

REPORT NO. 1

OBSERVATION MISSION FOR THE PARLIAMENTARY ELECTIONS OF 28 SEPTEMBER 2025

OBSERVATION PERIOD: 17 APRIL - 21 JULY, 2025



Promo-LEX Association

23/13 Mitropolit Petru Movila St.

Chisinau, Moldova

info@promolex.md

www.promolex.md

Promo-LEX

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The Observation Mission is carried out under the aegis of the Civic Coalition for Free and Fair Elections.

Responsibility for the opinions expressed in this report lies with the Promo-LEX Association, and they do not necessarily reflect the position of the donors. In case of discrepancies between the text in Romanian and its translation into another language, the Romanian version of the report will prevail.

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EXECUTIVE SUMMARY

Political background. The Republic of Moldova is a parliamentary republic, in which the Parliament gives a vote of confidence to the Government, responsible for exercising the domestic and foreign policy of the state.

The victory of PAS candidate Maia Sandu in the presidential election of 2024, as well as of the pro-European option in the constitutional referendum, created prerequisites for the strengthening of the pro-EU position in society, but also for promoting, in the context of the parliamentary elections, the ruling party – PAS.

The pre-electoral period was characterized by parliamentary and governmental stability. The existence of a one-color government led the opposition to accuse the government of monopolizing the political act and establishing control over public institutions. The relationship between power and opposition remained tense, characterized by confrontation rather than cooperation, both in the Parliament and in the public space.

The party system is competitive. In the context of public authorities' efforts to ensure more transparent party funding, legislation on political parties has been toughened. Most parties continue to exploit geopolitical cleavages and social polarization strategies.

At these elections, too, the danger of Russian interference in the electoral processes in Moldova persists. Based on previous observation experience, the main threats include illegal financing of electoral campaigns, corruption of voters, cyber attacks, and disinformation campaigns. An important role in the implementation of these actions is played by Ilan Șor, leader of the declared unconstitutional Șor Party (PPȘ), who, while being in Moscow, coordinates several political projects in Moldova.

Legal framework. The elections of 28 September 2025 are organized in accordance with the Electoral Code, which entered into force on 1 January 2023. Most of the recommendations to improve the regulatory framework made by the Promo-LEX OM after the 2021 elections have been implemented.

Despite the principle of stability of electoral relations, according to which electoral legislation should not be amended less than a year before elections, before the 2025 elections the Parliament adopted multiple amendments to both the Electoral Code and related legislation, some of which have the potential to undermine trust in electoral processes. The main legislative changes include: introduction of the new identity card as a voting document, definition of the notion of "camouflaged electoral bloc", extension of the criteria for refusal to register electoral competitors, adjustment of rules on electoral campaign financing, as well as new provisions for the digitization of the electoral process. The terms for setting up electoral bodies were also changed, and the possibility of using electronic signatures collecting lists was introduced.

The law on postal voting has also been amended in order to extend the applicability of this voting method, but the list of countries where it applies remains limited. In addition, the related legislation (Law of political parties, Contraventions Code, and Criminal Code) was amended, introducing rules on the activity of political parties and additional sanctions for illegal electoral campaigning and corruption of voters.

Although efforts have been made to modernize the electoral framework, frequent legislative changes and the application of additional restrictions can affect both political competition and public perception of the integrity of the electoral process.

Electoral bodies. Elections are held in accordance with the actions planned in the calendar of activities approved by the Central Electoral Commission (CEC). The CEC operates in full composition, but its apparatus of officials was not fully completed by the beginning of the electoral period.

The CEC meetings are public and are also broadcast online. However, the institution's website still has gaps in reflecting the stages of the decision-making process. The CEC failed to approve all the planned regulations and instructions by the beginning of the electoral period.

The Commission registered one electoral bloc – Alternative EB – and refused the registration of another one – Victory EB. As a reason to refuse registration, the CEC for the first time applied the legal norms

regarding “successor parties”, which entered into force shortly before the electoral period. The Commission accredited observers from three associations. At the same time, the intention of changing the conditions of accreditation already after the beginning of the electoral process contradicts international standards in the field.

The campaign for certification of potential electoral officials organized by the Center for Continuous Electoral Training (CCET) is ongoing. One challenge remains to be the certification of officials for polling stations abroad.

The Commission intends to increase the number of polling stations abroad for the 2025 parliamentary elections. The implementation of digital voter registration methods will facilitate the voting process in those stations. The coverage with postal voting has also been expanded, although insignificantly.

At least six complaints were filed to the CEC, five of which were filed by the MAN party against the actions of PAS. We repeatedly draw the attention of the electoral bodies to the need to ensure transparency in the process of filing, examining, and resolving electoral complaints.

At the beginning of the electoral period, we find that there are 15,308 more voters in the State Registry of Voters (SRV) than four years ago, in the last parliamentary elections. In the opinion of Promo-LEX, this discrepancy can be explained by the systemic problems of registering citizens rather than by the poor administration of the SRV and of voters lists by the CEC.

Potential electoral competitors. The process of nominating candidates for the parliamentary elections of 28 September 2025 began on 20 July and ends 40 days before the elections, but some decisions regarding candidates were publicly communicated long before the legal deadline, by PAS and the Victory Bloc.

The CEC published the list of parties that can participate in the elections, and only 39 of the 66 registered parties met the conditions for participation, while 14 of them still depend on the decisions of the Public Services Agency or court decisions regarding the activity of parties. This is the first time that registered parties, the activity of which has not been limited, officially cannot participate in the elections due to the new legal requirements regarding the presentation of the list of leading members.

In the first days of submission of files (20-21 July 2025), the CEC received applications from two parties for registration of lists (PAS and PPDA) and from seven potential independent candidates for initiating the signatures collection process.

According to the Promo-LEX OM, electoral promotion activities in the context of the presidential elections were observed in the case of at least eight potential electoral competitors.

Use of administrative resources. Promo-LEX found that state institutions used administrative resources and public funds to obtain political capital before the parliamentary elections. After setting the election date, the Parliament amended the state budget, redistributing money for various projects, and the Government launched the “Moldova can” information campaign, taken over and promoted by PAS. Promo-LEX notes that these projects can easily be confused with election promises. For its part, Chisinau City Hall conducted information campaigns with personalized messages for mayor Ion Ceban, and MAN promoted these campaigns on online platforms.

Involvement of the president of the state in the electoral process. The Promo-LEX OM found the involvement of the president of Moldova in identifying potential PAS candidates for the parliamentary elections of 28 September 2025. We shall remind that according to the case-law of the Constitutional Court, the president is obliged to act in the interests of the whole society, and the resolution of differences arising between the powers of the state, as well as between political parties, can be achieved only when he or she is an arbitrator who identifies him/herself with the national interest, and not with a political party.

Observation of the financing of electoral activities. This Promo-LEX OM will again observe the financing of the electoral competitors’ activities. The methodology involves identifying and estimating campaign expenses and comparing them with the information reported to the CEC. An important objective is also to monitor the activity of the CEC as a body of supervision and control. The electoral

authority established within the deadline the ceiling of funds that can be transferred to the account “Intended for the initiative group”, to the account “Electoral Fund”, as well as the amount of the loan granted to electoral competitors.

Hate speech and incitement to discrimination. The parliamentary elections of 28 September 2025 are the third elections held after the introduction in 2022 of sanctions for hate speech and/or incitement to discrimination, as well as incitement to violent actions on the grounds of bias, into the Contraventions Code and the Criminal Code.

The data of previous monitoring carried out by Promo-LEX Association show that the dynamics of the manifestation of hate speech during electoral periods oscillates depending on the type of elections. In the electoral period for the general local elections of 2023, an average of 1.1 new cases/day were identified, and in the electoral period for the presidential elections of 2024 the average was 2.6 new cases/day, less than in the parliamentary elections of 2021, when an average of 3.9 new cases/day were identified. On the other hand, the number of complaints about potential cases of hate speech and/or incitement to discrimination during the electoral period addressed to the General Police Inspectorate (GPI) has been decreasing. During the electoral period for the general local elections of 2023, 16 complaints were filed to the GPI, and one complaint and one ex-officio notification were filed during the electoral period for the presidential elections of 2024. Thus, the monitoring of hate speech remains a necessity for analyzing the degree of use and sanctioning of this type of speech, especially during electoral periods.

On 10 July 2025, the Parliament of the Republic of Moldova adopted new amendments to the Code of Audiovisual Media Services, while the Government of the Republic of Moldova approved the Instruction on the procedure for stopping access to web pages, which explains in detail the application of the provisions of Law No. 20 on preventing and combating cybercrime.

INTRODUCTION

Report no. 1 has been prepared and presented in the context of the launch of the Promo-LEX Observation Mission (OM) for the parliamentary elections of 28 September 2025. In general, it covers the period from 17 April 2025, when the Parliament adopted the decision on setting the date for the election of the Parliament. The report includes the results of observing the pre-electoral and electoral period until 21 July 2025.

The main findings and trends in the current report refer to the socio-political and legal context of the elections, the activity of electoral bodies and the activities with electoral impact of potential competitors, the financing of elections and of the electoral campaign. Also, some observations are presented regarding the trends of hate speech, which will be further monitored during these elections.

During the mission, Promo-LEX will present four interim elections observation reports and one final report. For the election day, press releases will be prepared on the conduct of the elections and the results of the rapid counting of votes.

The objectives of the Promo-LEX OM reports are: to inform society about the trends attested in the electoral process; to notify electoral bodies about the results of real-time observation of the quality of the procedures of organizing and conducting the elections; to hold the electoral actors accountable; to prevent possible violations of the electoral legislation.

The observation methodology applied by Promo-LEX is based on relevant international standards and involves observation of elections both in the long term (during the electoral period) and in the short term (on election day). The observation reports are prepared by the core team of the Promo-LEX OM based on their own findings and on those reported by the long-term observers (LTOs) regarding the activities of all the actors involved in the process of organizing and conducting the elections: (potential) electoral competitors, public authorities, electoral bodies, political parties, as well as civil society. LTOs' findings are reported on the basis of thematic forms and are stored on the web platform www.data.promolex.md, secure system with limited access, managed by Promo-LEX. Promo-LEX observers collect and analyze information resulting from on-site observations during visits to the territory, from interviews and meetings with interlocutors, as well as from study of official documents. The activity of electoral competitors and third parties will also be monitored online.

The monitoring of campaign financing is an important component of the work of the Promo-LEX OM. It involves observing electoral competitors from the perspective of the funds collected and used for campaign activities. Promo-LEX will estimate the expenses made by electoral competitors by applying minimum market prices and will compare them with those declared by competitors to the CEC in order to assess the transparency and correctness of the financing of the electoral campaign. We admit that there may be some differences between the costs applied by Promo-LEX for estimates and the actual costs of electoral competitors, but the important thing is that these prices will be applied uniformly for all competitors. The Promo-LEX OM will also observe and analyze how the Central Electoral Commission will perform its role of control and supervision in the area of political financing.

Observation of electoral procedures will be carried out during the electoral period by 42 LTOs, including two LTOs who will be responsible for monitoring voting abroad. Promo-LEX will monitor hate speech and discrimination through eight monitors.

On election day, the Promo-LEX OM will ensure the observation of voting by covering polling stations based on a representative sample made of 400 static short-term observers (STOs). Their effort will be supplemented by 400 STOs who will visit the rest of the polling stations being grouped into 200 mobile teams, two observers per team.

Promo-LEX will observe every polling station set up for voters in the Transnistrian region. About 100 polling stations opened abroad will also be covered with observers. In this regard, particular attention will be paid to the stations established for postal voting.

The work of observers is managed by the core team of the Mission. All Promo-LEX observers and monitors are trained in seminars organized by the Observation Mission. Observers also sign and

undertake to comply with the Code of Conduct¹ for Promo-LEX independent national observers, assuming the obligation to act operatively, in good faith, and in a nonpartisan manner.

The OM for the parliamentary elections of 28 September 2025 is a project carried out by Promo-LEX Association within the Civic Coalition for Free and Fair Elections (CALC).

The Promo-LEX OM is not a political opponent of competitors and participants involved in the electoral process, is not an investigation body, and does not assume the express obligation to prove the observed findings. However, the observers' reports will be accompanied, as far as possible, by photographic and video evidence, which may be made available to law enforcement bodies and the Central Electoral Commission following their requests, but under no circumstances to competitors. At the same time, the violations, including the alleged ones, found in this report must be treated by electoral authorities as complaints and are to be examined according to their competence, in the light of the provisions of art. 88 para. (9) of the Electoral Code.

The Promo-LEX Mission manages the web platform www.electorala.monitor.md, where anyone can report activities with electoral implications. Relevant information from observers' reports is stored on this platform, too. Citizens' reports can be checked by observers.

Promo-LEX is a public association that aims to develop democracy in Moldova, including the Transnistrian region, by promoting and protecting human rights, monitoring democratic processes, and strengthening civil society. The Association has been organizing election observation missions in Moldova since 2009, this OM being the 30th. Employees and members of the Association also have international experience, participating in international election observation missions in Armenia, the Czech Republic, Germany, Georgia, Estonia, Montenegro, Norway, Romania, Serbia, Sweden, Turkey, Ukraine, etc.

The international standards referred to in this report are those developed by the UN, the OSCE, the European Commission for Democracy through Law (Venice Commission), the European Union, and the Council of Europe. Each report ends with recommendations for public authorities, electoral bodies, electoral competitors, other stakeholders, in order to ensure proper organization and improvement of the electoral process.

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¹ [Code of Conduct](#) for Promo-LEX independent national observers.

I. SOCIAL AND POLITICAL CONTEXT

The institutional framework of parliamentary elections. The Republic of Moldova is a parliamentary republic, in which the legislative power is represented by the Parliament, composed of 101 members. The Parliament is elected by universal, equal, direct, secret, and freely expressed vote for a term of 4 years². At the same time, the executive power is exercised by the Government headed by a prime minister, and by the president of the Republic of Moldova, who has limited powers, mainly in the field of foreign policy and national defense. The Government is accountable to the Parliament.

The previous parliamentary elections were held on 11 July 2021, when the Parliament of the eleventh legislature was elected³. The term of the current Parliament expires according to regulations, after four years. The current elections will be held on 28 September 2025 and will be the 11th such elections in Moldova (five of which were held before the end of term).

The impact of the presidential election and constitutional referendum of 20 October 2024. The parliamentary elections of 2025 can be considered a continuation of the political (electoral) fight waged in the framework of the presidential election and the constitutional referendum of 2024. The victory of PAS candidate Maia Sandu in the presidential election, as well as of the pro-European option in the constitutional referendum, created prerequisites for strengthening the pro-EU position in society, but also for promoting the ruling PAS party. Maia Sandu, as president of the Republic of Moldova, without party affiliation⁴, seems to have an important role in setting up PAS electoral lists⁵.

Following the constitutional referendum of 2024, the Constitution of the Republic of Moldova was supplemented with provisions related to the integration into the European Union⁶. In this context, the political/electoral campaigns of competitors focused on denying the results of the referendum can jeopardize the European course supported by society in the referendum.

Public perception of the legislative institution. According to the public opinion, the Parliament enjoys a less positive appreciation compared to other public authorities. This perception is constant and does not necessarily relate to the current legislature.

Table 1. Opinion of citizens about public authorities, comparative perspective (2022-2025)⁷

<i>Very positive / Somewhat positive</i>	October- November 2022	July-August 2023	January-February 2024	May-June 2024	May 2025
Parliament	33%	36%	32%	36%	44%
Presidency	39%	42%	38%	36%	49%
Government	34%	38%	35%	36%	46%
Local authorities	74%	73%	73%	74%	80%

Promo-LEX Association fully monitored the activity of the Parliament of the 11th legislature⁸. Some positive aspects were noted in the activity of the Parliament (for example: planning the legislative process, launching a new website of the institution, transparency of financial management), but also a number of significant problems related to defective decision-making transparency, poor communication between the majority and the parliamentary opposition, insufficient cooperation with civil society, etc.

One-color ruling and the power-opposition relationship. After four years of ruling, in a context marked by a difficult election year in 2024, PAS entered the parliamentary campaign of 2025 maintaining its one-

² [Constitution](#) of the Republic of Moldova, art. 61 para. (1) and art. 63 para. (1).

³ [Final Report](#). Promo-LEX Observation Mission for the early parliamentary elections of 11 July 2021.

⁴ According to the provisions of art. 149 para. (2) of the [Electoral Code](#), until the validation of the mandate, the candidate elected for the Office of President of the Republic of Moldova shall submit to the Constitutional Court the confirmation that he is not a member of any political party.

⁵ [Igor Grosu](#): The President has come up with suggestions for the PAS electoral list. / [realitatea.md](#), 21.06.2025.

⁶ Constitutional Court [Decision](#) no. 24 of 31.10.2024 on the confirmation of the results of the Republican Constitutional Referendum of 20 October 2024.

⁷ Survey data of the [International Republican Institute](#) ([October-November 2022](#); [July-August 2023](#); [January-February 2024](#); [May-June 2024](#); [May 2025](#)). The question addressed to the respondents was "What is your opinion about each of the following institutions?". The table includes figures reflecting the sum of "Very positive / Somewhat positive" options.

⁸ [Publications](#) of the Promo-LEX Association on the subject of monitoring the activity of the Parliament.

color ruling, but in a tense political climate. The pre-electoral period was characterized by parliamentary and governmental stability, without internal political conflicts that could have caused splits within the ruling party. At the same time, the opposition factions decreased their representation in the Parliament, with some MPs from the BCS leaving the faction, while the PPŞ faction ceased its activity as a result of the declaration of PPŞ's unconstitutionality⁹.

Table 2. Changes in the composition of the Parliament of the 11th legislature.

	PAS	BCS	PPŞ	Independents	Unaffiliated	Total
Composition of the factions after the summing up of results of the parliamentary elections of 11 July 2021 ¹⁰	63	32	6	-	-	101
Parliament structure, members of Parliament (10 July 2025)	61	26	-	5	8	100

The relationship between power and opposition remained tense, characterized by confrontation rather than cooperation, both in Parliament and in the public space. In key issues, such as the initiation of the constitutional referendum on European integration and other important reforms¹¹, there was a lack of broad political consultation and a real consensus-building effort. For their part, the opposition parties did not actively and effectively contribute to the public consultations and debates initiated by the parliamentary majority and did not make use of all available instruments of parliamentary control. On the contrary, in some cases they resorted to polarizing messages and populist rhetoric. Against this background, part of the opposition frequently accuses the current government of dominance and political control over key institutions such as the Central Electoral Commission, the Constitutional Court, or the Audiovisual Council.

Competitive party system. The Republic of Moldova has a pluralistic party system that ensures a competitive political environment. Political parties are the main actors, including through electoral blocs, in the process of nominating candidates for parliamentary elections. We shall remind that there were no cases in political history when an independent candidate entered the Parliament based on the proportional electoral system.

For the parliamentary elections of 28 September 2025, compared to the previous parliamentary elections, we see less access of political parties to the electoral process, due to the tightening of the legislation on political parties. The legislative changes reflect public authorities' efforts to ensure greater transparency in the funding of parties and their decision-making processes.

Table 3. Evolution of the number of political parties

Parliamentary elections	Parties, total registered ¹²	Parties with the right to participate in elections ¹³	Registered parties (electoral blocs) ¹⁴	Parliamentary parties (electoral blocs)
2014	43	41	22	5
2019	46	46	15	4
2021	54	53	22	5
2025	66	39 ¹⁵	-	-

At the same time, there has been a continuous increase in the number of political parties. In addition, we see an intensification of the process of parties joining into political blocs in the pre-electoral period, as a step in preparation for the registration of electoral blocs. The tendency of political parties to fuse together can also be treated as an indicator of the politicians' awareness of the need to strengthen the

⁹ Constitutional Court [Decision](#) no. 10 of 19 June 2023

¹⁰ [CEC Decision no. 5180](#) of 19 July 2021 on establishing the number of seats in the Parliament of the Republic of Moldova obtained by electoral competitors according to the results of the early parliamentary elections of 11 July 2021.

¹¹ Local public administration reform, justice reform, etc.

¹² [Data](#) for the years 2014-2021 reflect the situation at the end of the calendar year, respectively, it may not coincide with the registered number at the beginning of the electoral period.

¹³ Data in sections 3-5 are extracted from the Central Electoral Commission reports on election results.

¹⁴ Meaning the number of competitors registered at the beginning of the campaign, which may not coincide with the number of competitors at the end of the campaign, following withdrawal or cancellation of registration.

¹⁵ [The CEC publishes](#) the list of political parties that have the right to participate in the parliamentary elections of 28 September 2025.

political system. An indirect reflection of the increased role of the phenomenon of political blocs, including the so-called Victory Bloc, established and managed from Moscow, is the process of their institutionalization¹⁶, as their status was not regulated before 2025.

Exploitation of geopolitical cleavages and political polarization strategies. Campaigns carried out by some opposition parties during the pre-electoral period indicate that the parliamentary elections of 28 September 2025 will be marked by the continued use of narratives that deeply polarize society around geopolitical cleavages, especially integration into the EU vs. pro-Russian sovereignty. They are often accompanied by themes associated with value oppositions, such as LGBTQ community rights vs. values and traditional family, which increase tensions and divisions in society. At the same time, the statements of Ilan Șor¹⁷, leader of the so-called Victory Political Bloc, regarding a possible union of Moldova with the Russian Federation not only contribute to antagonizing narratives, but also raise real concerns about the national sovereignty and security of the country.

At the same time, some opposition parties with a pro-eastern geopolitical orientation promote the idea of restricting the right to vote for Moldovan citizens abroad¹⁸, especially in EU member states, the USA, and Canada – an attempt to reduce the electoral influence of the diaspora, perceived as predominantly pro-European.

In this context of confrontation and radicalization, aggressive political speeches directed against the institutions that manage the electoral process, such as the Central Electoral Commission (CEC) and the Audiovisual Council (AC), are increasingly common¹⁹. Such attacks seem to aim at the early delegitimization of the autumn 2025 elections and, implicitly, at the weakening of public trust in public authorities.

The danger of external interference in the electoral processes of the Republic of Moldova. The experience of observing the voting in autumn 2024 allows the Promo-LEX OM to conclude that the freedom of vote and the fairness of elections were affected by external threats to national security, resulting from the hybrid war against the Republic of Moldova implemented by the Russian state. Among the main threats that affected the security of the electoral process were: illegal financing of electoral campaigns, corruption of voters, cyber attacks, and disinformation campaigns. These actions were coordinated, through political projects obscurely financed from the Russian Federation, by Ilan Șor, leader of the declared unconstitutional Șor Party (PPȘ).

After the 2024 ballots, the public authorities took a series of actions aimed at countering these interferences, both by strengthening the legal framework for sanctioning illicit behavior (see Chapter II of this report) and by increasing the capacities and prerogatives of public institutions in this field. The efforts of the national authorities of Moldova were further supported by the EU, including by decisions to sanction a new group of persons and economic agents (such as A7 000 (A7 LLC)) involved in “actions destabilizing the Republic of Moldova”²⁰.

However, the danger remains real for the parliamentary elections in autumn 2025. The activism and visits of politicians affiliated to Ilan Șor to the Russian Federation²¹, the involvement of the public organization Eurasia, associated with Ilan Șor, “to support the cultural dialog and traditional values of young people from Moldova”²², as well as the financing of the pilgrimages of representatives of religious faiths,²³ are indicators of persistent external threats aimed at influencing the results of the parliamentary elections.

The Transnistrian region, still uncontrolled by the constitutional authorities from Chisinau, but remaining under the influence of the Russian Federation, is a territory of the Republic of Moldova where

¹⁶ [Law no. 130](#) of 29.05.2025 on amending some regulatory acts.

¹⁷ [The Victory Bloc](#) announces from Moscow that it will participate in the parliamentary elections. Șor: “We will get to rule the country.”

¹⁸ [Draft law](#) amending the Electoral Code of the Republic of Moldova no. 325/2022 (art.39, 78, 86, 86'1)

¹⁹ Audiovisual Council [press release](#) of 16 July 2025

²⁰ [Council Decision \(CFSP\)](#) 2025/1435 of 15 July 2025 amending Decision (CFSP) 2023/891 concerning restrictive measures in view of actions destabilising the Republic of Moldova.

²¹ [The fugitive politician](#) Ilan Șor summoned his political allies from Moldova to Moscow.

²² [An NGO](#) based in Moscow, controlled by Ilan Șor, with business in Romania.

²³ [Moldovan priests](#) participated in pilgrimages to Russia supported by the Eurasia organization, which is under international sanctions. The Metropolitan confirms

still no elections can be held. The economic situation in the region is constantly worsening²⁴, and this fact, along with the anti-constitutional rhetoric of the Tiraspol leaders, can serve as grounds for possible challenges to the security and integrity of the national electoral process in autumn 2025.

Illegal campaign financing and electoral corruption. The supervision, control, and counteraction of illegal financing and corruption remain the main issues for ensuring the integrity of electoral processes in Moldova. The 2024 elections showed that if electoral corruption is not stopped, it can, through its massive and systemic character, significantly distort the election results.

In the context of the campaign for parliamentary elections, the public authorities strengthened the legal framework, as well as the capacities to document and sanction electoral corruption, by assigning the respective powers to the Moldovan police. The police documentation of cases of alleged electoral corruption after the 2024 elections is a direct consequence of the intensification of state efforts in combating this phenomenon. Even if the amplification of the coercive function of the state has led to certain social grievances, the fight against electoral corruption must remain a priority of the public authorities. In this context, Promo-LEX carried out extensive information campaigns for citizens, as well as police empowerment activities on the subject of identifying and reporting corruption in elections. Society still needs to be warned about the dangers of electoral corruption, including passive corruption.

²⁴ [The state of emergency in the economy](#) has been extended until 9 August. News from the Supreme Council.

II. LEGAL FRAMEWORK

On 17 April 2025, the Parliament of the Republic of Moldova set the day of parliamentary elections for 28 September 2025²⁵. According to art. 61 para. (3) of the Constitution, the elections of members of parliament are held no later than 3 months after the expiration of the mandate. Taking into account that the previous parliamentary elections were held on 11 July 2021 and the mandates of MPs expire on 11.07.2025²⁶, the date of this year's parliamentary elections was set within the deadline provided by the Constitution.

The setting of the election date more than five months before election day increased the predictability of the electoral process. However, this could also have a negative effect, limiting the right of new political parties to register in the elections²⁷. We shall note that in these elections, no party was registered after the election date was set. However, we recommend the Parliament to analyze the practice of setting the election date in previous elections and identify a legal solution that would both ensure the predictability of the electoral process and not limit new political parties to participate in elections.

Out of the total 22 recommendations for improving the regulatory framework proposed by the Promo-LEX OM following the observation of the parliamentary elections of 11 July 2021²⁸, 20 were fully or partially implemented, while 2 others were ignored. Among the most important recommendations taken into account by the legislator were: to supplement the Electoral Code and related legislation with norms regulating and sanctioning the organized transportation of voters to polling stations; to develop the legal framework regarding the prohibition of the involvement/use of the image of religious faiths during the electoral period, as well as sanctioning them; to supplement the legislation with norms preventing situations of camouflaged electoral blocs; to examine additional conditions and mechanisms for ensuring the right to vote for Moldovan citizens abroad.

2.1. Amendment of electoral and related legislation within one year before the election

Article 11 of the Electoral Code, "The principle of stability of electoral relations", in para. (1) establishes that the electoral system and the method of setting up electoral districts or electoral bodies may be changed no later than one year before the national ballot. Earlier, the Promo-LEX Association welcomed the introduction of such a provision into the new Electoral Code.

According to the Code of Good Practice in Electoral Matters, "The fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendment less than one year before an election"²⁹.

In addition, through the Revised interpretative declaration to the Code of Good Practice in Electoral Matters on stability of electoral law³⁰, particular emphasis was placed on the concept of legal certainty as a key element of the rule of law. According to the declaration, "In the electoral field, legal certainty means that the confidence in democratic elections in line with international standards should not be undermined by late amendments to primary or secondary legislation, including from electoral bodies."

On the other hand, the list of elements that are not recommended to be amended one year before the elections includes: rules that determine the right to vote and stand for election, including voter and candidate registration; essential elements of the voting process; rules guaranteeing the effectiveness of elections.

Despite the above mentioned, before the elections of 28 September 2025, the Parliament of the Republic of Moldova adopted a series of amendments to both the primary and secondary regulatory framework,

²⁵ [Decision](#) of the Parliament of the Republic of Moldova no. 77 of 17.04.2025 on setting the date for the election of the Parliament

²⁶ According to the Constitutional Court [Decision](#) no. 31/1997, the term of the Parliament is calculated from the date when the elections of members of parliament take place, provided that the mandate of MP is validated and ceases after the expiry of 4 years from the date of the parliamentary elections.

²⁷ Art. 63 para. (2) of the Electoral Code provides for the right to nominate candidates in elections only for political parties registered before the date of entry into force of the document setting the date of elections.

²⁸ [Final report](#). Promo-LEX Observation Mission for the early parliamentary elections of 11 July 2021, p. 87-90.

²⁹ [The Code of Good Practice in Electoral Matters](#). Guidelines and explanatory report. Adopted by the European Commission for Democracy through Law at its 52nd plenary session (Venice, 18-19 October 2002), p. 11.

³⁰ [Revised interpretative declaration](#) to the Code of Good Practice in Electoral Matters on stability of electoral law. Adopted by the Venice Commission at its 139th plenary session (Venice, 21-22 June 2024).

as well as to related regulations. Thus, the Electoral Code has been amended three times in the past year, all amendments taking place after the election date was set. The amended elements include the ones related to the registration of electoral competitors, with the establishment of additional conditions for registration. Other amendments, even if they do not directly affect the fundamental elements of electoral law, can nevertheless undermine citizens' trust in electoral processes, given that they are sometimes adopted without taking into account the need to ensure decision-making transparency and/or in the absence of a broad political consensus.

2.1.1. Amendment of the Electoral Code and of the Law on partial implementation of postal voting

The Electoral Code was amended by the Parliament three times³¹ during 2025, both technical and substantive changes being made. The most significant ones are:

- Supplementing the list of documents on the basis of which the voter can vote, by adding to it the new identity card. This change is in line with the legislation on identity documents in the Republic of Moldova³². However, given the introduction of the new identity card in a relatively short time before the elections (4 months before the election day), and also because it does not contain data on domicile or residence in printed/inscribed format, voters, electoral officials or operators may have uncertainties related to dealing with such situations. In this context, we consider it necessary to thoroughly train the members of polling stations on the new types of accepted acts, in order to avoid confusion or erroneous refusals.
- Supplementing the definitions of “domicile” and “temporary residence” and using the State Registry of Voters (SRV) to verify and confirm the domicile or residence of voters. This measure contributes to the modernization of the electoral process through digitization, but the accuracy and timeliness of data in these registers is absolutely necessary for an efficient implementation and for ensuring the right of citizens to vote. We shall remind that in the previous elections address errors were reported, and also incidents related to voter lists and the SRV³³. In this context, we recommend the Central Electoral Commission to establish clear procedures for rapid correction of errors in the registers before and on the day of voting and for resolving possible conflicts between voters and election officials for such reasons.
- Introducing the notion of “camouflaged electoral bloc” and redefining “independent candidate”. We shall point out that these amendments align with the principle of transparency and the Constitutional Court case-law³⁴, which held that it is necessary for the authorities competent in electoral matters to exclude the situations of electoral blocs camouflaging as one political party. Promo-LEX also previously recommended regulating situations in which some candidates supported by parties asked to be registered as independent³⁵, as well as banning the camouflage of electoral blocs³⁶.
- Extending the list of grounds for refusal to register electoral competitors with three additional grounds: “(1) Submission of documents for registration that do not meet the conditions of admissibility; (2) Failure to eliminate deficiencies within the deadline set by the electoral body; (3) Finding participation in a camouflaged electoral bloc in the ongoing elections.” In the opinion of Promo-LEX, the new grounds lack the necessary legal certainty and leave room for interpretation. Thus, regarding the first ground, the conditions of admissibility being unclear, electoral competitors might submit incomplete or incorrect documents, and thus might be excluded from the electoral process.

Next, regarding the elimination of deficiencies, if the deadline set by the electoral body is too short, competitors might be unable to eliminate deficiencies, especially in the case of documents that require

³¹ [Law no. 112](#) of 22.05.2025 on amending some regulatory acts (activities related to putting into circulation the identity card issued to citizens of the Republic of Moldova and the residence card issued to foreign citizens, stateless persons, refugees, and beneficiaries of humanitarian protection).

³² Art. 3 of [Law no. 273](#) of 09.11.1994 on identity documents in the national passport system.

³³ According to [the findings of the Promo-LEX OM](#), on the day of the presidential elections, 76 (Round 1) and 65 (Round 2) incidents concerning deficiencies in voter lists were reported. Promo-LEX observers found 22 cases of address errors.

³⁴ [Constitutional Court Decision](#) no. 29 of 09.12.2014 on confirmation of the results of elections for the Parliament of the Republic of Moldova of 30 November 2014 and validation of the mandates of elected MPs, pt. 99.

³⁵ [Final report](#) of the OM for the presidential election and republican constitutional referendum of 20 October 2024, p. 12, 100

³⁶ [Final report](#) of the OM for the 2021 parliamentary elections, p. 14, 87.

some time to be obtained (official certificates). At the same time, the requests of the electoral body to eliminate deficiencies must be reasonable and strictly limited to clarifying the registration conditions established by the Electoral Code. As for the third ground, we critically appreciate this change, since participation within a camouflaged electoral bloc in the ongoing elections could be found only after observing the electoral activities carried out jointly, and not when electoral competitors are being registered.

- Adding a new basis for canceling the registration of the electoral subject, namely if participation in a camouflaged electoral bloc is found.
- Supplementing the list of sanctions with the deprivation of allocations from the state budget for the performances obtained at the elections in which it is registered, as a complementary sanction that can be applied for a period from 6 months to 4 years.
- Excluding the precinct electoral bureau's attribution to confirm the representatives of electoral competitors and giving this power to the district electoral councils, including for the representatives delegated to offices. We shall remind that during the presidential election of 20.10.2024, there were cases of non-admission of representatives of electoral competitors to polling stations abroad³⁷, so the legislator's initiative to elucidate and solve the previously reported problems is welcome.
- Amending some conditions related to the financing of initiative groups and electoral campaigns by:
 - a. Extending donor categories (individual entrepreneurs, peasant households, patent holders, agencies with independent status, as well as those who are self-employed or provide professional services);
 - b. Prohibiting the financing of initiative groups and electoral campaigns by legal entities that, at the time of the donation, have arrears to the state budget, the social insurance budget, or to the funds of compulsory health insurance;
 - c. Prohibiting electoral competitors to use and benefit from property, goods, products and services, offered for payment, without their advance payment;
 - d. Establishing the additional condition for donations made by individuals, within the limit of 30% of the annual amount of scholarships or other social payments (in addition to the ceiling of an average salary per economy), if they are the donor's only income;
 - e. Establishing the additional condition for donations made by legal entities, within the limit of 30% of their annual income (in addition to the ceiling of 12 average monthly salaries per economy).
- Changing the terms for setting up district electoral councils, nominating candidates and submitting signatures collecting lists, setting the date of elections, etc., by moving them 10 days earlier. The term and start of the electoral campaign have not been changed.
- Introducing provisions regarding electronic signatures collecting lists, electronic signatures, and electronic voter lists.
- Changing some particularities of the coverage of elections by media outlets.
- Excluding the word "notification" from the notion of appeal in art. 91 para. (1) of the Electoral Code and establishing a preliminary stage of solving the appeal – the verification of the admissibility of appeal. The inadmissibility of appeal is to be communicated to the party concerned without examining the appeal in substance. We shall remind that Promo-LEX expressed a critical opinion³⁸ in relation to this initiative already at the stage of public consultations, because previously there were observed cases when appeals were not allowed solely because of the name of the document or when complaints related to elections were examined according to procedures other than those established by the Electoral Code³⁹. In this context, we shall point out that according to the Code of Good Practice in Electoral Matters⁴⁰, the appeal procedure must be simple and free of formality, especially with regard to determining the admissibility of appeals.

³⁷ [Report no. 1](#), Promo-LEX OM for the presidential election and the republican constitutional referendum of 20 October (3 November), p. 9.

³⁸ [The Promo-LEX opinion on draft law no. 152/29.04.2025](#) on the amendment of some regulatory acts.

³⁹ [Final report](#) of the OM for the early parliamentary elections of 11.07.2021, p. 36; [Final report](#) of the OM for the elections for the office of President of the Republic of Moldova on 1 (15) November 2020, p. 37-38.

⁴⁰ [Code of Good Practice in Electoral Matters](#) of the Venice Commission. Guidelines and explanatory report, pt. 3.3.b.

Law no. 109/2024 on the partial implementation of postal voting was amended in response to the limitations identified in the process of its implementation during the presidential election and the referendum of 20 October 2024, but also in order to extend its applicability for parliamentary elections.

At the same time, we shall remind that after piloting this law in the 2024 elections, the legislator was to include provisions on permanent applicability and to integrate this mechanism into the Electoral Code⁴¹. Although there may be uncertainties regarding the resumption of the applicability of a regulatory act that had a temporary application and whose action has ceased⁴², in substance, postal voting proved to be a useful and effective tool for increasing the accessibility of the electoral process⁴³. Amendments to the law were made in May 2025 and involved:

- Adding “or participation in voting of at least 30 persons in previous elections” as a criterion for determining the countries where postal voting is to be implemented. In general, we welcome the inclusion of additional criteria for determining the countries where postal voting is to be held. However, we shall note that the full list of these countries was established by the same law, and the fact that it was supplemented by one or more criteria did not produce any effect from the perspective of enlarging the list of countries in which postal voting will be available.
- Extending the applicability of postal voting to parliamentary elections and including Japan, Korea, Australia, and New Zealand. We positively appreciate this change, but we shall remind that Promo-LEX has previously recommended⁴⁴ ensuring the access of all citizens abroad to postal voting, so as to guarantee the principle of universality.
- Extending the deadline for receiving envelopes, accepting receipt until the Friday before election day. We consider this change positive because it could reduce the number of envelopes canceled because they arrived after the deadline and increase the possibility that the votes of as many voters as possible will be registered and counted.

2.1.2. Amendment of related legislation

The *law on political parties* was also amended twice, between May and June 2025. The main changes concerned the regulation of political blocs (those provisions will enter into force on 1 January 2026) and the introduction of the obligation for political parties to submit to the PSA, before the beginning of the electoral period, the numerical and nominal list of the party’s presidents, vice-presidents, members of central executive bodies, under the sanction of prohibiting participation in elections⁴⁵.

The imposition of such a ban could be considered disproportionate in relation to non-compliance with some formal criteria – the presentation of up-to-date information on the leadership of political parties. Moreover, given that these amendments entered into force on 14.06.2025 and the electoral period started on 14.07.2025, the political parties had only one month to comply with the new rules. Such impediments could restrict the participation of some political parties in elections and consequently affect political pluralism as well. We shall point out that such concerns have been raised by several political actors⁴⁶.

Also, the law included additional conditions regarding the registration of members of political parties and the obligation for parties to update entries in the register within 3 working days from the acquisition, suspension, or termination of membership. Also, the parties are obliged to submit to the CEC and the PSA the register of party members within the terms and forms established by them, under the sanction of limiting the activity of the political party.

Promo-LEX recognizes the need to keep records of the members of political parties, with the presentation of information to state authorities when needed, but the obligation established without ensuring a transitional period for compliance may affect small parties with limited resources. At the same time, the

⁴¹ Article 35 para. (2) and (5) of [Law](#) no. 109/2024, until the adoption of the amendments of 03.06.2025.

⁴² Article 73-74 of [Law](#) No. 100/2007 on regulatory acts

⁴³ [Final Report](#). Promo-LEX OM for the presidential election and the constitutional referendum of 20 October (3 November) 2024, p.4.

⁴⁴ [Opinion](#) of the Promo-LEX Association on the draft law on piloting postal voting, no. 65 of 01.03.2024.

⁴⁵ Art. 11 para. (7) of [Law no. 294/2007](#) on political parties.

⁴⁶ The [case](#) of the Alternative Electoral Bloc and the [case](#) of the political party ALDE.

lack of clear mechanisms for updating (e.g. secure digital platforms) can lead to errors or delays. We consider that limiting the activity of a political party (6-12 months) for failure to present data from the relevant register could be disproportionate, given that during the limitation period the political party cannot carry out practically any activity, including participation in public meetings or carrying out financial operations, all the more so the political party cannot register as an electoral competitor. We shall point out that according to the information published by the CEC⁴⁷, 15 political parties⁴⁸ are or have been targeted in judicial proceedings to limit their activity or dissolve them, largely because of the failure to submit financial management reports or the information necessary to carry out the supervision and control of political party financing.

Also, the Law on political parties was supplemented with a ban on the creation, registration of a new political party and the use of an existing political party to continue or resume, as a successor political party, the activity of a party declared unconstitutional. The law also established the circumstances that are taken into account when acknowledging the status of successor party. In principle, Promo-LEX supported this initiative, but recommended specifying the minimum number of criteria to be met for a party to be declared successor and respectively banned.

The Contravention Code was amended several times during 2025, as follows:

- A new formulation of contravention was introduced (art. 47²) regarding corruption in the context of organized meetings, providing for sanctions for both the acceptance and the offering of undue funds for participation in such meetings, for purposes affecting public order, morality, fundamental rights, or aimed at political advertising.
- The sanction for failure to submit information or documents requested by the electoral body was tightened.
- A specific rule related to repeated non-execution of the CEC decision was introduced.
- A new formulation of contravention was introduced regarding the collection of signatures by unauthorized persons (art. 51¹).
- Contraventions were included regarding the conduct of electoral campaigning – until election day, but also the conduct of electoral campaigning by subjects not registered as competitors.
- A new formulation of contravention was introduced regarding the holding of meetings and other public events contrary to the provisions of preliminary declaration, as well as the organization of transportation or transportation of persons to meetings organized by political parties and/or electoral competitors, in the absence of notification documents.

The *Criminal Code* was also amended, tightening the liability for electoral corruption (art. 181¹ of the Criminal Code⁴⁹). The maximum limit of the penalty for committing acts of electoral corruption in the version provided for in para. (1) was increased to six years imprisonment, while in the aggravated form of this crime, provided for in para. (1³), the penalty was set at the maximum limit of 15 years imprisonment, which equates this type of crimes with intentional homicide (art. 145 para. (1) of the Criminal Code) and fraud involving goods exceeding 100 average monthly salaries (art. 190 para. (6) of the Criminal Code).

⁴⁷ [The report](#) for 2024 on the financing of political parties, electoral campaigns and initiative groups, approved by CEC Decision no. 3586 of 31.05.2025.

⁴⁸ **Limitation of political party activity:** Chance Party; New Historical Option Party; Regions of Moldova Party; Social Reform Movement; Social Democratic Party; Conservative Party; United Moldova Party; Revival Party; Socialist Party of Moldova; Alternative and Rescue Force of Moldova. **Dissolution:** Chance Party; Regions of Moldova Party; Conservative Party; United Moldova Party.

⁴⁹ [Criminal Code](#) no. 985 of 18.04.2002.

III.ELECTORAL BODIES

3.1. Structure of the CEC and organization of the activity of electoral bodies

The Central Electoral Commission is the authority responsible for organizing and conducting national elections. For this purpose, the CEC coordinates the activity of lower-level electoral bodies, second-level district electoral councils (DECs) and precinct electoral bureaus (PEBs).

The composition of the CEC is full, made of the 9 members who organized the ballots in autumn 2024. According to Promo-LEX's observations regarding the decision-making process within the CEC, on the most sensitive subjects they usually vote 3 to 6.

According to the legislation, second-level district electoral councils and the Central Electoral Council of Gagauzia (CECG) are permanent electoral bodies. However, we note that at the time of presentation of this report, contrary to legislation, the CECG remains to be dissolved⁵⁰. Even if, according to the precedent from the presidential election of 2024, the CEC dealt with the process by creating DECs and appointing an interim leadership, the delay by the Parliamentary Assembly of the process of setting up an electoral council with permanent status may affect the quality of organizing elections in the district.

According to the information available on the CEC website and on www.cariere.gov.md, until 30 June 2025, 7 positions (about 11%) of the CEC apparatus were vacant; in all cases the competition was extended.

3.2. CEC and CCET activities relevant to the organization of the 28 September 2025 elections

The work of the Central Electoral Commission is generally carried out in a transparent manner. All CEC meetings are public and broadcast on online platforms. The institution informs the general public and interested parties, through press releases, about the stages and important aspects of the organization and conduct of elections. Certain draft decisions, such as the approval of the calendar of activities, were also discussed at round tables.

However, regarding the transparency of decision-making on the website of the institution, the Promo-LEX OM notes that in this election year, too, the authority does not reflect all the stages of public consultations. Thus, it is not clear which projects have been adopted and which have not, since the section "Status/Adopted decision" under the heading "Decision-making transparency/Decision-making process" contains only one decision out of a total of 25 positions (21.07.2025). Also, only two summary tables are published.

Adoption/revision of the regulatory framework. The amendment of the regulatory framework was one of the main concerns of the CEC during the monitored period. Following the changes made, but also based on the experience of the autumn 2024 elections, the CEC initiated the elaboration of about 30 draft decisions amending regulatory acts.

In the opinion of Promo-LEX, being initiated at the beginning of the year, this process was to be carried out more efficiently. However, by the beginning of the electoral period, the authority failed to approve and terminate all the initiated decision-making procedures. For example, after the beginning of the electoral period, amendments to the CEC regulatory framework on postal voting were approved⁵¹, and the Regulation on the procedure of accreditation of observers was barely opened to public consultations⁵².

⁵⁰ [The People's Assembly](#) with a scandal adopted in the first reading the amendments that liquidate the permanent CEC of Gagauzia.

⁵¹ [CEC Decision](#) no. 3654 of 16.07.2025 on approval of the instruction on the procedure for counting, totalizing, centralizing the results and transmitting the materials of postal voting.

⁵² [Announcement](#) on the organization of public consultation on the draft decision amending the Regulation on the status of observers and the procedure for their accreditation, approved by the Central Electoral Commission Decision no. 1195/2023.

Regarding the adding of new conditions to the regulatory framework for the accreditation of observers⁵³, we shall point out that three public organizations have already accredited observers for these elections⁵⁴. In the opinion of the Promo-LEX OM, changing the rules during an ongoing process seriously affects the principle of ensuring equal opportunities and damages the predictability of the electoral process. We believe that any changes with new conditions could be applied only for subsequent elections.

Moreover, some of the projects subject to public consultations did not meet the legal deadlines for receiving recommendations from interested parties⁵⁵.

In the process of organizing and preparing the elections of 28 September 2025, the CEC also approved the calendar of activities⁵⁶. The Promo-LEX OM notes that it includes practically all the activities of organizing and conducting the elections, except those related to the implementation of postal voting. In the opinion of Promo-LEX, the activities of organizing and conducting postal voting were to be included in the general calendar of activities for elections, being a component of the voting process abroad. At the same time, we shall point out that procedures of registration for postal voting are already underway, and a separate calendar of activities for the implementation of this method of voting had not been approved by the beginning of the electoral period.

Registration of electoral blocs. The CEC registered the ALTERNATIVE EB⁵⁷ for participation in the parliamentary elections of 28 September 2025, and the application for registration of the VICTORY EB was refused⁵⁸.

Regarding the Alternative EB, the registration procedure raised certain issues related to updating information at the Public Services Agency (PSA) on the numerical and nominal composition of the executive bodies of political parties, an obligation imposed only six days before the submission of documents for the registration of the bloc⁵⁹. In the opinion of Promo-LEX, the problems were generated by the delayed modification of the legal and regulatory framework concerning the conditions for registration of competitors.

According to the CEC decision⁶⁰, one component of the bloc, the Joint Action Party - the Civic Congress, was obliged to notify the PSA about the current composition of all executive bodies. Otherwise, the administrative act would be revoked (grounds for revocation). We shall point out that the legal grounds indicated by the CEC for revocation are not clear⁶¹, as the provisions of art. 144 of the Administrative Code refer to the withdrawal of illegal administrative acts. Moreover, para. 4 lit. d) of the same article provides that an illegal individual administrative act for periodic granting of material or monetary

⁵³ Draft decision amending the Regulation on the status of observers and the procedure for their accreditation – pt. 1.1 – Presentation of information on the availability of technical, human capacities, qualifications and experience in the field of election observation, which shall include the methodology used for observation, the planned number of accredited persons, the number of monitored ballots, the complete list of sources of funding for the election observation mission, including contact details and name of the organization/person which/who will finance the observation activity, the amount offered by each entity together with copies of supporting documents.

⁵⁴ [List](#) of accredited observers.

⁵⁵ For example, the [Announcement](#) on the organization of public consultation on the draft decision amending the Regulation on the particularities of nominating and registering candidates for parliamentary elections, approved by the CEC Decision no. 1402 of 30 August 2023, was published for consultation on 3 July and recommendations were to be received by 8 July 2025. We shall remind that the legal norm provides for at least 10 working days.

⁵⁶ [CEC Decision no. 3601](#) of 18.06.2025 on the approval of the calendar of activities for organizing and conducting the parliamentary elections of 28 September 2025.

⁵⁷ [CEC Decision no. 3611](#) of 25.06.2025 on the application of the ALTERNATIVE Electoral Bloc for registration to participate in the parliamentary elections of 28 September 2025.

⁵⁸ [CEC Decision no. 3670](#) of 19.07.2025 on the application of the VICTORY Electoral Bloc for registration to participate in the parliamentary elections of 28 September 2025.

⁵⁹ [Law no. 100](#) of 13.06.2025 on amending some regulatory acts; [CEC Regulation](#) on particularities of establishment and registration of electoral blocs. We shall point out that the law was published and entered into force on 14 June, the CEC Regulation was approved on 17 June, and the procedure for registration of electoral blocs started on 20 June, the Alternative EB submitting the documents for registration on the same day.

⁶⁰ [CEC Decision](#) no. 3511 of 25.06.2025 on the application of the ALTERNATIVE Electoral Bloc for registration to participate in the parliamentary elections of 28 September 2025.

⁶¹ Art. 138 para. (4) lit. e), art. 144 of the Administrative Code.

benefits may be withdrawn [...] only for 3 years after its communication. In this regard, it is not clear what the registration of an electoral bloc has to do with the periodic granting of material or monetary benefits.

In addition, we believe that the establishment of grounds for revocation, although provided for in administrative procedures, cannot be used in a broad sense by the electoral authority. This is because each decision of the electoral body produces immediate effects, and the time limit for challenging electoral acts is three days - different than in the administrative process. A revocation of a decision of the electoral body might thus result in the annulment of other decisions and deprive all subsequent proceedings of legal certainty. For this reason, the legislator has set express deadlines for the examination and registration of electoral competitors.

As for the refusal to register the Victory EB, among the reasons indicated by the CEC is the choice by applicants of a name identical to one of the component parties. We shall remind that this reason was invoked by the electoral authority in the decision rejecting the application for registration of that entity for participation in the ballots of 30 October 2024⁶². But competitors proposed using the same name for these elections anyway.

We would also like to draw attention to the fact that in the case of the VICTORY EB, as a reason to refuse registration, the CEC for the first time applied the legal norms on “successor parties”, which entered into force on 14 June 2025⁶³. The CEC underlined the link between the Şor Party, declared unconstitutional, and the components of the bloc through the direct involvement of Ilan Şor, leader of the Şor Party, in the formation of the so-called electoral bloc.

In addition, the CEC noted in its decision (pt. 29), “In most of the ballots in which the electoral competitors of the Şor Party participated, the principle of transparency in the financing of electoral campaigns was violated by their failing to declare in the party’s financial reports the funds used in the campaign; failing to declare donations; exceeding the maximum permissible ceiling of electoral funds; diminishing the real value of donations and services provided in the electoral context; and ignoring the warnings applied by the Central Electoral Commission regarding the obligation to declare the real value of goods and services used in the campaign.”

Certification of electoral officials. An important stage in the organization of elections is the certification of future electoral officials by the Center for Continuous Electoral Training (CCET). On 1 January 2025, the grace period of 2 years from the entry into force of the Electoral Code ended, during which all those included in the Register of Electoral Officials could serve as electoral officials. Further, in accordance with the provisions of the Electoral Code, only persons holding qualification certificates are designated for the position of member of DEC at any level and of PEB.

According to Promo-LEX observers, the certification process is organized, transparent, carried out both online and offline, with the active assistance of heads of DEC. According to CCET data⁶⁴, from the beginning of the certification session 2025 (10 April) to 13 July, 254 exams were organized, with a total of 4,405 participants, of which 3,553 obtained the qualification certificate (pass rate – 81%).

The certification session is open until 5 September 2025. Given the current pace, as well as the number of officials certified in the last two years, filling in with certified officials does not seem to be a problem in the autumn 2025 elections. The challenge, however, remains to be the degree of certification of potential electoral officials for polling stations abroad, including in the context of the possible increase in their number.

⁶² [Decision no. 2687](#) of 07.08.2024 on the application for registration of the Victory Electoral Bloc for participation in the republican constitutional referendum and the election for the office of President of the Republic of Moldova of 20 October 2024.

⁶³ [Law no. 100](#) of 13.06.2025 on amending some regulatory acts (effective combating of electoral corruption and related aspects). Respectively, according to art. 3 para. (1¹) of Law no. 294/2007 on political parties, “The creation and registration of a new political party and the use of a registered political party in order to continue or resume, as a successor political party, the activity of a political party declared unconstitutional is forbidden, being considered fraudulent exercise of the right to political association.”

⁶⁴ CCET electoral certification information system. [7-13 July](#): week totals

Accreditation of observers. During the monitored period, the procedure of accreditation of observers started, and observers from three associations have been accredited: the Union of Jurists of Moldova, Promo-LEX Association, and ADEPT Association. There were no refusals of accreditation during the monitored period.

CEC collaboration with ITCSS. Hosting of the State Automated Information System “Elections” (SAISE) on the platform of the Information Technology and Cyber Security Service (ITCSS) led some opposition parties to blame the CEC for lack of transparency in the organization and conduct of elections⁶⁵, as well as for possible government interference in the electoral process. According to the Commission, the operation, integrity, access, and use of SAISE data remained under the management of the electoral authority⁶⁶, ITCSS being in charge of ensuring the cyber security of the system. Promo-LEX is aware of the increasing danger of cyber attacks, but believes that the CEC, in order to avoid any suspicions, should have proactively and fully communicated about the changes in the management of SAISE.

Informing voters. During the pre-electoral period, the CEC conducted the voter information campaign “Know Your Electoral Right”⁶⁷ about the activities preceding elections, election-related news, voting methods, rights and obligations of voters on election day. An important objective of the campaign, implemented in partnership with Promo-LEX Association, was to raise the participants’ awareness about the phenomenon of electoral corruption and illegal financing of political parties and electoral campaigns. Also, the CEC in collaboration with the General Inspectorate of Border Police conducted a campaign to inform the citizens with the right to vote passing through the border crossing points about the importance of prior registration for the parliamentary elections of 28 September 2025.

3.3. Organization of voting abroad

In the context of the autumn 2024 elections, the Promo-LEX OM pointed out that the CEC had organized the largest number of polling stations abroad – 234, of which three for postal voting. For the 2025 elections, the CEC has budgeted resources for an even larger number of stations – 260, of which 10 for the implementation of postal voting.

Also, for 25 PEBs of the total planned to be organized, expenses were budgeted for the organization of elections over two days. We shall remind that even if for the autumn 2024 elections the possibility of holding the vote over two days was included, the CEC did not approve any decision in this regard. The Promo-LEX OM considers that the organization of voting over two days in polling stations abroad would be an alternative to the trend of continuous increase in the number of polling stations, which involves human, logistical, and financial efforts.

Table 4. Evolution of the number of polling stations established abroad

Elections	Parliamentary 2014	Presidential 2016	Parliamentary 2019	Presidential 2020	Parliamentary 2021	Presidential 2024	Parliamentary 2025 ⁶⁸
No. of polling stations abroad	95	100	125	139	150	234	260

According to the information communicated by the CEC⁶⁹, at least in polling stations abroad, new technologies will be implemented to streamline the filling of voter lists by voters. For this purpose, during the pre-electoral period, the CEC received from donors/development partners modern equipment to support the electoral process, particularly document verification equipment – ultra-compact scanners for passports and identity documents.

⁶⁵ In particular, the topic was addressed during the interviews conducted by Promo-LEX Association with representatives of Our Party and the Alternative PB. Also, three other opposition parties – the Coalition for Unity and Welfare, the Moldovan National Party, and the Will of the People Party – [publicly presented their position](#), and the European Social Democratic Party issued a [statement](#).

⁶⁶ [CEC press release](#). CEC clarification regarding the State Automated Information System “Elections” (SAISE).

⁶⁷ [Central Electoral Commission](#). A new edition of the information campaign “Know Your Electoral Right”

⁶⁸ According to [CEC Decision no. 3237](#) of 28.11.2024 on the approval of the budget of the Central Electoral Commission for 2025. Of the total of 260 polling stations expected to be organized, 10 are set for postal voting.

⁶⁹ [CEC press release](#). Voters will benefit from modern equipment for elections.

Postal voting will continue to be partially implemented in the 2025 parliamentary elections. According to the legislative amendments made by the Parliament⁷⁰, the implementation area has grown by several states – Japan, the Republic of Korea, the Commonwealth of Australia, New Zealand, but the implementation will still be partial⁷¹.

Registration for postal voting was initiated by the CEC on 03.06.2025⁷², when amendments to Law no. 109/2025 on the partial implementation of postal voting entered into force, although according to the law voters should have had the opportunity to register from the date of publication of the act establishing the date of elections – 18 April 2025. In this context, we reiterate the finding of the late adoption of amendments to the electoral and regulatory legal framework⁷³.

With the publication on 18 April 2025 of the Parliament decision setting the date of the parliamentary elections, the period of registration through the online application Pre-Registration began, the app being actually activated on 22 April 2025 for citizens with the right to vote who intend to vote abroad in the elections of 28 September 2025⁷⁴. In this context, it is to be appreciated that the CEC established for these elections a dedicated (separate) platform for postal voting, other than the one for pre-registration, in accordance with the previous recommendation of Promo-LEX⁷⁵. Although pre-registration is a complementary criterion, it can still influence the decision on the distribution of polling stations abroad, and for this reason, the Promo-LEX OM considers it important for citizens to use the pre-registration mechanism.

3.4. Complaints filed in the context of parliamentary elections

During the monitored period, at least six complaints were filed to the CEC – five by the MAN party against the actions of the PAS party and one by a PAS adviser against the actions of persons affiliated to the MAN party:

- Regarding the use of a banner that included a call to vote. The complaint invoking the alleged actions of carrying out electoral campaigning outside the electoral campaign was filed on 23.05.2025. According to the CEC reply⁷⁶, PAS submitted a reference to the complaint, in which it admitted that during the information campaign it mistakenly used a banner that included the slogan “Vote PAS – Team Europe”, previously used in the general local elections of 2023. The CEC informed PAS on the need to comply with the legal provisions without applying any sanctions.
- Regarding the use of a social program carried out by the Government for political purposes, in the sense of verifying expenses and including them in the report on the financial management of the party. The complaint was filed on 26.05.2025, and the CEC replied⁷⁷ on 19.06.2025 that it would examine those circumstances within the verification of the financial report submitted for the first half of 2025.
- Regarding the receipt of donations in the form of services to promote PAS president, made by Igor Grosu. On 29.05.2025, MAN requested verification of this situation, as it claims that they are not found in the party’s financial activity reports for 2020-2025. The CEC replied⁷⁸ that it did not identify deficiencies related to the financial management of the PAS party.

⁷⁰ [Law no. 109](#) of 26.04.2024 on the partial implementation of postal voting.

⁷¹ The list of states in which postal voting will be implemented in the 2025 parliamentary elections includes: United States of America, Canada, Kingdom of Norway, Kingdom of Sweden, Republic of Finland, Iceland, Japan, Republic of Korea, Commonwealth of Australia, New Zealand.

⁷² [CEC press release](#). Moldovan citizens from the United States of America, Canada, the Kingdom of Norway, the Kingdom of Sweden, the Republic of Finland, Iceland, Japan, the Republic of Korea, the Commonwealth of Australia, New Zealand can register for postal voting in the parliamentary elections of 28 September 2025.

⁷³ [CEC Decision](#) no. 3640 of 10.07.2025 amending the Regulation on the peculiarities of organizing and implementing postal voting, approved by CEC Decision no. 2680/2024; [CEC decision](#) no. 3653 of 16.07.2025 amending the Instruction on remote voter identification by digital means, approved by CEC Decision no. 2688/2024

⁷⁴ [CEC press release](#). The Pre-Registration application for the parliamentary elections of 28 September 2025 has been activated.

⁷⁵ [Final Report](#). Promo-LEX OM for the presidential election and the constitutional referendum of 20 October (3 November) 2024, p. 25.

⁷⁶ [CEC Reply](#) no. CEC-8/7910 of 19.06.2025

⁷⁷ [CEC Reply](#) no. CEC-8/7909 of 19.06.2025.

⁷⁸ [CEC Reply](#) no. CEC-8/7922 of 20.06.2025.

- Regarding the nomination of candidates for the parliamentary elections of 28 September 2025⁷⁹, the complaint being filed on 05.07.2025. We shall point out that, by the time of publication of this report, the CEC had not adopted a decision on this complaint. Likewise, by checking the CEC website, it was not possible to identify the initial complaint.
- Regarding the alleged electoral campaigning outside the actual electoral campaign, being invoked that a publication was made on Facebook on 13 July 2025, in which several people dressed in yellow vests with the inscription "Vote PAS – Team Europe" distributed PAS publicity materials in a tent and in mailboxes⁸⁰. By the time of publication of this report, the CEC had not adopted a decision on this complaint.
- Regarding the distribution of electoral materials allegedly promoting people from the MAN party in educational institutions in Chisinau⁸¹. By the time of publication of this report, the CEC had not adopted a decision on this complaint.

In the context of the above, we shall draw the attention of electoral bodies to the need to ensure the transparency of the process of filing, examining, and resolving electoral complaints and appeals. We shall remind that this problem was also observed in previous elections⁸².

3.5. Management of the State Registry of Voters

The CEC continued to ensure the transparency of SRV data by means of their monthly publication. Thus, we find that at the beginning of the electoral period there were 15,308 more voters in the SRV than four years ago, in the last parliamentary elections. Against the background of negative natural increase for more than two decades, the increase in the number of voters might raise questions about the quality of data in the SRV.

Table 5. Dynamics of the number of voters 2021-2025 based on data from the SRV

Date	Total voters	Dynamics	Without domicile/residence	Dynamics	ATU on the left bank of the Dniester	Dynamics	Assigned by constituency	Dynamics
01.06.2021 ⁸³	3,282,288		237,322		258,598		2,786,368	
01.06.2022 ⁸⁴	3,282,032	-256	249,289	+11,967	262,673	+4,075	2,770,070	-16,298
01.08.2023 ⁸⁵	3,301,121	+19,089	259,386	+10,097	270,836	+8,163	2,770,899	+829
01.08.2024 ⁸⁶	3,300,600	-521	287,148	+27,762	274,531	+3,695	2,738,921	-31,978
01.07.2025 ⁸⁷	3,297,596	-3,004	266,463	-20,685	276,517	+1,986	2,754,616	+15,695

However, analyzing data from the SRV by category of voters (see Table 5), it is important to note the increasing general evolution of the number of voters without domicile/residence, even if compared to 2024 there has been a decrease in their number. It is possible that some of them are citizens of Moldova settled abroad, who will anyway have access to polling stations, where they will vote on additional lists. However, the increase in the number of voters voting on additional lists in the country may indicate a problematic quality of the main electoral lists.

In conclusion, given the difficulty of the procedure for confirming the deaths of voters from the Transnistrian region and those from abroad, as well as the presence in the SRV of a significant number of voters without domicile or residence, we believe that the discrepancy mentioned above can be

⁷⁹ [Addition](#) to the complaint, registered under no. CEC-7/20634 of 08.07.2025, related to the complaint no. 105 of 04.07.2025 filed by the MAN party.

⁸⁰ [The complaint](#) filed by MAN member Victor Munteanu, registered under no. CEC-7/20797 of 16.07.2025.

⁸¹ [The complaint](#) filed by PAS municipal councilor Dumitru Ivanov, registered under no. CEC-7/20658 of 10.07.2025.

⁸² [Final report](#) of the OM for the presidential election and republican constitutional referendum, pp. 16, 31. [Final report](#) of the OM for the general local elections, p.33.

⁸³ [Total number of voters](#) in the State Registry of Voters as of 1 June 2021.

⁸⁴ [Total number of voters](#) in the State Registry of Voters as of 1 June 2022.

⁸⁵ [Total number of voters](#) in the State Registry of Voters as of 1 August 2023.

⁸⁶ [Number of voters](#) in the State Registry of Voters as of 1 August 2024.

⁸⁷ [Number of voters](#) in the State Registry of Voters as of 1 July 2025.

explained rather by systemic problems of citizen record-keeping than by the poor management of the SRV and voter lists by the CEC.

At the same time, the Promo-LEX OM recommends the CEC, along with the PSA, to present during the electoral period not only figures, but also some explanations regarding the increasing dynamics of the number of citizens/voters, in order to prevent possible attempts to manipulate or disinform society on this subject.

IV. POTENTIAL ELECTORAL COMPETITORS

4.1. Nomination of candidates for parliamentary elections and submission of applications for registration of candidates

The *nomination of candidates for parliamentary elections* begins 70 days before election day and ends 40 days before election day. According to the CEC's calendar of activities⁸⁸, the nomination of candidates for the position of MP began on 20 July 2025.

That procedure involves the adoption by political parties or electoral blocs of decisions on the candidates they are nominating for elective office, in accordance with their statutes or constitution agreements.

Like in the case of previous elections, the procedure for nominating candidates seems to be reduced to a simple formality – that of official approval of decisions in the meetings of the competent bodies of political parties/electoral blocs, while the decision *de facto* was adopted and communicated to citizens much earlier.

Thus, at least two political parties had announced their potential candidates before the nomination deadline by the time the report was published. One case concerns PAS, which began publicly announcing potential candidates who would join the party in the context of the parliamentary elections of 28 September 2025, as early as 16 June 2025⁸⁹. The second case is the Victory Political Bloc, which announced at the Political Congress held in Moscow, Russian Federation, on 6 July 2025, that Evghenia Guțul, the current governor of the Autonomous Territorial Unit of Gagauzia (ATUG), will be the first potential candidate on the bloc list⁹⁰.

Compared to other local and presidential elections, the early nomination of candidates for the position of MP does not have the same impact on the transparency of political campaign financing. This is due to the proportional electoral system with closed lists of candidates, where the political party/electoral bloc as a whole is promoted, rather than any individual candidate on the list.

Parties eligible to participate in elections. On 14 July 2025, the CEC approved and published the list of political parties eligible to participate in the parliamentary elections of 28 September 2025⁹¹. According to it, only 39 out of the 66 registered political parties will be able to participate in parliamentary elections. The CEC has reserved the right to revoke the participation rights of 14 of the 39 parties in parliamentary elections if the PSA does not issue a favorable individual administrative act and/or if the court issues an enforceable decision on the dissolution/restriction of political parties' activities.

This year's parliamentary election is the first in which registered political parties whose activities are unrestricted are prohibited from participating in elections. The significant reduction in the number of political parties that can participate in elections (by 40%) was caused by recent amendments to the Law on Political Parties, which introduced the obligation for parties to submit to the PSA, before the start of the electoral period, a nominal and numbered list of political party members who fall under the Article 3(1)(e⁵) of Law no. 133/2016 on the Declaration of Assets and Personal Interests. Parties that do not submit the required list are not eligible to participate in the elections. In this regard, we believe that failing to meet a formal condition within a limited time frame disproportionately restricts a political party's right to participate in elections, one of the most important rights of political parties⁹².

Submission of applications for registration of candidates. During the first two days of the period for submitting documents for candidate registration (20-21 July 2025)⁹³, the CEC received the following:

- applications from two political parties for registration of candidate lists – PAS and PPDA;
- applications from seven potential independent candidates for the formation of initiative groups and/or the issuance of signature collecting lists – Oleseă Stamate, Andrei Năstase, Eleonora Rusu, Sergiu Rența, Natalia Clevadi, Victoria Sanduța, Victor Grosu.

⁸⁸ [Calendar of activities](#) for organizing and conducting the parliamentary elections of 28 September 2025.

⁸⁹ PAS conferences of [16, 23](#) June and [7](#) July 2025, the show with [Igor Grosu](#) of 20 June 2025.

⁹⁰ The [Congress](#) of the Victory Political Bloc in Moscow.

⁹¹ [CEC decision](#) no. 3651 of 14.07.2025 on the list of political parties eligible to participate in the parliamentary elections of 28 September 2025

⁹² Article 17 (2) (b) of [Law](#) no. 294/2007 on Political Parties

⁹³ CEC press releases of [20 July 2025](#) and [21 July 2025](#).

4.2. Promotion activities with electoral implications

As in previous elections, Promo-LEX OM observed that several potential electoral competitors carried out multiple promotional activities with electoral implications during the pre-electoral period and up to the presentation of this report.

In this context, we remind that the electoral campaign should start for all electoral competitors only on 29 August 2025⁹⁴. Respectively, the electoral campaigning can be carried out only after their registration, but not earlier than 30 days before the voting day, and ends on the date of annulment of the registration of the electoral competitor or on the Friday before the voting day.

At the same time, we shall mention that until the beginning of the electoral campaign, the activities carried out by political parties are considered political promotion activities, if they are not carried out in the context of the activity of initiative groups and/or promotion of potential candidates nominated for elective positions.

Thus, an intensification of promotion activities was observed among the following potential electoral competitors until the publication of the report:

- On 28 June 2025, PAS announced the launch of an information campaign in all villages and towns across the country to discuss with citizens the achievements and plans for the future, so that EU accession can be ensured within the next four years⁹⁵;
- On 23 June 2025, the PSRM announced the launch of a campaign to promote the idea of sovereignty and national⁹⁶ interest, where information materials were distributed and signatures were collected in several regions in support of the so-called "Declaration on Sovereign Policy";
- PPMM is conducting the "With Faith in God for Moldovans" campaign, which includes organizing meetings with citizens, distributing informational materials, active online promotion, etc.;
- PRIM: the "Protection" and "Save You from PAS" campaigns, which include organization of protests, mostly anti-PAS; online anti-PAS promotion campaign, etc.;
- PPVM: protests under the slogan "meeting for democracy and freedom of expression"; online promotion campaign on social media;
- MRM: information campaign in localities across the country through the distribution of informational materials and meetings with citizens (starting in early June 2025); online promotion of activities;
- Alternative EB: the "Consulting with Citizens" campaign, which involves meetings with citizens to discuss current issues and the bloc's political program; online promotion of activities;
- On 25 May 2025, Together PB launched the party's political program in the context of the parliamentary elections of 28 September 2025⁹⁷.

4.3. Use of administrative resources

According to legislation, during the electoral period it is forbidden for candidates to use administrative resources⁹⁸, and the violation of these provisions shall be sanctioned⁹⁹. In its experience of monitoring elections, Promo-LEX found that administrative resources are used by stakeholders not only in electoral

⁹⁴ [Calendar of activities](#) for organizing and conducting the parliamentary elections of 28 September 2025.

⁹⁵ [Post](#) on social media of PAS.

⁹⁶ [PSRM](#) launches a campaign to promote the idea of sovereignty and national interest.

⁹⁷ [Press conference](#) organized by the Together Bloc on the occasion of the launch of the Bloc's political program

⁹⁸ The Electoral Code, Article 1 – definition of administrative resources – “the human, financial and material resources which are equally available to persons in important public positions, persons with positions of responsibility and civil servants and which derive from the control of these persons over the personnel, financial resources and allocations from the national public budget, from access to public facilities or from the administration by these persons of movable and immovable assets that are part of the public domain of the state or of administrative-territorial units”.

⁹⁹ Article 48¹(7) of the [Contravention Code](#) of the Republic of Moldova and Article 181²(2) of the [Criminal Code](#) of the Republic of Moldova.

campaigns, but also outside them, including for political promotion purposes outside the electoral period. For this reason, it was recommended to prohibit and sanction the use of administrative resources both during the electoral period and outside the electoral period for political promotion purposes¹⁰⁰. Promo-LEX also promoted the adoption of the definition of administrative resources formulated by the Venice Commission¹⁰¹, a broader and more exhaustive one¹⁰².

By the *Document of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE (OSCE)* of 29.06.1990¹⁰³, member states have undertaken to ensure ***clear delimitation between the state and political parties; in particular, political parties cannot be confused with the state.***

Given the above, but also findings in the run-up to the electoral period and during the electoral period, Promo-LEX found the use of administrative resources by the state institutions, through expenditure made from public budget to obtain political capital in the context of the parliamentary elections, as follows:

- *Amendments to the state budget and the reallocation of funds for infrastructure, energy, and social projects implementation;*

On 17 April¹⁰⁴ and 10 July 2025¹⁰⁵, the Parliament adopted amendments to the 2025 State Budget Law.

The first draft amendment, also known as the "Budget +Plus" was approved. It provided for the allocation of approximately 8 billion MDL for two dimensions: the energy package and the economic development package. The money came from EU allocations for the implementation of the Growth Plan for the Republic of Moldova and the Energy Resilience Program¹⁰⁶. The manner in which the project was approved, as well as its provisions, provoked critical reactions in society the following reasons: lack of transparency in the decision-making process, inconsistency of some measures with the philosophy of the Economic Growth Plan for the Republic of Moldova, limitation of local autonomy, and establishment of conditions that encourage political patronage¹⁰⁷.

The energy package included electricity subsidies, monetary heating subsidies during the cold season, and subsidies allocated to local public authorities (LPAs) for hospitals, kindergartens, schools, and other social institutions to reduce bill costs.

The economic development package includes several projects to be completed by the end of 2025. These projects include repairing roads, modernizing yards and agricultural markets, modernizing school canteens across the country, supporting entrepreneurs in creating new jobs; supporting farmers; supporting young employees by offering a salary supplement of MDL 3,000 for their first job at home; environmental projects, etc.

Based on the "Budget + Plus" program, on 21 May 2025, the Government announced the launch of the "Moldova can"¹⁰⁸ national information campaign, declared to be an initiative aimed at bringing public decisions closer to citizens. The campaign aimed to raise awareness among citizens about public decisions by promoting national unity and collaboration with the EU. Promotion activities were planned to reach a national audience. The budget allocated for this campaign was 5 million MDL. To obtain additional data, Promo-LEX sent a request for access to information to the institution.

¹⁰⁰ [Report](#): Financing of political parties in the Republic of Moldova. Retrospective of the year 2021, p. 39-40.

¹⁰¹ [Report](#) of the Venice Commission on the misuse of administrative resources during electoral processes, Strasbourg, 16 December 2013.

¹⁰² "Administrative resources include: human, financial, material, in natura and other immaterial resources enjoyed during electoral processes by both elected representatives and representatives of the public sector deriving from their control over public sector staff, finances, allocations and access to public facilities. It entails also resources enjoyed in the form of prestige or public presence that stem from their position as elected representatives or public officers and which may turn into political endorsements or other forms of support".

¹⁰³ [Document](#) of the Copenhagen Meeting of the Conference on the Human Dimension of the CSCE (OSCE) of 29.06.1990, pt. 5.4.

¹⁰⁴ [Law no. 78](#) of 17.04.2025 amending the 2025 State Budget Law no. 310/2024

¹⁰⁵ [Draft Law](#) amending the 2025 State Budget Law no. 310/2024 (Articles 1, 2, 3, etc.).

¹⁰⁶ [Press Release](#) of the Government of the Republic of Moldova: The Great Composers Collection.

¹⁰⁷ [Expert Group](#): Position note on the draft amendment of the 2025 State Budget Law.

¹⁰⁸ [Press conference](#) after the meeting of the Government of the Republic of Moldova on 21 May 2025.

Before the report was published, the aforementioned campaign's activities were observed online and through street advertising, television, radio, etc., promoting infrastructure, social, energy, and other projects that were planned to be implemented under the "Budget +Plus" program. The Government's campaign was taken up by PAS and promoted both in party newspapers and on online platforms. According to Promo-LEX, the planned projects could easily be mistaken for election promises.

The second draft amendment to the State Budget Law, dated 10 July 2025 (4 days before the start of the electoral period), provided for the allocation of 300 million MDL in one-time financial support to prepare students in grades I-IX for the 2025-2026 school year. This support was planned to be granted on 2 – 5 September 2025¹⁰⁹, amidst the electoral campaign.

- *Information campaign of the Mayor's Office of Chisinau municipality about projects implemented;*

In 2025, the distribution of the newsletter of the Mayor's Office of Chisinau municipality, as well as of flyers, outdoor advertising, at bus stops, on public transport, online, etc. was observed. Through these materials "We do. We have shown that we can", "We build. You can see it!" Information Campaign is being carried out.

In several cases, in the context of the aforementioned advertising, it was noticed that the distributed messages were personalized and indicated the name of the mayor: "Ion Ceban, the General Mayor of Chisinau municipality", thus taking credit for the entire activity of the LPA.

Furthermore, the information materials distributed by the Mayor's Office of Chisinau are printed using same colors as MAN. MAN also sponsored the promotion on online platforms of the information campaign of the Mayor's Office of Chisinau municipality¹¹⁰. To obtain details about that campaign, Promo-LEX sent a request for access to information to the institution.

4.4. Involvement of the president of the state in the electoral process

Promo-LEX OM finds the involvement of President of the Republic of Moldova in identifying potential PAS candidates for the parliamentary elections of 28 September 2025.

To this end, it should be reminded that according to Article 149(2) of the Electoral Code, until the validation of the mandate, the candidate elected for the Office of President of the Republic of Moldova shall submit to the Constitutional Court the confirmation that he or she is not a member of any political party. Therefore, Promo-LEX believes that the President of the Republic of Moldova cannot support a potential electoral competitor.

Also, it should be reminded that by its decisions¹¹¹, the Constitutional Court reaffirmed that the President of the Republic of Moldova must act in the interests of the entire society, and the settlement of differences between the state powers, as well as between political parties, can be achieved only when he or she is an arbitrator who identifies himself or herself with the national interest, and not with one political party.

Thus, the authority set a very high standard, suggesting that there should be no "trace of appearance" of connections between a candidate for the office of President of the Republic of Moldova and a political party. This is because the incompatibility imposed on the President serves the benefit of that office, since it contributes to the establishment of a favorable framework for the exercise of his or her constitutional duties, detached from political parties.

However, we note that in the context of the announcement and public presentation of potential PAS candidates for the position of MP, they emphasized that they had accepted the invitation of the President of the Republic of Moldova and the PAS to run on the party's lists in the parliamentary elections¹¹². Igor

¹⁰⁹ [Press release](#) of the Ministry of Education and Research: financial aid worth MDL 1,000 for students in grades I-IX.

¹¹⁰ Promotion sponsored by MAN includes [modernization](#) of the Sfânta Treime Municipal Hospital; [rehabilitation](#) of streets and Mihai Viteazul [bridge](#) in the capital etc.

¹¹¹ Constitutional Court Decision [no. 2](#) of 24.01.2017 (para. 31) and Decision [no. 35](#) of 12.12.2017 (para. 57).

¹¹² [PAS press conference](#) on "New personalities from different fields join PAS in parliamentary elections" of 23 June 2025.

Grosu, the Speaker of Parliament, as well as PAS leader, informed about the president's involvement in forming the list of PAS candidates for the parliamentary elections¹¹³.

Furthermore, the PAS Annual Political Conference took place on 5–6 July 2025, and was attended by the President of the Republic, Maia Sandu, who gave a speech¹¹⁴.

¹¹³ The show with [Igor Grosu](#) dated 20 June 2025.

¹¹⁴ [PAS 2025 Annual Political Conference](#).

V. ELECTION AND CAMPAIGN FINANCING

5.1. CEC budget for parliamentary elections

The CEC approved budget for the parliamentary elections of 28 September 2025 is MDL **152,860,200**¹¹⁵, including MDL 10,716,100 for postal voting.

Most of the planned funds are earmarked for staff remuneration and other expenses based on contracts with individuals, which make up 82% of the total planned funds. Seven percent of the funds are earmarked for postal and courier services, while another 3% are allocated for business trips abroad in the context of parliamentary elections.

5.2. Ceiling of funds that can be transferred to the account "For the initiative group" / "Electoral Fund" and the interest-free loan

According to the legislation¹¹⁶, the CEC establishes the ceiling of funds that can be transferred to the account with the mention "For the initiative group" / "Electoral fund". It constitutes 0.1% of the income provided for in the state budget law, relative to the total number of voters per country, and in the case of initiative groups also multiplied by the maximum number of signatures required to be collected by the initiative group to support a candidate for an elective position.

The ceiling of funds that can be transferred to the account with the mention "For the initiative group" was set on time and amounts to MDL 57,564¹¹⁷. This amount was calculated based on the maximum number of 2,500 signatures that the initiative group must collect to support an independent candidate for the position of deputy in the Parliament of the Republic of Moldova.

The ceiling of funds that can be transferred to the account with the mention "Electoral Fund" was established on time and amounts to MDL 75,932,486¹¹⁸, which is 0.1% of the revenues provided for in the 2025 State Budget Law (for the reference year - MDL 75,932,486).

The amount of the interest-free loan granted to electoral competitors in the parliamentary elections of 28 September 2025, was set at MDL 50,000 lei for each political party/electoral bloc and MDL 10,000 for each independent candidate¹¹⁹.

5.3. Legal framework on financing of initiative groups / electoral campaign

The financing of initiative groups / electoral campaign is regulated by several legislative and regulatory acts adopted both by the Parliament and the CEC¹²⁰. The CEC is the body authorized to receive, verify, supervise and control financial reports on the financing of initiative groups and electoral campaigns.

Sources of funding and bank accounts. For the financing of initiative groups and electoral campaigns, electoral competitors can use funds from three sources:

- ✓ their own funds accumulated in the accounts of the political party by the beginning of the electoral period (contributions, donations, allowances, other incomes provided by law);
- ✓ donations;

¹¹⁵ [Budget](#) approved by the CEC for 2025.

¹¹⁶ Article 53 of the [Electoral Code](#).

¹¹⁷ [CEC Decision](#) no. 3666 of 19 July 2025 on establishing the ceiling of funds that can be transferred to the account with the mention "For the initiative group" for supporting the independent candidate for the position of deputy in the Parliament of the Republic of Moldova in the parliamentary elections of 28 September 2025.

¹¹⁸ [CEC Decision](#) no. 3667 of 19 July 2025 on establishing the general ceiling of funds that can be transferred to the account the mention "Electoral Fund" and used by the electoral competitors in the parliamentary elections of 28 September 2025.

¹¹⁹ [CEC Decision](#) no. 3668 of 19 July on establishing the amount of interest-free loan granted to electoral competitors in the parliamentary elections of 28 September 2025.

¹²⁰ [Electoral Code](#), [Contravention Code](#), [Criminal Code](#), [Law no. 294](#) of 21 December 2007 on political parties, [Law no. 62](#) of 17 March 2022 on advertising, [CEC Decision](#) no. 1185 of 18 August 2023 on the approval of the Regulations on financing of initiative groups and electoral campaigns, Calendar of activities for organizing and conducting the parliamentary elections of 28 September 2025, approved by [CEC Decision](#) no. 3601 of 18 June 2025.

- ✓ interest-free loans from the state.

Electoral competitors can collect donations from legal entities (up to 12 average salaries per economy, by bank transfer) and from individuals, citizens of Moldova (up to one average salary per economy in cash and/or up to 6 average salaries per economy by bank transfer).

In 2025, the average salary per economy is MDL 16,100¹²¹. Therefore, individuals will be able to donate a maximum of MDL 96,600, while legal entities – MDL 193,200. These values can be donated cumulatively to initiative groups and/or electoral competitors.

If the activities of collecting signatures and electoral campaigning involve financial expenses, electoral competitors are obliged to open a bank account “For the initiative group” / “Electoral fund” and to register with the CEC the person responsible for funds – treasurer.

Compliance with the requirements for the publication of information on the conditions of offering advertising space. In accordance with provisions of Article 54(9) and (10) of the Electoral Code, within 7 days from the start of the electoral period (until 20 July 2025, inclusive), media service providers and advertising distributors, owners or managers of fixed or mobile advertising devices are obliged to disclose the conditions under which they offer advertising space and other related services to electoral competitors or initiative groups.

According to information on the CEC website, five radio stations and one TV station had complied with the requirements by the time the report was presented¹²². According to the legislation, in case of non-compliance with the mentioned provisions, media service providers and advertising distributors will not be able to distribute electoral advertising.

Funding bans. The financing of initiative groups and electoral campaigns is prohibited to citizens of Moldova who have not reached the age of 18; citizens who did not have declared income in the previous year; citizens in respect of whom a judicial protection measure in the form of guardianship has been established; legal entities from abroad, including those with foreign or mixed capital; public authorities financed from the national public budget, self-managing public authorities/institutions, state-owned enterprises and joint-stock companies, the founders of which are central and local public administration authorities, state or municipal enterprises or other legal entities financed from the national public budget or having state capital; individuals who are not citizens of the Republic of Moldova; anonymous persons or on behalf of third parties; legal entities that, in the last three years before the start of the electoral period, have concluded public procurement contracts with public institutions or benefited from state aid; non-commercial organizations, trade unions, non-commercial associations or foundations in the Republic of Moldova or abroad, charitable or religious organizations, as well as other states or international organizations, including international political organizations.

Financial reporting. Electoral competitors have the obligation to submit to the CEC in electronic format, through the module of the "Financial control" information system, within three days from the opening of the "For the initiative group"/"Electoral Fund" accounts and, subsequently on a weekly basis, a report on the accumulated funds and expenses incurred during the collection of signatures/electoral campaign. The final report for the electoral campaign shall be submitted within 3 days after the voting day (Wednesday)¹²³.

Reports shall be published on the official website of the CEC within 24 hours of submission, in reusable format.

Sanctions. For violation of election-related regulatory acts, the CEC may apply or request the application of the following main or complementary sanctions:

- ✓ warning;
- ✓ deprivation of free and/or paid airtime for a period of 24 to 48 hours, which can only be applied after the sanction of warning had been given;
- ✓ deprivation of allowances from the state budget;

¹²¹ [Decision](#) no. 845 of 18 December 2024 on the approval of the amount of the average monthly salary per economy, forecast for 2025.

¹²² [Information](#) on the conditions of offering advertising space are available on the official website of the CEC.

¹²³ Article 58(3) from the [Electoral Code](#).

- ✓ deprivation of allowances from the state budget for the performances obtained in the elections in which it is registered as an electoral competitor;
- ✓ contravention sanction that, according to the Contravention Code, is within the competence of the CEC;
- ✓ deprivation of allowances from the state budget for a period from two months to one year (in case of repeated application of the sanction in the form of warning during one electoral period);
- ✓ cancellation of registration of electoral competitors;
- ✓ request of ex officio de-registration of political parties.

The registration of electoral competitors may be canceled if the following violations in the process of financing the IG/electoral campaign are found: use of undeclared funds and goods exceeding 1% of the ceiling of funds that can be transferred to the "For the initiative group"/"Electoral fund" account; exceeding the legally established ceiling; use of funds from abroad (except for donations from citizens of the Republic of Moldova with income earned outside the country).

VI. HATE SPEECH AND INCITEMENT TO DISCRIMINATION

6.1. Legal framework regulating hate speech

On 11 April 2025, the Ministry of Economic Development and Digitalization submitted for public consultations the draft law on digital services¹²⁴. The draft proposes that providers of very large online platforms and online search engines assess systemic risks, including "any actual or foreseeable negative effects on the exercise of fundamental human rights and freedoms" or "any actual or foreseeable negative effects in terms of gender-based violence, the protection of public health and minors, and negative effects for a person's physical and mental well-being". The draft law also proposes that online platform providers pay attention to the impact of restrictive measures, including "adapting content moderation processes" and "processing notifications related to specific types of illegal content". The Ministry of Economic Development and Digitalization proposes that illegal hate speech or online violence, once reported, be removed or access to it blocked. The Parliament of the Republic of Moldova had not registered the draft law prior to the preparation of this document.

On 29 May 2025, the Parliament of the Republic of Moldova registered the draft law no. 191¹²⁵ amending the Code of Audiovisual Media Services of the Republic of Moldova no. 174/2018. The draft law was submitted for public consultation¹²⁶ by the Committee on Culture, Education, Research, Youth, Sport, and Media on 9 June 2025. The authors of the draft law proposed changing the definition of "speech inciting hatred", based on the definition of "hate speech" given by the Committee of Ministers of the Council of Europe in Recommendation Rec/CM (2022)16¹²⁷. According to Promo-LEX Association¹²⁸, the authors of the draft law adopted the definition of the Committee of Ministers, but limited its applicability to only one of the four actions (incitement) and excluded the other types of actions (promotion, dissemination, and justification). Also, draft law no. 191 proposes to ban "content that incites hatred or violence or that spreads messages that can be classified as discrimination, intolerance, hatred, or violence" (Article 11(2)(b)) in audiovisual media services and video-sharing platform services. Another amendment concerns Article 17(3)(a) proposes prohibiting the broadcasting of audiovisual programs that "incite violence or hatred". The draft law was voted on in its final reading on 10 July 2025. As of this writing, the final text of the adopted draft law had not been published.

On 4 June 2025, a group of MPs registered draft law no. 198¹²⁹ for amending and supplementing certain regulatory acts. Through this, the authors propose the introduction of a new article on traditional spiritual and moral values into the Education Code, Code of Audiovisual Media Services, the Law on Freedom of Expression, and the Family Code. The new article prohibits promoting or supporting "by any means, information, attitudes, actions, or any other manifestations of support for non-traditional sexual relations, gender reassignment, same-sex marriages, or any other actions that are contrary to traditional spiritual and moral values". Additionally, the authors of the draft law proposed to supplement the Contravention Code and sanction the promotion of non-traditional sexual relations, homosexuality, and/or gender reassignment preferences. By the end of the parliamentary session, this draft law had not been debated in parliamentary committees or in the plenary session of Parliament.

On 28 May 2025, the Government of the Republic of Moldova approved¹³⁰ the Instruction on the procedure for restricting access to websites¹³¹. The instruction details the application of the provisions of Law No. 20 on preventing and combating cybercrime. The latter was completed in 2024, by draft law

¹²⁴ Ministry of Economic Development and Digitalization, [draft law](#) on digital services, last accessed: 8 July 2025.

¹²⁵ Parliament of the Republic of Moldova, [draft law no. 191](#) amending the Code of Audiovisual Media Services of the Republic of Moldova no. 174/2018 (preamble, Articles 1, 2, 4, etc.) dated 29.05.2025, last accessed: 8 July 2025.

¹²⁶ Parliament of the Republic of Moldova, [public consultations](#) on the draft law no. 191 amending the Code of Audiovisual Media Services of the Republic of Moldova no. 174/2018 (preamble, Articles 1, 2, 4, etc.) dated 29.05.2025, last accessed: 8 July 2025.

¹²⁷ Council of Europe, Committee of Ministers, [Recommendation Rec/CM\(2022\)16](#) on combating hate speech, last accessed: 8 July 2025.

¹²⁸ Promo-LEX Association, [Opinion](#) on the draft law no. 191 amending the Code of Audiovisual Media Services of the Republic of Moldova no. 174/2018 (preamble, Articles 1, 2, 4, etc.) dated 29.05.2025, last accessed: 8 July 2025.

¹²⁹ Parliament of the Republic Of Moldova, [draft law no. 198](#) for amending and supplementing certain regulatory acts (Article 7 of the Education Code no. 152/2014; Article 20, etc. of the Code of Audiovisual Media Services no. 174/2018), last accessed: 8 July 2025.

¹³⁰ Ministry of Internal Affairs, [Press release](#), 28.05.2025, last accessed: 9 July 2025.

¹³¹ Government of the Republic of Moldova, [Instruction](#) on the procedure for shutting down websites, last accessed: 9 July 2025.

no. 199¹³². According to the instruction, after identifying one or more websites containing information intended for or used in the preparation or commission of crimes, the specialized subdivision of the Ministry of Internal Affairs or the Security and Intelligence Service must: 1) draw up a document on the examination of the website(s) and 2) within 24 hours, either issue an order to remove the online content at source, issue an order to restrict access to the websites, or refuse to issue the removal/restricting order. The instruction also clarifies what an order to remove content or restrict access to websites must contain, including the legal grounds and specific arguments underlying the assessment.

6.2. Trends in hate speech

In the last two elections held after 2022, the Promo-LEX Association identified 346 cases of hate speech, incitement to discrimination, or other forms of intolerance. The data of previous monitoring carried out by Promo-LEX Association show that the dynamics of the manifestation of hate speech during electoral periods oscillates depending on the type of elections. In the electoral period for the general local elections of 2023, an average of 1.1 new cases/day were identified, and in the electoral period for the presidential elections of 2024, the average was 2.6 new cases/day, less than in the parliamentary elections of 2021, when an average of 3.9 new cases/day¹³³ were identified.

On the other hand, although since 2022, although the Contravention Code has sanctioned hate speech and/or incitement to discrimination during the electoral period¹³⁴ since 2022, the number of complaints addressed to the General Police Inspectorate (GPI) has decreased. During the electoral period for the general local elections of 2023, 16 complaints¹³⁵, and one complaint and one ex-officio notification were filed to GPI during the electoral period for the presidential elections of 2024¹³⁶.

Since 2018¹³⁷, the trend regarding the age and gender of people who most frequently use hate speech has remained unchanged. Men and people aged between 35 and 50 use hate speech more often, mainly through social media and mobile applications. Meanwhile, incitement to discrimination continues to be part of electoral campaign strategies. Various social groups are targeted by this type of speech during electoral periods, particularly electoral competitors, politicians, members and supporters of political parties, LGBTQI+ people, and women.

Given the recorded trends, but also the data on cases of hate speech and/or incitement to discrimination documented by the police, the monitoring of hate speech remains a necessity in order to analyze and assess the degree of use of this type of speech and sanctions applied for it.

6.3. Methodological benchmarks for monitoring hate speech

Between 21 July and 19 October 2025, Promo – LEX Association will monitor hate speech and incitement to discrimination during the electoral period for the parliamentary elections of 28 September 2025. The monitoring process will be carried out based on the methodology developed in 2018 and supplemented after each monitoring cycle, including after the one carried out in 2024.

¹³² Promo-LEX Association, [Monitoring Report](#): "Hate Speech and Incitement to Discrimination in the Public Space and in the Media in the Republic of Moldova during the Electoral Period for the Presidential Elections of 20 October (3 November) and the Republican Constitutional Referendum of 20 October 2024", p. 15, 2024. Last accessed: 9 July 2025.

¹³³ Promo-LEX Association, [Monitoring report](#) "Hate speech and incitement to discrimination in the public space and in the media in Moldova within the electoral campaign for the early parliamentary elections of 11 July 2021 (monitoring period: 11.05.2021-25.07.2021).

¹³⁴ [Law no. 73](#) of 31.03.2022 on the amendment of some regulatory acts.

¹³⁵ Promo-LEX Association, [Monitoring Report](#): "Hate Speech and Incitement to Discrimination in the Public Space and in the Media in the Republic of Moldova during the Electoral Period for the Presidential Elections of 20 October (3 November) and the Republican Constitutional Referendum of 20 October 2024", p. 16, 2024. Last accessed: 9 July 2025.

¹³⁶ Promo-LEX Association, [Monitoring Report](#): "Hate Speech and Incitement to Discrimination in the Public Space and in the Media in the Republic of Moldova during the Electoral Period for the General Local Elections of 5 (19) November 2023", p. 16, last accessed: 9 July 2025.

¹³⁷ The Promo-LEX Association has been monitoring hate speech and incitement to discrimination in public spaces and the media since 2018. This phenomenon has been and continues to be monitored in various contexts, and the monitoring data has been published in reports ([2018](#), [2019/1](#), [2019/2](#), [2020](#), [2021](#), [2022](#), [2023](#) and [2024](#)).

The purpose of monitoring is to analyze and assess the extent to which hate speech and incitement to discrimination are used in the context of the 2025 parliamentary elections in the Republic of Moldova. *Monitoring target group* consists of electoral competitors and active persons who can influence the opinion of voters, including but not limited to politicians, representatives of religious denominations, local and national media and online media.

The monitoring process will be based on document analysis, quantitative and qualitative analysis. For quantitative analysis, the monitoring will generally be performed manually by a team of trained monitors. A software tool developed specifically for this purpose in 2024 will be used to monitor hateful content on TikTok. The monitoring team will assess the cases identified in the first stage with the support of the software tool. In the second stage, cases identified both manually and using the software tool will be reported on the data.promolex.md platform, based on an online questionnaire developed by the Promo-LEX Association in 2018. The cases identified and reported will enable the presentation of statistical data on the age and gender of perpetrators and victims, the sources through which hate speech was transmitted, promoted, or justified, the criteria underlying hate speech, etc. Furthermore, the identified cases will be analyzed in terms of content and arguments, which will enable the identification of forms of hate speech as well as trends in electoral and political speech from a human rights perspective. A qualitative analysis will also be carried out in cases of hate speech identified during the monitoring process.

Hate speech and incitement to discrimination will be monitored on a national scale. To establish the sample, criteria were developed for selecting monitoring sources: media sources, electoral competitors, politicians, opinion leaders, etc.

Monitoring limitations:

- Content broadcast/published by media outlets will only be monitored via their websites, social media pages, and mobile applications that are followed by at least 3,000 people.
- The list of monitoring sources included only social media pages and/or mobile applications of political party branches, selected based on criteria, which were monitored at the time of the assessment (May 2025) by at least 1,000 people / accounts on social media and which had been active consistently over the last 6 months (November 2024 – April 2025).
- Public messages and content published/disseminated by politicians and political parties will be monitored through:
 - a) websites, if any, social media pages, and mobile applications that are followed by at least 1,500 people in the case of politicians, and 3,000 people in the case of political parties (headquarters) and 1,000 people in the case of political party branches; and
 - b) electoral campaign materials: street banners, newspapers, leaflets, etc. displayed, distributed, etc. in Chisinau municipality or other district centers.

Interim quantitative and qualitative data will be shown in the reports of the Promo-LEX Association Observation Mission. The final analysis of quantitative and qualitative data, as well as the findings and recommendations identified and formulated on the basis thereof, will be included in a final general report. It will be made available to the public and sent to the relevant authorities and other stakeholders.

RECOMMENDATIONS

To the Parliament of Moldova:

1. To define the term "administrative resources" in line with international standards in this field and to regulate the prohibition of and sanctions for the use of administrative resources for political promotion both during and outside the electoral period.
2. To analyze the practice of setting the date of elections in previous elections and identify a legal solution, which would allow predictability of the electoral process, but also not limit new political parties to participate in elections.

To the Central Electoral Commission:

3. To establish clear procedures for the rapid correction of errors in the registers before and on election day, and for reconciliation of any discrepancies between voters and election officials regarding voters' domicile or residence.
4. To explain in detail, together with the Public Services Agency, if necessary, the causes of the increase in the number of voters in the SRV in the context of negative natural increase and emigration from Moldova.
5. To fill in all sections in the compartment "Decision-making transparency / Decision-making process", in particular, "Results of public consultation", "Draft after public consultations", and "Status / decision adopted".
6. To regularly update the institution's website dedicated to complaints/notifications and acts of their resolution during the electoral period.
7. To update in due time the CEC regulations placed on the website in the section "Regulatory framework / Regulations" in accordance with the amendments approved by the authority.
8. To publish on the CEC website under the heading "Institutional transparency" information on the approved budget of the institution, including the expenses planned for elections, the source of funding, as well as the level of its execution.

To the Government of the Republic of Moldova and local public authorities

9. Not to allow the use of administrative resources during the electoral period.

To political parties:

10. To carry out electoral campaigning activities only within legal timeframes, strictly in accordance with the electoral legislation.

ABBREVIATIONS

para. – paragraph
LPA – local public administration
art. – article
PSA – Public Services Agency
PEB – precinct electoral bureau
BCS – Bloc of Communists and Socialists
PB – political bloc
EB – electoral bloc
AC – Audiovisual Council
CEC – Central Electoral Commission
DEC – second-level district electoral council
CCET – Center for Continuous Electoral Training
IG – initiative group
lit. – letter
MAN – National Alternative Movement (political party)
OM – Observation Mission
MRM – Respect Moldova Movement (political party)
mun. – municipality
no. – number
OSCE – Organization for Security and Co-operation in Europe
LTO – long-term observer
STO – short-term observer
PAS – Action and Solidarity Party
PPMM – Greater Moldova Political Party
PPVM – Future of Moldova Political Party
PRIM – Heart of Moldova Republican Party
PSRM – Party of Socialists of the Republic of Moldova
pt. – point
SRV – State Registry of Voters
SAISE – State Automated Information System “Elections”
PS – polling station
“Financial Control” ISS – “Financial Control” Information Subsystem
ITCSS – Information Technology and Cyber Security Service
ATUG – Autonomous Territorial Unit of Gagauzia
EU – European Union