Asian Network for Free Elections

International Election Observation Mission
2025 Philippines National and Local Midterm Elections

INTERIM REPORT

Table of Contents

EXECUTIVE SUMMARY 3
I. Overview of ANFREL's Election Observation Mission 5
II. Political & Legal Context 6
III. Key Aspects of The Mission 7
a. Administration of the 2025 elections 7
b. Electoral laws and frameworks - efficiency, compliance, and communication 8
c. Inclusion and participation 10
d. Abuse of state resources in elections, vote buying and vote selling 11
e. The role of media (Conventional media and social media) 12
Mis- and dis-information 13
IV. Election Day Observations 18
V. Post-Election Environment 19
VI. Conclusions & Recommendations 20

EXECUTIVE SUMMARY

The Asian Network for Free Elections (ANFREL) congratulates the Filipino voters, the Commission on Elections (COMELEC), and all stakeholders for their unwavering determination and mass participation to uphold democracy through the conduct of the 2025 National and Local elections despite operational challenges and a climate of political uncertainty. A total of 68,431,965 individuals registered to vote in the 2025 elections, with the initial estimated turnout reaching 81.65%—the highest ever recorded in the history of Philippine midterm elections.[1]

ANFREL deployed its International Election Observation Mission (IEOM) for the 2025 Philippines National and Local Midterm Elections on 27 April 2025, comprising a team of 21 observers covering 11 regions across the country. The mission covered key aspects of the electoral process, including the campaign period, election day, and post-election environment. ANFREL observed several key highlights of the 2025 elections, including enhanced transparency, sustained efforts toward inclusivity, and high voter participation. However, the mission also identified areas requiring improvement, such as limited electoral competition, the persistent challenges such as abuse of state resources, vote buying and vote selling, campaign finance issues, operational and management issues on the election day, and issues related to the regulation of social media.

The COMELEC effectively administered the 2025 elections, introducing a range of new resolutions and institutional mechanisms since 2022 aimed at addressing challenges identified in previous electoral cycles and enhancing overall electoral processes.

While COMELEC has shown strong institutional commitment through new resolutions and outreach efforts, significant challenges remain in the enforcement of electoral laws and in ensuring equitable competition. Legal restrictions on COMELEC's jurisdiction prior to the official campaign period continue to limit its ability to address early instances of vote-buying and the misuse/abuse of state resources — practices that remain widespread and sophisticated.

Political campaigns remain dominated by personalities rather than policies, with many voters basing decisions on candidate visibility and material benefits. There are continued issues related to the entrenched power of political dynasties and weak political parties. In many districts, races were uncontested, and substantive policy debates were largely absent from the public discourse — often supplanted by social media-driven popularity contests lacking concrete campaign platforms or commitments.

Efforts by COMELEC to improve inclusion were notable and welcome, with the rollout of Accessible Polling Place (APP) and Priority Polling Places (PPP) and the full implementation of early voting hours for persons with disability, senior citizens and pregnant women.

[1] Locus, S., '81.65% voter turnout for Eleksyon 2025, says Comelec', *GMA News,* 15 May 2025

COMELEC's steps in this regard were generally well received, although challenges remain in infrastructure and Election Day preparedness.

COMELEC introduced new digital campaign regulations in response to these evolving dynamics and collaborated with civil society and tech platforms to encourage responsible online campaigning. However, ANFREL observed that enforcement remains uneven, and calls for a systematic review and strengthening of these policies. The shrinking capacity of traditional media has left accountability gaps that civil society actors have sought to fill, though this shift has also created more space for unchecked disinformation. These developments underscore the urgent need to reinforce regulatory frameworks, enhance media literacy, and invest in long-term digital resilience to safeguard electoral integrity in the Philippines.

The misuse/abuse of state resources, especially social welfare programs, alongside rampant and widespread vote-buying, continues to blight the electoral landscape. Such practices have become so institutionalized that for many voters, participation in elections is increasingly shaped by the expectation of payment.

In the Bangsamoro Autonomous Region in Muslim Mindanao (BARMM), observers noted delayed openings and voter frustration in some polling areas. The BARMM's continued vulnerability to political intimidation, misuse of aid, and fragile security underscores the importance of sustained engagement ahead of its upcoming October Parliamentary Elections.

Election Day was generally orderly, with most polling stations managing procedures effectively. Innovations such as early voting hours and continued practices, like dedicated polling places for vulnerable groups were successfully implemented. However, issues such as crowd management, technical malfunctions with voting machines, ballot secrecy concerns, and enforcement of campaign material restrictions remain areas for improvement.

The post-election period will be critical in ensuring transparency, the effective resolution of complaints, and continued institutional learning. ANFREL urges the Philippine electoral authorities, civil society, political actors, and international partners to work collaboratively toward strengthening the legal framework, addressing long-standing electoral vulnerabilities, and ensuring inclusive and credible future elections.

I. Overview of ANFREL's Election Observation Mission

ANFREL deployed its International Election Observation Mission (IEOM) for the 2025 Philippines National and Local Midterm Elections on 27 April 2025, comprising a team of 21 observers. This included a Mission Management Team, two Electoral Analysts, 10 Long-Term Observers (LTOs) and three Short-Term Observers (STOs). Observers monitored the campaign activities, media coverage, voter education efforts, and preparations by the COMELEC. LTOs also established early contacts with key electoral stakeholders, documented critical incidents, and provided regular field reports to support the mission's comprehensive assessment.

This mission builds upon ANFREL's previous experiences in the Philippines and aims to offer an independent and impartial assessment. The primary objectives of this mission were to observe critical areas, including campaign conduct, media and social media coverage, electoral integrity, the credibility of voting technologies, the political finance framework, and the protection of civil and political rights. Special attention will be given to the growing role of disinformation and the misuse of digital platforms, which pose new and evolving threats to democratic discourse.

ANFREL's observation efforts place a strong emphasis on inclusivity, documenting the participation of the vulnerable sectors, persons with disabilities, indigenous peoples, persons deprived of liberty/detainees and senior citizens. The mission assessed whether the electoral environment upholds the right of all citizens to participate freely, fairly, and equally.

On Election Day, ANFREL observers were deployed to monitor the polls across 270 polling precincts in 11 regions of the Philippines. This included 75 polling precincts in the National Capital Region (NCR), with the remainder spread across various provinces nationwide. ANFREL observers closely followed the entire electoral process, including the opening of polling stations during the early voting hours to better accommodate senior citizens, persons with disabilities, and pregnant voters, as well as voting procedures throughout the day, and the closing and vote transmission process. Likewise, All ANFREL observers for the Philippine elections were accredited by the Commission on Elections (COMELEC) and adhered to the Declaration of Principles for International Election Observation, the Declaration of Global Principles for Nonpartisan Election Observation, the Model Commitments for Advancing Genuine and Credible Elections (2024), and ANFREL Code of Conduct. This adherence guaranteed high standards of impartiality, objectivity, and transparency throughout the mission.

II. Political & Legal Context

The legal foundation for the conduct of elections in the Philippines is the Omnibus Election Code of 1985. It serves as the primary legislation governing all aspects of the electoral process, including voter registration, campaigning, voting procedures, and election offenses. The Commission on Elections (COMELEC) is the main body responsible for administering elections and ensuring they are conducted freely, fairly, and credibly.

The 2025 Midterm Elections in the Philippines represent a critical juncture for the country's democratic development. Coming at a time of evolving political dynamics, technological advancements, and calls for greater electoral transparency, these elections will play a decisive role in shaping the nation's political and governance landscape. Unlike presidential elections, which often center around national leadership, the midterms focus more on legislative and local contests, reflecting the diverse political sentiments across the archipelago's regions and provinces.

The midterms are particularly significant as they mark the first major elections after the introduction of new Automated Counting Machines (ACMs) and the implementation of internet voting for overseas Filipinos. The legal basis for this initiative lies in Article VII, Section 52, which allows COMELEC to adopt certain technologies, provided relevant stakeholders are informed during its implementation. In the 2025 elections, 77 overseas posts used internet voting, while 16 posts continued with in-person voting through embassies.

Additionally, the campaign finance landscape will be scrutinized, given persistent concerns regarding financial opacity, abuse/misuse of state resources, and unequal access to media and platforms. To help ensure free and fair elections, COMELEC also issued Resolution No. 11104, *In the Matter of Expanding the Powers and Functions of the Committee on Kontra Bigay*. This resolution enhances COMELEC's capacity to combat vote-buying and the abuse of state resources. According to ANFREL's observation, there were still instances of vote buying through cash and goods, and cases of state resource misuse by-election candidates.

Following the present midterm elections, the country will hold two more key polls: the Bangsamoro Autonomous Region in Muslim Mindanao (BARMM) Parliamentary Elections in October, and the Barangay and Sangguniang Kabataan Elections (BSKE) in December. These upcoming elections present important opportunities for the Commission on Elections (COMELEC) to build on the lessons learned from the May midterms and further enhance the effectiveness and inclusivity of electoral reforms and processes.

The 2025 midterm elections also hold broader political significance, as they are widely seen as a prelude to the 2028 national elections, in which the President and Vice President will be elected. Given the power of the Senate and the evolving dynamics of political alliances,

the outcome of this year's elections is expected to shape the political landscape for the next three years—and will likely influence strategies and coalitions leading up to 2028.

Overall, the Philippine electoral framework aligns with international human rights standards, including the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), 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 Model Commitment for Advancing Genuine and Credible Elections.

III. Key Aspects of The Mission

a. Administration of the 2025 elections

The administration of the 2025 elections has benefited from a more directional leadership within the Commission on Elections (COMELEC), following the permanent appointments of a new Chairperson and several Commissioners after the 2022 elections. This appears to have enabled a more consistent and strategic approach to electoral preparations that maximizes the existing electoral framework while laying further legal ground for new initiatives. Stakeholders in 2025 expressed greater confidence in the institution's direction and responsiveness, although concerns around political impartiality remain for some commentators.

Legal frameworks supporting the rights of vulnerable sectors were established across different electoral regulations, particularly since 2010, when voting for persons deprived of liberty (PDLs) were introduced (Resolution 8811, followed by Resolution 9371 in 2012); further provisions for persons with disabilities through the creation of accessible polling places were created in 2013 (Resolution 10366); and indigenous peoples in 2016 (Resolution 10106).

This institutional commitment was further strengthened with the creation of the Vulnerable Sectors Office in 2019, which aimed to enhance the Commission's capacity to develop inclusive policies and ensure the effective implementation of accessibility measures. The continuous implementation of this framework across election cycles reflects a sustained effort to uphold inclusive electoral participation.

COMELEC has implemented a range of new resolutions and bodies designed to improve and build on issues noted in previous electoral cycles and this legal framework, including recommendations made by ANFREL in 2022 (for example, in improving the accessibility of polling precincts). Notable among these initiatives are measures to support the participation of PDLs, senior citizens, and other priority groups through Accessible Polling Places (APPs), Priority Polling Places (PPPs), Special Priority Polling Places (S-PPPs), and special polling places inside jails. These initiatives reflect a growing institutional commitment to electoral inclusion. However, observations during the 2025 elections show

that implementation remains uneven across polling centers, often affected by logistical limitations, unclear communication, or varying levels of preparedness. The effectiveness of the Vulnerable Sectors Office is evident in policy development, but further institutional support is needed to ensure that these frameworks are consistently translated into practice on the ground.

The Commission was widely perceived by civil society organizations as more accessible and communicative than in past cycles. This is an area of improvement that ANFREL highlighted in 2022 and is a welcome change for many stakeholders interviewed. Interviewees noted improvements in transparency and engagement, with domestic observer groups reporting no major grievances in their interaction with COMELEC. The Commission has also shown willingness to collaborate with a broad set of actors, including candidates, media, and social media platforms.

In addition, COMELEC's adoption of new regulations on social media, artificial intelligence, campaign finance, and the promotion of safe spaces marks a positive step towards adapting to evolving electoral challenges. These efforts signal a proactive institutional posture and a willingness to apply lessons learned from previous exercises. COMELEC has reminded candidates and political parties that they must remove social media posts related to the election by 17 May.[2] Given the proximity to Election Day at the time of writing, it remains to be seen how effective these guidelines have been, but ANFREL will continue to monitor this in advance of our final report.

In several regional, provincial, city and municipality offices, COMELEC appears under-resourced, raising concerns about its capacity to enforce new regulations and sustain momentum post-election. This was particularly evident in the Political Finance Affairs Department (PFAD), which monitors the spend of candidates, and remains severely understaffed, given its challenging remit. The department has recently expanded its work to include regulation of political parties, exposing gaps in the legal framework such as the continued accreditation of inactive parties. Strengthening the institutional capacity and ensuring continuity within COMELEC will be essential for robust oversight moving forward.

b. Electoral laws and frameworks

Since 2022, COMELEC has introduced several new resolutions aimed at modernising the electoral framework, including guidelines on the use of social media and artificial intelligence, safe campaign spaces, and greater transparency and enforcement of campaign finance rules. These developments mark a positive step towards more responsive election administration.

Some of the key electoral legal frameworks are outlined above, but since 2022, the key resolutions and initiatives from COMELEC relating to the 2025 elections include:

[2] *GMA News*, 'COMELEC: Candidates have until May 17 to remove campaign materials, ads on social media', 13 May 2025 [Accessed 15 May 2025].

- Resolution No. 11064, which lays out guidelines on the use of social media, artificial intelligence, and internet technology.[3] To monitor and implement this, COMELEC launched a new task force, 'Task Force Katotohanan, Katapatan, Katarungan (KKK) sa Halalan' in 2024.[4]
- Resolution No. 11076, which gives instructions for the Electoral Board (polling staff) on Election Day, as well as the process of counting and transmission of results.[5]
- The Committee on *Kontra Bigay,* first established as a Task Force in 2016, which is empowered to monitor vote buying and selling, as well as other instances of the abuse of state resources. The powers and functions of this committee were further laid out in Resolution 11104.[6]
- Resolution 11116, which outlines anti-discrimination and fair campaigning guidelines for the election. This applies to all candidates during the election period, from January 11 to June 12. The resolution, as well as an amendment (11127) declare all election-related activities and venues as "safe spaces". COMELEC's Task Force on Safeguarding Against Fear and Exclusion (SAFE) is responsible for implementing this resolution[7]
- Resolution 11109, which outlines campaign finance rules for the election, setting campaign spend limits and disclosure of expenditure.[8]

However, observers noted persistent weaknesses in the legal framework and its enforcement. Many key electoral safeguards are only applicable during the official campaign period, significantly limiting COMELEC's ability to respond to violations, such as vote buying and the abuse/misuse of state resources, that often occur before the official campaign period. This limitation was raised by several stakeholders as a serious gap that malign actors continue to exploit with little risk of sanction.

The 1987 Constitution laid the groundwork for 'party-list' representation in the House of Representatives, to constitute twenty percent of the total number of representatives (63 seats). For three terms (9 years) after the ratification of the Constitution, half of these party-list representatives were to be filled by representation from 'the labor, peasant, urban poor, indigenous cultural communities, women, youth, and such sectors as may be provided by law, except the religious sector'.[9] In 1995, as the end of the original three terms above approached, the Senate enacted Republic Act No. 7491, which continued the system beyond 1998.[10] In 2013, a challenge to a COMELEC decision to disqualify 54 party-list groups resulted in a Supreme Court ruling that significantly broadened the definition, stating that 'national parties or organizations and regional parties or organizations do not

[3] COMELEC, Resolution No. 11064 (September 2024)
[4] Villanueva, R. 'COMELEC forms panel vs disinformation', *The Philippine Star,* 21 July 2024
[5] COMELEC, Resolution No. 11076 (October 2024)
[6] COMELEC Resolution 11104 (January 2025)
[7] COMELEC Resolution 11116 (February 2025)
[8] COMELEC Resolution 11109 (February 2025)
[9] 1987 Constitution, Article 6, Section 5
[10] Republic Act No. 7491 (March 1995)

need to organize along sectoral lines and do not need to represent 'any marginalized and underrepresented' sector'.[11]

The impact of this decision since 2013 was highlighted by several respondents that ANFREL interviewed. Instead of incubating different parties and sector representation, it has increasingly been used by established political interests to expand influence, with weak legal provisions meaning that some party list groups are effectively functioning as 'franchises'. This seems to cause apathy and resignation among voters that established political powers have too much of an upper hand to be challenged.

The Fair Elections Act (Republic Act No. 9006) sets clear guidelines on the size, placement, and environmental sustainability of campaign paraphernalia, including a prohibition on their display in public places or on publicly owned buildings.[12] Despite these regulations, campaign materials and vote solicitation around polling stations were once again observed, echoing findings from ANFREL's 2022 report. Several clear violations were seen in the campaign period and on election day around the posting of campaign materials. These recurring issues highlight both enforcement challenges and the need for broader reforms.

Legislative action is driven in the Philippines by both houses, but the Senate, made up of 24 representatives, holds significant power in determining the passage and amendment of laws. The Congress must agree on bills and amendments, which means that while new electoral regulations in 2025 show promise, the legal framework remains dependent on congressional action. Without further legislative reform and strengthened enforcement capacity, the credibility and fairness of future electoral processes may continue to be undermined.

c. Inclusion and participation

The Model Commitment for Advancing Genuine and Credible Elections states that the legal framework ensures every person's exercise of election-related rights and responsibilities is free from discrimination proscribed by international human rights norms and protected by equality before the law and equal protection of the law.[13] It also stated that the right to vote was guaranteed by law and was subject only to reasonable and objective restrictions. The COMELEC applies compliance with this commitment.

The introduction of early hours voting in 2025, for two hours before polling precincts officially opened, was another important development aimed at supporting voters with specific needs. While some confusion was reported among voters regarding eligibility and timing (particularly whether they could still vote after 7am if needed) the initiative was

[11] Romero, P., 'SC shakes up party list in new verdict', *Rappler*, 5 April 2013.
[12] Republic Act No. 9006 (February 2001)
[13] 'The Carter Center, IFES, International IDEA, NDI, Kofi Annan Foundation, 'Model Commitments for Advancing Genuine and Credible Elections', (September 2024), p.7.

generally welcomed and created space for voters who might require additional time or assistance at polling stations.

Overseas voting operations appeared to proceed smoothly, including the option for online voting via mobile devices. Although full data on voter turnout has not yet been released at the time of writing, there are indications that overseas voting suffered from low turnout. ANFREL was told by representatives of COMELEC that registration had been lower than expected, and initial indicators from voters in the United States[14] and the United Arab Emirates[15] appear to slow low numbers. Further assessment may be needed to understand the factors affecting participation and to explore options for enhancing engagement among overseas voters in future electoral cycles.

d. Abuse of state resources in elections, vote buying and vote selling

A meaningful election must ensure a competitive election in which candidates can compete in a fair and equal contest. One way to ensure this equality is by preventing the abuse/misuse of state resources for electoral purposes. Another key element in ensuring fair competition is transparency in campaign finance reporting. The legal framework provides for transparency in electoral campaign financing, including definitions of what counts as campaign expenditures, disclosure of funds raised and expenditures, striking a balance between transparency and donor privacy, and covering political advertising of all types—whether in broadcast, print, social, or other digital media.[16] The misuse of state resources for electoral purposes became one of the key concerns in the conduct of the Philippines' midterm election, as monitoring results indicated the occurrence of such abuse.

Despite administrative improvements in the 2025 elections, the abuse of state resources (ASR) and vote buying remain widespread and deeply entrenched challenges in the Philippine electoral landscape. Stakeholders consistently described vote buying as rampant, and even more prevalent, with reported payments ranging from 500 to as high as 5,000 pesos (approximately 9-90 USD) per voter (and in some instances, up to 30,000 pesos per household). Such practices have become so institutionalised that for many voters, participation in elections is increasingly shaped by the expectation of payment. The growing use of digital platforms and online cash transfers to facilitate vote buying has made it more difficult to detect and regulate.

Abuse of state resources was also widely reported in the pre-campaign period. Observers and civil society organizations were told about the misuse of public funds and programs in different areas of observation (particularly scholarship schemes, government welfare

[14] Manotoc, TJ, 'Halalan 2025: Overseas Filipinos in US frustrated by low turnout in online voting', *ABS-CBN,* 13 May 2025
[15] Bulambot, J., 'PH Embassy: UAE voter turnout at 20%', *GMA News,* 13 May 2025
[16] The Carter Center, IFES, International IDEA, NDI, Kofi Annan Foundation, 'Model Commitments for Advancing Genuine and Credible Elections', (September 2024), p.10.

initiatives, and other forms of social support) being selectively distributed to supporters or withdrawn from voters who did not support candidates. This is supported by the findings of the Legal Network for Truthful Elections (LENTE), which has recorded around 100 vote-buying cases at the time of writing, 30% of which were recorded as related to ASR.[17] As of Election Day, COMELEC had received almost 700 cases of vote-buying to the Committee on *Kontra Bigay*.[18] These practices, while longstanding, remain a critical concern, especially given that COMELEC's jurisdiction is largely restricted to the official campaign period.

COMELEC has taken some positive steps to address these issues, notably through the introduction of new legal presumptions around vote buying and abuse of state resources, and the expansion of a dedicated and permanent committee(through Resolution 11104, Section 26).[19] While most saw these as important tools, others expressed concern over their selective use and potential politicisation. Stakeholders urged COMELEC to evaluate the effectiveness of these mechanisms and for there to be a change in regulatory authority to cover the pre-campaign period, when many abuses are most prevalent.

e. The role of media (Traditional media and Social media)

The media plays a crucial role in disseminating information during the election period. It is responsible for informing voters about the various stages of the electoral process and providing information about the candidates. To ensure that the media delivers accurate and impartial information, laws and regulations must guarantee non-discrimination against media outlets. These freedoms include access to information related to elections and referenda from any medium, free from disinformation, including digital communication channels and content generated by artificial intelligence.[20]

One of the challenges observed during the Philippines' 2025 midterm elections was the presence of media outlets affiliated with specific candidates, which compromised the balance and neutrality of information provided to the public. Another challenge was the high cost of media exposure, which was not equitably accessible to all candidates. As a result, many candidates turned to social media as an alternative platform to promote themselves. One interviewee stated that they used social media to engage directly with voters.

However, campaigning on social media comes with its own set of challenges. Despite being relatively cost-effective, candidates face issues such as the spread of disinformation and attacks from non-authentic accounts. In response to these issues, COMELEC has

[17] Serquina, MC., 'LENTE logs almost 100 vote-buying cases for Eleksyon 2025', *GMA News,* 11 May 2025
[18] Jaymalin, M., 'Comelec receives 689 reports of vote buying', *The Philippine Star,* 13 May 2025
[19] See also COMELEC, 'Primer on vote-buying, vote-selling, and abuse of state resources'
[20] The Carter Center, IFES, International IDEA, NDI, Kofi Annan Foundation, 'Model Commitments for Advancing Genuine and Credible Elections', (September 2024), p.26.

established the Task Force KKK, which guides the use of social media, artificial intelligence, and internet technology in the electoral context.

Mis- and dis-information

Digital campaigning played a central role in the 2025 Philippine elections, with most voters relying on online platforms for information. ANFREL's preliminary social media monitoring findings reveal that electoral discourse across Facebook, Instagram, TikTok, X (formerly Twitter), and YouTube was dominated by personality-driven and event-focused content. From 317 unique accounts identified, 250 were coded, with a 7 percent randomized sample of over 38,000 posts analyzed in depth. Candidate accounts were more active early in the campaign, while party-list content surged in April, with both peaking just before Election Day. While most posts recapped campaign events and endorsements, only a quarter addressed substantive policy themes such as the economy, public services, rights, democracy, education, and gender.

Encouragingly, content promoting civic participation and democratic values consistently outnumbered undemocratic narratives. A limited number of posts included harmful content such as disinformation or delegitimizing claims, but these remained isolated and did not significantly shape the broader online discourse. Most posts raising electoral concerns reflected genuine voter issues rather than coordinated efforts to undermine the process. Although foreign policy topics, particularly those involving China, were rarely mentioned, some content offered civic education and debunked misinformation—suggesting early signs of grassroots engagement and a proactive defense of electoral integrity.

COMELEC introduced new digital campaign regulations in response to these evolving dynamics and collaborated with civil society and tech platforms to encourage responsible online campaigning. However, ANFREL observed that enforcement remains uneven, and calls for a systematic review and strengthening of these policies. The shrinking capacity of traditional media has left accountability gaps that civil society actors have sought to fill, though this shift has also created more space for unchecked disinformation. These developments underscore the urgent need to reinforce regulatory frameworks, enhance media literacy, and invest in long-term digital resilience to safeguard electoral integrity in the Philippines.

Social media companies were observed to be engaging with local civil society organizations and COMELEC. This involved launching an 'Election Hub' and supporting COMELEC through Task Force KKK. Social Media companies work with verified fact checkers and have processes in place to respond to mis and disinformation. Some stakeholders noted that their response to harmful or misleading content remained limited, but with improved process of content takedown. ANFREL hopes that there would be more transparency in enforcement decisions. With the decline of traditional media's reach and resourcing, civil society organizations such as Rappler, Vera Files, and the Center for Media Freedom and Responsibility (CMFR) have stepped in to provide fact-checking, monitoring, and voter

education. These efforts are critical in countering misinformation, particularly given the tendency of candidates to bypass media scrutiny by focusing campaign efforts on controlled online platforms.

f. Domestic and international election monitoring organizations

Public participation in the midterm elections was evident through voter turnout at polling stations and the involvement of civil society in monitoring the electoral process. This form of public participation was demonstrated through the engagement of other civil society organizations (CSOs) such as LENTE, PPCRV, and NAMFREL. The involvement of CSOs occurred not only at the national level but also at the provincial level—for instance, in Cebu, where the Cebu-Citizens Involvement and Maturation for People's Empowerment and Liberation (C-CIMPEL) carried out political education activities in educational institutions.

Their involvement was not limited to election day but extended to pre- and post-election periods. During the pre-election period, these CSOs were engaged in voter education activities and in promoting fair elections. On election day, their participation included setting up Voter Assistance Desk (VAD) at polling stations to assist voters, helping with transmission processes, and receiving reports of election violations from the public, among other roles. After the elections, CSOs monitored the vote-counting process and participated in the Random Manual Audit (RMA).

In addition to local observers, international observers, such as the European Union, monitored the Philippines' 2025 mid-term election. The EU Election Observation Mission (EU-EOM) monitored various aspects of the electoral process, including election administration, election technology, voter registration, registration of candidates, the campaign environment, media, and social media coverage, as well as the participation of women and under-represented groups.

The involvement of CSOs in monitoring the electoral process is also supported by the Omnibus Election Code, Article XV, Section 180, which states: "*The duly accredited citizens arm of the Commission shall be entitled to appoint a watcher in every polling place. Other civic, religious, professional, business, service, youth, and any other similar organizations, with prior authority of the Commission, shall be entitled collectively to appoint one watcher in every polling place.*"

IV. Campaign Environment

Genuine elections that reflect the will of the people require an openly competitive environment.[21] However, ANFREL observed that the campaign landscape in this election continued to reflect deep-rooted structural challenges in Philippine politics—including personality-driven campaigning, weak party systems, and the enduring dominance of political dynasties. ANFREL's observers reported widespread use of unauthorised campaign

[21] Commitment 1 of Model Commitments.

materials, such as posters and paraphernalia placed in public spaces in violation of COMELEC regulations.

In terms of campaign tactics, ANFREL also observed that while social media has become an increasingly popular medium for political communication, traditional methods remain highly significant—especially in the final stretch of the campaign. Among the most common strategies observed were door-to-door campaign, social media outreach, and public rallies. This blend of digital and grassroots engagement demonstrates how Philippine campaigns continue to adapt to evolving media landscapes while maintaining personal, ground-level voter interactions.

Despite the intensity of campaigning, voter decision-making remained shaped less by policy platforms and more by candidate visibility and personal benefit. Many voters whom ANFREL observers interviewed openly admitted that their choices were influenced by financial incentives, welfare support, or tangible local benefits—often linked to vote buying or selective access to government services.

As mentioned above, Republic Act No. 9006 sets clear guidelines on the size, placement, and environmental sustainability of campaign paraphernalia, including a prohibition on their display in public places or on publicly owned buildings.[22] However, in approximately two-thirds of ANFREL's areas of deployment, observers documented violations of these provisions, with campaign materials prominently displayed in restricted spaces. In addition, many materials observed were not environmentally sustainable, and the implementation of the Act's provisions varied widely across regions.

While many voters expressed interest in the electoral process and intended to vote, ANFREL noted a prevailing sense of political apathy in several regions. This disenchantment was often tied to frustration with entrenched dynasties and a lack of meaningful political alternatives. Although the 1987 Constitution includes a provision banning political dynasties, it remains unenforceable without enabling legislation from Congress. This frustration extended to the party-list system, originally intended to empower marginalized sectors. As analysis by the Philippines Center for Investigative Journalism suggests, several of the leading party-list groups in 2025 were linked to dominant political families—including the Tulfos, Revillas, Abaloses, and Dutertes—raising concerns about the system's continuing co-optation.[23] In Ilocos Sur, for example, at least 23 members of the Singson clan ran for various positions, prompting analysts to describe them as a 'super obese dynasty.[24]

Thus, in one out of every three areas observed by ANFREL, electoral competition was severely limited due to uncontested races. This lack of opposition undermines political debate and reflects how dynastic power can suppress pluralism at the local level.

[22] Republic Act No. 9006 (February 2001)
[23] PCIJ, 'Party list groups linked to political dynasties lead 2025 race', (May 2025)
[24] PCIJ, "Political dynasties also swarm the party-list elections', (December 2024)

Finally, the broader political context shaped the dynamics of the campaign. The elections were widely perceived as a referendum on the current administration and a testing ground for the 2028 national elections, amplifying the sense of high political stakes.

V. Bangsamoro Autonomous Region in Muslim Mindanao (BARMM)

The 2025 BARMM parliamentary elections represent a critical milestone in the region's transition toward self-governance and democratic consolidation under the Bangsamoro Organic Law (BOL). Ensuring that these elections are conducted in accordance with international democratic standards is essential to reinforcing public confidence in the political process, legitimizing newly formed institutions, and sustaining the long-term dividends of peace and stability. These standards, grounded in the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights, affirm the right of all citizens to take part in periodic, genuine elections conducted by secret ballot, on the basis of universal and equal suffrage, and held in an environment where freedoms of expression, association, and assembly are protected.

In this context, inclusivity remains central to the credibility of the electoral process. The participation of indigenous peoples, women, youth, persons with disabilities, and former combatants is not only required under international legal instruments such as CEDAW and the CRPD but also critical to ensuring that the post-transition government genuinely reflects the region's diverse population. While efforts have been made to promote inclusive participation, initial observations indicate persistent challenges.

Transparency and integrity of the electoral process are equally vital. Public trust hinges on the independence, impartiality, and preparedness of the election management bodies, particularly the Bangsamoro Electoral Office and the Commission on Elections (COMELEC). These institutions must not only operate free from political interference but also possess the technical capacity to implement complex electoral procedures. ANFREL is closely monitoring how the COMELEC is implementing the key provisions of the Bangsamoro Electoral Code, including those related to the accreditation of regional political parties, the allocation of reserved seats, and the conduct of voter education and information campaigns. The progress of regional political party preparations is particularly significant, as their participation is a core component of BARMM's parliamentary system and an indicator of institutional maturity and political pluralism.

At the same time, the role of domestic election observers is more vital than ever in the Bangsamoro region. Their sustained presence and engagement can help deter irregularities, ensure community-level confidence in the process, and complement the work of national and international observers. However, ANFREL notes that domestic observation initiatives in BARMM remain limited and under-resourced. Greater support for civil society monitoring is urgently needed to strengthen electoral transparency and accountability in a region historically challenged by political violence, clan dynamics, and weak rule of law.

Campaign regulation is another critical area of concern. The early stages of the election period have seen signs of premature campaigning, patronage-driven mobilization, and potential misuse of state resources. These practices undermine the principle of a level playing field and erode public trust. Disinformation, particularly in the digital space, further complicates the campaign environment by distorting voter perceptions and weakening informed political debate. Authorities must ensure that legal frameworks are enforced and that efforts to counter harmful narratives online are grounded in transparency and rights-based approaches.

Ensuring that the 2025 BARMM elections align with international standards is a strategic imperative for the region's political future. Meeting these benchmarks will help secure the legitimacy of the next Bangsamoro Parliament, reinforce the credibility of democratic institutions, and serve as a foundation for broader electoral reforms ahead of the 2028 elections.

ANFREL conducted observation in key areas within BARMM, including in Cotabato City, as well as Sultan Kudurat and Datu Odin Sinsuat in Maguindanao del Norte province, in areas under control of COMELEC. The region remains a critical area for assessing the conduct of elections in a post-conflict setting, particularly in relation to local security dynamics, clan influence, and the implementation of inclusive governance reforms as part of the transition out of conflict.

In some ways, observers noted that the overall election environment in BARMM was largely consistent with broader national trends. Some areas of BARMM had also been placed under COMELEC 'control' in the election, where the body has the power under Resolution No. 11067 to 'exercise direct and immediate supervision and control over national and local officials or employees, including members of any national or local law enforcement'.[25] However, a number of security issues and areas under COMELEC control highlighted specific issues in the area on Election Day. In one area of observation, polling began over two hours late due to delayed arrival and preparation by Electoral Board (EB) members. In another, voters were waiting to cast their ballot until 2 pm —nine hours behind schedule, in a precinct under COMELEC control. This led to long queues and voter frustration, potentially affecting participation in areas already facing high levels of political disengagement.

The region continues to grapple with post-conflict violence and issues including voter intimidation and allegations of the misuse of government aid. While no major incidents of violence were observed during this mission, the security environment remains fragile and requires sustained monitoring ahead of the upcoming 2025 BARMM parliamentary elections.

[25] COMELEC Resolution 11067 (September 2024)

Continued engagement from COMELEC, civil society, and regional authorities will be vital to ensuring a credible and peaceful electoral process as BARMM moves toward further institutional consolidation and the next phase of democratic development.

IV. Election Day Observations

On Election Day, 21 ANFREL observers were deployed to monitor the polls at 270 polling precincts across 11 regions in the Philippines. The observation included 75 precincts in the National Capital Region (NCR), with the rest located across various provinces nationwide. Observers monitored the entire election day process—from opening and voting to closing and transmission. ANFREL observers were assigned to different types of polling stations, including school premises (238), shopping malls (15), and other locations (17) such as detention centers, gymnasiums, and city halls.

The 2025 midterm elections featured key innovations and reforms introduced by the Commission on Elections (COMELEC), particularly aimed at improving accessibility and promoting inclusivity. These efforts reflect a commitment to universal suffrage, informed and inclusive participation, and administrative inclusiveness. Priority Polling Places (PPP), Accessible Polling Places (APP), Satellite-PPPs, and polling places for Indigenous Peoples and Persons Deprived of Liberty (PDLs) were established. Early voting hours from 5:00 to 7:00 AM were also implemented to accommodate vulnerable voters.

In general, the observations on election day showed that the Electoral Board (EB) carried out procedures at the polling places effectively during opening, voting, and closing/transmission stages. During the opening, EBs demonstrated the sealed Automated Counting Machine (ACM) case to the public, opened the ACM case, showed that the official ballot package was sealed, and then broke the seal in public. They also ensured that all necessary equipment was complete. During the voting process, EBs followed key procedures such as verifying voters' identities and providing secrecy folders and marking pens.

As per ANFREL's election day observation data, COMELEC made efforts to uphold inclusivity principles in the conduct of the elections. This was reflected in the setup of polling stations, where approximately one in every two had ramps and priority lanes for voters, while roughly three in every five were wheelchair accessible and had minimal hazards or obstacles for persons with disabilities. About four-fifths featured clear directional and instructional signs, and more than two-thirds had assistors for vulnerable voters. However, provisions such as ACM headphones and assisters for the visually impaired were available in only around two-fifths of polling stations, indicating room for improvement in certain areas of accessibility.

Despite the overall smooth administration of Election Day, ANFREL observers identified several challenges that require attention to strengthen electoral integrity and public trust. These include:

➔ *Crowd Management and PPP Implementation*

At several of the polling places observed, long and congested queues formed due to poor organization. The early voting hour policy encouraged voters to arrive earlier, which resulted in crowd build-up and confusion between regular voters and those using the PPP facilities. At the same time, based on interviews conducted during our observation, some voters expressed confusion, believing that the PPP was their only available option. This highlights the need for clearer voter information and guidance on accessible voting arrangements.

➔ *Voting Environment and Ballot Secrecy*

In several locations, challenges were noted regarding the secrecy of the ballot. Voters' choices were sometimes clearly visible due to inadequate spacing, Electoral Board members being positioned too closely to the voters or the ACM, or voters speaking with staff during the voting process. Other factors included improper use of secrecy folders by voters, voting areas being too close to windows or chairs, and poll watchers or people nearby being able to see voters' choices. 176 polling stations (68.22%) were observed to be set up to ensure the secrecy of the ballot marking process, while 82 polling stations (31.78%) were not designed to protect the confidentiality of the ballot paper.

➔ *Automated Counting Machine (ACM) Technical Issues*

In some of the monitored locations, technical problems with ACMs were reported. During closing, some machines ran out of paper, and inserting new paper required multiple attempts—sometimes only succeeding on the third or fourth try. There were also issues transmitting results due to poor signal at the polling stations. Beyond technical problems, there were operational challenges: some voters were unsure how to properly insert their ballots into the machine. Observers also noted inconsistent adherence to the prescribed ballot verification timing—15 seconds for the front side and 5 seconds for the back—which was not uniformly followed. One-third of voters did not use ballot verification once they had submitted their ballot. Many voters were unfamiliar with the ACM and seemed unaware of the purpose of the screen, which may have limited its use.

V. Post-Election Environment

ANFREL observers noted the absence of significant disturbances or protests. The post-election atmosphere has remained calm and orderly. Observers also noted that losing parties were able to accept the election results. The transmission and vote counting

processes also proceeded peacefully, despite operational issues during the results transmission process.

Based on observations, Filipino voters could trust the vote-counting process conducted by COMELEC. This trust was also supported by public participation in overseeing the vote-counting process, such as efforts carried out by NAMFREL and PPCRV. In addition, a Random Manual Audit (RMA) is being conducted with the involvement of civil society to audit the use of the ACM. The vote-counting process is ongoing, and the public has shown patience while waiting for the official results announcement from COMELEC.

There has been an improvement in COMELEC's performance during the 2025 midterm elections, although there is still room for improvement, particularly regarding the technical aspects of election administration at polling stations.

VI. Conclusions & Recommendations

The 2025 National and Local midterm elections took place at a critical juncture in the political landscape of the Philippines. Seen by most as a referendum on President Marcos Jr.'s administration in the run up to the 2028 election, these elections were also influenced by external and internal politics that drew more public attention than a midterm might.

New leadership at COMELEC since the last election also meant that the work of the election management body was under scrutiny. Elections were marked by notable institutional improvements, particularly in the area of inclusivity, responsiveness, and adherence to electoral law. Stakeholders welcomed new regulations around campaign finance and vote buying, digital media space, and accessible voting. COMELEC demonstrated greater openness and transparency in its engagement with civil society, media, and political actors.

However, serious challenges persist. These include widespread vote buying and the continued abuse of state resources, both of which erode public trust and undermine electoral fairness. Legal limitations on COMELEC's jurisdiction before the official campaign period create significant enforcement gaps, allowing violations to occur unchecked. Additionally, digital disinformation, weak political parties, and dynastic dominance continue to distort voter choice and limit political competition.

Election Day was generally well administered, but observers identified issues with crowd control, ballot secrecy, and technical problems with voting machines. In BARMM, concerns remain around voter intimidation, and post-conflict vulnerabilities, while significant delays in opening of the polls created significant frustration.

To ensure the credibility and inclusivity of future electoral processes,especially in the lead-up to the BARMM parliamentary elections and local Barangay and Sangguniang

Kabataan elections later this year, reform must address both legal gaps and enforcement capacity.

To this end, ANFREL makes several preliminary recommendations to COMELEC and other electoral stakeholders, as well as reaffirming recommendations made in our report on the 2022 elections, '*A Vibrant Democracy amid Systemic Challenges*'.

TO THE COMMISSION ON ELECTIONS (COMELEC)

1. Security and Election Administration

- Strengthen enforcement of the firearm and deadly weapons ban during the election period by increasing checkpoints and imposing stricter penalties.
- Ensure polling precincts, especially Priority Polling Places (PPPs), are trained and equipped to manage crowding and accessibility challenges.
- Improve crowd management in large voting centers by enhancing precinct layout and better training of electoral boards.
- Institutionalize and refine pilot testing of automated elections to improve both efficiency and transparency.

2. Accountability and Enforcement

- Conduct a post-election review in collaboration with vulnerable sector groups to evaluate Accessible and Priority Polling Places and Early Voting Hours, especially for upcoming BARMM and Barangay/SK elections.
- Advocate for legal reforms to extend COMELEC's jurisdiction to the pre-campaign period to more effectively address vote buying and abuse of state resources.
- Strengthen COMELEC's Political Finance Affairs Department and regional monitoring units to increase enforcement capacity.
- Implement mandatory training and certification of poll watchers and monitor compliance with watcher limits.
  Enforce stricter rules on assisted voting by recording assistors' identities and frequency; in cases of unclear identity, EB members should provide the assistance.
- Create a Witness Protection Program specifically for election-related offenses.
- Ensure periodic elections are held in accordance with legal mandates and court decisions, and that postponements only occur through proper legal processes.
- Institutionalize election-related task forces to allow year-round monitoring and enforcement.

3. Transparency and Communication

- Improve COMELEC's capacity for effective public communication, especially on legal guidelines and enforcement.

- Strengthen the Education and Information Department and secure additional funding to operationalize affirmative action mandates under the Fair Elections Act.
- Institutionalize and enhance E-Rallies at the national and local levels; require local offices to manage official social media accounts and receive training.
- Improve the quality of discourse and inclusiveness of E-Rallies by issuing clear guidelines and ensuring outreach to Persons with Disabilities and persons deprived of liberty.
  Coordinate with social media platforms for consistent content moderation and takedown mechanisms during election periods.
- Publish SOCEs in accessible, open formats and require multiple submissions to improve campaign finance transparency.
- Release election-related data sets in formats that are accessible and analyzable by the public.
- Ensure timely and multi-platform communication about voting center relocations (e.g., mall voting) and general election information.

4. Inclusion and Accessibility

- Institutionalize the Vulnerable Sectors Office (VSO) through legislation to ensure financial independence and permanent staff.
- Expand the number of Accessible Voting Centers (AVCs), Separate Polling Places (SPPs), and Satellite-EAPPs, especially for PWDs, older persons, and Indigenous Peoples.

- Broadcast e-rally materials in detention facilities and improve coordination with BJMP for timely retrieval of ballots.
- Provide transportation and special voter registration services for vulnerable groups in remote or difficult-to-reach areas.
  Improve delivery logistics to Special Polling Places using advance authorization processes.
- In mall voting setups, ensure ground-floor accessibility, install clear signage and establish in-mall assistance centers.
- Expand Early Voting Hours to more regions and labor sectors (e.g., BPO, retail workers) to encourage greater participation.

TO THE CONGRESS OF THE PHILIPPINES

- Enact enabling legislation to clearly define “political dynasties” as prescribed in the 1987 Constitution to allow for enforcement.
- Reform the party-list system to reduce political capture and improve genuine representation of marginalized and underrepresented groups.
- Amend the legal framework to extend COMELEC’s authority to cover the pre-campaign period for proactive enforcement.

- Amend RA 8189 (Voter Registration Act) to simplify voter registration procedures and explore integration with the National ID system.

TO POLITICAL PARTIES AND CANDIDATES

- Strengthen internal party platforms that emphasize issue- and policy-based campaigning.
- Commit to a Code of Conduct for digital campaigning, ensuring accountability for disinformation and other unethical practices.
- Refrain from abusing government systems, resources, and influence during campaigns, and uphold the integrity of the electoral process.
  Cooperate fully with COMELEC and civil society efforts to ensure a free and fair campaign environment.

TO CIVIL SOCIETY AND THE MEDIA

- Sustain independent election monitoring and civic education efforts in coordination with COMELEC.
- Lead and support fact-checking initiatives to mitigate misinformation and disinformation in both traditional and digital media spaces.
- Work closely with media organizations to widen outreach and improve voter awareness and education, especially in underserved areas.

TO THE INTERNATIONAL COMMUNITY

- Support capacity-building initiatives for COMELEC, civil society organizations, and election-related institutions involved in voter education, inclusion, and electoral integrity.
- Engage in constructive dialogue with Philippine authorities on electoral reforms, especially regarding campaign finance, election law enforcement, and institutional strengthening.

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