



12 January 2024.

An Coimisiún Toghcháin,  
Dublin Castle,  
Dublin 2,  
D0 2X8X8,  
Email: [research@electoralcommission.ie](mailto:research@electoralcommission.ie)

**Re: Draft Research Programme 2024-2026**

A Chara,

We are writing to you in connection with your current public consultation on *An Coimisiún Toghcháin's* first *Draft Research Programme 2024-2026* and would make the following comments for your consideration.

At the outset, we welcome and support the inclusion, in particular, of the following items in the draft research programme in connection with –

- the use of posters,
- reducing the voting age,
- the expansion of postal voting,
- replacing bye-elections, and
- residency and voting (i.e. the 18 month rule).

As you may recall, the Programme for Government - *Our Shared Future* - contains commitments to examine each of these aspects of electoral policy with a view to bringing forward further reforms to strengthen and improve our electoral system where such reforms are strongly supported by evidence-based research.



We also note and very much welcome *An Coimisiún*'s intention to undertake a review of the Electoral Act 1997. As you have set out in your draft research programme, a number of civil society organisations have raised concerns with the wide-ranging definition of "political purposes" as set out in section 22(2)(aa) of the Act and its impact on the means by which they legitimately raise funds to run their normal day-to-day operations. These issues have been, and remain, the subject of discussions by the European Commission, in the context of its annual Rule of Law Reports, and by the United Nations (i.e. Special Rapporteur on the rights to freedom of peaceful assembly and of association and the Special Rapporteur on the situation of human rights defenders), in the broader context of fundamental freedoms.

Furthermore, the Standards in Public Office Commission, which is the regulator under the Act, has itself made a number of recommendations to amend the Act in its Annual Reports over several years in order to clarify and address potential gaps in our political funding regime. We would suggest that the recommendations made by the Standards in Public Office Commission be examined as part of your research.

In addition, we would welcome the inclusion of the following items in your forthcoming research programme -

- measures to maximise the participation of ethnic minorities and new communities in our elections and electoral events,
- how the State might better support candidates from ethnic minority or new community backgrounds to contest elections,
- how *An Coimisiún* might play a role in supporting less developed countries to improve transparency in their elections, and
- the replacement of addresses of candidates on ballot papers with alternatives to better protect the homes of candidates from being targeted from anti-social behaviour.

As we have stated before, we believe that the research carried out by *An Coimisiún* will provide an important contribution to the future development of electoral policy and the enhancement of our electoral system.



We look forward to examining the outputs of *An Coimisiún*'s research over the months and years ahead.

Is sinne, le meas

A handwritten signature in black ink, appearing to be 'D. O'Brien', written on a light blue background.

**Darragh O'Brien, TD,  
Minister for Housing, Local  
Government & Heritage.**

A handwritten signature in black ink, appearing to be 'Malcolm Noonan', written on a light blue background.

**Malcolm Noonan, TD,  
Minister of State for Heritage and  
Electoral Reform.**