind. It was unclear how the armed group entered the totalling centre premises, but reportedly the attack seems to have been coordinated. Findings of any investigation in the incident are yet to be made public. Polling station results tabulated from Makeni totalling centre were not included in the declaration of preliminary presidential results by the ECZ chairperson on 18 August.

Bwatcha South Constituency, Kabwe District, Central Province.

EU EOM observers attended Bwatcha South constituency totalling centre in Central Province twice, on the morning of 14 August and on mid-day of 16 August (pre- and post- the ECZ's counting/results announcement suspension). Polling agents from both main parties were present during both observations. Seals on election materials were always intact during the second observation and in most cases during the first. While there were no significant problems during the first observation, that was not the case for the second when pressure, intimidation and violence were reported, which contributed to a prolonged break during the second observation (more than two hours). Election materials were not sufficiently protected during the break.

Overall, the first observation was described as organised, results-oriented, disciplined, and clear, while the second one was evaluated as "very bad" with comments of untransparent, chaotic, and tense. The same decline was noted in the transparency of the process: evaluated as "good" during the first visit, it was evaluated as "very bad" during the second, which denotes a considerable decline and concern.

Alleged UPND cadres raided the Bwatcha South totalling centre on 16 August, disrupting the tabulation process; police teargassed the totalling centre to disperse the attackers. As a result, the RO and staff left the totalling centre "without giving any clear information how and when they would resume tabulation" to the polling agents. This disruption led to delays in the results tabulation which only concluded in Kabwe district on the evening of 17 August.

Chingola Central Constituency, Chingola District, Copperbelt Province.

EU EOM observers visited Chingola Central constituency totalling centre in Copperbelt Province three times (the evening of 13 August, the morning of 14 August (both observations pre-suspension) and on the morning of 15 August (post-suspension)). During their first two observations, no polling agents from NRPUP or UPND were present, while during the post-suspension observation both were noted.

During pre-suspension observations, some materials arrived without being sealed properly. Pre-suspension observations were characterised as good in terms of totalling centre staff overall performance and transparency. Their evaluation changed during their third visit when no election materials arrived with intact seals. In the first two visits, they could not check if the RO had ensured that figures matched with those in the tally sheet, but such reconciliations never took place during their third observation. Both, performance and transparency elements received lower marks during their last visit. Regarding the obvious procedural omissions, EU EOM observers reported that “none of the results envelopes arrived closed and sealed”.

These various elements raise significant concerns about key procedural elements of the tabulation process, especially after the announced suspension, when transparency and respect for process appears to have deteriorated.

