

SUMMARY REPORT

OBSERVATION MISSION FOR THE PARLIAMENTARY ELECTIONS OF 28 SEPTEMBER 2025

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

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

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EXECUTIVE SUMMARY

Social and political context. The Republic of Moldova is a parliamentary republic, in which the Parliament gives a vote of confidence to the Government, responsible for exercising the domestic and foreign policy of the state. The pre-electoral period was characterized by parliamentary and governmental stability due to a single-party ruling. The relationship between the government and the opposition was permanently tense.

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

The status of a candidate country for EU accession, combined with the involvement of the Russian Federation in the electoral process in Moldova, generated a tense socio-political climate for the elections of 28 September 2025. The interference of the Russian Federation in national electoral processes materialized through the illegal financing of some political parties, as well as through public statements by some officials, hostile to the government and to the European path of the Republic of Moldova. An important role in the implementation of these actions was played by Ilan Șor, the leader of a party declared unconstitutional.

The existing **legal framework** ensured the proper organization and conduct of the elections. The parliamentary elections in Moldova were held, for the first time, in accordance with the provisions of the new Electoral Code. Several months before the elections, amendments were made to both the Electoral Code and the Law on Political Parties. The most visible and meaningful changes to the legal framework occurred in the context of the authorities' efforts to eradicate the phenomenon of electoral corruption. These amendments allowed for the establishment of a sufficient framework for punishing electoral corruption, but not for its elimination as a phenomenon.

The Promo-LEX OM identified several legislative deficiencies and gaps that may affect the proper conduct of the electoral process. They include, among other things: amendment of the electoral and related legislation within one year before the elections; amendment of the Regulation on the status of observers and on the accreditation procedure; suspension of activities of a candidate for the position of MP; limitation of activities of a constituent party of an electoral bloc; interference between the position of Prime Minister and electoral activities; etc.

Electoral bodies. Overall, the CEC managed the process of organizing the parliamentary elections efficiently and transparently, but the regulatory framework continued to be modified/adjusted even after the start of the electoral period. The lower electoral bodies were established within legal deadlines, but their completion took time, with the last certification exams of electoral officials taking place two days before election day.

The 2025 parliamentary elections were notable for a significant increase in the number of accredited observers – 3,423, mainly due to the increase in the share of national observers (2,511). At the same time, the CEC, based on the opinions of the security institutions and the Ministry of Foreign Affairs, refused to accredit some international observers. The activity of Promo-LEX observers was limited in at least two cases, by a party leader and a public institution. Also, in these elections, we observed recruitment of so-called “observers” from among voters abroad, by entities that had no accreditation rights and promised generous unofficial payments.

The lower electoral bodies (37 DECs and 2,274 PEBs) were established within legal deadlines. The working hours were complied with by electoral bodies in most cases. Accessibility for people with special locomotor needs was still a problem for the offices of DECs and PEBs. The composition of the

lower electoral bodies remains unbalanced from a gender perspective (with 86% women in PEBs and 72% women in DEC)s).

For these elections, the largest number of polling stations was established abroad (301), within legal deadlines. The CEC fully supported the proposals made by the MFA. However, the Promo-LEX estimates differed in some places from the CEC decision, since the MFA's proposals were based mainly on the participation data for the 2024 elections and not for the last three elections. For security reasons, only two PSs were opened in each of the countries involved in conflicts (Russia, Ukraine, Israel). Postal voting was partially implemented in these elections as well. We believe that the legislator should decide in optimum time on the "universal" application of this voting mechanism for voters abroad.

Moldova continued to provide its citizens from the localities on the left bank of the Dniester, which are outside the control of the central authorities, with the opportunity to vote. However, the reduction in the number of polling stations compared to previous elections and the removal of some of them from the security zone limited voters' access. The CEC's decisions were motivated by security considerations. According to Promo-LEX, the organization of polling stations for voters from the left bank of the Dniester should be treated in a broader context of the need for democratization and reintegration of the uncontrolled region.

Electoral complaints and disputes. Courts and electoral bodies partially ensured the right to an effective remedy, while a large number of complaints was sent to other competent authorities and the deadline for resolving complaints was violated in some cases. At least 98 complaints and 67 notifications were submitted to the CEC, and 44 actions were filed to courts.

The deficiencies observed in the process of examining and resolving complaints include the registration of complaints as notifications and their resolution within extended terms, the differentiated treatment of some electoral competitors, etc.

Nomination and registration of candidates. In the electoral race for the position of MP, the CEC registered the lists of candidates submitted by four electoral blocs, 15 political parties, and four independent candidates. The parliamentary elections of 28 September were competitive, with political parties and independent candidates showing greater interest than in the last two parliamentary elections.

At the same time, the rate of registration refusals was also significantly higher: the CEC examined 33 files and issued 10 refusals, while there was only one refusal out of 24 files in 2021. A determining factor was the change in the conditions for submitting files for candidates on the list, as well as the introduction of new requirements for participation in elections for political parties.

1,368 candidates for MP were registered, of whom 580 (42.4%) were women and 788 (57.6%) were men, on average about 13 candidates competing for one seat in the legislature.

Voters' lists and the State Register of Voters (SRV). The CEC ensures the transparency of data in the SRV by publishing them monthly. The total number of voters in the SRV has been decreasing steadily but insignificantly over the last two years, in connection with negative demographic trends. In parallel, the increase in the number of voters in the localities on the left bank of the Dniester remains stable.

Regarding the reception of voters' lists by PEBs, in the absolute majority of cases the lists arrived within legal deadlines. According to observers, the defects of voters' lists most frequently mentioned by PEB members included assignment to wrong polling stations/localities and the presence of deceased persons on the lists.

Electoral competitors. In these elections, too, multiple activities with electoral undertones were observed before the start of the campaign, which affected equality of opportunity. The electoral

campaign for the 2025 parliamentary elections was one of the most active observed by Promo-LEX, with at least 5,362 reported electoral campaign activities, over 1,000 activities more than in the 2024 elections and over 500 more than in the early parliamentary elections of 2021. Competitors conducted activities both with physical presence and online. Meetings with voters and distribution of printed electoral materials were the preferred methods for most competitors, but the role of online promotion is continuously growing. As for the subjects, the most activities were observed in the case of PAS – 30%, Patriotic EB – 23%, Alternative EB – 16%, and PN – 12%.

During the electoral campaign, the actions qualified by Promo-LEX as contrary to regulations included the misuse of administrative resources, the involvement of “third parties” in the campaign, voter corruption, the involvement of religious faiths in the campaign, negative campaigning, and others. In terms of quantity, the largest number of activities contrary to regulations referred to the misuse of administrative resources – 260 cases (similar to the 2024 elections). As for electoral corruption, in these elections both the CEC and the law enforcement bodies actively contributed to the control and investigation of acts of corruption. Finally, the involvement of “third parties” in the campaign remains a challenge for the integrity and fairness of the electoral process that has not been resolved legally. Moreover, coordinated inauthentic behavior, as a form of third-party involvement, emerged in these elections by way of influencing and manipulating public opinion and had unidentifiable financing.

Financing of the electoral campaign. During the electoral period, the CEC ensured supervision and control of the financing of the activity of initiative groups and electoral competitors, having applied several sanctions, including deprivation of allocations from the state budget (BUN EB, PPDA).

The main sources of financing, according to the reports of electoral competitors, consisted of income accumulated from individuals (donations) and their own funds from the bank accounts of political parties. The most income in the parliamentary elections was declared by PAS – 33%, followed by Patriotic EB – 19%, Alternative EB – 15%, PN – 10%, and PAM – 7%.

As a result of civic monitoring, the Promo-LEX OM estimated unreported expenses for the parliamentary elections in the amount of at least MDL 2,040,541, the most being in the case of MRM – 28% of the total estimated expenses, followed by Alternative EB – 16%, CUB – 15%, and PAS – 14%.

Hate speech. Compared to the electoral period for the 2021 parliamentary elections, in the 2025 electoral period, the number of cases of hate speech increased by 1.7 times. 70% of the total number of 521 cases identified in the electoral context were published and spread through Telegram, TikTok, and Facebook.

Men and people aged between 35 and 50 use hate speech most often. For the first time, however, hate speech was based, in a greater number than in previous electoral periods, on the criteria of professional activity, opinion, and health. The number of complaints for the use of hate speech by electoral competitors during electoral periods has dropped to zero. In contrast, there has been an increase in the number of self-notifications by the police.

Election day. Polling stations generally opened and closed according to regulations, with only 27 stations extending their activity. A particular situation was registered at two polling stations intended for voters from the Transnistrian region, where ballots ran out before closing time. Vote counting was carried out mostly in an orderly and calm manner, but lengthy for some polling stations abroad. The Promo-LEX OM repeatedly reported on the failure of some of PEBs to comply with all requirements regarding the vote counting procedure.

During election day, observers reported 1,019 incidents, 241 more than in the first round of the presidential election of 20 October 2024 and 560 more than in the early parliamentary elections of 2021. The structure of the incidents, in principle, was the same as in previous national elections. In terms of quantity, the most frequent remain incidents with violation of the secrecy of the vote (taking pictures of ballot papers, displaying the ballot with the vote cast) – 277 cases, as well as deficiencies

in the functioning of the State Automated Information System “Elections” (124), interruptions in the filming process (120).

However, on election day, the emergence of new types of incidents was also noted, such as difficult access for representatives of electoral competitors to PSs abroad, deficiencies related to voting with mobile ballot boxes, filming of the voting process by representatives of electoral competitors, etc.

The Promo-LEX OM expresses particular concern regarding the situations/rumors of rewards being offered to voters (5 cases) and cases of organized transportation of voters (17 cases). We shall also draw attention to the cases of restriction of the free observation process in polling stations (16), refusal to issue the minutes of vote counting results, mainly in polling stations abroad (10), as well as isolated situations of intimidation of observers.

The results of the rapid counting of votes and the parallel tabulation of the results of the vote exercised in the parliamentary elections confirmed the official data of the CEC.

Post-electoral period. After the end of the parliamentary elections, several complaints were filed to court, but following their examination, no violations were found in the electoral process that could have influenced the election results. On 16 October 2025, the Constitutional Court confirmed the results of the parliamentary elections and validated the mandates of the elected Members of the Parliament of the Republic of Moldova. At the same time, the Court sent an address to the Parliament, in which it emphasized the need for the legislature to strengthen the authorities’ powers regarding video sharing platforms.

INTRODUCTION

The observation mission for the *parliamentary elections of 28 September 2025* is a project carried out by Promo-LEX Association within the Civic Coalition for Free and Fair Elections. Promo-LEX is a public association that aims to develop democracy in Moldova, including the Transnistrian region, by promoting and protecting human rights, monitoring democratic processes, and strengthening civil society.

The observation of electoral procedures was carried out during the electoral period by the central team as well as by 42 territorially distributed long-term observers (LTOs), including two LTOs responsible for monitoring voting abroad.

On election day, the Promo-LEX OM delegated a total of 932 observers to polling stations. Specifically, it ensured the presence of static short-term observers (STOs) in 409 polling stations (PS), selected based on a sample established by a sociological company. In addition, static observers were delegated to all 12 PSs established for the exercise of the right to vote by voters from the Transnistrian region. Also, 129 static observers were delegated to observe the elections in PSs established abroad (out of a total of 301 PSs). The electoral process in polling stations not included in the sample or in other categories mentioned above, including access routes to PSs and the space in their immediate vicinity, was monitored by 191 mobile teams composed of 382 observers (two observers per team).

The Promo-LEX OM also monitored hate speech and discrimination through eight monitors.

All observers involved in the monitoring process were trained in seminars organized by the Promo-LEX Mission and signed the Code of Conduct of the Promo-LEX Independent National Observer¹, committing themselves to act promptly, in good faith, and in a non-partisan manner. The activity of all observers was coordinated by the Mission's central team. LTOs' findings were reported on the basis of thematic forms and are stored on the web platform www.data.promolex.md, secure system with limited access managed by Promo-LEX. Through visits to the territory, Promo-LEX observers collected and analyzed information resulting from on-site observations, interviews, meetings with interlocutors, and consulted official documents. The online activity of electoral competitors was also monitored.

The monitoring of campaign financing is an important component of the work of the Promo-LEX OM. It involves observing electoral competitors from the perspective of the funds collected and used for campaign activities. In addition to electoral competitors themselves, the Promo-LEX OM estimated the expenses incurred by electoral competitors by applying minimum market prices and compared them with those declared by competitors to the CEC in order to assess the transparency and correctness of the financing of the electoral campaign. We admit that there may be some differences between the costs applied by Promo-LEX for estimates and the actual costs incurred by electoral competitors, but the important thing is that these prices will be applied uniformly for all competitors.

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

¹ [Code of Conduct](#) for Promo-LEX Election Observers

web platform www.electoral.monitor.md, where anyone can report activities with electoral undertones.

The Promo-LEX Association has been organizing election observation missions in Moldova since 2009, this OM being the 30th. Employees and members of the Association also have international experience, participating in international election observation missions in Armenia, the Czech Republic, Germany, Georgia, Estonia, Montenegro, Norway, Romania, Serbia, Sweden, Turkey, Ukraine, etc.

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

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RECOMMENDATIONS

To the Parliament of Moldova:

1. Supplement the Electoral Code with rules on the “universal” implementation of postal voting at least one year before the 2028 presidential election.
2. Adjust art. 11 para. (1) of the Electoral Code to the provisions of the Revised Interpretative Declaration on the Stability of Electoral Law of the Venice Commission concerning the Code of Good Practice in Electoral Matters, in particular regarding the rules that determine the right to vote and to be elected and the rules that guarantee the effective settlement of electoral disputes.
3. Regulate political and electoral financing by third parties.
4. Amend the legislation so that all political parties registered in the elections submit to the CEC, before the official start of the electoral campaign, a financial report related to the pre-electoral period (from the announcement of the election date to the start of the electoral campaign).
5. Amend the definition of administrative resources by adjusting it to the notion formulated by the Venice Commission: “Administrative resources are human, financial, material, in natura and other immaterial resources enjoyed by both incumbents and civil servants in elections, deriving from their control over public sector staff, finances and allocations, access to public facilities as well as resources enjoyed in the form of prestige or public presence that stem from their position as elected or public officers and which may turn into political endorsements or other forms of support.”
6. Supplement the Electoral Code with provisions that would prohibit the organization and conduct of electoral campaign activities in the premises of public healthcare facilities, hospitals, and educational institutions of any level (except in cases when such an institution is the only one available in the locality for meetings with voters).
7. Extend the prohibition to use administrative resources for the purpose of accumulating political capital to the periods between elections.
8. Review and reformulate new grounds for refusal to register electoral competitors under art. 68 para. (11) of the Electoral Code, by defining objective, verifiable, and proportionate criteria.
9. Amend art. 77 of the Electoral Code in order to introduce specific provisions regarding voting in healthcare facilities.
10. Examine the opportunity to tighten criminal sanctions for falsifying voting results, especially when voting involves persons with disabilities, given their state of vulnerability.
11. Examine the opportunity to amend the legislation in order to introduce anonymity, in a certain form, in the wording of art. 47² para. (3) of the Contraventions Code (corruption related to organized meetings), in order to encourage suspected persons to collaborate with law enforcement bodies.

To the Central Electoral Commission:

12. Abandon the practices of amending the regulatory framework that governs ongoing electoral procedures.
13. Establish in the regulatory framework the application of complementary criteria from the Electoral Code to the creation of polling stations abroad (data on prior registration and

information presented by the MFA regarding the number and location of Moldovan citizens abroad).

14. Amend the regulatory framework in order to detail the method of calculating the number of polling stations for voters from the districts on the left bank of the Dniester by applying the grounds provided for by the legal framework.
15. Supplement the Guidelines on preventing and combating the use of administrative resources in electoral processes, developed by the CEC, in order to clearly delimit the competence of investigative authorities, such as the CEC and the GPI.
16. Examine the possibility of simplifying requirements related to the method of sealing and sending envelopes with ballots by voters, as well as of counting envelopes/ballots by members of PEBs.
17. Establish, by a regulatory act, a clear mechanism for verifying the integrity of candidates for the position of member of electoral bodies and specify verification criteria and procedures in order to ensure transparency and uniform application.
18. Standardize the practice of applying sanctions for violations committed by members of electoral bodies.
19. Adjust the provisions of the Regulation on the status of observers and their accreditation procedure to the requirements of the Electoral Code by excluding accreditation conditions related to the technical and organizational capacity of observation missions.
20. Analyze the phenomenon of “fake observers” and examine the opportunity to regulate/limit their access to the electoral process; establish a proper mechanism for monitoring and identifying this category of alleged observers.
21. Train electoral officials and the staff of healthcare facilities on matters of assisted voting, so as to ensure respect for the rights provided for in the Convention on the Rights of Persons with Disabilities, to which the Republic of Moldova is a party.
22. Develop a guide/instruction on how to evaluate and report on volunteer activities provided for the benefit of political entities/electoral competitors.
23. Ensure the publication of the date of submission of financial reports by electoral competitors in the “Financial Control” ISS.
24. Organize discussions with political parties on the relevance and necessity of the institution of trusted persons in the electoral campaign, in order to improve electoral legislation.
25. Develop mechanisms for monitoring political and electoral advertising distributed on social networks and through search engines, including surveys conducted or published in violation of the regulatory framework.
26. Present, jointly with the PSA, in addition to statistical data, detailed explanations regarding the nature of changes in the number of citizens/voters in the SRV in order to prevent attempts to manipulate or disinform society about this matter.
27. Develop, together with the PSA and LPA, a legal mechanism that would allow for changes to be made to the SRV, under the responsibility of the LPA, in cases where there is credible information on the death of voters but no confirming documents.
28. Reassess the relevance, usefulness, and quality of the video cameras used, with analysis of alternative options that can ensure a constant and reliable level of monitoring in future elections.
29. Promote the ESCL ISS among voters in order to capitalize on this online signatures’ collection tool, especially before presidential elections.

To the Center for Continuous Electoral Training:

30. Conduct a comprehensive analysis of the certification experience in the period of 2023–2025, with the involvement of all relevant parties, including in order to assess its impact on the quality of training of electoral officials.
31. Provide additional training to PEB members on the rights and obligations of observers, in order to avoid violations of the legislation by electoral officials, including regarding observers' access to voters' lists.

To the Audiovisual Council:

32. Further develop the internal mechanism for monitoring hate speech in audiovisual media by collecting disaggregated data.
33. Continue to carry out periodic training activities for members and employees on identifying cases of hate speech, incitement to discrimination, or other forms of intolerance.

To law enforcement bodies and the General Police Inspectorate:

34. Examine within short terms and give priority to cases of misuse of administrative resources in elections, along with cases of electoral corruption, and sanction the guilty persons accordingly.
35. Strengthen the capacities of authorities to identify political and electoral advertising distributed on social networks and through search engines, including by third parties, and inauthentic behavior.
36. Strengthen efforts to identify, document, and sanction cases of non-compliant use of political, pre-electoral, and electoral advertising, including through surveys conducted in violation of the regulatory framework.
37. Strengthen the capacities to document illegal cash flows, including the ones using virtual assets/cryptocurrencies.
38. Develop an internal procedure for redirecting potential bias-motivated offenses/crimes, including hate speech, to police officers trained to document and investigate them.
39. Promote among the general public the mechanism of reporting cases of hate speech and/or incitement to discrimination to the police by initiating information campaigns.

To the Bureau for Reintegration Policies:

40. Identify, in partnership with the CEC and other relevant authorities, solutions to ensure access for the national media to the Transnistrian region, for the conduct of campaign activities by competitors, access for observers, etc.
41. Engage, together with the CEC and CCET, in activities to organize and conduct information and civic and electoral education campaigns for voters in the localities on the left bank of the Dniester.

To local public administration authorities:

42. Ensure the accessibility of public utility buildings where polling stations and electoral bureaus are located.
43. Clearly regulate procedures for the use of public spaces by electoral competitors, with a clear indication of the price in cases when spaces are granted for a fee.

To electoral competitors/political parties:

44. Capitalize on the institution of trusted persons in the electoral campaign.

45. Collaborate with the CCET on the planning and implementation, starting with 2026, of certification sessions for persons who will subsequently be appointed as electoral officials by parliamentary political parties.
46. Maintain candidate lists and avoid frequent changes to them, especially in the period immediately preceding elections.
47. Publicly and unequivocally condemn any form of political and electoral corruption, and establish internal prevention and reporting mechanisms, including prompt notification of the competent authorities in the event of identification of such practices.
48. Condemn hate speech and use national mechanisms to examine and sanction hate speech whenever targeted by such speech.
49. Conduct periodic training activities for party members, especially for those who are designated as candidates for elective positions and communicators, regarding hate speech, sexism, racism, homophobia, and other forms of intolerance.

ABBREVIATIONS

para. – paragraph
LPA – local public administration
art. – article
PSA – Public Services Agency
PEB – precinct electoral bureau
Alternative EB – Alternative Electoral Bloc
Patriotic EB – Patriotic Electoral Bloc of Socialists, Communists, Heart and Future of Moldova
BUN EB – The National Unity Electoral Bloc
PB – political bloc
EB – electoral bloc
CEC – Central Electoral Commission
DEC – second-level district electoral council
CCET – Center for Continuous Electoral Training
CUB – Coalition for Unity and Welfare Political Party
GPI – General Police Inspectorate
MFA – Ministry of Foreign Affairs
MRM – Respect Moldova Movement Political Party
OSCE – Organization for Security and Co-operation in Europe
LTO – long-term observer
STO – short-term observer
PAM – Moldovans Alliance Party
PAS – Action and Solidarity Party
PN – Our Party
PPDA – Democracy at Home Political Party
SRV – State Register of Voters
PS – polling station
ESCL ISS – “Electronic Signatures Collecting List” Information Subsystem
“Financial Control” ISS – “Financial Control” Information Subsystem
EU – European Union

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