



MYANMAR JUNTA'S  
PLANNED ELECTIONS:

# FALLING SHORT OF DEMOCRATIC LEGITIMACY

SEPTEMBER 2025 | ANFREL



# **Myanmar Junta's Planned Elections: Falling Short of Democratic Legitimacy**

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ANFREL Myanmar Assessment Report



## **Myanmar Junta's Planned Elections: Falling Short of Democratic Legitimacy**

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## GLOSSARY

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- AA: Arakan Army
- AAPP: Assistance Association for Political Prisoners
- ACLED: Armed Conflict Location and Event Data
- AFTA: Articles of Federal Transitional Arrangements
- *Amyotha Hluttaw*: House of Nationalities (upper house of parliament)
- ANP: Arakan National Party
- ASEAN: Association of Southeast Asian Nations
- A-WEB: Association of World Election Bodies
- CRPH: Committee Representing *Pyidaungsu Hluttaw*
- EAO: Ethnic Armed Organization
- EVM: Electronic Voting Machine
- FDC: Federal Democracy Charter
- FPTP: First-past-the-post
- GAD: General Administration Department
- ICCPR: International Covenant on Civil and Political Rights
- IDP: Internally Displaced Person
- MEVM: Myanmar Electronic Voting Machine
- MFDP: Myanmar Farmers' Development Party
- MNDA: Myanmar National Democratic Alliance Army
- MOIP: Ministry of Immigration and Population
- MUP: Mon Unity Party

- NDF: National Democratic Force
- NLD: National League for Democracy
- NSDC: National Security and Defense Council
- NSPNC: National Solidarity and Peace Negotiation Committee
- NUCC: National Unity Consultative Council
- NUG: National Unity Government
- NUP: National Unity Party
- OHCHR: Office of the High Commissioner for Human Rights
- PDF: People's Defence Force
- PNO: Pa-O National Organization
- PP: People's Party
- PPP: People's Pioneer Party
- PR: proportional representation
- *Pyidaungsu Hluttaw*: Union-level parliament (bicameral)
- *Pyithu Hluttaw*: House of Representatives (lower house of parliament)
- SAC: State Administration Council
- SCO: Shanghai Cooperation Organization
- SNDP: Shan and Nationalities Democratic Party
- SNLD: Shan Nationalities League for Democracy
- SSPC: State Security and Peace Commission
- *Tatmadaw*: armed forces of Myanmar
- TNLA: Ta'ang National Liberation Army



- UDHR: Universal Declaration of Human Rights
- UEC: Union Election Commission
- UID: Unique Identity
- UN: United Nations
- UNCAC: United Nations Convention Against Corruption
- UPDJC: Union Peace Dialogue Joint Committee
- USDP: Union Solidarity and Development Party
- VPN: virtual private network
- VVPAT: voter-verifiable paper audit trail

## EXECUTIVE SUMMARY

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Since they unlawfully took power on 1 February 2021 and imprisoned civilian leaders and election officials, Myanmar's armed forces (Tatmadaw) and junta leader Min Aung Hlaing have repeatedly promised new elections to “resolve” the ongoing political crisis and shore up legitimacy for a new régime of their design.

This strategy was laid out in the State Administration Council's (SAC) five-point roadmap<sup>1</sup>, where the first item was the nomination of a new Union Election Commission (UEC) to scrutinize the 2020 voter lists, and the last was the holding of “free and fair multiparty democratic elections” once the state of emergency ended, with the winning party taking over state duties from the military junta.

Min Aung Hlaing had initially hoped to hold these elections within one year of his power grab, but his plans were derailed by widespread fighting and protests against military rule. A new target date, August 2023<sup>2</sup>, then came and went without elections being announced as the country fell deeper into conflict and the military council entrenched itself in Naypyidaw.

Almost five years after the coup, Min Aung Hlaing's attempts at normalization of military rule have all but failed, but he has not given up on his election plans. While the situation in Myanmar is more precarious and polarized than ever, the nationwide state of emergency ended on 31 July 2025 after seven consecutive extensions, and the first of several election phases was announced for 28 December. Meanwhile, the SAC rebranded itself as the State Security and Peace Commission (SSPC), an “interim government” that will oversee the elections.

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1 e.g. *Global New Light of Myanmar*, “Five-Point Road Map of the State Administration Council”, 13 July 2021, [https://cdn.digitalagencybangkok.com/file/client-cdn/gnlm/wp-content/uploads/2021/07/13\\_July\\_21\\_gnlm.pdf](https://cdn.digitalagencybangkok.com/file/client-cdn/gnlm/wp-content/uploads/2021/07/13_July_21_gnlm.pdf)

2 Aljazeera, “Min Aung Hlaing says no Myanmar elections until 2023”, 1 August 2023, <https://www.aljazeera.com/news/2021/8/1/min-aung-hlaing-promises-myanmar-multi-party-elections-2023>

This report demonstrates that the junta's elections will take place in an environment of widespread violence, restrictive laws, and intense repression, and will feature dubious electronic voting machines, handpicked political parties, and no independent scrutiny from media or civil society, all in the hope that the international community will accept the results and restore relations with Myanmar.

Our assessment reviews the junta's upcoming elections according to established international standards and best practices for genuine democratic elections. These include fundamental rights such as freedom of assembly, freedom of association, freedom of expression, freedom of information, and freedom from fear, as well as election safety, integrity, transparency, inclusiveness, and the rule of law. They are enshrined in the Universal Declaration of Human Rights of 1948, the International Covenant on Civil and Political Rights of 1966, the Bangkok Declaration of 1967, the ASEAN Human Rights Declaration of 2012, the [Model Commitments for Advancing Genuine and Credible Elections](#), and the Global Network for Securing Electoral Integrity's [Principles for Democratic Electoral Reform Processes](#), among others.

Through fifteen concise sections discussing different aspects of the electoral process, ANFREL will demonstrate that **the elections staged by the junta in Myanmar do not align with international standards and cannot be considered credible or legitimate**. These “sham elections”, as they have widely been referred to, have severe political and procedural shortcomings and cannot be a solution to the conflicts raging across Myanmar.

Worse still, Min Aung Hlaing's ruthless pursuit of international and domestic legitimacy means that **people are being killed and will continue to die because of the junta's elections**. More than a question of legality, these elections raise profound moral concerns given the ongoing suffering of the population.

The methodology for this assessment included a review of election-related developments in Myanmar and dozens of interviews with civil society, media, pro-democracy institutions, and political parties, including several that will compete in the upcoming elections. ANFREL has been working in Myanmar for nearly two decades, and observed the 2015 and 2020 general elections, as well as the 2017 and 2018 by-elections.

In parallel with this report, ANFREL will continue working with NGOs and civil society organizations in Myanmar, across Asia, and internationally to uphold democratic principles and to draw attention to the challenges and risks surrounding the junta's planned elections.

In solidarity,

**Rohana**, ANFREL

**Brizza**, ANFREL

# 1 | THE JUNTA'S ELECTIONS ARE ILLEGAL AND ILLEGITIMATE

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The elections organized by the military junta will take place under the framework of the 2008 constitution. This document is fundamentally undemocratic, as it reserves 25% of all parliamentary seats at the Union and state/region levels for the armed forces of Myanmar (*Tatmadaw*), and grants them effective veto power over any constitutional amendment.

This constitution was ostensibly adopted in a referendum held just days after Cyclone Nargis made landfall in the Irrawaddy delta, leaving devastation in its wake. Yet, the junta of the time reported a voter turnout of over 98%, with more than 93% of votes in favor. These results were widely seen as fraudulent and nonsensical under the circumstances.

Even though the 2008 constitution was written and imposed by the *Tatmadaw* to serve its own interests, Min Aung Hlaing and the State Administration Council (SAC) have repeatedly ignored and violated it. The overthrow of the elected government on 1 February 2021 and declaration of a nationwide state of emergency failed to follow constitutional procedures and were therefore illegal, as were all subsequent decisions by the SAC. The junta also repeatedly extended the state of emergency beyond the maximum period of two years permitted by Article 421 of the constitution.

Most stakeholders in Myanmar have long considered the 2008 constitution null and void due to the military's actions. On 31 March 2021, the Committee Representing Pyidaungsu Hluttaw (CRPH) announced its abolition and proclaimed in its stead the Federal Democracy Charter (FDC), which a People's Assembly then ratified in January 2022.

A coalition of political organizations across Myanmar is now drafting a new framework for constitution building with the Articles of Federal Transitional Arrangements (AFTA), embracing the principle of bottom-up federalism, which are expected to be published by the end of the year. These are the initiatives that should be supported by the international community for a more inclusive, stable, and democratic Myanmar.

**The military junta has neither constitutional nor democratic legitimacy to call elections. The mandate of the people remains with the lawmakers elected in the 2020 general election until genuine and transparent elections can be held.**

### **Applicable international standards:**

- Article 21(3) of the Universal Declaration of Human Rights establishes that the will of the people shall be the basis of the authority of government.
- Article 25 of the International Covenant on Civil and Political Rights states that every citizen has the right to take part in the conduct of public affairs, directly or through freely chosen representatives, and to vote and be elected in genuine periodic elections.
- Article 2(2) of the ASEAN Charter requires ASEAN member states to adhere to the rule of law, good governance, the principles of democracy and constitutional government.
- Article 3(11) of the Inter-Parliamentary Union's Declaration on Criteria for Free and Fair Elections states that every candidate and political party competing in an election shall accept the outcome of a free and fair election.

## For more:

- Committee Representing Pyidaungsu Hluttaw, “Federal Democracy Charter, Part 1”, 31 March 2021, <https://crphmyanmar.org/wp-content/uploads/2021/04/Federal-Democracy-Charter-English.pdf>
- International IDEA, “Unconstitutionality of the 2021 coup in Myanmar”, 29 March 2022, <https://www.idea.int/sites/default/files/publications/unconstitutionality-of-the-2021-military-coup-in-myanmar.pdf>
- Mizzima, “NUCC aims to finalize federal transitional constitution ahead of Myanmar junta’s planned elections”, 28 August 2025, <https://eng.mizzima.com/2025/08/28/25850>
- United Nations Special Rapporteur on the situation of human rights in Myanmar, “Illegal and Illegitimate: Examining the Myanmar Military’s Claim as the Government of Myanmar and the International Response”, 31 January 2023, <https://www.ohchr.org/sites/default/files/documents/countries/mm/2023-01-27/crp-sr-myanmar-2023-01-31.pdf>

## 2 | AN ELECTION COMMISSION UNLAWFULLY INSTALLED

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Among the first steps taken by the *Tatmadaw* during the coup was the arrest of Union Election Commission (UEC) chair U Hla Thein and members U Myint Naing and U Than Htay, alongside President Win Myint and State Counsellor Aung San Suu Kyi.

The three UEC officials were targeted by the military for performing their duties and successfully holding the 2020 general election. They were later sentenced by a junta tribunal to three years in prison under Section 130(a) of the Penal Code, which sanctions negligence by civil servants of provisions in the constitution or any law. U Hla Thein and U Myint Naing were freed in October 2022 after their sentences were commuted by the junta as a gesture of “goodwill<sup>3</sup>”. More election officials were reportedly arrested following the coup and pressured into signing false confessions.

In his very first order as acting president on 1 February 2021, *Tatmadaw* appointee Myint Swe claimed that the UEC “had not only failed to perform their duties but also neglected to ensure free, fair, and transparent elections<sup>4</sup>”. He appointed a new election commission the next day, led by U Thein Soe, a former army major general who had previously led the UEC during the 2010 general election, which was widely regarded as not free and fair.

On 26 July 2021, the junta-appointed commission annulled the results of the 2020 general election. However, neither the 2008

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3 Eleven Myanmar, “Sentences to former UEC Chairman U Hla Thein and UEC member U Myint Naing relaxed: SAC Information Team”, 11 November 2022, <https://elevenmyanmar.com/news/sentences-to-former-uec-chairman-u-hla-thein-and-uec-member-u-myint-naing-relaxed-sac>

4 Republic of the Union of Myanmar, Office of the President, Order Number (1/2021), in Global New Light of Myanmar, 2 February 2021, [https://www.moi.gov.mm/nlm/sites/default/files/newspaper-pdf/2021-02/2\\_Feb\\_21\\_gnlm.pdf](https://www.moi.gov.mm/nlm/sites/default/files/newspaper-pdf/2021-02/2_Feb_21_gnlm.pdf)



constitution nor election laws empower the election management body with the authority to do so, even if it were properly appointed.

U Thein Soe was replaced as UEC chair on 31 January 2024 by U Ko Ko, himself replaced on 31 July 2025 by U Than Soe. U Than Soe was first appointed as a UEC member by the junta on 26 February 2021, and now chairs the 14-member commission that will administer the elections on behalf of the military junta.

ANFREL has repeatedly advocated for other election management bodies in Asia, as well as the Association of World Election Bodies (A-WEB), to stop any collaboration and sever their ties with the junta's election commission.

**The junta's Union Election Commission (UEC) is not an independent or legitimate body, but an organ of the Myanmar military without a legal mandate to hold elections. Lawfully appointed election officials were illegally arrested and jailed after the coup.**

### **Applicable international standards:**

- UN Human Rights Committee, **CCPR General Comment No. 25**, paragraph 20: "An independent electoral authority should be established to supervise the electoral process and to ensure that it is conducted fairly, impartially and in accordance with established laws which are compatible with the Covenant."
- Asian Electoral Stakeholder Forum II, **Dili Indicators of Democratic Elections**, item III(a)(1): "Appointment of election management body officials is based on a just, impartial and transparent process."
- Inter-Parliamentary Union, **Declaration on Criteria for Free and Fair Elections**, Article 4(2): "States should take the necessary policy and institutional steps to ensure the progressive achievement and consolidation of democratic goals, including

through the establishment of a neutral, impartial or balanced mechanism for the management of elections. [...]"

- **Model Commitments for Electoral Integrity**, legal framework commitments on independent election authority: "The legal framework provides that election administration will be independent, politically neutral, sufficiently and timely funded, subject to transparency and accountability requirements that reinforce public confidence in its effectiveness and fairness, and always consistent with international human rights."

### For more:

- Radio Free Asia, "Myanmar charges three pre-coup UEC members with breaching polling laws", 8 July 2022, <https://www.rfa.org/english/news/myanmar/myanmar-charges-three-pre-coup-uec-members-with-breaching-polling-law-07082022055935.html>
- The Guardian, "Election officials detained in Myanmar 'in bid to prove fraud'", 12 February 2021, <https://www.theguardian.com/world/2021/feb/12/election-officials-held-in-myanmar-in-bid-to-prove>
- The Irrawaddy, "Myanmar Regime Jails Former Election Commission Head", 30 November 2021, <https://www.irrawaddy.com/news/burma/myanmar-regime-jails-former-election-commission-head.html>

### 3 | THE MILITARY'S CLAIMS OF ELECTION FRAUD IN 2020 REMAIN UNSUBSTANTIATED

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Myanmar's junta has used voter fraud in the 2020 general election as a narrative to justify the coup, subsequent reforms, and the holding of new elections. However, evidence contradicts the claims of the military.

Before the elections took place in November 2020, the military-affiliated Union Solidarity and Development Party (USDP) and *Tatmadaw* commander-in-chief Min Aung Hlaing repeatedly criticized the UEC and its decisions, setting the stage for post-election protests. The USDP immediately rejected the election results when it appeared that the ruling National League for Democracy (NLD) had won by a landslide, and called for the UEC to hold new elections in collaboration with the armed forces.

The USDP then launched a coordinated campaign to file election complaints nationwide and flood election tribunals, spending more than US\$75,000 in legal fees doing so. At the same time, in an attempt to side-step the electoral dispute resolution process provided by law, the USDP and other political parties close to the military called for a commission of inquiry comprising political parties and “institutions and entities responsible to safeguard the Constitution<sup>5</sup>” to investigate election fraud.

The UEC eventually received 287 formal complaints, including 171 filed by the USDP and more filed against the NLD by private proxies, compared to 45 after the 2015 general election. As the commission was scheduled to start hearings on these complaints on 1 February, the *Tatmadaw* staged a coup the same day, further

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5 “Joint Statement by 16 Political Parties on the Outcome of the 2020 General Election”, 11 November 2020, <https://www.facebook.com/share/18pDVJrD17/>

proving that it did not engage in the election dispute resolution process in good faith.

In April 2021, the SAC released a 118-page booklet detailing the military's accusations of election fraud, claiming that it had found 10,482,116 fraudulent entries on the voter lists. ANFREL denounced this report at the time as “filled with false truths, misrepresented facts, and inaccuracies<sup>6</sup>”. The junta-appointed UEC has since released a consolidated report, claiming an even higher number of 11,305,390 fraudulent voters<sup>7</sup>, or about 30% of all registered voters.

However, no concrete evidence of this alleged fraud or disaggregated data was ever made public. The junta-appointed election commission has nevertheless charged at least 505 people with election fraud since the coup.

**It remains ANFREL's informed opinion that the results of the 2020 general election were, by and large, representative of the will of the people of Myanmar, and that the military used baseless claims of widespread fraud to circumvent due process of law.**

### **Applicable international standards:**

- Universal Declaration of Human Rights, Article 8: “Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.”
- Article 2(3) of the International Covenant on Civil and Political Rights states that any person whose rights or freedoms are violated has the right to an effective remedy by competent judicial, administrative or legislative authorities.

6 ANFREL, “Report Launch: ANFREL IEOM to 2020 Myanmar General Elections”, 17 May 2021, <https://www.facebook.com/ANFREL/videos/1117553968743334>

7 Union Election Commission, “Findings on the Investigation of Electoral Frauds and Malpractices in 2020 Multi-party Democracy General Election”, <https://2020election.uec.gov.mm>

- Asian Electoral Stakeholder Forum II, Dili Indicators of Democratic Elections, item V(b): “The process of resolving disputes is done in an impartial, transparent, independent and timely manner consistent with respect for the rule of law.”
- ASEAN Human Rights Declaration, Article 5: “Every person has the right to an effective and enforceable remedy, to be determined by a court or other competent authorities, for acts violating the rights granted to that person by the constitution or by law.”
- Model Commitments for Electoral Integrity, electoral accountability commitments on timely, transparent resolution of complaints and disputes: “Applicable laws and rules regarding administrative complaint mechanisms and judicial proceedings concerning electoral processes are widely publicized, transparent and equally available to all without overly burdensome fees, deposits, or requirements to prospective voters, electoral contestants, and other interested parties.”

### For more:

- Myanmar Now, “USDP spends \$75,000 on election complaints against almost 200 NLD MPs”, 29 December 2020, <https://myanmar-now.org/en/news/usdp-spends-75000-on-election-complaints-against-almost-200-nld-mps/>
- Radio Free Asia, “Aung San Suu Kyi sentenced to a further three years on election fraud charge”, 22 September 2022, <https://www.rfa.org/english/news/myanmar/suu-kyi-sentence-09022022040050.html>

- The Irrawaddy, “Myanmar Opposition Party Demands Election Rerun With Military Involvement”, 11 November 2020, <https://www.irrawaddy.com/news/burma/myanmar-opposition-party-demands-election-rerun-military-involvement.html>

## 4 | **A REPRESSIVE ENVIRONMENT DEVOID OF FUNDAMENTAL FREEDOMS** \_\_\_\_\_

Credible elections rest on building blocks, among which are the fundamental freedoms of assembly, association, expression, information, and political participation. Since the military takeover, these rights have been systematically infringed upon, and the citizens of Myanmar are facing restrictive laws and widespread repression.

According to the Assistance Association for Political Prisoners, 29,704 people have been arrested between the coup and 19 September 2025, and 22,427 remain in detention. At least 651 people were killed and 1,600 were arrested during demonstrations in the six months following the coup, violating the fundamental right to peaceful assembly.

The NGO Data for Myanmar reports that 1,884 people have been arrested for social media posts or online communications expressing support for Myanmar's pro-democracy movement. The junta has set up a committee monitoring online content around the clock, and the use of virtual private networks (VPNs), used by many to protect their identity, has been banned, further attacking freedom of speech.

In October 2022, the junta enacted the Organisation Registration Law, requiring all non-governmental organizations to be registered under a strict legal framework and introducing disproportionate penalties for non-compliance, including significant fines, jail time, and confiscation of assets. The law uses broad language to restrict NGO activities and mandates invasive monitoring by authorities, severely curtailing freedom of association.

The junta has also weaponized the counter-terrorism law (amended in 2021 and 2023) and cybersecurity law (enacted in

January 2025) to grant broad powers to state agencies to monitor, target, and seize the assets of civil society groups, independent media, and political dissidents. As of September 2025, internet and communication networks have been shut down 405 times since the coup, according to the Myanmar Internet Project, and over 220 journalists have been arrested, denying the population's basic right to information.

On 29 July 2025, the SAC enacted the “Law on the Protection of Elections from Interference and Disruption”. This bill criminalizes any sabotage or disruption of the electoral process, with a punishment of at least three years in prison, and the death penalty for actions resulting in the death of a person. Destruction of election materials, EVMs, or polling stations can result in five to ten years in prison, or life imprisonment if committed as a group. In early September, a man was sentenced to seven years of hard labor, in the first documented case of the law being used to suppress criticism of the junta's elections. The amended election laws published in August also punish any disruption of the elections with up to three years in prison.

**The military junta has weaponized restrictive laws to crack down on dissent and curtail fundamental freedoms, in violation of its international obligations. These sweeping attacks on human rights undermine the very foundation of the electoral process, which cannot be considered free or fair in such a prohibitive environment. Credible elections cannot exist if fundamental political rights are not upheld.**

### **Applicable international standards:**

- Freedom of assembly is recognized by Article 20 of the Universal Declaration of Human Rights (UDHR), Article 21 of the International Covenant on Civil and Political Rights (ICCPR), General Comment No. 37 by the UN Human Rights Committee, and Article 24 of the ASEAN Human Rights Declaration.



- Freedom of expression and information is defined in Article 19 of the UDHR and ICCPR, General Comment No. 34, and Article 23 of the ASEAN Human Rights Declaration.
- Freedom of association is inscribed in Article 20 of the UDHR and Article 22 of the ICCPR.

### For more:

- Article 19, “Myanmar: Crackdown on Freedom of Expression with 24-hour Monitoring”, 1 April 2024, <https://www.article19.org/resources/myanmar-crackdown-on-freedom-of-expression-with-24-hour-monitoring-2/>
- Assistance Association for Political Prisoners, “Political Prisoners Post-Coup” dashboard, accessed 8 September 2025, <https://aappb.org/>
- Associated Press, “Man sentenced to 7 years of hard labor for criticizing Myanmar’s election plan”, 10 September 2025, <https://apnews.com/article/myanmar-election-law-conviction-966901c0e49ea5c82d823a39b9d4ef2e>
- Athan, “Update on Journalism and Media Safety in Myanmar”, 7 June 2025, <https://athanmyanmar.org/update-on-journalism-and-media-safety-in-myanmar-2/>
- Data for Myanmar, “Crackdown on Digital Rights: Online Expression in the Face of Oppression in Myanmar”, February 2025, [https://drive.google.com/file/d/1dBPYB2a\\_m53QoAh48LXD-OsC9p6LSn13/view](https://drive.google.com/file/d/1dBPYB2a_m53QoAh48LXD-OsC9p6LSn13/view)

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- Myanmar Internet Project, “Internet Shutdown” dashboard, accessed 8 September 2025, <https://www.myanmarinternet.info/internet-shutdown>
- Radio Free Asia, “Amendment grants Myanmar junta sweeping new powers under Anti-Terrorism Law”, 15 March 2023, <https://www.rfa.org/english/news/myanmar/amendment-03152023170207.html>
- The Diplomat, “Myanmar Military Junta Enacts Repressive New Cybersecurity Bill”, 3 January 2025, <https://thediplomat.com/2025/01/myanmar-military-junta-enacts-repressive-new-cybersecurity-bill/>

## 5 | **RAMPANT INSTABILITY INCOMPATIBLE WITH ELECTIONS**

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While Myanmar has experienced armed conflict without interruption since its independence, the security situation has dramatically worsened since the coup. The United Nations High Commissioner for Human Rights has described it as a “human rights crisis characterized by violence and atrocities<sup>8</sup>”.

Data collected by conflict monitoring organizations highlights the human toll of the war triggered by the military takeover. The Myanmar Peace Monitor project reports 32,267 armed conflict fatalities, including 8,001 civilians, between 1 April 2022 and 9 September 2025, and over 2,500 airstrikes and 4 million internally displaced persons (IDPs) since the coup.

The Institute for Strategy and Policy-Myanmar has recorded over 80 mass casualty events where at least ten civilians were killed, with most perpetrated by junta troops. It also tallied nearly 9,500 civilian deaths and 12,000 airstrikes between the coup and May 2025. The Armed Conflict Location and Event Data (ACLED) project has reported a much higher figure of at least 80,000 killed since the coup, and ranked Myanmar as the third most deadly country in the world in 2024.

There are credible reports that war crimes and crimes against humanity, including the use of thermobaric weapons, banned cluster munitions, human shields, and sexual violence, have been committed repeatedly by *Tatmadaw* troops across the country.

The military junta has been targeting civilian populations with ever-increasing ferocity. A massive escalation in airstrikes by

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8 United Nations Human Rights Council, “Situation of human rights in Myanmar: Report of the United Nations High Commissioner for Human Rights”, 16 June 2025, <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session59/advance-version/a-hrc-59-57-aev.pdf>

the *Tatmadaw*, enabled by deliveries of jet fuel to the junta despite calls for an international embargo, resulted in more civilians being killed or injured in 2024 than during the three previous years combined.

The violence is such that political parties and candidates are taking extraordinary measures to ensure their safety. Those who can afford it are allegedly purchasing bulletproof vehicles and jackets to campaign in, while others are expressing concerns about sufficient security for in-person campaigning. Some parties will reportedly deploy armed security personnel as part of the junta's election security arrangements.

While there are historical precedents for elections taking place in wartime, the situation in Myanmar is far from conventional, as the military junta is pushing for elections while at the same time waging war on its own population, creating mass suffering, displacement, and fear.

**No genuine election can take place amid a backdrop of such widespread and egregious violence. It is essential that the military junta step down and hostilities stop across the country before any elections can be considered.**

### For more:

- ACLED, "The war from the sky: How drone warfare is shaping the conflict in Myanmar", 1 July 2025, <https://acleddata.com/report/war-sky-how-drone-warfare-shaping-conflict-myanmar>
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- The Irrawaddy, “Pro-Junta Parties to Be Armed to Teeth in Myanmar Polls”, 17 December 2024, <https://www.irrawaddy.com/news/politics/pro-junta-parties-to-be-armed-to-teeth-in-myanmar-polls.html>

## 6 | ELECTION PHASES WILL FURTHER RAMP UP CONFLICT

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Mapping conflict in Myanmar is a difficult task. Control is often fleeting as armed groups regroup and relocate. Nonetheless, resistance forces appear to have reached a peak in early 2025, with 144 townships partly or wholly under the effective control of the People's Defense Force (PDF) or anti-junta ethnic armed organizations (EAOs), 107 townships under SAC control, and 79 townships contested, according to the NUG's Ministry of Defense.

Since then, however, the *Tatmadaw* was able to push back in some key areas. On 21 April, it regained control of Lashio, after the MNDAA agreed to withdraw under pressure from China. On 17 July, it reclaimed Nawngkhio from the Ta'ang National Liberation Army (TNLA), followed on 23 July by the town of Thabeikkyin in Mandalay region, previously controlled by the PDF. The military has also made gains in Kayah and Southern Shan states, retaking the towns of Moebye on 6 July and Demoso on 19 August, and is on the offensive in several regions.

Min Aung Hlaing first announced that the junta's elections would be held in phases in an interview with Russian state media in March 2024. Myanmar's legal framework allows this, and there is a historical precedent as elections were held over a period of ten months in 1951-1952.

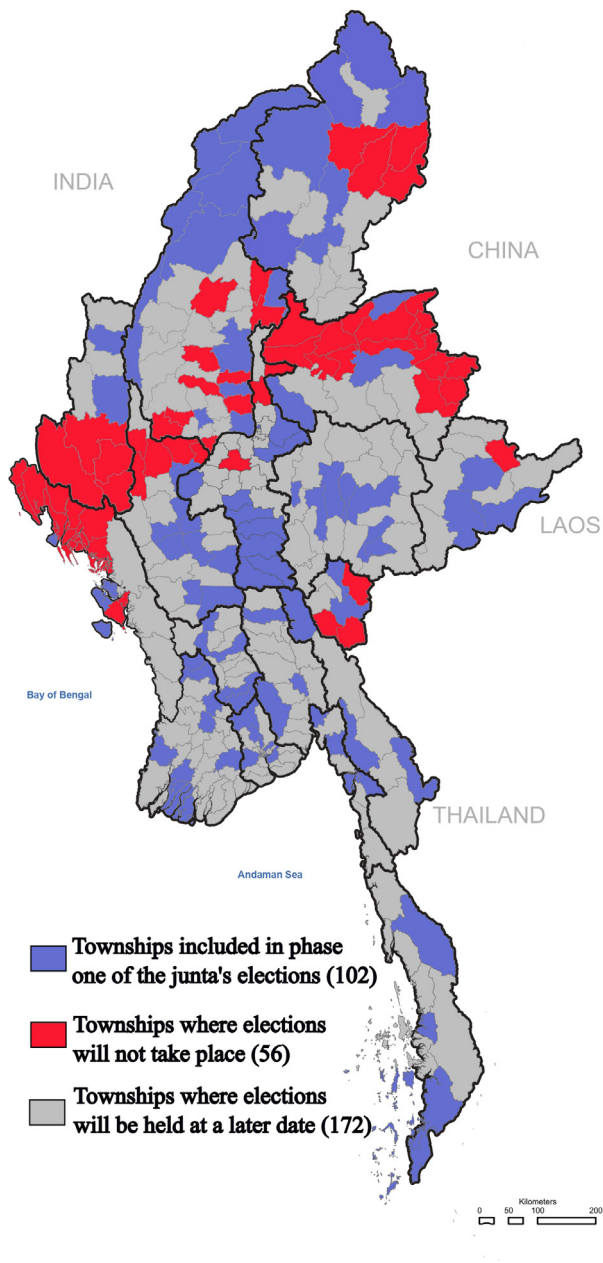
The first phase of the elections staged by the junta will take place in 102 townships on 28 December 2025. 72 of these townships are experiencing armed conflict, according to the Myanmar Peace Monitor project. Some towns included in this first phase, like Lashio and Nawngkhio, were recently reclaimed by the junta. Two more phases are expected to take place in January, although details have yet to be released.

In June 2025, the junta's election commission declared that elections would be held in up to 267 townships in December 2025 and January 2026. This number reflects the martial law later declared in 63 townships controlled by resistance forces, and marks a sharp decline in the capacity of the UEC to organize polling across the country, as previous general elections were held in 325 townships in 2010, 323 townships in 2015, and 315 townships in 2020.

### Map: Breakdown of townships by election phase

State/Region	No. of townships included in the junta's elections phase one	No. of townships where elections will not take place	No. of townships where elections will be held at a later date
Kachin	6	4	8
Kayah	2	3	2
Kayin	3	0	4
Chin	2	4	3
Sagaing	12	10	15
Tanintharyi	4	0	6
Bago	8	0	20
Magway	9	5	11
Mandalay	8	3	17
Mon	5	0	5
Rakhine	3	10	4
Yangon	12	0	33
Shan	12	17	26
Ayeyarwaddy	8	0	18
Naypyitaw	8	0	0
<b>Total</b>	<b>102</b>	<b>56</b>	<b>172</b>

*Data source: UEC*





On 14 September, the UEC announced that elections would not be held in 121 constituencies, including 56 for *Pyithu Hluttaw*, nine for *Amyotha Hluttaw* (first-past-the-post), and 56 for state and region *hluttaaws* (first-past-the-post). However, ten of the 56 townships affected by election cancelations are not under martial law, while the junta is still planning to hold elections in 17 townships under martial law. While these discrepancies were not explained by the UEC, they are likely rooted in the military's confidence in its capacity to hold at least partial elections in some townships. More elections could be canceled later if the *Tatmadaw* fails to expand its control.

As pointed out by the Institute for Strategy and Policy – Myanmar, the junta has “[fused] political manoeuvres – including elections – with military strategy<sup>9</sup>”. This means that election preparations and offensives by the *Tatmadaw* are taking place concurrently to achieve maximum control in townships identified by the UEC for each election phase. This concentration of manpower and military action is likely to result in less, rather than more, security for civilians.

**Civilian populations will bear the cost as military operations, including airstrikes, will be deployed across the country to support elections held on a rolling basis. Each election phase will create more instability and insecurity and cause more casualties.**

### For more:

- DMG, “Junta imposes martial law in 63 resistance-held townships”, 1 August 2025, <https://www.dmediag.com/news/jimli.html>
- DVB, “Regime elections to be held in 267 townships; Sixteen arrested, including six-year-old, for killing retired general”, 9 June 2025, <https://english.dvb.no/regime-elections-to-be-held-in-267->

9 ISP-Myanmar, “Prospective 4th Generation *Tatmadaw* – Pathways to Reform or Further Regression?”, 2 September 2025, <https://ispmyanmar.com/op-27/>

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- NUG Ministry of Defense, "2024 Military Progress Report", 4 January 2025, <https://www.facebook.com/share/p/19iYiQSRcF/>
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## **7 | NO MINIMUM COVERAGE OR VOTER TURNOUT IS REQUIRED FOR THE JUNTA'S ELECTIONS**

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Myanmar's legal framework imposes few procedural requirements as to the validity of election results. Not only are elections not required to be held at the same time across the country, as discussed previously, but there are also no geographical or participation thresholds that the elections would need to meet.

In practice, this means that:

- There is no minimum number of constituencies where elections must be held in order to be considered valid.
- There is no minimum coverage of each constituency where elections must be held to be considered valid.
- There is no minimum voter turnout for elections to be considered valid.

Most stakeholders interviewed by ANFREL for this assessment expect the junta to make use of these legal shortcomings to stage elections in small areas under their control, most often city centers, but declare results for entire townships or constituencies, thereby artificially inflating the coverage of the junta's election management body. In extreme cases, the UEC could hold elections in only a few wards or village tracts, with only a few voters taking part, and the results would still be certified.

One example of a township where this is likely to happen is Tedim, one of only two in Chin state where the junta has announced elections will take place in "phase 1", on 28 December 2025. As of July 2025, the junta was present only in urban areas

of Tedim, with the rest of the township controlled by either the Chin Brotherhood or the Chinland Council<sup>10</sup>, two rivaling anti-junta factions. Regardless of ongoing junta offensives, it is improbable that the UEC would be able to conduct voter registration, an election campaign, and voting in more than a small fraction of the township.

While Min Aung Hlaing previously declared that “it is necessary to hold elections in more than 50 percent of constituencies in states and regions<sup>11</sup>” for the elections to be considered “successful”, he was referring to the quorum of over 50% of “Hluttaw representatives who have the right to attend” required to convene the new parliament, as stated in Article 85 of the 2008 constitution, and the junta’s UEC is not bound to effectively hold elections in half of the country.

**The junta does not need to organize widespread, inclusive, or even remotely representative elections for them to be considered valid under its legal framework. The elections staged by the junta will be held only in urban centers and areas under military control, excluding many voters and areas even within townships where elections have been announced.**

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10 See ISP-Myanmar, “Chin Resistance Groups Control 80 Percent of Chin State”, 24 July 2025, <https://ispmyanmar.com/mp-106/>

11 From a January 2023 National Defence and Security Council meeting, see <https://www.seniorgeneralminaunghlaing.com.mm/en/29433/national-defence-security-council-republic-union-myanmar-holds-meeting-12023/>

## 8 | A NEW ELECTORAL SYSTEM TO ENSURE MILITARY HEGEMONY IN THE NEXT PARLIAMENT

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Soon after the coup, Min Aung Hlaing and the junta-appointed UEC proposed changes to Myanmar's electoral system, including the introduction of proportional representation (PR) instead of first-past-the-post (FPTP), which had traditionally been used for all elections. The change was allegedly considered to allow for more inclusive representation in parliament.

While it is true that first-past-the-post is criticized by some for reinforcing majoritarian rule, due to its “winner takes all” nature, the junta's implementation of proportional representation is designed to entrench the military further.

PR had been a long-standing demand of the Union Solidarity and Development Party (USDP) and other parties, such as the National Democratic Force (NDF), to reduce the dominance of the NLD. On the other hand, most political parties that won seats in 2020 have voiced their opposition to a PR system. The junta-appointed UEC conducted meetings and workshops with registered political parties on the implementation of PR, until amended election laws were published on 30 July 2025, as one of the last measures taken by the now-defunct SAC.

Under the new laws, half of *Amyotha Hluttaw* and state/region *hluttaw* members will be chosen through closed-list proportional representation, with the other half still selected via first-past-the-post. However, the UEC has announced that voters will only get to vote once for both elections, as FPTP votes will be used to calculate seat allocation under PR. *Pyithu Hluttaw* elections will continue to use FPTP only as changing the constituency

delimitation process would have required a constitutional amendment. The number of seats in all houses remains unchanged.

By keeping 50% of seats in *Amyotha Hluttaw* and state/region *hluttaws* allocated via FPTP, the new electoral system maintains an advantage for larger parties, and especially the USDP, which has the most resources, enjoys the military's support, and will compete nationwide. In addition, the PR component also favors larger parties, as many states or regions are divided into several constituencies (up to three each for *Amyotha Hluttaw*, and six each for region/state *hluttaws*).

The nature of PR systems is such that electoral districts with more seats yield more proportional results, and vice versa. 11 out of 26 *Amyotha Hluttaw* constituencies will have only two seats, which will be awarded to the parties arriving first and second. However, the seat allocation formula uses the largest remainder method and the Hare quota, both of which favor smaller parties in larger constituencies, granting them token representation in the new parliament.

The junta's revised electoral system has drawn criticism from registered ethnic parties. Some have said that PR was not appropriate for use in state/regional parliaments<sup>12</sup>, while others complain that linking FPTP and PR votes will favor large parties over smaller ones, which are unable to field as many candidates<sup>13</sup>.

**Despite claims of greater representation, the new electoral system introduced by the junta and its election commission favors large political parties, especially the military-backed USDP. Together with the 25% of seats reserved for the *Tatmadaw*, it ensures that the military and its proxies will be dominant in the next parliament.**

12 CNI, "PR system should not used for Region and State Hluttaws", 6 August 2025, <https://cnimyanmar.com/index.php/english-edition/30667-pr-system-should-not-used-for-region-and-state-hluttaws>

13 [in Burmese] Myanmar Peace Monitor, "ဆန္ဒမဲတစ်မဲဟာ ကိုယ်စားလှယ်လောင်းအဖြစ် ပါတီကိုပါ မဲပေးတဲ့ပုံစံနဲ့ ဆောင်ရွက်မယ်လို့ UEC ဖြေ", 27 August 2025, <https://mmpacemonitor.org/my/mmr-news/%e1%80%86%e1%80%94%e1%80%b9%e1%80%92%e1%80%99%e1%80%b2%e1%80%90%e1%80%85%e1%80%ba%e1%80%99%e1%80%b2%e1%80%9f%e1%80%ac%e1%80%80%e1%80%ad%e1%80%af%e1%80%9a%e1%80%ba%e1%80%85%e1%80%ac%e1%80%b8%e1%80%9c/>

## Applicable international standards:

- UN Human Rights Committee, CCPR General Comment No. 25, paragraph 21: “The principle of one person, one vote, must apply, and 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.”
- Asian Electoral Stakeholder Forum II, Dili Indicators of Democratic Elections, item II(a): “Electoral constituency boundaries are drawn on the basis of the size of the population and geographic area.”

## For more:

- Burma Associated Press, “Myanmar’s junta switch to PR system beneficial only to them”, 11 March 2022, <https://anfrel.org/myanmars-junta-switch-to-pr-system-beneficial-only-to-them/>
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- Myanmar Now, “Junta steps up efforts to promote switch to Proportional Representation in elections”, 14 October 2021, <https://myanmar-now.org/en/news/junta-steps-up-efforts-to-promote-switch-to-proportional-representation-in-elections/>

- The Irrawaddy, “Myanmar Political Parties Reject Regime’s Proportional Representation System”, 9 November 2021, <https://www.irrawaddy.com/news/burma/myanmar-political-parties-reject-regimes-proportional-representation-system.html>

**Table 1: Breakdown of proportional representation constituencies and seats by state and region**

Region or state	Amyotha Hluttaw		Region or state hluttaw	
	Constituency	Number of seats	Constituency	Number of seats
Ayeeyarwaddy	1	3	1	9
	2	3	2	4
			3	7
			4	6
Bago	1	3	1	5
	2	3	2	6
			3	5
			4	4
			5	8
Chin	1	6	1	9
Kachin	1	2	1	9
	2	4	2	9
Kayah	1	6	1	7
Kayin	1	6	1	7



Region or state	<i>Amyotha Hluttaw</i>		Region or state <i>hluttaw</i>	
	Constituency	Number of seats	Constituency	Number of seats
Magway	1	3	1	10
	2	3	2	5
			3	4
			4	6
Mandalay	1	2	1	5
	2	2	2	6
	3	2	3	5
			4	7
			5	5
Mon	1	6	1	10
Rakhine	1	3	1	10
	2	3	1	7
Sagaing	1	2	1	11
	2	4	2	17
			3	9
Shan	1	2	1	13
	2	2	2	8
	3	2	3	10
			4	5
			5	5
			6	14
Tanintharyi	1	6	1	10

Region or state	<i>Amyotha Hluttaw</i>		Region or state <i>hluttaw</i>	
	Constituency	Number of seats	Constituency	Number of seats
Yangon	1	2	1	13
	2	2	2	8
	3	2	3	8
			4	10
			5	3
			6	3

*Data source: UEC*

## 9 | THE JUNTA'S POLITICAL PARTY REGISTRATION LAW: ENSURING OBEDIENCE

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In January 2023, the junta enacted a new Political Parties Registration Law, which mandated that every party re-register with the SAC-appointed Union Election Commission or be dissolved. 40 political groups, including the National League for Democracy (NLD) and dozens of ethnic parties, refused to comply and were banned as a result in March 2023.

The new law also introduced a registration process under strict oversight by the UEC, and high thresholds for Union-level political parties. Parties seeking to compete in elections nationwide are required to deposit 100 million kyat (approximately US\$50,000) into a bank account, recruit 50,000 members, and establish offices in at least one-third of all townships (110)<sup>14</sup>.

Establishing a political party locally is much easier, with 1,000 members, five party offices, and a deposit of 10 million kyat (approximately US\$5,000) required. However, these parties will be able to stand for election in only one state or region. This distinction did not exist in previous elections, as registered parties were free to compete in any area.

The significant disparity between national and local requirements ensures that few groups will be in a position to challenge the military-backed Union Solidarity and Development Party (USDP) nationwide.

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14 Initially 100,000 members and half of all townships, lowered on 30 January 2024 by State Administration Council Law No. 15/2024

Registered parties can be dissolved by the UEC for many reasons, including the use of any state property directly or indirectly and, for Union-level parties, failure to field candidates in at least one-fourth of all constituencies nationwide<sup>15</sup>. In July 2025, a second amendment to the political parties registration law added a provision so that the UEC can dismiss any party against whom it finds evidence of voter fraud or illegal practices. The UEC's decisions to reject or revoke a party's registration cannot be appealed.

The law also bars anyone who is a member of, or in contact with, “insurgent”, “terrorist”, or “unlawful” organizations, which include the National Unity Government (NUG) and most other opposition groups, from establishing or joining a political party. This contradicts the junta's token olive branch extended towards these groups in September 2024 to put down their weapons and participate in the elections, which was universally rejected.

**The junta's political party registration law places disproportionate barriers on freedom of association, enables collective punishment, and denies the right to appeal. It provides opportunities to weaponize the law against political dissidents at any time before or after an election.**

### Applicable international standards:

- **Universal Declaration of Human Rights**, Article 20(1): “Everyone has the right to freedom of peaceful assembly and association.”
- Article 22 of the International Covenant on Civil and Political Rights states that everyone shall have the right to freedom of association with others. Limits to freedom of association must be necessary and proportionate in measure.

<sup>15</sup> Initially half of all constituencies, lowered on 21 September 2025 by National Defense and Security Council Law No. 3/2025

- Asian Electoral Stakeholder Forum II, Dili Indicators of Democratic Elections, items II(b)(1): “Requirements for political party and candidate registration are reasonable and clear.” and II(b)(2): “Regulations for political party and candidate registration are non-discriminatory.”
- Inter-Parliamentary Union, Declaration on Criteria for Free and Fair Elections, Articles 3(2): “Everyone has the right to join, or together with others to establish, a political party or organization for the purpose of competing in an election.” and 3(8): “Every individual or political party whose candidature, party or campaign rights are denied or restricted shall be entitled to appeal to a jurisdiction competent to review such decisions and to correct errors promptly and effectively.”

### For more:

- Human Rights Watch, “Myanmar: Political Parties Law Shackles Opposition”, 14 February 2023, <https://www.hrw.org/news/2023/02/14/myanmar-political-parties-law-shackles-opposition>
- Reuters, “Myanmar junta urges armed opposition to join political fold in elections”, 26 September 2024, <https://www.reuters.com/world/asia-pacific/myanmar-junta-urges-armed-opposition-join-political-fold-elections-2024-09-26/>
- Stimson Center, “Challenges and Perspectives of Political Parties on Democracy and Elections in Myanmar”, 26 March 2024, <https://www.stimson.org/2024/challenges-and-perspectives-of-political-parties-on-democracy-elections-myanmar/>

## 10 | THE JUNTA'S ELECTIONS WILL FEATURE ONLY HANDPICKED POLITICAL PARTIES

77 parties applied to register with the UEC, and 63 have been approved. However, two registered parties were dissolved in November 2023<sup>16</sup> and four in September 2025<sup>17</sup> for not meeting the required number of members or offices, bringing the total of political parties able to run in the junta's elections to 57. 39 are parties that existed before the coup, while 18 are new parties. Only six are registered at the Union level.

Most registered political parties are known to be affiliated with the military or ethnic militias close to it. They participate in so-called peace initiatives from the SAC, such as the National Solidarity and Peace Negotiation Committee (NSPNC), the Union Peace Dialogue Joint Committee (UPDJC), and the 2025 Peace Forum. Many also have a track record of signing joint statements in support of the military's claims of election fraud in 2020 or condemning resistance groups, demonstrating that they have fully embraced the junta's narrative.

Some political parties, such as the People's Party (PP) led by former student leader Ko Ko Gyi, are purportedly unaffiliated with the military but still decided to re-register with the UEC. Pro-democracy stakeholders interviewed dismiss these as opportunists who have been co-opted by the junta and are motivated by the perspective of political gains in the absence of the NLD.

There are indications that some of the new parties were set up or supported by junta officials. Others are proxies for local parties to be able to compete in more than one region or state.

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16 The Mro Nationality Party and the Shan State Kokang Democratic Party

17 The National Democratic Force, the Women's Party (Mon), the Democratic Party of National Politics, and the Union Farmer-Labour Force Party. The National Democratic Force claims to have reported 75,000 members prior to being dissolved by the UEC.

An in-depth analysis of the 2020 election results highlights how little legitimacy registered parties have. As a whole, they represent 43.0% of parties competing in the last general election, 26.8% of votes cast for *Pyithu Hluttaw* and *Amyotha Hluttaw*, and only 9.8% of the total number of seats across all elections held in November 2020. Most are politically insignificant and have never won a seat in previous elections.

According to the UEC, 5,023 candidates were nominated by all 57 registered parties for phase 1 of the junta's elections. The military-backed Union Solidarity and Development Party (USDP) alone will field 1,048 candidates, including over 20 generals and senior junta officials.

**All registered political parties were extensively screened by the UEC and can be considered pro-military. They have been co-opted or propped up by the junta to create a façade of multi-party democracy and an illusion of choice in the upcoming elections.**

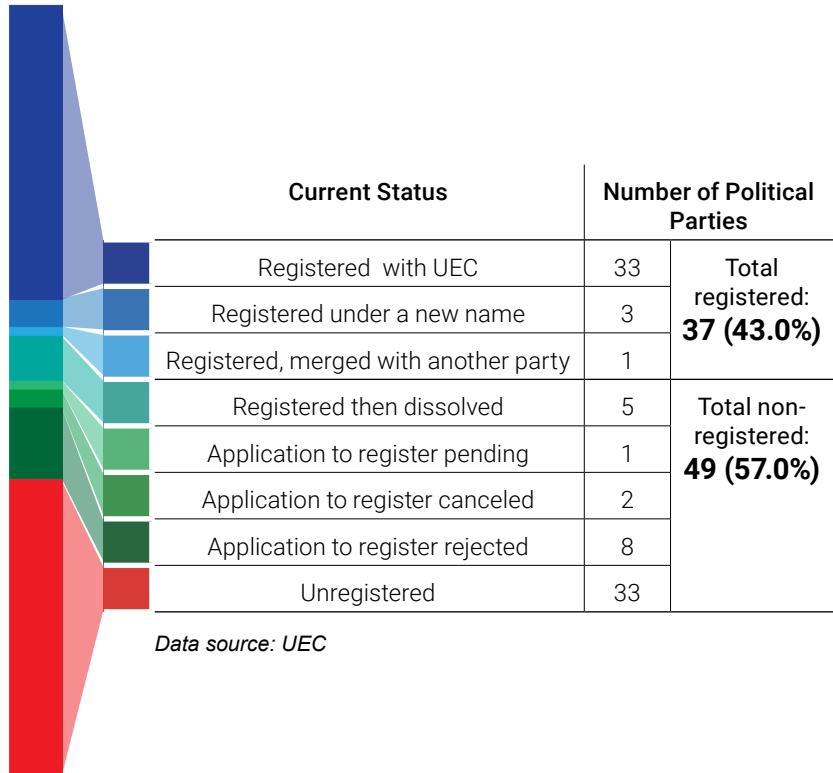
### For more:

- David Scott Mathieson, "Peace theater of the absurd in Myanmar" in Asia Times, 28 June 2025, <https://asiatimes.com/2025/06/peace-theater-of-the-absurd-in-myanmar/>
- [in Burmese] DVB, "ဥပဒေနှင့်အညီ တင်ပြသော်လည်း ကြိုတင်အကြောင်းကြားဘဲ ပါတီဖက်သိမ်းခံရဟု NDF ပါတီဖြော", 10 September 2025, <https://www.dvb.no/post/723510>
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- The Irrawaddy, "Myanmar Political Parties Fear Mass Boycott of Junta's Election", 19 May 2025, <https://www.irrawaddy.com/news/burma/myanmar-political-parties-fear-mass-boycott-of-juntas-election.html>

- The Irrawaddy, “Ruling Generals, Ministers to Dominate Myanmar Military’s Proxy Party Candidate List”, 16 September 2025, <https://www.irrawaddy.com/news/politics/ruling-generals-ministers-to-dominate-myanmar-militarys-proxy-party-candidate-list.html>

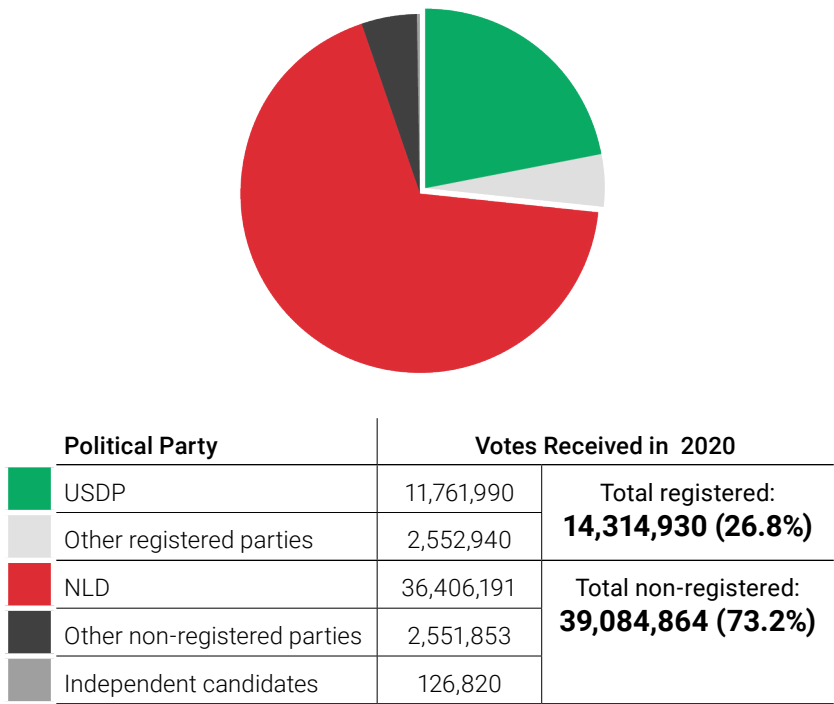
## Infographics: Registered political parties in the 2020 elections

**Figure 1: Status of parties competing in the 2020 elections today**



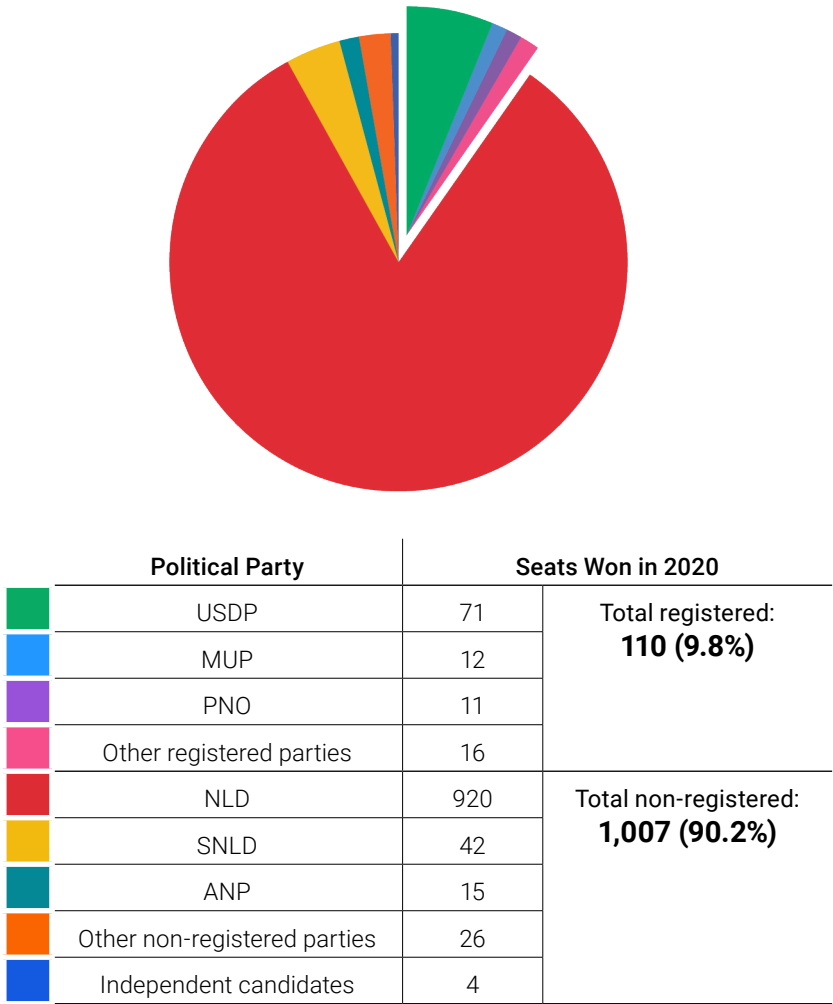


**Figure 2: Breakdown of votes cast in the 2020 general election (across *Pyithu Hluttaw* and *Amyotha Hluttaw*)**



Data source: UEC

**Figure 3: Breakdown of seats won in the 2020 general election (across *Pyithu Hluttaw*, *Amyotha Hluttaw*, state/region hluttaws, and ethnic affairs minister positions)**



Data source: UEC

## 11 | VOTER LISTS ARE PREPARED FROM THE JUNTA'S SURVEILLANCE TOOLS

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As in previous elections, the Union Election Commission is responsible for preparing voter lists, and does so by collating data from the population registries maintained by the General Administration Department (GAD) and the Ministry of Immigration and Population (MOIP). The UEC is also conducting door-to-door voter registration in townships where elections will be held.

However, pro-democracy stakeholders have raised concerns about the accuracy and inclusiveness of said registries, as these have been used by the military to monitor the population, and suspect that the UEC's voter lists will be used by the junta to further control election outcomes.

Indeed, state agencies have been updating population registries as part of the junta's forced conscription drive, and many youth have gone into hiding to avoid being drafted. The junta has also been collecting biometric data and issuing "smart cards" with a unique identification (UID) number, now required for leaving the country and accessing government services, further raising concerns of state surveillance.

The junta conducted a partial census in late 2024, for which the stated goal was to update voter lists, although independent analysts have denounced it as an intelligence tool to identify resistance fighters and support conscription. The census was a failure, with only 145 townships covered fully and another 127 partially out of 330. An estimated 19 million people were not surveyed, out of a population of 51 million. There were credible reports that census data was incorrectly collected or even

fabricated. Nevertheless, the census was used to update population registries and, in turn, voter lists.

The quality of voter lists cannot be assessed until public displays are conducted ahead of the elections. However, under the current context of widespread armed conflict and mass displacement, and without scrutiny from civil society and political parties, it is unlikely that the UEC can produce an accurate, inclusive, and comprehensive voter registry.

**The use of data collected by the junta to enforce conscription and impose surveillance over its population to prepare voter lists goes against international standards. It raises concerns that these lists could be used to exclude, intimidate, or monitor voters.**

### **Applicable international standards:**

- Article 21(3) of the Universal Declaration of Human Rights and Article 25 of the International Covenant on Civil and Political Rights protect universal suffrage.
- UN Human Rights Committee, CCPR General Comment No. 25, paragraph 11: “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 and obstacles to such registration should not be imposed. If residence requirements apply to registration, they must be reasonable, and should not be imposed in such a way as to exclude the homeless from the right to vote. Any abusive interference with registration or voting as well as intimidation or coercion of voters should be prohibited by penal laws and those laws should be strictly enforced. Voter education and registration campaigns are necessary to ensure the effective exercise of article 25 rights by an informed community.”

- Inter-Parliamentary Union, Declaration on Criteria for Free and Fair Elections, Articles 2(2): “Every adult citizen has the right to access to an effective, impartial and non-discriminatory procedure for the registration of voters.” and 2(3): “No eligible citizen shall be denied the right to vote or disqualified from registration as a voter, otherwise than in accordance with objectively verifiable criteria prescribed by law, and provided that such measures are consistent with the State’s obligations under international law.”
- Asian Electoral Stakeholder Forum II, Dili Indicators of Democratic Elections, items III(b)(1): “The voter registration list is prepared in a manner free from fraud.” and III(b)(2): “The voter registration list is available for inspection by interested groups.”

### For more:

- Eleven Myanmar, “Myanmar government dismisses e-ID surveillance rumours, says system aims for secure digital identification”, 22 July 2025, <https://elevenmyanmar.com/news/myanmar-government-dismisses-e-id-surveillance-rumours-says-system-aims-for-secure-digital>
- Eleven Myanmar, “UEC completes compilation of population lists into CVLMS”, 9 January 2025, <https://elevenmyanmar.com/news/uec-completes-compilation-of-population-lists-into-cvlms>
- Myanmar Now, “Census report reveals junta’s declining power across Myanmar”, 1 January 2025, <https://myanmar-now.org/en/news/census-report-reveals-juntas-declining-power-across-myanmar/>

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- The Irrawaddy, “Myanmar Regime Begins Compiling Voter Lists for Planned Election”, 11 January 2023, <https://www.irrawaddy.com/news/burma/myanmar-regime-begins-compiling-voter-lists-for-planned-election.html>

## 12 | CONCERNS EXIST OVER THE MILITARY'S CONTROL OF ADVANCE VOTING PROCESSES

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Similar concerns exist over advance voting, a process that has historically been less transparent and more vulnerable to fraud, especially among military personnel. The UEC has started accepting applications for overseas voting, but Myanmar migrant workers abroad are worried that the junta could pressure them into voting through the restriction of embassy services, such as passport renewals, or the intimidation of family members back home, and that these ballots may be used by the junta to produce favorable election results. Military personnel could also be pressured into voting under undue influence.

Initially scheduled from 21 August to 8 September, the window for Myanmar citizens abroad to register for advance voting was extended by the UEC until 12 October, presumably because of a low registration rate.

The new election laws introduced changes to the advance voting system, including the requirement that ballots cast outside of Myanmar, and inside of Myanmar but outside of their constituency (which includes most *Tatmadaw* personnel), will be counted and announced before election day. This goes against international best practices and could be used to influence election results. In-constituency advance votes will still be counted on election day.

Finally, there are concerns that the UEC may use internally displaced people (IDPs) to hold elections remotely in places controlled by resistance forces. For instance, holding elections is impossible in most of Rakhine state, but voters from Rakhine who have fled to Yangon or other regions could be invited to participate in advance voting, thereby creating an opportunity for

the UEC to declare elections “successful” regardless of the situation on the ground.

**The integrity of advance voting under the military-appointed UEC and other relevant state agencies is questionable in the absence of procedural safeguards and independent scrutiny.**

### **Applicable international standards:**

- United Nations Office for the Coordination of Humanitarian Affairs, Guiding Principles on Internal Displacement, principle 22: “Internally displaced persons, whether or not they are living in camps, shall not be discriminated against as a result of their displacement in the enjoyment of the following rights: [...] (d) the right to vote and to participate in governmental and public affairs, including the right to have access to the means necessary to exercise this right.”
- Asian Electoral Stakeholder Forum II, Dili Indicators of Democratic Elections, item IV(g): “Local absentee voting mechanisms are provided for voters who cannot cast ballots in their assigned polling station on election day.”

### **For more:**

- DVB, “Myanmar citizens living abroad refuse to vote in advanced polls prior to December 28 elections”, 24 August 2025, <https://english.dvb.no/myanmar-citizens-living-abroad-refuse-to-vote-in-advanced-polls-prior-to-december-28-elections/>
- The Irrawaddy, “Overseas Myanmar Nationals Spurn Junta’s Advance-Voting Push”, 25 August 2025, <https://www.irrawaddy.com/news/politics/overseas-myanmar-nationals-spurn-juntas-advance-voting-push.html>



## 13 | THE JUNTA'S TOP-DOWN ADOPTION OF ELECTRONIC VOTING MACHINES

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In early 2023, the junta announced its intention to use electronic voting machines (EVMs) in its planned elections. A prototype of the so-called “Myanmar Electronic Voting Machine” (MEVM) was presented to Min Aung Hlaing by the UEC on 9 February.

While neighboring countries India and Bangladesh have long used EVMs, this would be the first time that the technology is used in Myanmar. The UEC has justified the introduction of voting machines with lower costs of operation, faster results, and the elimination of voter fraud and spoiled or invalid ballots, thus perpetuating the narrative of election fraud in 2020.

The UEC has said that the machines were developed and manufactured in Myanmar, but the MEVM prototypes displayed look very similar to EVMs used by the Election Commission of India. Furthermore, one of the two producers of EVMs for India is Bharat Electronics Limited, a state arms manufacturer with strong ties to the *Tatmadaw*, which claims to have exported electronic voting systems to numerous Asian and African countries.

The UEC has also stated that 55,000 MEVMs would be produced, with 2,500 already delivered by July 2025 for demonstration and training purposes. While Myanmar's military has the manufacturing capacity to assemble the machines, it still needs to supply thousands of components from abroad, such as the Raspberry Pi Pico microcontroller boards on which they appear to be based. It is likely that components were sourced in whole or in part from India. The junta has not released any tenders or details on the procurement of EVM parts, contrary to Myanmar's obligations under the United Nations Convention Against Corruption (UNCAC).

More importantly, the introduction of EVMs in Myanmar was a top-down decision made without any consultation or input from stakeholders. Political parties have received some information from the UEC about the machines, but appear to still have misconceptions and questions, demonstrating that they remain unfamiliar with the voting process and are unable to appropriately educate voters on the matter.

In contrast, India followed a structured path towards EVM adoption, introducing the machines gradually through legal reforms, pilot testing, and political consensus-building over more than two decades. After a first trial in 1982, EVMs were rolled out progressively beginning in 1998, then expanded in 2001, and used nationwide for the first time in the 2004 general election. Despite this careful and consultative approach, allegations of EVM tampering and electoral fraud have periodically been raised by opposition parties in India, particularly after contentious election results. However, these claims have not been substantiated by independent audits or the Election Commission of India.

**Myanmar's election commission has forcibly introduced EVMs without prior consultation of stakeholders and with little transparency around their procurement. While the machines are believed to have been sourced in whole or in part from India despite claims of domestic manufacture, the key concern lies in the lack of openness and clarity in the process.**

### **Applicable international standards:**

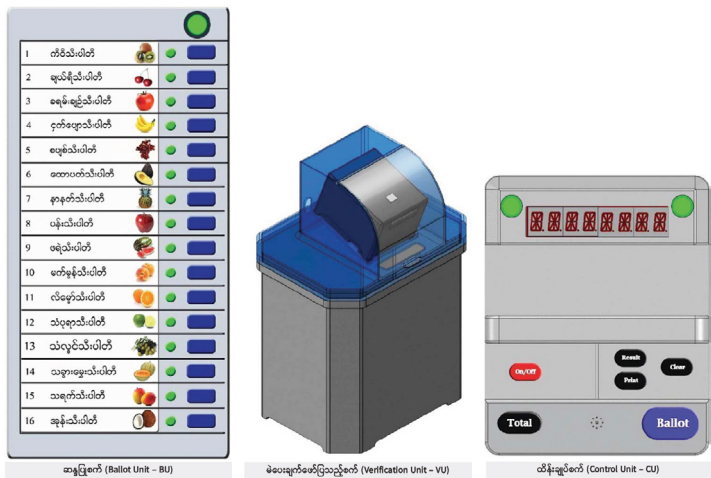
- Global Network for Securing Electoral Integrity, Principles for Democratic Election Reform Processes, principles 1: "Political consensus building is foundational to any electoral reform process." and 2: "Electoral reform processes should be transparent."

- Article 9 of the United Nations' Convention Against Corruption (UNCAC) requires states to establish procurement systems based on transparency, competition and objective criteria in decision-making and to make information on government tenders public.

### For more:

- Eleven Myanmar, "Military Chief visits Bharat Electronics Limited (BEL) in Ghaziabad", 1 August 2019, <https://elevenmyanmar.com/news/military-chief-visits-bharat-electronics-limited-bel-in-ghaziabad>
- Eleven Myanmar, "Myanmar to introduce electronic voting machines in upcoming General Election", 5 July 2025, <https://elevenmyanmar.com/news/myanmar-to-introduce-electronic-voting-machines-in-upcoming-general-election>
- [military propaganda] Global New Light of Myanmar, "UEC explains Myanmar Electronic Voting Machine (MEVM) production to SAC Chairman Prime Minister Senior General Min Aung Hlaing", 10 February 2023, <https://www.gnlm.com.mm/uec-explains-myanmar-electronic-voting-machine-mevm-production-to-sac-chairman-prime-minister-senior-general-min-aung-hlaing/>
- Justice for Myanmar, "India aiding and abetting Myanmar junta atrocities through continued transfers of military equipment", 27 March 2024, <https://www.justiceformyanmar.org/stories/india-aiding-and-abetting-myanmar-junta-atrocities-through-continued-transfers-of-military-equipment>

- The Hindu, “Sweden’s AP Pension fund exits Bharat Electronics Limited over Myanmar military sale reports”, 21 March 2025, <https://www.thehindu.com/news/national/swedens-ap-pension-fund-exits-bharat-electronics-limited-over-myanmar-military-sale-reports/article69354192.ece>



Above: The three main components of the Myanmar Electronic Voting Machine (MEVM)  
Source: Myanma Alinn Daily, 26 February 2023  
Below: an example of EVMs used in India  
Source: Election Commission of India

## 14 | MYANMAR'S ELECTRONIC VOTING MACHINES RAISE RISKS FOR ELECTORAL INTEGRITY

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There are also technical concerns about the MEVM. At face value, its hardware architecture is simple and appears to be similar to that of Indian EVMs. It includes three core components:

- a ballot unit for casting votes.
- a control unit for use by polling staff. This counts the number of voting tokens issued throughout the day and produces the final tally at closing time.
- a verification unit, comprising a voter-verifiable paper audit trail (VVPAT) printer so that voters can double-check for whom they voted, and a receptacle for the VVPATs.

Template polling station layouts released by the UEC reveal that there will be at least three MEVMs per polling station, with one each per election (Pyithu Hluttaw, Amyotha Hluttaw, and state/region hluttaw), and more in the case of elections for ethnic affairs ministers. MEVMs are battery-powered and do not connect to the Internet. It is unknown at this time how the UEC plans to transmit and aggregate the results after voting hours.

The core issue with the Myanmar Electronic Voting Machine is that its software and transmission protocols are opaque to anyone but the UEC. No civil society organization, political party, media, or independent authority was invited to review the source code used, and no access to the transmission and tabulation of results will be granted by the UEC.

Several stakeholders interviewed believe that the MEVMs were introduced by the UEC to control and, if necessary, inflate voter turnout or fabricate election results according to desired

outcomes. They have also expressed distrust towards the machines, which they fear can record individual voters' choices. Another concern expressed is that MEVMs do not include a “none of the above” or “no vote” option, leaving voters without the possibility to abstain.

There are also concerns that election staff may be able to alter the vote counts produced by the machines, as some teachers who attended MEVM training allegedly told Khit Thit Media<sup>18</sup>. Following this article, election workers are reportedly being investigated for leaks<sup>19</sup> and asked to sign a pledge not to share any information with the public<sup>20</sup>.

International standards for the use of technology in elections dictate that the adoption of EVMs should be accompanied by more, not less, transparency. For instance, an International IDEA policy paper recommends that “e-voting systems should be certified by an independent agency and audits should be conducted throughout the process to allow independent confirmation of the results<sup>21</sup>”. It also flags the risk of manipulation by insiders as a weakness of electronic voting, and emphasizes the importance of buy-in from a wide range of stakeholders.

Instead of enacting transparency measures, the junta has criminalized voter complaints against MEVMs: under Article 64 of the amended election laws, any person who falsely reports that the VVPAT issued does not match their actual vote could be sentenced to three years in prison and a fine of up to 300,000 kyat (approximately US\$150).

**Myanmar’s electronic voting system lacks transparency measures and independent oversight. In this context, there are serious risks that EVMs could be misused in ways that undermine electoral integrity**

18 [in Burmese] Khit Thit Media, “စစ်ကောင်စီက ထုတ်လုပ်ထားသည့် မြန်မာအီလက်ထရောနစ် မဲပေးစက်က မဲရလဒ် များကို လိုသလို ချက်ချင်း အပြောင်းအလဲလုပ်နိုင်ပြီး သက်သေမကျန်”, 15 July 2025, <https://yktnews.com/2025/07/221382/>

19 [in Burmese] DVB, “မဲပေးစက်က မဲခိုး၍ရသည်ဟု သတင်းဖြန့်ပြီးနောက် ဆရာ၊ ဆရာမများ စစ်ဆေးခံနေရ”, 7 September 2025, <https://burmese.dvb.no/post/723075>

20 [in Burmese] DVB, “ရွေးကောက်ပွဲအချက်အလက်များ မပေါက်ကြားရန် Non CDM ဝန်ထမ်းများ ဝန်ခံလက်မှတ်ထိုးရ”, 7 September 2025, <https://burmese.dvb.no/post/723031>

21 International IDEA, “Introducing Electronic Voting Essential Considerations”, 1 December 2011, <https://www.idea.int/sites/default/files/2023-09/introducing-electronic-voting.pdf>

**and place voters under pressure, rather than serving as safeguards. The absence of a “no vote” option, combined with the criminalization of voter complaints, further restricts space for freedom of opinion and expression.**

## 15 | NO CREDIBLE ELECTION OBSERVERS WILL BE ALLOWED IN THE JUNTA'S ELECTIONS

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Election observation is a crucial component of democratic transitions, helping to build public trust in electoral processes. A high number of domestic and international election observation groups participated in the 2015 and 2020 general elections in Myanmar, and the UEC welcomed their contributions and recommendations, some of which were enacted to improve the conduct of future elections.

Election observation has an established methodology, which emphasizes neutrality, independence, and non-interference in electoral processes. Election observers have been recognized as human rights defenders by multiple international organizations, and the right to observe has been confirmed by the United Nations' Human Rights Committee.

However, in recent years, autocratic states have increasingly co-opted election observation by inviting groups with government backing or dubious credentials to participate in and rubber-stamp their elections, in an effort to seek international legitimacy. One of the most documented cases of spurious election observation was the 2018 Cambodian general election, where 80,000 observers were accredited by the election commission despite having “neither the autonomy nor the skills to conduct an independent, reliable assessment of the elections<sup>22</sup>”.

Min Aung Hlaing has declared that “international election observation, study, and evaluation representatives have been

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22 Joint Statement by 27 Election Monitoring Organizations, “Fake Observers and the Cambodian Legislative Elections”, 28 July 2018, <https://anfrel.org/wp-content/uploads/2018/07/Press-Release-Cambodia-2-edited-1.pdf>



invited<sup>23</sup> to participate in the elections staged by the junta. However, the groups invited are neither independent nor recognized election monitors. These include the Cambodian People's Party of strongman Hun Sen, as well as representatives from Russia, Belarus, and India, governments that supply weapons to the junta. Russia, Belarus, and India are members of the Shanghai Cooperation Organization (SCO), which has a track record of rubber-stamping controversial elections. China, a major supporter of the junta's election plans, is also a member of the SCO. Laos is reportedly considering sending observers as well. The Election Commission of Thailand is expected to send representatives under a bilateral relationship it maintains with the UEC.

On the other hand, credible international observer organizations have not been invited. ANFREL, the only international group to have observed elections in Myanmar in 2015, 2017, 2018, and 2020, will not seek accreditation or engage with the junta's election commission.

Similarly, none of the domestic election observation groups contacted by ANFREL are planning to monitor the junta's elections. The junta will likely provide accreditation to friendly civil society organizations to claim participation from election observers. One observer group based in Chin state has already expressed its intent to observe the junta-staged elections. However, genuine election observation is impossible, as anyone saying that the elections are not free, fair, or transparent could be sentenced to seven years in prison under the junta's "election protection law".

**No established domestic or international election observation group will participate in the junta's election. Countries supporting the junta will send representatives to legitimize the electoral process, but no independent scrutiny will be permitted by the UEC.**

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23 Global New Light of Myanmar, "National Defence and Security Council convenes Meeting 3/2025", 1 August 2025, <https://www.gnlm.com.mm/national-defence-and-security-council-convenes-meeting-3-2025/>

## **Applicable international standards:**

- UN Human Rights Committee, CCPR General Comment No. 25, paragraph 20: “There should be independent scrutiny of the voting and counting process and access to judicial review or other equivalent process so that electors have confidence in the security of the ballot and the counting of the votes.”
- Inter-Parliamentary Union, Declaration on Criteria for Free and Fair Elections, Article 4(7): “States should take all necessary and appropriate measures to ensure the transparency of the entire electoral process including, for example, through the presence of party agents and duly accredited observers.”
- Asian Electoral Stakeholder Forum II, Dili Indicators of Democratic Elections, item III(b)(5): “Representatives of political parties, candidates, and the public are permitted to reasonably observe the various aspects of election preparation and conduct of polls.”
- Global Network for Securing Electoral Integrity, Principles for Democratic Election Reform Processes, principle 2: “Electoral reform processes should be transparent.”

## **For more:**

- Belta, “Belarusian observers invited to monitor election campaign in Myanmar”, 7 March 2025, <https://eng.belta.by/politics/view/belarusian-observers-invited-to-monitor-election-campaign-in-myanmar-166089-2025/>

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- Global New Light of Myanmar, “UEC delegation returns from Thailand’s Senate Election observation programme”, 28 June 2024, <https://www.gnlm.com.mm/uec-delegation-returns-from-thailands-senate-election-observation-programme/>
- Global New Light of Myanmar, “India supports Myanmar’s SCO entry”, 1 September 2025, <https://www.gnlm.com.mm/india-supports-myanmars-sco-entry/>
- Khmer Times, “CPP to dispatch a delegation to observe the election process in Myanmar next year”, 24 November 2024, <https://www.khmertimeskh.com/501596853/cpp-to-dispatch-a-delegation-to-observe-the-election-process-in-myanmar-next-year/>

## RECOMMENDATIONS

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In light of our assessment, and of the abundant evidence that the elections staged by the Myanmar junta do not comply with international standards and cannot be free or fair, ANFREL recommends the following courses of action.

### **To the international community:**

- Exercise caution in engaging with the junta's electoral process and refrain from actions that could lend it legitimacy, given its failure to meet international standards;
- To call for the military junta to immediately and unconditionally return power to a civilian government;
- Review ongoing cooperation with Myanmar's state institutions and election commission, and ensure that such engagement does not reinforce structures lacking independence or credibility;
- To call for the immediate and unconditional release of all political prisoners in Myanmar.
- To engage with and support the efforts of pro-democracy forces, including representative bodies, ethnic organizations, and civic stakeholders, in advancing an inclusive system of governance for Myanmar.
- To support and sustain the efforts of Myanmar civil society organizations to provide humanitarian relief, dialogue, inclusiveness, education, rule of law, active participation, and more;
- To uphold the mandate of members of parliament elected in 2020 until genuine and transparent elections can be held in Myanmar; and

- To support the extension of U Kyaw Moe Tun's mandate as Myanmar's legitimate representative to the United Nations in upcoming UN Credentials Committee meetings.

**To media:**

- Strive for balanced coverage by including diverse perspectives and contextual analysis when reporting on the junta's planned elections; and
- Highlight the broader human impact of the coup and ongoing conflict, and report responsibly on how the electoral process affects fundamental freedoms and democratic aspirations.



## About ANFREL

The **Asian Network for Free Elections (ANFREL)** was formed in November 1997 to promote and support democratization in Asia at the national and regional levels. It has since established itself as the foremost NGO working for democratic elections in the region.

ANFREL is an international, multi-sector, independent and non-political alliance of like-minded organizations working together to advance a common vision: that every State should have a government whose authority derives from the will of the people as expressed by secret ballot in genuine free and fair elections held at regular intervals on the basis of universal and equal suffrage. We strongly believe in the principles enshrined in Article 25 of the International Covenant on Civil and Political Rights (ICCPR).

ANFREL's main efforts are focused on conducting international election observation missions, developing capacity building programs for electoral stakeholders such as domestic election observer groups, media, and other civil society organizations working for democratization in their home countries, and undertaking campaign and advocacy activities to address electoral challenges and related issues encountered in the development of democracy in Asia. These three areas of work support and complement one another to further our mission of improving the quality of elections across Asia.

Today, ANFREL counts 27 member organizations hailing from 18 different countries.





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