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Organization for Security and Co-operation in Europe
Office for Democratic Institutions and Human Rights (ODIHR)
Ul. Miodowa 10, 00-251 Warsaw, Poland

For the attention of:
Ms. Lusine Badalyan, Senior Election Adviser
Mr. Ranko Vukčević, ODIHR Election Adviser

Subject: Official voter information ahead of Iceland's referendum of 29 August 2026 – unsourced and one-sided cost figures published by the Ministry for Foreign Affairs

Dear Ms. Badalyan and Mr. Vukčević,

We write on behalf of the Icelandic Taxpayers' Association (Samtök skattgreiðenda), an independent, non-partisan association working for transparency in public finances. As part of that work we have been assessing the fiscal effects of possible EU membership for Iceland, ahead of the national referendum asking "Should Iceland reopen accession negotiations with the European Union?", to be held on 29 August 2026 and observed by OSCE/ODIHR.

In the course of that research we compared the official cost information published for voters by the Ministry for Foreign Affairs – in particular the English-language article "How much would EU membership cost?" (government.is, 22 June 2026) and the Ministry's memorandum to the Foreign Affairs Committee of the Althingi (17 April 2026, p. 20) – against the EU's own budget documents, Eurostat data, figures from the Finnish Ministry of Finance, and the actual payments of Croatia, the newest member state. That comparison raised the following concerns, each of which is documented in detail in the attached memorandum:

1. **Only a net figure is published; the gross payment is never stated.** The official material tells voters that membership would cost ISK 10–15 billion net (EUR 68–103 million). It nowhere states what Iceland would pay TO the EU before receipts are netted off. Calculated under the EU's own financing rules, that gross payment is ISK 43–53 billion per year (EUR 295–363 million) – roughly 1% of GDP. Voters are shown only one side of the ledger.

2. **The central figure is given without source or reference year.** The Ministry's memorandum states that Finland's net contribution "has been estimated" at 0.2–0.3% of GDP, citing no source and no year. Official data from the Finnish Ministry of Finance show the figure ranging from 0.11% to 0.38% of GDP within the past decade – the official range omits the upper half of the actual record.

3. **The implied reference year, 2024, was the lowest-contribution year in a decade.** The EU's annual call rate on national income was at its lowest point in ten years in 2024, for nearly all member states. Any estimate anchored to that year systematically understates the cost.

4. **The stated EEA offset double-counts.** Of the ISK 8 billion in current EEA-related costs said to lapse upon accession, about ISK 5.6 billion are participation fees in EU programmes (Horizon Europe, Erasmus+) that return substantial funds to Iceland – and Finland's net figure, on which the official estimate rests, already includes the corresponding Finnish receipts. The same benefit is thus credited to Iceland twice.

5. **The only external assessment cited is by a campaign participant.** The government.is article cites a single outside source for its figures: an assessment by the think-tank Evrópustraumar (European Currents), an organization publicly advocating EU accession. The article does not disclose that position. No independent or dissenting estimate is cited, even though the parliamentary record itself contains one (opinion of the third minority of the Foreign Affairs Committee, May 2026).

Our own assessment – verified by three independent methods that converge on the same range, and which reproduces Croatia's actual 2025 payment to the euro – puts the annual net cost at ISK 23–44 billion (EUR 158–301 million), with a central estimate of about ISK 34 billion. That central estimate is more than double the upper end of the officially published net figure of ISK 10–15 billion, and even the low end of our range lies above that upper end.

We do not ask ODIHR to take a position on the substance of the referendum question, and our association takes none in this letter. Our concern is narrower: in the period before a national referendum, the ministry charged with informing the public is disseminating cost figures that are unsourced, one-sided and materially understated, and whose only cited external corroboration comes from one side of the campaign. We note that ODIHR's own Needs Assessment Mission report of 31 July 2026 identified "the neutrality and sufficiency of official voter information" among the main legal issues specific to this referendum, and recorded the National Election Commission's position that its role is limited to providing neutral, clear, complete, and accessible voter information. The concerns set out above go precisely to that issue, and we respectfully ask that they be taken into account in ODIHR's observation of the referendum.

Attached is a memorandum setting out the full analysis, with every calculation shown step by step and every source publicly verifiable. We are at your disposal for any questions, and can provide the underlying data and calculations in full.

Yours sincerely,

Skafti Harðarson

Arnar Arinbjarnarson

Róbert Bragason

Board members, the Icelandic Taxpayers' Association (Samtök skattgreiðenda)

Attachment: Memorandum: "What would Iceland pay to the European Union each year?" (August 2026)