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Advancing democracy and human rights

SUBMISSION

Following Rule 9.2 of the Rules of the Committee of Ministers for the supervision of the execution of judgments and of the terms of friendly settlements

Judgment date: 19.10.2012

Case: *Catan and Others v. Russia* (Applications nos. 43370/04, 8252/05 and 18454/06)

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INTRODUCTION

1. In line with Rule 9.2 of the Rules of the Committee of Ministers, this Communication provides updated information on issues arising from the non-execution of the European Court of Human Rights (ECtHR) judgment in *Catan and Others v. Russia*¹, focusing on developments from January through December 2025, and highlights the measures needed to address critical flaws in implementation. It should be read in conjunction with our previous submissions (notably the March 2025 Rule 9.2 Communication²) which detail the evolution of the situation of the eight Moldovan-administered Latin-script (“Romanian-language”) schools in the Transnistrian region and the broader human rights context in that breakaway territory.

INDIVIDUAL MEASURES

2. The Russian Federation has not fulfilled its obligation to pay the sums awarded by the ECtHR to the victims in the *Catan* case, namely €6,000 to each applicant in non-pecuniary damage and €50,000 jointly in costs and expenses. More than a decade after the judgment, none of the applicants has received the court-ordered just satisfaction. On the contrary, the Russian authorities have maintained their stance-articulated by the Russian Constitutional Court and reinforced through legislation adopted on 11 June 2022-that executing ECtHR judgments is “unconstitutional” in Russia³. This position was reiterated by Russia’s continued refusal in 2025 to acknowledge or enforce the *Catan* judgment, despite Russia’s obligation to comply with all ECtHR rulings delivered before its departure from the Council of Europe in 2022. The result is a complete absence of redress for the victims, in clear defiance of Article 46 of the Convention. The Committee of Ministers (CM) has repeatedly urged Russia to honor its obligations: at its 1521st meeting in March 2025⁴, the CM again stressed that Russia remains bound to execute this judgment and must pay

¹ *Case of Catan and Others v. Moldova and Russia* [GC], nos. 43370/04, 8252/05 and 18454/06, Judgment, European Court of Human Rights, October 19, 2012, para. 133.

² Council of Europe, Committee of Ministers, *Communication from an NGO (Promo-LEX) (20/01/2025) in the Catan and Others group of cases v. Russia (Application No. 43370/04)*, distributed for the 1521st meeting (March 2025) (DH), January 20, 2025, available at [https://hudoc.exec.coe.int/eng/?i=DH-DD\(2025\)128E](https://hudoc.exec.coe.int/eng/?i=DH-DD(2025)128E)

³ Russian Federation, *Federal Law No. 183-FZ on Amendments to Certain Legislative Acts of the Russian Federation and the Invalidation of Certain Provisions of Legislative Acts of the Russian Federation in Connection with the Termination of the Application of the Convention for the Protection of Human Rights and Fundamental Freedoms to the Russian Federation*, June 11, 2022, art. 7.

⁴ Council of Europe, Committee of Ministers, *Decisions of the Committee of Ministers on the supervision of the execution of the European Court’s judgments: Catan and Others group v. Russian Federation (Application No. 43370/04)*, 1521st meeting (DH), CM/Del/Dec(2025)1521/H46-27, March 6, 2025.

the outstanding compensation and adopt measures to remedy the violations. Nevertheless, as of the end of 2025, Russia had taken no action to comply, leaving the applicants uncompensated and the violations unaddressed.

GENERAL MEASURES

3. The Russian Federation has yet to show any intention to implement general measures required by the judgment. It has neither presented an action plan nor made any commitment to eliminate the discriminatory policies identified by the Court. The separatist “law on languages” in Transnistria-imposed by the *de facto* administration under Russia’s effective control, and requiring that the so-called “Moldovan language” be written in the Cyrillic script-remains in force, entrenching linguistic discrimination against the Moldovan (Romanian-speaking) community. Moscow has not taken any steps to encourage or compel the Transnistrian administration to revoke this unlawful regulation or to otherwise bring local practices into line with Convention standards. Likewise, no measures have been taken by Russia to prevent ongoing interference in the educational process or to ensure the safety of children and teachers at the affected schools. The intimidation, harassment and pressures documented in previous years persist unabated: students, parents and teachers continue to face an array of abuses – from discriminatory school inspections and arbitrary restrictions to the looming threat of forced conscription of students into paramilitary structures – with full impunity. Given Russia’s decisive political and military influence over the separatist regime, it is clear that it has the capacity and the tools to induce the *de facto* authorities to cease these practices, yet it has willfully chosen not to exercise that influence. Indeed, in March 2025 the CM “[reiterated] the obligation of the Russian Federation to comply” with the *Catan* judgment and urged Russia to end the harassment of students, parents and teachers, but Moscow ignored this appeal. Instead of compliance, the Russian Federation effectively abetted the ongoing violations – for example, by opposing robust international monitoring. Notably, due to objections by the Russian side, the mandate of the OSCE Mission to Moldova (the principal international presence in the region) was renewed in 2025 only for a truncated 6-month period instead of the standard one-year term, undermining the Mission’s capacity to plan and monitor the human rights situation long-term. In sum, throughout 2025 Russia demonstrated a continuing policy of non-execution, marked by inaction or obstruction, which has allowed the Transnistrian administration to persist in violating the right to education of thousands of children.
4. Beyond the question of formal compliance, the situation in Transnistrian region in 2025 underlined that the right to education in one’s mother tongue, as affirmed by the Court, is not an isolated issue but lies at the heart of a broader struggle over cultural identity and fundamental freedoms. The ongoing enforcement of the Cyrillic-script requirement is not just a linguistic technicality; it symbolizes a deeper campaign to erode the linguistic and

cultural heritage of the region's Moldovan community. The eight Latin-script schools have often been described as "islands of Romanianism" – bastions of cultural and national identity – in an environment where Russification policies are aggressively pursued. The essence of the conflict goes beyond classroom instruction: it touches on the community's right to exist and express itself freely in its native language. By penalizing and stigmatizing the use of Latin script (Romanian) in schools, the de facto authorities – with Russia's acquiescence – are effectively attempting to rewrite the cultural identity of a generation. This elevates the *Catan* case from a local education dispute to a matter of defending European values of diversity and human rights in a "grey zone" outside full democratic oversight. The dignity and self-identity of an entire community are at stake. Russia's failure to act, and its tacit endorsement of these discriminatory practices, raise serious questions about its long-term intentions towards the region's cultural autonomy and pluralism.

5. The international community has observed the deteriorating situation in Transnistrian region with mounting concern. Throughout 2025, diplomats and human rights experts warned that the intransigence of the Russian and Transnistrian administration could lead to further escalations⁵. While full-scale violence has so far been averted, the risks of latent conflict remain. Policies such as forced "military training" of youth (discussed below) and the information isolation imposed on the region's population contribute to a volatile environment. These tactics, which amount to a *de facto* segregation of the region from the rest of Moldova (and from European legal space), could easily spiral into broader socio-political confrontation. The Committee of Ministers, in its decisions, has repeatedly emphasized that the *Catan* judgment requires more than the payment of damages – it entails removing structural barriers to education in the mother tongue and guaranteeing that such abuses are not repeated. Yet, with each passing year of non-implementation, the gulf widens between Transnistrian region and the rest of the country in terms of rights protections. The lack of a proactive stance from the Russian Federation – the one actor with decisive leverage in Tiraspol – has compelled bodies like the CM to consider additional measures to induce compliance. In 2025, the CM plainly signaled its readiness to "use any suitable means" to urge fulfillment of the judgment, reflecting the gravity of the situation. The continuation of educational repression in Transnistrian region is increasingly seen not as a niche bilateral issue, but as a challenge to Europe's collective human rights system.
6. The plight of the Romanian-language schools remains a microcosm of the larger human rights crisis in Transnistrian region. These schools – attended by roughly 2,000 children – are virtually the only places in the region where fundamental freedoms (such as the right to receive an uncensored education in one's native language) can still be exercised openly.

⁵ European Commission, *Joint Declaration following the first EU-Republic of Moldova Summit*, Statement/25/1740, July 3, 2025, https://ec.europa.eu/commission/presscorner/detail/en/statement_25_1740

Their survival and well-being are therefore indicators of the overall human rights climate. In 2025, these indicators were mixed: on one hand, the schools continued to operate and even attract new students (including from communities normally aligned with the *de facto* regime), demonstrating the resilience and appeal of the educational model offered by constitutional authorities. On the other hand, the pressures on these schools intensified through more sophisticated means (economic strangulation, propaganda campaigns, etc.), highlighting the fragility of their situation. The focus of international attention is not merely on keeping the schools open, but on ensuring they can truly fulfill their educational mission in a safe and normal environment. This requires addressing all facets of the problem – legal, political, and practical. A lasting resolution will demand diplomatic engagement and cooperation from all stakeholders. The Moldovan government, backed by international partners, has repeatedly offered dialogue to resolve practical issues (for example, through the OSCE-led working group on education), and to guarantee that children’s educational rights are respected irrespective of the region’s political status. However, the Transnistrian side (with Moscow’s backing) has often rebuffed or undermined these initiatives – as demonstrated in April 2025 when the Tiraspol representatives walked out of an education working group meeting rather than tolerate the presence of a Promo-LEX civil society expert⁶. Such incidents illustrate the gulf in trust and the challenges facing confidence-building measures. Ultimately, the stability and reintegration of the region hinge on respecting the rights and identities of all its inhabitants; progress on the schools issue could serve as a cornerstone for broader reconciliation, whereas continued stalemate only deepens division.

7. In summary, Russia’s deliberate non-compliance and the Transnistrian regime’s entrenched discriminatory policies have, through 2025, perpetuated a climate where fundamental rights are routinely flouted. The developments over the past year – from aggressive propaganda labeling Romanian-language schools as “fascist”, to new local laws facilitating the conscription of students – indicate not improvement but further escalation of risks⁷. This ongoing impasse not only violates the rights of the children and families involved, but also tests the resolve of the Council of Europe’s supervision mechanism. The Committee of Ministers is faced with a clear case of *principled non-execution*, one that Russia has turned into a public repudiation of its Convention obligations. If unaddressed, this will embolden similar conduct elsewhere, as other actors in *de facto* territories or authoritarian contexts observe that a major judgment can be ignored without consequence. Therefore, the general measures needed are not only those addressing Transnistria’s local issues (e.g. returning school premises, lifting language bans, halting

⁶ Government of the Republic of Moldova, Bureau for Reintegration Policies, "Press Release: Tiraspol Representatives Blocked the Meeting of the Working Groups on Education," April 14, 2025, <https://gov.md/ro/advanced-page-type/biroul-pentru-reintegrare>

⁷ Asociația Promo-LEX, "Promo-LEX Highlights Worsening Human Rights Situation in Transnistrian Region: Retrospective 2025," *Promo-LEX*, December 23, 2025, <https://promolex.md/retrospective-2025-transnistria>

harassment), but also systemic measures to ensure accountability at the international level. The following sections detail the key developments in 2025 that inform these conclusions, before this submission concludes with concrete recommendations for the Committee of Ministers to consider.

KEY DEVELOPMENTS IN 2025

GENERAL ISSUES

8. In 2025, the Romanian-language schools in the Transnistrian region continued to face a range of illegal and coercive actions by the local (unrecognized) administration, reflecting a deliberate policy to undermine these institutions. Although the outright violent attacks seen in the past (such as the 2004 school raids) were not repeated, the *de facto* administration refined its methods of repression. Instead of physical closure, the tools of choice have become economic strangulation, administrative harassment and propaganda. For instance, the Transnistrian administration subjected the Latin-script schools to *punitive tariffs* for utilities (detailed below) and to intrusive inspections and requirements not imposed on schools under Tiraspol's control. Teachers from these schools continued to be threatened or harassed, especially when crossing the network of illegal checkpoints that separates the region from government-controlled territory. Parents were also targeted: there were recurrent reports of parents being intimidated or interrogated by security officers in an effort to dissuade them from enrolling their children in Moldovan-administered schools. In several cases, families that had initially chosen Romanian-language education felt compelled to transfer their children to Tiraspol-controlled schools after such pressure. Perhaps the most alarming trend was the militarization of the educational climate – the Transnistrian military commissariats frequently demanded lists of students for conscription purposes, casting a shadow of fear over older pupils and their parents (this is examined in detail below)⁸. The cumulative impact of these tactics is a climate of uncertainty and fear that pervades the day-to-day operation of the schools. Despite these adversities, the schools remarkably kept their doors open throughout 2025, a testament to the resilience of their staff and communities. Yet the situation remains extremely fragile: without fundamental changes, each academic year brings fresh risks of rights violations against students and educators.
9. Alongside these intentional interferences, longstanding structural problems affecting the schools remained largely unresolved in 2025. Chronic under-investment means that many of the eight schools lack adequate facilities (from proper classrooms and science labs to

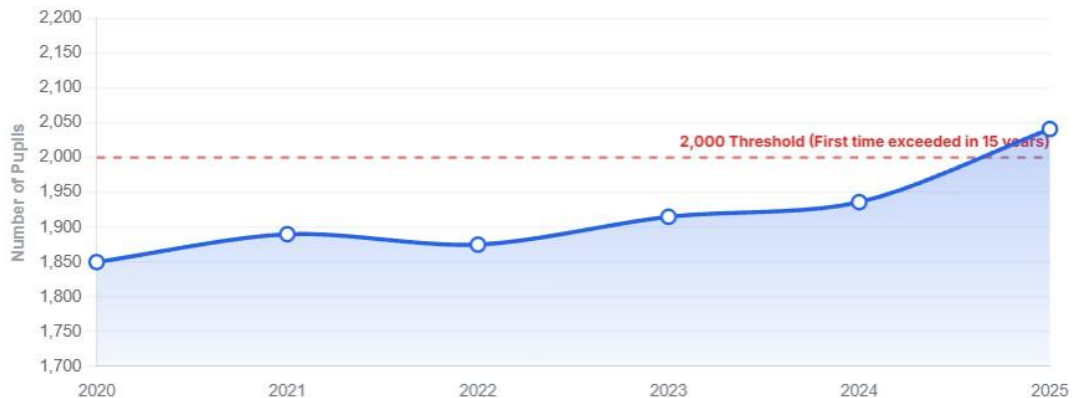
⁸ Promo-LEX Association, "Cum sunt pregătiți copiii din regiunea transnistreană pentru război: copilăria petrecută în școala de cadeți" [How children in the Transnistrian region are prepared for war: childhood spent in the cadet school], *Promo-LEX*, June 12, 2025, <https://promolex.md/cum-sunt-pregatiti-copiii-din-regiunea-transnistreana-pentru-razboi-copilaria-petrecuta-in-scoala-de-cadeti/>.

gyms and assembly halls) and suffer from shortages of qualified teachers and modern educational materials. Transportation for students (discussed further below) continued to be insufficient, with too few vehicles to safely ferry children from distant localities. The schools also operate under persistent movement restrictions: the presence of checkpoints and the need for special permits often limit the ability of students to travel to cultural or academic events on the right bank, and likewise hinder Moldovan authorities or outside experts from visiting the schools. These systemic issues – poor infrastructure, difficult logistics, isolation from broader cultural life – are not merely incidental; they are consequences of deliberate policies by the Transnistrian regime to impede the normal development of these institutions. Five of the eight schools still function in inadequate, rented premises (often improvised spaces not originally intended for education), because the rightful school buildings were seized in 2004 and have not been returned. In 2025, the Moldovan side repeatedly raised these issues in the 5+2 negotiation frameworks and working group meetings, yet *Tiraspol's representatives refused to engage substantively*, insisting that the schools either accept the status quo or come under their jurisdiction – an unacceptable proposition that would strip the schools of their Moldovan curricula and identity. Meanwhile, despite the adverse environment, the schools endeavored to improve inclusivity and quality: there were initiatives (with support from Chişinău) to integrate non-Romanian-speaking pupils by offering additional Romanian language classes, and efforts to obtain new educational materials and equipment. However, such measures only partially alleviated the challenges. The root causes – the discriminatory policies and the lack of security guarantees – persisted, meaning the schools and their communities remained under constant strain.

10. Notably, the Council of Europe's Committee of Ministers maintained a strong focus on these issues during 2025. At its Human Rights (DH) meetings, the CM reaffirmed the fundamental principle that primary and secondary education in one's national language is an essential right under Article 2 of Protocol No. 1 of the Convention. The CM recalled that executing the *Catan* judgment requires more than just payment of money – it involves removing the discriminatory regulatory framework, restoring the Latin-script schools to premises suitable for education, and halting all forms of harassment and pressure on pupils, parents, and teachers. In the March 2025 decision, the CM "*stressed*" that Russia, even after ceasing to be a CoE member, is not released from these obligations, and it called upon the Russian authorities to present a concrete plan of action. Regrettably, as mentioned, Russia provided no response. The CM's decision also emphasized the positive developments on the ground – in particular, the steady increase in enrollment at the eight Romanian-language schools – as evidence of the importance of preserving these institutions. Indeed, for the first time in fifteen years, the total number of children attending the Latin-script schools exceeded 2,000 in 2025. According to data from the Bureau for Reintegration Policies (BPR), the 2025–2026 academic year opened with 2,041 pupils enrolled across the eight schools. This represents a rise of roughly 5.4% over the previous

year – a slow but consistent growth trend that has been observed over the past five years. The CM noted that this upward trend underscores parents’ demand for mother-tongue education free from undue constraints, and it lends urgency to the need for long-term solutions to the schools’ precarious situation.

Enrollment Trend (2020 - 2025)



**Historical data (2020-2023) is illustrative to demonstrate the "below 2,000" trend described in the report. 2024-2025 data is based on the reported figures.*

11. The enrollment increase in 2025 is particularly significant given the demographic decline in Transnistrian region and the continued out-migration from the region. In other words, the Latin-script schools are not merely maintaining their student numbers in a shrinking population – they are actively drawing students who might otherwise attend schools under the de facto administration. There is evidence of a shift in parental choices: even families who primarily speak Russian or Ukrainian at home are increasingly opting to send their children to Romanian-language schools, viewing them as an investment in a better future. According to one detailed analysis of the Promo-LEX Association, only about one-third of the pupils now come from ethnically Romanian/Moldovan families; the rest belong to other linguistic communities, which marks a remarkable openness to Romanian-language education in a traditionally Russophone environment. Several factors explain this trend. First, the diplomas and academic qualifications issued by the Moldovan curriculum schools are recognized internationally (including by Romanian and EU universities), whereas those issued by Transnistrian “state” schools have little to no recognition abroad. Parents realize that graduating from a school accredited by Chişinău vastly improves their children’s chances for higher education and employment beyond the narrow confines of Transnistria. Second, the geopolitical context has shifted perceptions: Russia’s war against Ukraine and its growing international isolation have made Transnistria’s alignment with Moscow less attractive to many local residents. By contrast, a Moldovan (and implicitly European) educational path is seen as opening doors to peace, stability, and prosperity. Third, despite the material hardships, the Romanian-language schools are reputed for their dedicated

and professional teaching staff, who often go above and beyond to deliver quality education – an aspect that has earned the trust of parents over time. This confluence of factors led one observer to call the rise in enrollment a “*paradoxical growth*” against the demographic tide – a vote of confidence by parents in an environment of adversity.

12. The flip side of this success story, however, is that the schools are straining under the weight of their growing enrollments. With more students each year but no expansion in infrastructure or resources, conditions have, in some respects, deteriorated. Overcrowding is now a common issue – for example, the *Roghi* Gymnasium and *Ștefan cel Mare* Lyceum (operating in exile in Doroțcaia) have in recent years resorted to running classes in the afternoon or evening shifts due to lack of classroom space for all students in the morning. The influx of students from diverse linguistic backgrounds also creates new needs: additional Romanian language support, integration activities, and measures to prevent any ethnic or linguistic tensions. These are good problems to have – they reflect the schools’ broadening appeal – but they are problems nonetheless, and they require resources. The Moldovan authorities have indicated that they view this trend as an opportunity to further the reintegration of the country. Programs like the national campaign for Romanian language study (which includes adult education in the region) benefit from the presence of these schools as nuclei of Romanian culture and language. In effect, the Latin-script schools play a dual role: they provide a standard education to their pupils, and they serve as community centers that anchor the Moldovan identity in Transnistrian region. This dual role is *irreplaceable* – as evidenced by the fact that, with Transnistrian administration closing many of their own “Moldovan” (Cyrillic-script) schools due to low enrollment or policy shifts, the eight Latin-script institutions have become the only viable option for families in the region who desire instruction in Romanian. Local parents recognize this, referring to these schools not just as educational establishments but as a “*guarantee of the future*” for their children in an otherwise restrictive environment. The continued commitment of the Moldovan Government to support these schools – reiterated in public statements in 2025 – is encouraging, but without a resolution of the underlying political dispute and Russia’s cooperation, national support alone cannot fully normalize the situation.

INFRASTRUCTURE DEFICIENCIES IN ROMANIAN-LANGUAGE SCHOOLS

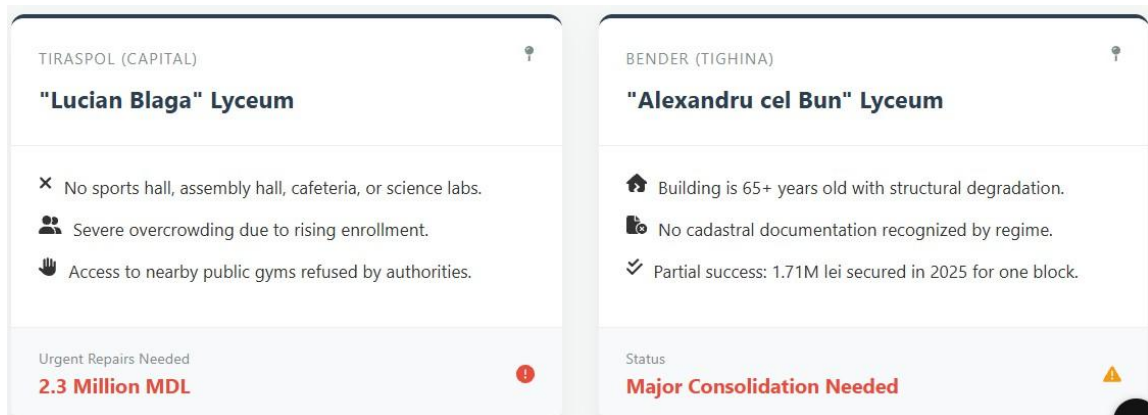
13. Inadequate premises remained one of the most pressing problems for the Romanian-language schools in 2025. Most of these institutions have been housed in sub-standard buildings for over two decades, with minimal renovations during that period. Five out of the eight schools are still forced to operate in buildings that they do not own – typically cramped, rented premises that fail to meet modern educational standards. This is a direct consequence of the events of 2004, when the Transnistrian administration confiscated the original school buildings; as of 2025, none of those confiscated premises has been restored to the schools’ use. Consequently, students attend classes in facilities that often lack basic

amenities such as science labs, libraries, proper heating systems, or outdoor space for sports. Major renovations are long overdue across the board, yet budgetary constraints mean that only piecemeal repairs can be carried out. In most cases, the Ministry of Education and Research of Moldova can barely cover routine maintenance, and parents have had to contribute from their own pockets to fund minor fixes (for example, replacing windows or patching leaks). By 2025, many of the buildings were visibly deteriorating: leaking roofs, poor insulation, outdated electrical wiring, and overcrowded classrooms were common issues. The health and safety risks are not trivial – some schools have reported electrical fires or structural weaknesses that could endanger students if not addressed. Yet, absent a durable solution (such as recovering the original buildings or constructing new ones), the schools are essentially trapped in a cycle of patchwork fixes.

14. To illustrate the gravity of the infrastructure deficiencies, a few examples are salient. The “Lucian Blaga” Theoretical Lyceum in Tiraspol – serving the capital of the region – operates in a building with no sports hall, assembly hall, cafeteria, or dedicated science labs, severely limiting the scope of extracurricular and practical activities it can offer. Even basic classroom space is at a premium due to rising student numbers. Moreover, Blaga Lyceum’s attempts to compensate by using nearby facilities have been thwarted: the de facto authorities consistently refuse the school access to sports infrastructure in adjacent public buildings. Local experts estimate that around 2.3 million Moldovan lei would be needed for urgent renovations to Blaga Lyceum (repairing the roof, façade, heating system, etc.), but no clear funding source is available. The “Alexandru cel Bun” Lyceum in Bender (Tighina) faces a similarly dire situation. It occupies an aging building (over 65 years old) that suffers from structural degradation. In 2025, the school managed to secure 1.71 million lei from the Moldovan budget to reinforce one of its study blocks – a welcome investment. However, this covers only a fraction of the overall needs, which include structural consolidation of the main building, refurbishment of the courtyard and sports field, and renovation of classrooms and sanitation facilities. A further complication is that the property in Bender has no cadastral documentation recognized by the de facto regime, raising legal hurdles for any major works. Essentially, the school is caught in a limbo where it cannot significantly upgrade its premises, and it cannot relocate to a purpose-built facility because none is offered⁹.
15. The “Ștefan cel Mare și Sfânt” Lyceum of Grigoriopol provides another telling example. Since 2002, this school has been exiled from Grigoriopol town and operates in the village of Doroțcaia (under Moldovan control on the right bank of the Dniester). In Doroțcaia, it shares space with a local school, which means the Romanian-language lyceum does not have a dedicated campus at all. Classrooms are limited, and as mentioned, many classes

⁹ NewsMaker. 2025. “4 conditions that Tiraspol accepted to receive gas after February 10”, <https://newsmaker.md/ro/4-conditii-pe-care-le-a-acceptat-tiraspolul-pentru-a-primi-gaz-dupa-10-februarie>.

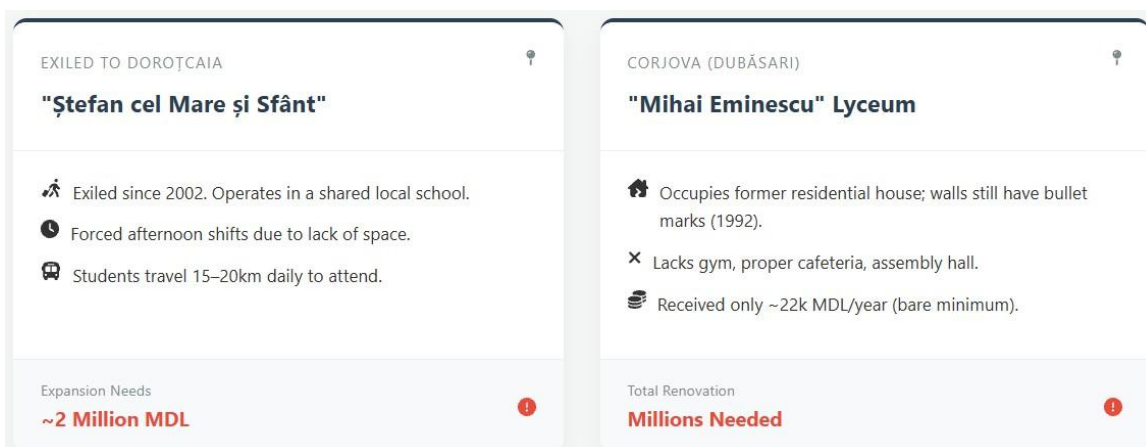
are held in the afternoons because the premises are too small to accommodate all pupils in a normal morning schedule. Some students travel 15–20 km each way to attend (coming from Grigoriopol and surrounding villages across the river). In winter months or bad weather, this commute becomes especially arduous. Despite these challenges, *Ștefan cel Mare* Lyceum has grown in enrollment, highlighting the urgent need for a suitable building. The estimated cost for a much-needed capital renovation and expansion of the facilities in Doroțcaia (including updating the electrical system and installing proper lighting and equipment) is about 2 million lei, but no such funds have been allocated. In Corjova (Dubăsari district), the “Mihai Eminescu” Theoretical Lyceum occupies what used to be a residential house – a structure still scarred by bullet marks from the 1992 armed conflict. This building has never undergone a full overhaul; it lacks a proper gymnasium, cafeteria, assembly hall, and the computer lab is below standard. In each of the last four years, the Eminescu Lyceum received only about 20,000–22,000 lei from the government for repairs, which covered little beyond the most basic maintenance. The school’s wish list – including a new roof, thermal insulation, modern windows, and a refurbished sports field – would cost several million lei, far beyond its budget capacity. Similar conditions prevail at the “Evrika” Lyceum in Rîbnița: the school has managed only minor interior repairs over the years, while major needs (such as replacing the crumbling façade, estimated at ~2 million lei, and refurbishing old bathrooms, ~800,000+ lei) remain unaddressed. A particular safety concern at Evrika is a corridor lined with flammable material, which experts say requires about 200,000 lei to fix – a project that has been pending due to lack of funds¹⁰.



16. There were a few partial improvements in 2025. The “Constantin Sucitu” Gymnasium in Corjova (Dubăsari district) is one school that benefited from some earlier investment and thus faces relatively fewer infrastructure problems than the others. Even so, it needs work

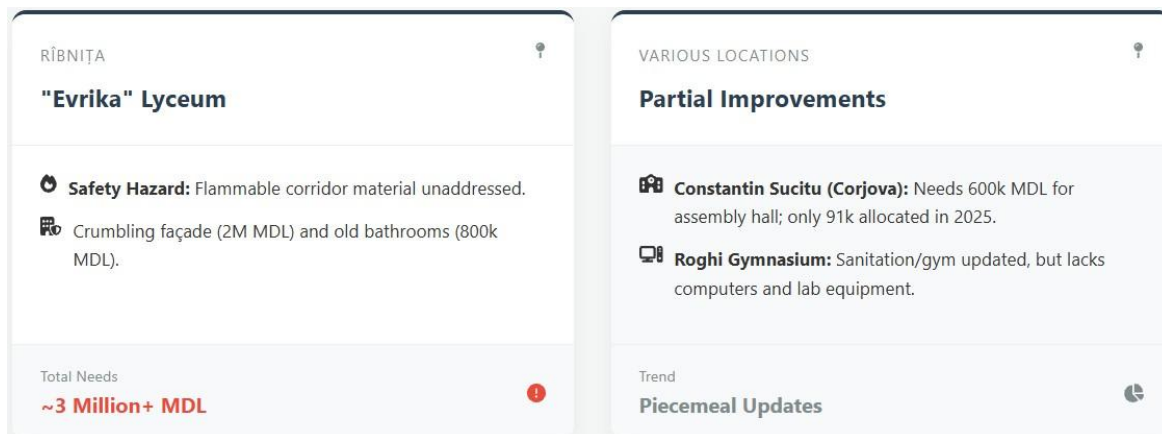
¹⁰ Government of the Republic of Moldova. 2025. After more than two decades, education experts from both banks of the Nistru River visited the complex of buildings of the “Evrika” Theoretical Lyceum, located on 14 Gagarin Street, in the city of Rîbnița, <https://www.gov.md/index.php/ro/comunicate-de-presabpr/dupa-mai-bine-de-doua-decenii-expertii-din-domeniul-educatiei-de-pe-ambele>.

on its assembly hall: approximately 600,000 lei is required to complete renovations, but after spending 300,000 lei in 2024, the allocation for 2025 was only 91,000 lei, leaving a significant shortfall. The Roghi Gymnasium (near Molovata Nouă) has seen upgrades to its sanitary facilities, cafeteria, sports stadium and sports hall through targeted projects in recent years. Despite these welcome investments, Roghi still needs additional resources to modernize its classrooms and to acquire updated technology (e.g., computers and lab equipment). In all cases, the pattern is the same: local improvements have been piecemeal and donor-driven, whereas any comprehensive modernization plan is stymied by the unresolved status of the schools and the Transnistrian regime's obstructiveness. The uncertainty of property rights is a critical barrier. As of 2025, most of the schools function under lease agreements (usually 10-year leases) signed with the de facto authorities back in 2017; these leases are set to expire in 2027, and it is unknown whether they will be renewed or under what conditions. The short term of these leases also disqualifies the schools from many international assistance programs, which typically require a guarantee that a facility will be available for educational use for 20–25 years if significant funds are to be invested. In effect, the schools cannot access large-scale infrastructure grants because they lack secure tenure over their buildings. This catch-22 situation leaves critical infrastructure needs in limbo and has a direct negative impact on the quality of education (for example, lack of science labs means students cannot do proper laboratory experiments for their exams, etc.).



17. A noteworthy development in 2025 was an attempt by the constitutional authorities in Chișinău to leverage the energy crisis to resolve at least one long-standing infrastructure issue – the return of the *Evrika* Lyceum's building in Rîbnița. In January 2025, amidst a severe gas supply crisis (after Gazprom suspended deliveries via Ukraine), the Moldovan government negotiated conditions for allowing Russian gas transit to resume to Transnistria. One of the four conditions put forward by Chișinău was the restitution of *Evrika* Lyceum's original premises on 14 Gagarin Street, Rîbnița, which have been unlawfully occupied by the Transnistrian "authorities" since 2004. In an unprecedented step, on 28 February 2025, education experts from both Chișinău and Tiraspol conducted

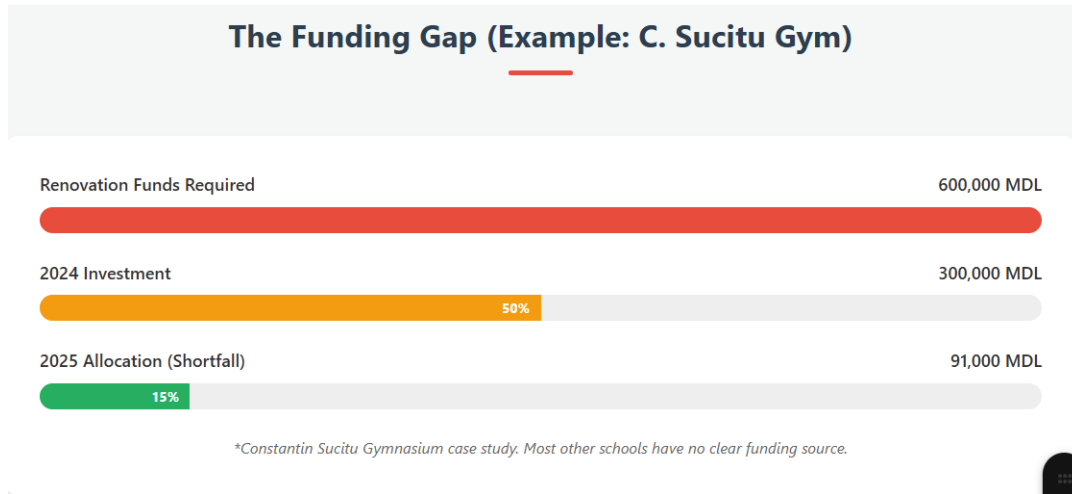
a joint visit to inspect this school complex. This was the first time in over two decades that Transnistrian officials had permitted Moldovan representatives to access the site. The complex includes multiple buildings, one of which has been used as a sports school by the de facto administration during the years of confiscation. During the February visit, the experts performed an initial assessment of the buildings' condition and the surrounding land, aiming to determine what works would be necessary to rehabilitate the campus for educational use. This joint inspection raised cautious optimism that the deadlock might be breaking¹¹.



18. However, shortly thereafter, the Transnistrian side reneged on cooperation. When Moldovan authorities attempted to send construction specialists for a more detailed technical evaluation (a prerequisite for drafting a renovation plan), they were prevented from entering one of the key buildings – specifically the one currently serving as a sports facility. Tiraspol's officials provided no valid justification for this obstruction. Repeated requests from Chișinău for a formal, written confirmation that the premises would be returned to the lyceum went unanswered. By the end of 2025, no concrete progress had been achieved: the Evrika Lyceum was *still operating in rented quarters*, and the grand opportunity created by the conditionality threat during the gas crisis had seemingly been lost. Notably, although Chișinău had indicated that continued gas flow was contingent on meeting the conditions, in practice no enforcement mechanism was triggered when the Transnistrian side failed to deliver on the Evrika issue. This episode underscores both the potential and the limits of negotiation: it showed that access to seized school properties is not entirely off the table, but it also demonstrated Tiraspol's intransigence and Russia's unwillingness to press its protégés even for such a humanitarian gesture. The return of any of the five confiscated school buildings (in Rîbnița, Tiraspol, Bender, Dubăsari, and

¹¹ IPN Press Agency. 2025. "Experts from Chisinau prevented from entering one of the buildings of the "Evrika" high school in Râbnița", <https://ipn.md/expertii-din-chisinau-impiedicati-sa-intre-in-una-din-cladirile-liceului-evrika-din-rabnita/>.

Grigoriopol) remains one of the key outstanding commitments under the ECtHR judgment and relevant CM decisions, yet 2025 closed with no tangible change on this front.



TRANSPORTATION

18. Transportation of students and staff to the Romanian-language schools continued to be a significant logistical challenge in 2025. The issue is twofold: first, the fleet of vehicles available to these schools is largely old and dilapidated; second, the distances and routes some students must travel have increased as enrollment has grown. Most of the schools rely on a handful of minibuses or second-hand buses, many of which were acquired in the early 2000s and have far exceeded their intended service life. Maintenance of these vehicles is costly and difficult – spare parts for such outdated models are often no longer produced, forcing schools to cannibalize parts or seek expensive custom solutions. Breakdowns are frequent. For example, at the *Evrika* Lyceum in Rîbnița, two of the school’s three transport vehicles became irreparable in recent years due to lack of compatible parts. Safety is a major concern: some buses lack modern safety features or even reliable heating (an obvious problem during cold winters). Moreover, the geographic catchment area of these schools has expanded. To attend a Romanian-language school, children from Romanian-speaking families (or others desiring a Moldovan curriculum) often must commute from villages many kilometers away, since there is typically only one such school per district on the left bank. In 2025, around 69% of the students at Tiraspol’s Lucian Blaga Lyceum, for instance, were from localities outside Tiraspol city, some traveling from as far as 40 km (e.g., from Dnestrovsc). Likewise, *Evrika* Lyceum in Rîbnița was transporting students daily from five different rural communities up to 80–90 km round-trip. These distances mean that without reliable transport, many children would simply be unable to attend school. Therefore, transport is not a luxury – it is essential to ensure access to education for these pupils.

19. Throughout 2025, the schools and Moldovan authorities made efforts to keep transportation running, but capacity shortfalls were evident. The largest school by

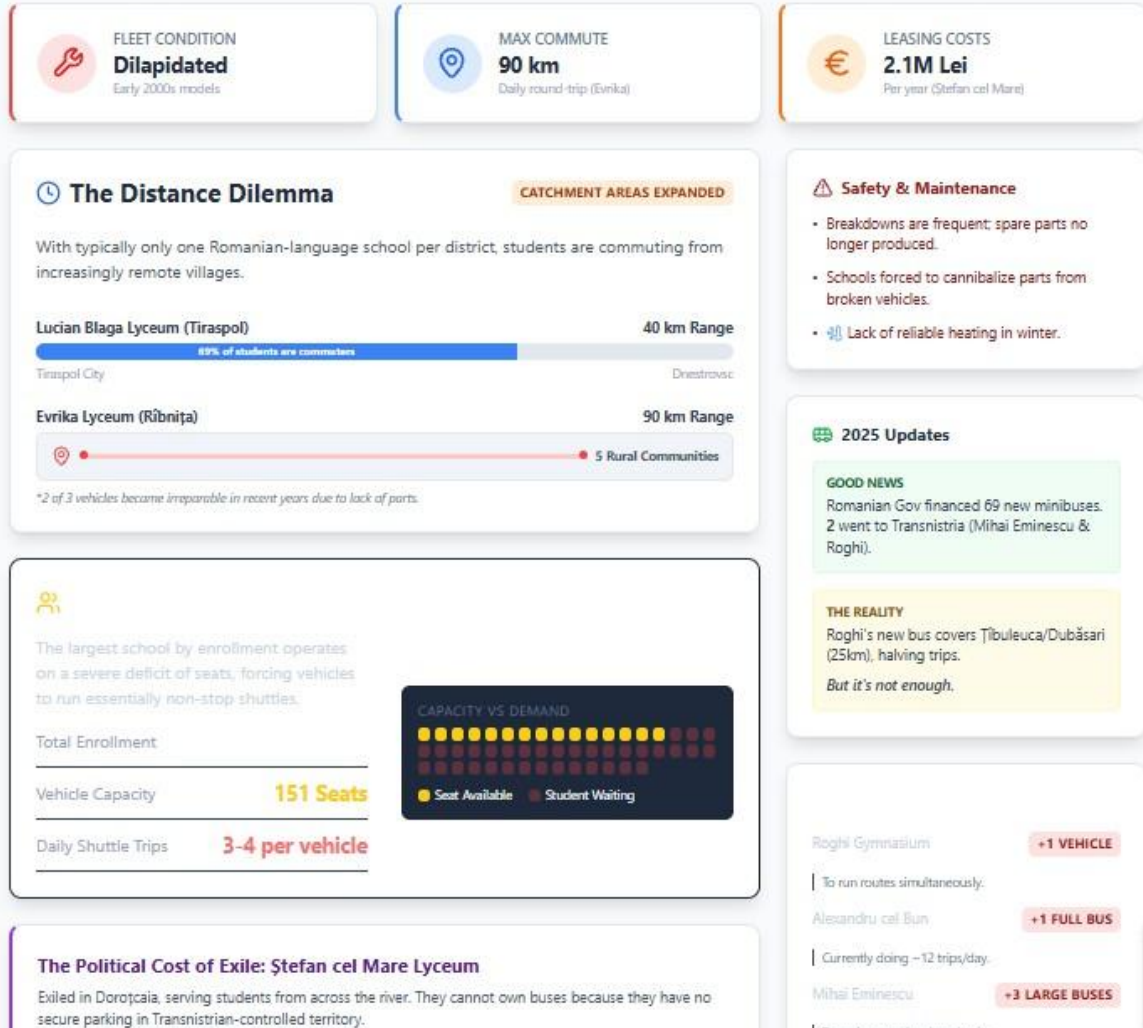
enrollment, *Mihai Eminescu* Lyceum in Corjova (Dubăsari), had about 500 students in 2025, of whom a great many commute from eight surrounding localities (including the town of Dubăsari). The school operated six vehicles with a combined capacity of 151 seats, which necessitated 3–4 shuttle trips per vehicle per day to ferry all students and over 40 staff members. This intense usage strains the vehicles and drivers alike. A glimmer of improvement came in late 2024, when the Romanian Government financed a batch of 69 new mini-buses for Moldova’s education system – as part of that program, two Romanian-language schools in Transnistria (*Mihai Eminescu* and Roghi Gymnasium) each received a new 17-seat bus. In 2025, those buses were put into operation and did improve the situation slightly on their routes. For example, Roghi Gymnasium’s new mini-bus serves students from the villages of Țibuleuca and Dubăsari, covering about 25 km, and it allowed the school to halve the number of daily trips needed. However, these gains were limited by the small size of the buses. Roghi still needs an additional vehicle so that it can run both of its transport routes simultaneously (instead of sequentially). Likewise, at Corjova’s *Eminescu* Lyceum, while the new 17-seater helped, the school estimated it still requires at least three larger buses (40-50 seat capacity) to replace the most overburdened older units. The *Alexandru cel Bun* Lyceum in Bender, which educates many children from that city and nearby areas, was transporting roughly 270 students daily in 2025 using a combination of vans and small buses – some of which had to make up to a dozen trips per day in-town to cover all students. This lyceum has flagged an urgent need for at least one full-size bus (~50 seats) to handle the volume. Meanwhile, the *Ștefan cel Mare* Lyceum (exiled in Doroțcaia) faces a unique constraint: it leases five large coaches (50–55 seat each) to bring in about 310 students from five different localities across the river. The annual cost of these leases is enormous (approximately 2.1 million lei per year) and strains the reintegration budget. The reason it leases rather than owns buses is because, lacking a base in Grigoriopol (the town it originally served), the lyceum has no secure parking or maintenance facility in the Transnistrian-controlled area, making it impractical to station purchased buses there. This exemplifies how the political constraints force inefficient solutions (renting instead of owning, at higher long-term cost).

20. The consequences of inadequate transportation extend beyond inconvenience; they directly affect the students’ right to education. When vehicles break down or are in short supply, some children may miss classes or parents might decide to withdraw them due to the difficulty of travel. There have been instances of buses being delayed at checkpoints or by bad road conditions, causing students to arrive late or endure long commutes in uncomfortable conditions. Furthermore, the lack of backup vehicles means that if one bus is out of service, routes are disrupted. All schools reported that transportation eats into their budgets considerably – fuel costs, maintenance, and leasing fees divert funds that could otherwise improve educational materials or school facilities. The Moldovan authorities have acknowledged that without consistent, reliable transport, families might be discouraged from enrolling their children in these schools. Safety is also a major

concern: overcrowded vans, or old buses on rough roads, pose risks of traffic accidents. Fortunately, no serious accidents were reported in 2025 involving school transport, but near-misses underscored the urgency of fleet renewal. Another often overlooked aspect is the transport needs for teachers and administrative purposes. Several lyceums (e.g. Lucian Blaga in Tiraspol, Ștefan cel Mare in Dorotcaia, and Mihai Eminescu in Corjova) indicated they need an additional vehicle dedicated to staff and logistics. As it stands, the existing school vans not only carry students but are also used to shuttle teachers (many of whom commute from Chișinău or central Moldova to teach) and to haul essential supplies – from diesel fuel (for generators/heating) to textbooks and even construction materials for repairs. This multi-use strains the vehicles and sometimes leaves the schools in a bind (for example, when a bus must be used to pick up donated equipment on the right bank, it cannot do the student route that day). In sum, transportation remains an Achilles' heel for these schools. Despite some improvements due to international assistance, as of end-2025 the situation demands a comprehensive solution – ideally, investment in new buses, sustainable financing for fuel and maintenance, and agreements with Tiraspol to allow unhindered passage of school transport at checkpoints. Without these, the noble goal of providing accessible Romanian-language education to all who seek it in Transnistria will remain only partially fulfilled.

The School Run 2025

Logistical challenges facing Romanian-language schools in the Transnistrian region.
Access to education relies on a crumbling transport network.



21.

ACCESS TO ROMANIAN CULTURAL PRODUCTS AND SERVICES

21. Students and teachers of the Latin-script schools continued to face significant obstacles in accessing broader cultural and informational resources in 2025. The Transnistrian region's self-isolation, enforced by the regime's controls on movement and media, means that engaging with Romanian (Moldovan) culture – whether through attending events, receiving literature, or meeting artists – is unusually difficult. For example, going on a simple field trip to Chișinău (on the right bank) can turn into a logistical nightmare due to the need to cross checkpoints, obtain permissions, and the risk of being turned back by Transnistrian “border” guards. Equally, inviting guest speakers or cultural figures from the right bank into the Transnistrian region is often blocked. The illegal “border” checkpoints function as filters that limit not only physical movement but also the flow of cultural goods.

In practical terms, this meant that in 2025 the Romanian-language schools could not freely organize visits to museums, theaters, or libraries outside the region – such activities had to be done sparingly and usually only involving smaller groups of students to avoid provoking the separatist authorities. Within the region, pro-European or Romanian cultural initiatives are viewed with suspicion or outright hostility by the de facto administration, which maintains a pronounced pro-Russian and anti-Western discourse in public life. This hostile environment was exemplified by an incident in late 2024 (contextualized here as it influenced 2025 tensions): the *Alexandru cel Bun* Lyceum in Bender invited several Moldovan writers to speak to students, only to have Transnistrian officials bar the writers from entering the school, accusing them of carrying magazines (*Timpul*) that contained “political propaganda” against the separatist regime and Russia. The smear campaign that followed (with local media attacking the lyceum for hosting “undesirable” literature) cast a long shadow into 2025, making school directors even more cautious about arranging cultural events that might draw ire.

22. Despite these obstacles, there were a number of cultural activities and opportunities that reached the Romanian-language schools in 2025, often thanks to creative planning and support from Moldovan authorities or international partners. The Ministry of Culture (MC) of Moldova does not have a dedicated program exclusively for the Transnistrian schools, but it has included them within wider initiatives targeting the Security Zone and diaspora communities. Over the past two years (2024–2025), in cooperation with national cultural institutions and with funding from development partners, a series of events have been organized that benefited students from at least some of the eight schools. These included visits by well-known writers, theater troupe performances brought to venues accessible to the Transnistrian students, guided tours at major museums (art, history, literature) for groups of pupils, and even a study trip to Lithuania for a select group of students as part of a history education project. Additionally, a *summer school* and an *autumn school* program were held, focusing on Romanian language and culture, where students from Transnistria mingled with peers from the rest of Moldova. A particularly positive example of sustained engagement is the collaboration between the “*Ginta Latină*” Cultural Centre in Chişinău and two of the largest Transnistrian schools (Lucian Blaga and Evrika lyceums). Through this partnership, dozens of students are regularly able to travel (in coordinated groups) to attend theatrical performances and cultural workshops in Chişinău. Such excursions, while requiring meticulous coordination, have proven immensely beneficial: students report feeling more connected to their national culture and gaining a sense of normalcy from these experiences. They also counterbalance the isolation by showing students that they are very much part of a broader cultural community beyond the separatist enclave.
23. The Moldovan Government has also tried to extend nationwide cultural programs to Transnistrian residents. For instance, the “Cultural Voucher” program launched by the Ministry of Culture, which grants every 18-year-old citizen a voucher (1,000 lei) to spend

on cultural goods (books, theater tickets, etc.), in theory includes youth from Transnistria. However, due to poor publicity and the practical difficulties of redeeming the vouchers in the region, uptake has been minimal – by the end of 2025 the Ministry could not ascertain how many Transnistrian youngsters, if any, had benefited. This reflects a recurring pattern: government initiatives struggle to penetrate the region unless accompanied by robust information campaigns and sometimes clandestine distribution channels (to avoid interference by the de facto authorities). It is telling that even something as apolitical as free money for cultural purchases is stymied by the lack of a cooperative mechanism across the divide. Access to Romanian-language media also remained a challenge. While technically residents in many parts of Transnistria can receive Moldovan TV/radio or access Romanian internet content, the information space is dominated by Russian and local state-controlled media. According to a study in October 2025, over 42% of the region’s official media content is pure propaganda and the rest heavily censored. This means students are often exposed at home to one narrative, whereas at school they learn another (based on factual, democratic principles). Teachers noted the difficulty of combating entrenched stereotypes and disinformation in the classroom when students’ families are immersed in a controlled media bubble. The regime’s propaganda even specifically targets the schools: as detailed in §5.6 below, a coordinated media assault in early 2025 painted the Romanian-language schools as hotbeds of extremism, falsely claiming that their history curriculum “rehabilitates fascism” and thus poisoning the atmosphere for any genuine cultural exchange. In essence, the cultural and informational isolation of Transnistria acts as a form of pressure on the Latin-script schools. It deprives students of the full richness of cultural life and is used by Tiraspol as a tool to discourage enrollment (by implying that those schools are alien or hostile). Overcoming this will require not only infrastructure (buses, funding for trips) but also policy support – perhaps special agreements within the settlement negotiations to allow cultural access, or international cultural events held in neutral areas for these students. Until then, the schools and their partners will continue their ad hoc efforts to keep the flame of culture burning, with the understanding that a well-rounded education is not possible in a cultural vacuum.

ABUSES COMMITTED AGAINST SCHOOLS IN 2025: UTILITY TARIFFS

24. A stark manifestation of discrimination in 2025 was the drastic increase in utility tariffs imposed on the Moldovan-administered schools by the Transnistrian authorities. Building on a trend noted in 2024, Tiraspol escalated its so-called “tariff war” in the winter of 2024–2025, using economic pressure as a means to punish the Latin-script schools. The scale of these hikes was unprecedented and far out of line with any market justification. To illustrate: in early 2025 the price of natural gas charged to the Romanian-language schools was suddenly set at five to six times higher than the rate paid by analogous schools controlled by the Transnistrian regime. Concretely, while industrial consumers in the region were paying around 3,290 Transnistrian rubles per 1,000 cubic meters of gas, the

Romanian-language schools were charged about 5,640 rubles for the same volume – roughly a 1.7-fold difference, making it the highest gas tariff in the entire region for any category of consumer. In percentage terms, this represented an astounding 500% increase in the gas price for the schools compared to the previous year. Electricity tariffs saw a similarly punitive hike: by over 125% year-on-year, resulting in the schools paying roughly 1.6 times what Tiraspol-run entities pay for power. Water and sanitation fees were also raised disproportionately (with differentiated rates applied that kept schools at a higher bracket). Moreover, rents for school buildings, where applicable, were indexed upwards and long-term lease renewals were withheld – a move clearly intended to create uncertainty and leverage against the schools’ continued operation. These moves came under the pretext of an “energy crisis” – indeed, the cutoff of Russian gas briefly in January 2025 (as noted §5.2 above) caused economic strain in Transnistria. However, instead of sharing the burden evenly, the separatist authorities chose to single out the Moldovan-administered schools for exorbitant tariff increases, well beyond any rational reflection of cost increases¹².

25. The impact of these abusive tariffs on the schools was immediate and severe. Heating, electricity and water are basic necessities to keep schools running; the winter of 2025 saw some of the schools struggling to pay their heating bills. In fact, in January 2025, when gas supply was cut and then rationed, the de facto authorities *first* disconnected institutions subordinate to Chişinău (including some school buildings in the Security Zone) from the gas network. Schools like Lucian Blaga, Evrika, Alexandru cel Bun, as well as the Roghi Gymnasium, had to suspend in-person classes and switch to online learning for most of January 2025 due to lack of heating. Once gas flow resumed under the conditional arrangement, it came with the aforementioned massive price increase. As a result, a large portion of the schools’ budgets (which are funded by Chişinău specifically to support these schools) was swallowed by utility payments. The Transnistrian “authorities” collected these inflated payments, effectively siphoning off Moldovan public funds. Promo-LEX and other observers pointed out that this policy had a double aim: (1) to drain the reintegration budget that the Moldovan Ministry of Education allocates for these schools, and (2) to push the schools toward financial insolvency by burdening them with unsustainable overhead costs. Indeed, if a school cannot pay its bills, it risks closure – which is presumably what Tiraspol seeks. During 2025, the Moldovan side had to continuously adjust and find extra resources to cover the shortfalls caused by these extortionary prices. For example, emergency funds were used to provide the schools with firewood, generators, or alternative heating devices to reduce reliance on Transnistrian utilities. Additionally, the Ministry of Education and Research supplied 350 tablet computers to the nine schools

¹² Radio Free Europe Moldova. 2025. “We're cold, but let's see the result”. How Romanian-language schools on the left bank of the Nistru River conduct online classes”, <https://moldova.europalibera.org/a/tragem-frig-dar-sa-vedem-rezultat-cum-fac-ore-online-scolile-cu-predare-in-romana-din-stanga-nistrului/33269998.html>.

(eight in Transnistria plus one in the Security Zone) in January 2025, to facilitate remote learning during the heating crisis. Air conditioning units were also installed in some classrooms as a temporary heating solution. While these measures helped avert a complete shutdown, they are no substitute for a stable solution. The discriminatory nature of the tariffs was widely recognized – the OSCE mission and other international partners were briefed on the details, and the issue was raised in the 5+2 talks. However, the Transnistrian side justified the hikes with technical excuses and refused to grant any relief or exemptions to the Moldovan-administered schools. By mid-2025, those schools were paying the highest utility rates in all of Moldova, for deliberately contrived reasons¹³.

26. This form of economic harassment is not only a breach of the right to education (as it directly impairs the schools' functioning), but it also contravenes basic principles of non-discrimination. For the Committee of Ministers, the tariff issue has been noted as part of the *Catan* execution context since it evidences ongoing "administrative pressures" against the victim schools. The 2025 developments took those pressures to an extreme. It is important to highlight that the energy crisis in early 2025 – triggered by the war in Ukraine and Russia's gas supply tactics – was used opportunistically by Tiraspol to tighten the screws on the schools. Instead of seeking solidarity in hardship, the de facto authorities cynically turned the situation into a weapon against a vulnerable minority (children and teachers pursuing education in Romanian). This raises serious humanitarian concerns. A school like Lucian Blaga in Tiraspol had to send children home and resort to online classes in the dead of winter because it was cut off from heat. Even after partial restoration, classroom temperatures were hard to maintain under the inflated gas tariffs, leading to cold classrooms and sporadic suspensions of lessons. It is reported that only those schools which had alternative heating (biomass boilers) fared okay; notably, two Moldovan-administered schools located just outside Transnistria (in government-controlled villages Varnița and Copanca) could use biomass and thus were less affected by gas cuts. But the core eight schools suffered the brunt. The financial toll was significant: while exact figures are confidential, unofficial calculations suggest that the combined utility bills of the eight schools in 2025 jumped to more than five times their 2023 level, forcing Promo-LEX to appeal for emergency aid from the Moldovan government and donors. This situation is clearly unsustainable. It vividly demonstrates that, absent constraint or consequence, the Transnistrian authorities will continue to devise new ways to persecute these schools. Hence, one of the key general measures needed (as discussed in recommendations) is to establish some form of *monitoring and accountability* that can flag such abusive practices in real time and mobilize responses. For now, the utility tariff discrimination remains in

¹³ Radio Free Europe Moldova. 2024. "How will the Romanian-language schools on the left bank of the Nistru operate now that they have been left without heating?", <https://moldova.europalibera.org/a/cum-vor-activa-scolile-cu-predare-in-romana-din-stanga-nistrului-ramase-fara-caldura/33258078.html>.

effect – a potent reminder that these schools are operating under hostile conditions tantamount to economic siege¹⁴.



INTIMIDATION OF PARENTS AND TEACHERS IN 2025

27. Intimidation and harassment of the school communities persisted as a core element of the Transnistrian authorities' strategy in 2025. This took both direct and indirect forms, targeting not just the students but also their parents and the teaching staff. One of the most insidious developments was the propaganda campaign unleashed through the region's mass media and official statements, aimed at demonizing the Romanian-language schools and sowing fear among those associated with them. In February–March 2025, Transnistria's main television channels – "Pervii Pridnestrovskii" and "TSV" (owned by the Sheriff conglomerate) – aired over 30 programs and reports that portrayed the Latin-script schools as purported centers of "rehabilitation of Nazism and fascism". The

¹⁴ Ministry of Education and Research of the Republic of Moldova. 2025. The situation of schools affected by the energy crisis on the left bank of the Nistru River – to the attention of the Ministry of Education and Research. <https://mec.gov.md/ro/content/situatia-scolilor-afectate-de-criza-energetica-de-pe-malul-stang-al-nistrului-attentia>.

content of this smear campaign revolved around the history curriculum taught in the Moldovan schools. It was alleged, falsely, that the history textbooks used (which teach the History of Romanians and integrated European history) were glorifying fascists and labeling Soviet WWII veterans as “occupiers”. The narrative pushed on TV asserted that children in these schools were being “indoctrinated” to eventually hate their (Russian-speaking) parents and grandparents by viewing them as oppressors. These absurd claims were clearly designed to incite hostility among the local population against the Romanian-language schools and to frighten parents who might consider sending their children there. The de facto leader, Vadim Krasnoselsky, personally amplified this rhetoric. In March 2025, Krasnoselsky publicly urged parents to “check what history is being taught” in the Romanian schools, insinuating that it was a distorted, dangerous version and declaring that such a version “will not be permitted” in Transnistria. Then, on 22 August 2025, at the region’s annual teachers’ forum, Krasnoselsky delivered an inflammatory speech in which he stated he “cannot understand why anyone here in Transnistria, even in the Romanian-language schools, should study the History of the Romanians” and called it “fundamentally wrong”. He asserted that the only acceptable history curriculum for the region would be the “History of the Moldavian Transnistrian Republic” – effectively mandating separatist ideology. The implied threat behind these statements was palpable: the de facto authorities signaled they might move to ban or alter the curriculum of the Latin-script schools (which currently follow Moldova’s national curriculum) under the guise of combating “fascism.” Although no formal curriculum changes were imposed on these schools in 2025 (owing to their status under Chişinău’s jurisdiction), Krasnoselsky’s remarks had a chilling effect. Teachers and parents feared that association with the Moldovan curriculum was being equated with extremism, potentially exposing them to persecution.

28. On the ground, surveillance and intimidation of individual parents and teachers continued to be reported. In several communities, especially those where many local officials or law enforcement officers have children, parents were discreetly warned by their employers or by security agents that it would be “better” to transfer their children to a Transnistrian school. Some parents were called in for “prophylactic talks” by the local militsiya (police), where they were questioned about why they chose a Romanian-language school and cautioned about the “risks” of that choice. These risks were often couched in terms like: *“Your child might not get a job here if they don’t follow our system”* or *“We cannot guarantee your safety if tensions rise”*. Such veiled threats exploit the vulnerability of families who just want a good education for their children. Promo-LEX documented that in 2024 these tactics had caused at least a handful of families to pull their kids out of the Latin-script lyceums, and it is believed similar cases occurred in 2025 (though some families are afraid to speak publicly about it). Teachers, particularly those who commute from the right bank, faced continued harassment at checkpoints. Instances were recorded of teachers being subjected to body searches, having personal books or USB drives confiscated on suspicion of containing “Romanian propaganda”, or being arbitrarily delayed and thus missing class.

The everyday stress on educators – knowing that at any checkpoint they might be singled out – contributed to a worsening shortage of staff (as discussed in §5.7 below, young teachers are discouraged from working in such conditions). The atmosphere of intimidation peaked whenever external attention was given to the schools. For example, ahead of the March 2025 CM meeting, when Promo-LEX submitted information and it became local news (via Moldovan press), Transnistrian state media reacted angrily, accusing specific activists and even naming teachers who they claimed were “spying” for Chişinău. This kind of public vilification puts individuals at personal risk.

29. The cumulative pattern of these actions in 2025 demonstrates a systematic effort to delegitimize the Romanian-language schools and to break the will of their communities. By branding the schools as politically dangerous (“Nazi sympathizers”) and by personally pressuring those involved, the Transnistrian authorities aim to achieve through fear what they could not through outright closure – that is, to cause the schools to wither away from declining enrollment and self-censorship. It is important to note that these intimidation tactics violate not just the right to education, but also freedom of expression and thought. They punish individuals for associating with a certain type of school and for holding a different view of history or culture. The European Court’s judgment in *Catan* implicitly recognized that behind the right to education case lay an attempt to extinguish a minority identity; the events of 2025 confirm that this attempt is ongoing. Nevertheless, the resilience of the community has also been evident: many parents openly defied the propaganda by *enrolling more children than ever*, as noted earlier, and teachers continued to teach the approved Moldovan curriculum including the true history of Romania/Moldova. Civil society and media in right-bank Moldova provided some support, debunking Tiraspol’s lies. The Moldovan government publicly condemned the intimidation and assured parents that the state would stand by them and their right to choose these schools. For instance, officials from the Bureau for Reintegration praised the courage of parents in choosing the “only safe and viable alternative” for quality education and vowed to support the schools despite “all artificially generated impediments”. This moral support is crucial, though the physical safety of these families remains a concern. Ultimately, the intimidation of 2025 failed to reverse the positive trend in enrollment, but it undoubtedly caused distress and could have longer-term repercussions if not addressed. A key recommendation arising is for enhanced monitoring and intervention when such intimidation occurs – possibly involving international monitors or hotlines for reporting harassment, because leaving families alone to face a powerful security apparatus is simply unfair.

MILITARY REGISTRATION WITH PARAMILITARY FORCES

30. The year 2025 saw a worrying intensification of efforts to conscript or involve students from the Latin-script schools in the Transnistrian region’s paramilitary structures. This issue, which directly implicates the right to education and the right to security of the

person, had been flagged in previous communications as a recurring problem (for instance, school directors being asked to submit lists of male students nearing graduation age). In 2025, these pressures became more formalized and aggressive. School administrators from multiple Romanian-language schools reported that throughout the year they received persistent official requests from the local “military commissariats” (i.e., conscription offices of the de facto authorities) demanding the nominal rolls of all male students who turned 16. The purpose stated was to register these youths for eventual military service with the “Transnistrian armed forces.” This practice is in direct contravention of Moldovan law (which of course does not recognize the separatist draft) and international norms on the recruitment of minors. The school principals, acting under instructions from Chişinău, refused to comply with these requests, but the pressure was unrelenting. Matters escalated dramatically in November 2025 when the Transnistrian Supreme Soviet (parliament of the unrecognized regime) adopted a set of legal amendments pertaining to citizenship and military duty. These amendments essentially confer automatic Transnistrian “citizenship” on all children born in the region (including those who are de jure Moldovan citizens) regardless of their parents’ citizenship or wishes. In effect, every schoolboy in Transnistria would be deemed a citizen of the self-proclaimed “rmn” (Transnistrian Moldavian Republic) upon turning 16, if not earlier, and thus liable for conscription into its forces. This “forced citizenship” law is a blatant attempt to legitimize the forced enlistment of youths, many of whom are in fact Moldovan citizens (and in some cases Romanian or Ukrainian citizens as well). By unilaterally assigning them a citizenship they never asked for, Tiraspol seeks to claim legal cover to draft them at age 18 (or even to press-gang them earlier into cadet activities). Promo-LEX has strongly denounced this move, labeling it a “perverse legal instrument” that flies in the face of international law. It also exposes these young people to criminal liability under Moldovan law – since from Moldova’s perspective, joining the illegal paramilitary of Transnistria could be prosecutable as separatism or at least service in an unlawful formation. This places the youths in an impossible dilemma and could ruin their futures¹⁵.

31. The risk of forced conscription became a source of deep anxiety for older students and their families in 2025. In practical terms, some families started exploring ways to get their sons out of the region before they turned 18 (for example, sending them to study in Chişinău or abroad after finishing 9th grade, to avoid the draft). There were reports (unconfirmed due to the sensitivity) that a few graduating male students from the Latin-script lyceums were visited at home by local “military commissars” and pressured to accept Transnistrian passports to formalize the new citizenship policy. The intimidating message was that refusal could result in difficulties for their families (like loss of jobs or other harassment). This was essentially coercion to comply with an illegal policy. The Moldovan

¹⁵ Telegram channel of the regional public TV station “Pervii Pridnestroovskii”. Post from August 22, 4:00 p.m.: https://t.me/tv_pmr/70571.

Reintegration Bureau and Ombudsman's Office have gathered testimonies about these incidents and raised them in the Joint Control Commission and other forums. However, the separatist side denies any wrongdoing, insisting that "citizens of Transnistria must serve their homeland" – absurdly treating individuals as their citizens by fiat. It is crucial to note that these practices violate not only human rights but also the ceasefire agreement provisions which prohibit actions that would worsen the security situation. For instance, the Geneva Conventions prohibit an occupying power (and by extension any authority in a conflict zone) from forcing protected persons to serve in its armed forces. By analogy, the Transnistrian policy of conscripting Moldovan citizens likely contravenes international humanitarian law, a point which was indeed made by legal experts in Moldova and noted by Promo-LEX.

32. Alongside the legal maneuvering around conscription, 2025 saw a further militarization of the educational sphere in Transnistria that indirectly affected the Romanian-language schools. While those eight schools follow Moldova's civilian curriculum, their students live in communities where the education system run by Tiraspol has become heavily infused with military training and propaganda. In 2025, it became mandatory in Transnistrian-controlled high schools to take a course in "Basic Military Training," which includes practical drills like firearms handling, grenade throwing, and infantry tactics. This means many peers of the Latin-script students – sometimes their own cousins or neighbors – are receiving paramilitary training as part of daily schooling. The environment outside the Latin-script classrooms is thus increasingly militaristic. Moreover, clear evidence emerged that the de facto authorities were sending groups of schoolchildren (usually from Russian-language schools) to paramilitary "patriotic education" camps. A particularly alarming example was the dispatch of Transnistrian youths to the famous "*Artek*" camp in Crimea, which, since Russia's occupation of Crimea, has been repurposed to indoctrinate young visitors with Kremlin-centric patriotism. In mid-2025, a contingent of teenagers from Transnistria spent time at Artek, where they were reportedly subjected to intensive propaganda that glorified Russia's war against Ukraine, taught militarist values, and attempted to instill loyalty to Russia's geopolitical agenda. Photographs of these camps show minors in military-style uniforms participating in drills. Such practices constitute a grave violation of children's rights, arguably amounting to *forced indoctrination* and even *child soldier recruitment* (at least at a preparatory level). Although the students from the Moldovan-administered schools were not sent to these camps (the invitations would typically go through the Transnistrian school system), the existence of this program contributed to a climate of fear. Some parents worried that if their child's name was on a Transnistrian registry (via the new citizenship scheme), they could be compelled to attend

such camps during summer breaks¹⁶. Indeed, the notion of “re-education” camps is terrifying for these minority communities, evoking historical traumas.

33. In sum, 2025 highlighted that the military aspect of the conflict over Transnistria is encroaching upon the domain of education in a way that endangers children. The *Catan* judgment addressed the right to education, but what we see now is that the very same children who won the right to study in Romanian are being menaced with conscription into an unrecognized army. This is a direct affront to the spirit of the judgment and an urgent protection issue. It also underscores the argument, made in prior submissions, that Russia’s effective control over Transnistria entails responsibility for stopping such practices. The fact that the Transnistrian side proceeded with the “forced citizenship” law and conscription drive in 2025 strongly suggests they felt shielded by Russia’s patronage, especially as Russia itself was recruiting heavily for its war efforts and perhaps tacitly approving any auxiliary sources of manpower. The Committee of Ministers has been made aware of these developments through communications and needs to consider them as part of the continuing violation of Article 2 of Protocol No.1 (since fear of conscription can deter attendance at school or continuation to higher grades, etc., thus interfering with education). From the perspective of the victims and their families, this is a state of acute distress: their educational journey is marred by the possibility that at age 18 their sons could be forcibly taken away to serve in a rogue military force. This goes far beyond the initial scope of the case but is a direct consequence of the same climate of impunity that allowed the school crisis to persist. In our view, it demands a resolute response both in the execution process (as a factor necessitating interim measures or urgent attention) and through other international mechanisms for protecting children in conflict zones.

CONCLUSIONS

Principled non-execution undermining the ECtHR

34. The Russian Federation’s continued refusal to comply with the *Catan and Others v. Russia* judgment – including its failure to pay just satisfaction and its unwillingness to engage in any remedial measures – represents a flagrant affront to the authority of the European Court of Human Rights. By declaring ECtHR judgments “unconstitutional” domestically and legislating to block their enforcement, Russia has openly repudiated its obligations under the Convention. This deliberate non-execution not only denies justice to the individual victims, nullifying their rights as affirmed by the Court, but it also erodes the credibility of the ECtHR as a guarantor of human rights across Europe. Russia’s stance sets a dangerous precedent: it signals to other states (or breakaway regimes) that binding international

¹⁶ More information can be found in the analysis article of the Promo-LEX Association, published on April 4, at the following link: <https://promolex.md/scolile-cu-predare-in-limba-romana-din-regiunea-transnistreana-sunt-tinta-unei-noi-campanii-de-denigrare-in-mass-media-controlata-de-tiraspol/>.

judgments can be ignored with impunity. The integrity of the Convention system hinges on the assumption that states will execute judgments in good faith. In the *Catan* case, that assumption has been willfully defied. The result is a serious challenge to the rule of law: if one of the most clear-cut judgments on educational discrimination can be disregarded for over a decade, the deterrent effect of the Court's jurisprudence is weakened, and other authoritarian-leaning actors may be emboldened to flout their human rights obligations. The Committee of Ministers, as the supervising body, is confronted with an egregious example of "principled non-compliance" – one where the non-compliance is not due to lack of capacity or resources, but due to a *political decision* by the Respondent State to reject the Court's authority. This strikes at the core of the European human rights system.

Systemic repression and legal loopholes

35. The situation in Transnistria illustrates how a de facto regime, under the shield of a patron state, can consolidate a repressive apparatus that effectively blocks victims from seeking or obtaining redress. The local "authorities" have entrenched an authoritarian governance model in which fundamental freedoms are curtailed and any attempt by citizens to seek justice (be it via Moldovan courts or international mechanisms) is met with retaliation or obstruction. In the context of the Latin-script schools, this has meant that even after the ECtHR's judgment, the victims on the ground have virtually no avenues to enforce their rights. For example, parents cannot go to a local court to challenge the illegal tuition fees or discriminatory laws – those courts are themselves instruments of the regime's policy. Likewise, complaints to law enforcement about harassment are futile when the harassers are the security services. This scenario exposes the limitations of existing enforcement mechanisms at the international level. Transnistria's status as a "grey zone" – not recognized as independent but outside the control of the lawful government – creates a legal vacuum that authoritarian actors exploit. Russia's exit from the Council of Europe in 2022 further complicated matters by removing formal avenues (like infringement proceedings under Article 46 §4 ECHR) and by enabling Russia to claim it is not bound to cooperate. In short, the *Catan* case exemplifies how human rights enforcement can hit a wall when confronted with a combination of impunity and jurisdictional ambiguity. This calls for innovative solutions, as standard tools (diplomatic demarches, CM resolutions) have so far not penetrated the shield of intransigence.

Alarming deterioration in occupied territories

36. The developments in Transnistria during 2025 are part of a broader pattern of deterioration of fundamental rights in territories under prolonged occupation or separatist control. What may seem like a local or sectoral problem – e.g., schooling in Transnistria – is in fact a manifestation of a wider phenomenon: authoritarian regimes using such territories as laboratories for rights suppression. These regions (Transnistria, but also others in post-Soviet space and beyond) serve as testing grounds for tactics that flout international scrutiny. In Transnistria, we have observed increasingly bold steps: open

militarization of schools, information ghettos, and even the normalization of forced conscription of minors. These are tactics designed to circumvent international oversight and normalize violations. The risk is not confined to Transnistria; if left unchecked, similar methods can be exported or replicated in other conflict areas. It is therefore crucial to view the non-execution of *Catan* not just as an isolated failure, but as part of a *wider challenge to the international rules-based order*. The growing interplay between local defiance (by Tiraspol) and global trends (resurgence of authoritarianism) means that addressing these violations is of international interest. The human rights situation in “grey zones” is a barometer of the health of the international system. The more these zones become black holes for rights, the more the universal protection regime is weakened.

Global threat and authoritarian expansion

37. The impunity observed in the *Catan* group of cases feeds into the larger dynamic of authoritarian resurgence worldwide. When a state like Russia successfully evades accountability for actions in a place like Transnistria, it not only perpetuates abuses there, but it also emboldens similar conduct elsewhere. We see this in how narratives are shared: disinformation campaigns, like labeling opponents as “fascists” or “foreign agents,” have been used by various regimes to justify crackdowns – Transnistria’s propaganda against the Romanian schools mirrors rhetoric used in other contexts to silence civil society or minorities. Moreover, the entrenchment of impunity in Transnistria contributes to Russia’s broader strategy of undermining democratic institutions. By showing that Council of Europe mechanisms can be flaunted, Russia and allied actors aim to diminish faith in those institutions, potentially fracturing the unity of democracies in condemning rights violations. In essence, each unresolved case like *Catan* becomes a propaganda victory for authoritarianism – it’s cited (explicitly or implicitly) as proof that Western institutions are toothless. This cannot be viewed in isolation from the geopolitical contest between rule-of-law values and authoritarian might. Thus, executing the *Catan* judgment and restoring respect for rights in Transnistria has significance beyond Moldova: it would signal that even in hard cases, the international community does not accept pockets of tyranny. Conversely, continued non-execution risks the perception of weakness that authoritarian regimes seek to capitalize on, both to reassure themselves and to attract or coerce others into their orbit.

Vicious climate of impunity

38. After decades of unresolved violations in Transnistria, a vicious cycle of impunity has become deeply ingrained. Those responsible for past abuses – such as the 2004 school closures, or the intimidation of parents and teachers – have faced no consequences; many remain in power or influential positions. This sends a clear message on the ground: the regime can act with no fear of reprisal from the international community. That climate not only encourages further abuses (as seen in 2025’s new repressive measures) but also demoralizes the victims and those who defend them. Teachers, parents, and students see

that their plight, even when recognized by the highest judicial authority in Europe, has not led to justice or change. This can breed cynicism and hopelessness, thereby weakening local resilience over time. From a systemic perspective, the inability to enforce the *Catan* judgment so far is chipping away at the perceived moral authority of international human rights law. If one part of Europe effectively exists outside the common legal space, it challenges the universality of rights. The longer this persists, the more it becomes a de facto acceptance of a two-tier system: one where most of Europe abides by certain norms, and another (the grey zones) where those norms are suspended. This is an untenable situation for the Council of Europe's credibility. The Committee of Ministers has recognized this in multiple interim resolutions (e.g., those in 2015, 2017, 2020, and 2022 on *Catan*), expressing deep concern and resolve. But expressions of concern must now give way to decisive actions to break the cycle of impunity.

Urgent need for strengthened accountability framework

39. The recurring and escalating nature of the violations in Transnistria underscores the urgent necessity of building a stronger international accountability framework to address human rights abuses in such contexts. This is not solely about the *Catan* case; it's about preventing grey zones from becoming legal black holes. Elements of such a framework could include: (a) individual accountability, i.e., identifying specific officials or actors responsible for repressive measures (like those who ordered school raids or tariff hikes) and ensuring they face legal consequences, potentially through Magnitsky-style sanctions or eventual prosecution; (b) targeted political and economic measures, such as coordinated sanctions or travel bans on Transnistrian leaders and their sponsors who are linked to the abuses, as well as conditionality on aid to Moldova that explicitly earmarks resources for rights protection in the Transnistrian region; and (c) innovative enforcement mechanisms, for example a trust fund (discussed below in recommendations) to ensure victims receive compensation even if Russia withholds payment, or an international mission specifically tasked with monitoring education rights in Transnistria (potentially under the aegis of the OSCE or UN, if a mandate can be secured). The situation in Transnistria reveals that traditional diplomacy has fallen short – despite dialogues and negotiation formats, core issues like the language law or school premises remain unresolved. Therefore, bolder steps must be contemplated. This might mean the Committee of Ministers supporting efforts at the UN level to highlight Russia's responsibility (e.g., through the Human Rights Council or General Assembly resolutions), or encouraging member states to use national legal tools to pursue justice (for instance, Moldova itself could explore proceedings in its courts or in international courts for failure to execute the judgment). The accountability framework should also integrate preventive dimensions – ensuring, for example, that any future peace settlement or special status for Transnistria is conditioned on firm human rights guarantees with international supervision. Overall, the lesson is clear: without new enforcement thinking, situations like Transnistria will persist, undermining human rights regionally and globally.

Erosion of trust in international institutions

40. The protracted non-implementation of the *Catan* judgment has begun to erode trust among the victim community in both national and international institutions. The applicants and those similarly situated placed their faith in the ECtHR and then in the Committee of Ministers' supervision process. After 11+ years, their right remains unvindicated. Each time the Committee debates the case and issues yet another decision urging compliance, without tangible follow-up, it risks diminishing the confidence that victims (and indeed the broader Moldovan public) have in these procedures. There is a growing sense of *frustration* and *fatigue*. This is dangerous, because it can lead to disengagement – for instance, some parents might conclude “international law cannot help us” and feel resigned to Transnistria's conditions. Likewise, Moldovan authorities who have been cooperative and patient may feel that the international mechanisms are not delivering, which can weaken the incentive to rigorously pursue such avenues in future cases. It is imperative to reverse this erosion by demonstrating concrete progress. That could be, for example, securing the return of one school building, or establishing the independent monitoring mechanism that civil society has asked for. Such moves would show the people on the ground that the international community can make a difference. Conversely, if *Catan* remains in limbo, it not only diminishes the ECtHR's standing, but also the OSCE's, the UN's, and others', because all are seen as part of an “alphabet soup” of organizations that talk but don't act in Transnistria. Rebuilding trust requires outcomes, not just processes.

Risk of wider global replication

41. Perhaps one of the most compelling reasons the Committee of Ministers must not relent on *Catan* is the risk that the model of defiance and rights suppression seen in Transnistria will be replicated elsewhere. Already we witness parallels: in Russian-occupied territories of Ukraine since 2014 (Crimea, Donbas, and more recently parts of Kherson, Zaporizhzhia), there have been reports of forced Russification of education strikingly similar to Transnistria's approach – e.g., Ukrainian language being expunged from curricula, history books rewritten, teachers vetted for “loyalty.” If the outcome in Transnistria is that such policies effectively succeed (in that the responsible state, Russia, suffers no penalty and the local regime is left in place indefinitely), then it could embolden expansions of this approach. Other regions with separatist conflicts might draw lessons that using education as a tool of coercion and identity change is a viable strategy when backed by a powerful patron. Additionally, non-state actors, seeing the lack of enforcement, might be encouraged to defy international orders, expecting that geopolitical cover will shield them. This is how a localized human rights failure can have global ripple effects. On the positive side, a strong stance by the Committee of Ministers, with meaningful consequences for non-compliance, would set a precedent of accountability. It would broadcast to any would-be imitators that Europe does not tolerate such abuses, and that even years later, justice will be sought. In essence, the handling of *Catan* will either provide a playbook for

how to get away with cultural oppression or a playbook for how the international community can unite to stop it. The stakes extend far beyond the banks of the Dniester River.

Political will as a prerequisite for compliance

42. Ultimately, the *Catan* case highlights that without political will, legal judgments alone cannot compel change. Russia's non-execution is not due to inability; it is a conscious choice anchored in political calculus. Therefore, securing compliance will also require a political strategy from the Council of Europe and its member states. Legal avenues (like the Article 46 §4 infringement mechanism) might be closed post-Russia's departure, but diplomatic and economic levers remain. It is incumbent on CoE member states to treat the non-execution of *Catan* as not just a legal anomaly but as a significant political issue – one that affects Europe's values and security. This may mean raising the case in bilateral talks with Russia (to the extent those occur in other forums), linking progress on this issue to other aspects of international relations. It also means supporting Moldova in its efforts to keep the issue high on the international agenda, especially as Moldova moves towards EU accession and garners more attention. The Committee of Ministers itself can use tools like interim resolutions not merely as routine communiques but as rallying calls, explicitly warning of further steps (e.g., support for global sanctions, public exposure of named officials) if no progress is made. The role of *political solidarity* among CoE states is key: a united front can amplify pressure. The coming period should be used to coordinate with the EU, OSCE, and UN so that Russia receives a consistent message across all fora – that continuing to ignore the *Catan* judgment will carry a reputational and practical cost. Only by injecting the necessary political will – essentially, making non-execution costlier than execution for Russia – can we hope to see movement. This requires creativity, resolve, and unity from the international community.
43. In conclusion, the situation of the Latin-script schools in Transnistria at the end of 2025 remains extremely precarious. While the community of teachers, students, and parents has shown admirable resilience and even achieved growth in the face of adversity, they stand effectively alone against a determined authoritarian system. The European Court's judgment gave them a beacon of hope, but that hope will fade unless the Committee of Ministers, together with all relevant stakeholders, dramatically strengthens its response. The recommendations below are put forward in this spirit – to galvanize action, to reinvigorate the execution process, and to ensure that the rights declared by the Court do not ring hollow. The stakes are high: it is about vindicating the rights of several hundred children and their families, preserving a culture under siege, and upholding the fundamental principle that even in Europe's darkest corners, the light of the Convention can prevail.

SPECIFIC RECOMMENDATIONS

44. Building on the conclusions above and the evidence presented, we respectfully propose the following targeted recommendations, which lie within the mandate of the Committee of Ministers and could be promptly undertaken to advance the execution of the *Catan* judgment:

Establish a specialised expert panel to draft an action plan

Through a formal decision, the Committee of Ministers should convene a short-term *Specialised Panel* comprising practitioners, legal experts, representatives of the affected schools, and civil society organisations (including Promo-LEX). The panel would be tasked to work, under the auspices of the Secretariat, on a concrete Action Plan for full implementation of the *Catan* judgment.

The panel should draft a clear, time-bound Action Plan detailing all general measures needed to restore and safeguard the right to education in Transnistria. This would include practical steps to revoke discriminatory regulations (such as the Cyrillic-script law), to return or replace confiscated school premises, to ensure freedom of movement for educational purposes, and to halt harassment and coercion of the school community. The plan should set measurable benchmarks and assign responsibilities (to the Russian Federation, to Moldovan authorities, to international partners as appropriate).

The output would be an authoritative “roadmap” for execution – ideally adopted or endorsed by the CM – which can serve as a reference for both member states and international organizations in coordinating pressure and assistance. It would translate the broad strokes of prior CM decisions into a concrete checklist with timelines, thus sharpening the focus and facilitating accountability for each item. If Russia continues to abstain, the Plan would still function as a consensus blueprint among other stakeholders (e.g., Moldova, OSCE, EU) for addressing the outstanding issues.

Create an independent monitoring mechanism for transnistrian region

The Committee of Ministers should seek to establish, via the Council of Europe Secretary General, an Independent Monitoring Mechanism dedicated to human rights in the Transnistrian region. This could be authorized by a CM resolution and implemented by a team of experts seconded by member states.

The mechanism’s experts (human rights specialists and education experts, possibly with OSCE or UNHCR participation) would conduct regular on-site or near-site assessments of the situation in the eight Latin-script schools (and potentially other areas of human rights concern in Transnistria). They would issue periodic public reports identifying instances of non-compliance with the *Catan* judgment and related standards, and recommend corrective measures. The mechanism would also document any obstacles or reprisals faced by the school community, thereby creating an ongoing factual record. It should coordinate with relevant Council of Europe bodies (e.g., the

Commissioner for Human Rights, the Venice Commission) for legal guidance and with the OSCE Mission for logistical facilitation.

Such a mechanism would bring much-needed transparency to the Transnistrian “grey zone.” Its independent reports would keep the issue high on the international agenda, enable quicker responses to new violations (like tariff hikes or intimidation incidents), and serve as an institutional channel to escalate urgent concerns directly to the CM and other international fora. This continuous monitoring would mitigate the current whack-a-mole approach of reacting after long delays, and instead ensure persistent scrutiny. Importantly, it would also give confidence to the victim community that their plight is seen and heard in real time, potentially deterring the de facto authorities from the worst excesses.

Institute a dedicated compensation mechanism (Trust Fund)

We recommend the Committee of Ministers to initiate the creation of a *Dedicated Compensation Mechanism* – essentially a Trust Fund for victims of non-execution – under Council of Europe auspices. This recommendation draws inspiration from the Trust Fund for Victims at the International Criminal Court and the proposals floated in the context of frozen Russian assets. The CM could task the Secretariat (in consultation with CAHDI and other legal/advisory bodies) to develop a blueprint for such a fund.

The Compensation Fund would be designed to provide financial redress to individuals who have obtained ECtHR judgments against a state but have not received the just satisfaction or other remedies due to that state’s non-compliance. In the *Catan* context, it would seek to finally pay out the sums owed to the applicants (with appropriate adjustments for delay and inflation) on Russia’s behalf. Criteria and procedures would be established for verifying claims and disbursing funds. The fund could also consider compensating for continuing harm (for example, the costs borne by families due to ongoing discrimination, though that may require a separate assessment). The financing of the fund could come from voluntary contributions by member states, and potentially from reallocated or seized Russian assets (subject to legal feasibility and coordination with EU sanctions regimes). Exploring synergies with EU and UN initiatives on accountability for human rights violations by Russia would be prudent, to align efforts in tapping frozen assets for victim redress.

The establishment of a Trust Fund would send a powerful message that even if a recalcitrant state tries to walk away from its obligations, the community of states will step in to uphold the principle of reparations. For the *Catan* applicants – who have waited so long – this would mean tangible justice at last, at least financially. It would also reinforce collective enforcement of human rights: member states sharing the burden to ensure judgments are not just moral victories but deliver real relief. In the bigger picture, it sets a precedent that could apply to other cases of non-payment (there will be many in the Russian docket post-2022), thereby buttressing the authority of the Court. While Russia would remain liable to reimburse the fund (a point that should be maintained),

the interim relief to victims cannot wait indefinitely. The CM's support for this mechanism would be a landmark step in adapting enforcement tools to current realities.

Adopt a strategic action plan on “Grey Zones” and impunity

We recommend that the Committee of Ministers use its platform to promote a broader *Strategic Action Plan* addressing human rights in territories under *de facto* control of an outside power (often termed “grey zones”), and the impunity gap associated with them. This could take the form of a high-level political declaration or guidance document, developed in thematic debates or through an intergovernmental working group.

The Action Plan would compile best practices and propose new measures for strengthening accountability in situations where the Convention is breached but the responsible state evades oversight (as with Russia in Transnistrian region, or similar scenarios). It would cover legal, diplomatic, economic, and informational strategies to pressurize non-compliant actors. For example, it might recommend that member states adapt their legislation to allow universal jurisdiction or other legal avenues to prosecute individuals responsible for severe human rights violations in grey zones. It would emphasize preventive steps like ensuring that educational and cultural rights of minorities are protected in any conflict mediation. Importantly, it should include strategies to prevent forced conscription of inhabitants of occupied territories, ensure freedom of movement (e.g., via humanitarian corridors for education), and safeguard linguistic rights – all issues highlighted by *Catan*. The plan would encourage synergy with other international organizations, to harmonize sanctions or conditionality.

The result would be a comprehensive framework that guides national governments and international bodies in responding to cases like Transnistrian region. It would elevate the discussion from reactive case-by-case management to a proactive policy level. Over time, this can help close the loopholes exploited by authoritarian regimes. It would also reassure affected populations that their plight is being addressed not ad hoc, but as part of a coherent international effort. By adopting such a plan or set of guidelines, the CM would demonstrate leadership in defending the universality of human rights against fragmentation.

Foster collaboration with universities and research institutions

The Committee of Ministers should encourage and facilitate partnerships with academic and research institutions to deepen the knowledge base on enforcing human rights in contested territories. A CM recommendation could be issued calling on member states and CoE bodies to support independent research and policy development in this field.

Key topics for research could include: the obstacles to executing ECtHR judgments in situations of non-recognized authorities; innovative legal mechanisms to enforce compliance when traditional state responsibility approaches fail; and effective strategies for protecting children's rights and linguistic freedoms in conflict or post-conflict settings. In the *Catan* context, one might imagine detailed case studies or simulations on options like arbitration, claims commissions, or

cyber measures to enforce the judgment. The academic partners (e.g., human rights centers, conflict studies departments) could host conferences or publish handbooks that provide *data-driven recommendations*. The CoE could even consider a small grants program for scholars focusing on Transnistria and similar cases, ensuring the findings feed back into CM deliberations.

By leveraging the expertise of academia and civil society, the CM would gain access to fresh ideas and objective analysis, which can inform more effective decision-making. This collaboration can yield practical proposals that may not emerge from political discussions alone. It would also engage the next generation of experts and practitioners in solving these protracted issues, thus keeping the momentum beyond the usual diplomatic circles. In sum, an evidence-based approach would strengthen the CM's hand – making sure that responses to non-execution are guided by research and lessons learned, and not doomed to repeat past inadequacies.

Maintain vigilant supervision and escalate political pressure

The Committee of Ministers must maintain the *Catan* group as a standing item on its Human Rights (DH) meetings' agenda at each quarterly session and be prepared to adopt robust interim resolutions that openly call out Russia's non-compliance and outline consequences. In particular, if no substantial progress is achieved in the coming review (e.g., by the 2026 DH meetings), the CM should issue a resolution noting Russia's failure to meet specific benchmarks (such as payment of just satisfaction, cessation of harassment, engagement with the expert panel) and declaring the CM's resolve to pursue all avenues to secure implementation.

Such interim resolutions and decisions should make explicit the CM's readiness to consider or support additional measures *outside* the Council of Europe framework as well. For instance, urging member states to undertake diplomatic demarches in other international bodies, or to leverage bilateral relations with Russia to raise the issue. The CM could invite the Secretary General to brief the UN Security Council or General Assembly on the matter (even if only informally, through member states). Furthermore, the CM should encourage member states to reinforce pressure nationally – through public statements by foreign ministers, through parliamentary resolutions condemning the continued violations, or even through targeted sanctions at national/EU level against key figures responsible for the repression in Transnistria. The message must be that *Catan* is not forgotten and that non-execution is a political liability.

Keeping *Catan* at the forefront of CM agendas ensures no "wearing out" of attention – Russia should not be allowed to wait out the Committee's interest. Regular scrutiny, coupled with strong language, maintains pressure. Interim resolutions with concrete demands and mention of potential measures (even if the Council of Europe itself has limited direct coercive power) contribute to a sense of urgency and lay the groundwork for coordinated actions by member states. Over time, this vigilant approach can alter Russia's cost-benefit calculus: as international isolation or criticism mounts, the incentives may shift toward negotiating at least minimal steps (for example, allowing a monitoring visit or quietly easing some pressures) to mitigate

reputational damage. In any case, it will dispel any notion that the Committee has resigned itself to the status quo.

Advance an international accountability framework

The Committee of Ministers should champion the development of a more formal International Accountability Framework for persistent non-compliance with human rights judgments, linking in with global initiatives. This could be done by recommending that the Council of Europe as an observer supports relevant efforts at the United Nations (such as creating a Special Rapporteur or Working Group on “justice in disputed territories” or similar), and by coordinating with the European Union on using its human rights sanctions regime (Global Magnitsky-style tools) against those obstructing the execution of judgments like *Catan*.

The framework would include both individual and state responsibility mechanisms. On the individual side, it would push for holding accountable those who personally implement the policies that the ECtHR found unlawful (e.g., officials who enforce the Cyrillic script law or orchestrate school harassment). Options range from criminal prosecution in any jurisdiction that can claim competence, to international travel bans and asset freezes. The framework would encourage evidence-gathering (with help from NGOs like Promo-LEX) to identify these actors and build case files. On the state side, it would seek to close the gap created by Russia’s exit: working with the UN and regional bodies to ensure Russia faces political and economic consequences for leaving binding judgments unexecuted. Coordination with the OSCE, EU.

While ambitious, moving toward an international accountability framework sets a precedent for collective action against intractable human rights violations. It would demonstrate that the Council of Europe is not alone or powerless, but rather part of a concerted front that can leverage multiple channels. In the case of *Catan*, this could materially increase pressure on Russia by multiplying the fora in which it faces censure and by directly targeting the enablers of the repressive status quo. In the long term, the establishment of such a framework (even if informal) would help address similar challenges that might arise with other judgments and other states, thereby strengthening the overall enforcement of human rights across borders.

45. By taking the above actions – each well within the Committee’s authority or influence – the Committee of Ministers would affirm its unwavering commitment to the enforceability of ECtHR judgments and to the fundamental principle that rights adjudicated and recognized must be rights realized. These measures are not only about securing belated justice in the *Catan* case; they also serve as a crucial bulwark against the corrosive trend of authoritarian impunity. The victims of the *Catan* case, and the hundreds of children currently studying under difficult conditions in Transnistria, have waited far too long to see meaningful progress. It is both a moral and a legal imperative for the CM to intensify its supervision of this case, to mobilise all available tools – legal, political, financial – and to

speaking in a unified, clear voice: that the right to education will be defended, that Russia will be held to its obligations, and that the abuses in Transnistria must end.

46. We therefore respectfully urge the Committee of Ministers to adopt a resolute stance at the upcoming examination of the *Catan and Others v. Russia* group. The time has come for a shift from words to impactful deeds. By doing so, the CM will not only honor the suffering and courage of the applicants and their community, but also reinforce the integrity of the European human rights system at a time when it faces unprecedented tests. The children in Transnistria, like children everywhere, deserve to learn and grow in freedom and safety – this was the essence of the ECtHR's judgment, and it must be the essence of our collective response in seeing that judgment fully executed.

On behalf of the Promo-LEX Association,

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