



EUROPEAN
NETWORK
OF ELECTION
MONITORING
ORGANIZATIONS
ENEMO

FINAL REPORT

INTERNATIONAL ELECTION OBSERVATION MISSION TO MOLDOVA



**PARLIAMENTARY
ELECTIONS**

28 SEPTEMBER 2025

FINAL REPORT

INTERNATIONAL ELECTION OBSERVATION MISSION

Parliamentary Elections in Moldova

28 September 2025

EUROPEAN
NETWORK
OF ELECTION
MONITORING
ORGANIZATIONS
ENEMO

The English version of this report is the only official document of ENEMO IEOM.



FINAL REPORT

INTERNATIONAL ELECTION OBSERVATION MISSION

Parliamentary Elections in Moldova

28 September 2025

ENEMO Bul. Josipa Broza 23A
81 000 Podgorica, Montenegro
Email: info@enemo.eu
www.enemo.eu

Published by: ENEMO- European Network of Election Monitoring Organization

Cover image (cropped): Parliament Building of Moldova, Chişinău, Moldova - photo by Diego Delso (delso.photo), via Wikimedia Commons. License: CC BY-SA 4.0

Editor:

Dritan Taulla

Authors:

Dritan Taulla
Ana Mihajlovic
Nino Rizhamadze
Maja Milikic
Mariam Chubabria
Daniel Kerekes



Kingdom of the Netherlands



ENEMO's International Election Observation Mission for the 2025 Parliamentary Elections in Moldova was financially supported by the Kingdom of the Netherlands and the Soros Foundation in Moldova. The contents of this report are the sole responsibility of ENEMO and do not necessarily reflect the views of the donors.

CONTENTS

EXECUTIVE SUMMARY	6
INTRODUCTION AND ACKNOWLEDGMENTS	13
I. BACKGROUND AND POST- ELECTION DEVELOPMENTS	14
II. LEGAL FRAMEWORK AND ELECTORAL SYSTEM	18
LEGAL FRAMEWORK	18
ELECTORAL SYSTEM	22
III. ELECTION ADMINISTRATION	23
IV. VOTER REGISTRATION	29
V. CANDIDATE REGISTRATION	31
VI. ELECTION CAMPAIGN AND CAMPAIGN FINANCE	37
ELECTION CAMPAIGN	37
CAMPAIGN FINANCE	44
VII. MEDIA	51
MEDIA ENVIRONMENT	51
LEGAL FRAMEWORK.....	52
TRADITIONAL MEDIA	54
ONLINE MEDIA.....	57
VIII. ELECTION DISPUTE RESOLUTION	62
POST-ELECTION COMPLAINTS.....	66
CRIMINAL CASES AND CONTRAVENTIONS	67
IX. ELECTION DAY	68
X. ELECTION OBSERVATION	69
XI. PARTICIPATION OF WOMEN AND GENDER EQUALITY	71
XII. NATIONAL MINORITIES	73
XIII. INCLUSION OF PERSONS WITH DISABILITIES	75
RECOMMENDATIONS	77
ABOUT ENEMO	83
ANNEXES	86

EXECUTIVE SUMMARY

Following an invitation from the Central Election Commission of the Republic of Moldova, the European Network of Election Monitoring Organizations (ENEMO) deployed a Limited Election Observation Mission (LEOM), composed of six experts, to observe the 28 September 2025 parliamentary elections. The EOM's aim was to improve the transparency of the election process and assess its integrity and compatibility with international obligations of Moldova and standards for democratic elections, as well as the domestic legislative framework, paying special attention to the fulfillment of previous recommendations. The Final Report is based on findings throughout the electoral period, including post-election developments.

In its [Statement of Preliminary Findings and Conclusions](#) issued on 29 September 2025, the EOM concluded that the elections “took place in a polarized environment amid persistent disinformation and misinformation, with foreign influence and other hybrid threats seeking to shape public narratives. Despite extensive legal amendments and more proactive action by the authorities, these hostile operations at times remained ahead of institutional responses. The process was administered efficiently and within deadlines, although on substantive matters the CEC was often divided, with voting patterns at times aligned with contestants’ public positions. Late deregistrations, broad executive and security powers, and continuing risks of illicit financing may have affected public confidence in equal conditions.”

The elections took place amidst heightened hybrid threats and entrenched political polarization. Moldova’s authorities continued to pursue an ambitious reform agenda focused on de-oligarchization, anti-corruption and European integration, supported by substantial international assistance. Foreign interference, illicit financing and disinformation remained pressing concerns. The Constitutional Court validated the election results on 16 October and the first sitting of the new legislature took place on 22 October. Five election contestants obtained representation in the new Parliament: the Party of Action and Solidarity, which retained the majority with 55 seats; Patriotic Bloc, 27; Alternative Bloc, 9; Our Party and Democracy at Home, 6 seats each. The Party of Socialists of the Republic of Moldova publicly rejected the 2025 election results; however, it entered the Parliament, continuing to criticize aspects of the process while operating within the institutional framework.

The 2025 elections were the first parliamentary elections held under the 2022 Electoral Code. The legal framework provides an overall adequate basis for democratic elections. The 2022 Electoral Code was adopted through an inclusive and transparent process. The Code has been amended twelve times since its adoption and extensive changes to party, criminal, and extremism legislation were adopted shortly before the 2025 elections, without support by the parliamentary opposition. While the amendments

were necessary to address legitimate and serious election integrity risks and safeguard the genuine will of voters, their frequency and timing are not fully in line with good practice and complicate their implementation. Several of the new provisions are broadly formulated and grant wide discretion to executive and security authorities, raising concerns about proportionality, legal certainty and a potential chilling effect on freedoms of expression, assembly and association; their impact will largely depend on consistent, impartial implementation and strong judicial safeguards against arbitrary or selective enforcement.

The 101 Members of Parliament are elected in a single nationwide constituency under a closed-list proportional representation system, with thresholds of 5 percent for parties, 7 percent for electoral blocs, and 2 percent for independent candidates. Candidate lists must include between 51 and 111 candidates and comply with a 40 percent gender quota, including placement rules requiring at least four candidates of each gender in every group of ten. Elections are considered valid if turnout reaches at least one third of registered voters; in these elections turnout was 52.24 percent.

The parliamentary elections were administered by a three-tier election administration composed of the Central Election Commission, 37 district electoral councils and 2,274 precinct electoral bureaus. The Central Election Commission, a permanent body of nine members, generally managed preparations professionally and efficiently within legal deadlines, despite limited human resources and the additional workload created by extensive recent legal amendments. Sessions were public, livestreamed and largely collegial, and the Commission fulfilled a broad mandate that included, among others, voter registration, campaign and finance oversight, complaint handling, and voter education, with support from international partners. Decisions on technical matters were generally adopted unanimously but on substantive and politically sensitive matters, the Commission was often divided, with voting patterns closely mirroring election contestants' public positions in some instances. The Central Election Commission enjoyed the confidence of many interlocutors, but some of them questioned its impartiality, particularly in light of politically sensitive decisions on registration and deregistration of contestants.

Voting arrangements for citizens abroad and for residents of the left bank of the Nistru were also a subject of political debate. The number of out-of-country polling stations increased compared with 2024, while only two polling stations remained in Israel, Russia and Ukraine. By contrast, polling stations and, in particular, ballot allocation for Transnistrian voters were substantially reduced, and several polling stations were relocated shortly before election day on security grounds. The absence of clear, pre-established rules for allocating ballot papers and the heavy reliance on past turnout in this decision created risks for the equal enjoyment of voting rights and fueled perceptions among some stakeholders that access for voters residing in Transnistria was being narrowed.

Moldovan citizens who have reached 18 years of age on election day are eligible to vote. Voter registration is passive and continuous. The compilation of voter lists was

administered transparently and most interlocutors expressed confidence in their inclusiveness and overall accuracy. Voters residing in Transnistria and those without a registered domicile or residence were not included in the main lists and were registered on supplementary lists on election day. Voters were given sufficient opportunity to review their information in the voter list, both in person and online. Arrangements such as absentee voting certificates, mobile ballot boxes and an expanded postal voting pilot in ten countries provided additional opportunities for participation.

Candidate registration was generally inclusive, allowing citizens with the right to vote to stand as candidates if nominated by parties or blocs, as well as independents, and the removal of the previous limitation on signing support lists for only one contestant enhanced equality of opportunity. The CEC registered 23 contestants, including four independent candidates, out of 32 applications, mostly rejecting lists for non-compliance with the gender quota, incomplete or ineligible lists, or failure to meet internal statutory requirements. Recent amendments introduced a ten-day interval between the close of registration and the official start of the campaign, partly addressing earlier recommendations and, in principle, allowing all contestants to begin campaigning on an equal footing. In practice, however, deadlines for resolving registration-related complaints and appeals continue to overlap with the campaign period and two contestants were registered only after the campaign had started.

During the campaign, the newly introduced powers to limit party activity during the electoral period were applied in the case of the Republican Party Heart of Moldova (a member of the Patriotic Bloc), whose activities were temporarily restricted by the Chisinau Court of Appeal at the request of the Ministry of Justice and whose registration was subsequently cancelled on this basis. In a separate high-profile case, two days before election day, the CEC cancelled the registration of the political party Great Moldova and its candidate list for alleged grave financial and integrity violations, a decision later upheld by the courts. While these measures responded to genuine concerns and were upheld by the judiciary, the broad scope of the new powers to restrict party activity and cancel registration, applied immediately before election day, granted the authorities wide discretion at the most sensitive stage of the process and raised concerns about legal certainty and effective remedy.

Contestants were generally able to campaign freely through door-to-door activities, meetings in public institutions and enterprises, tent-based distribution of materials, media appearances, televised debates and extensive use of social networks, including outreach to voters abroad. The campaign was active and competitive but highly polarized, with debates centered on socio-economic issues, corruption and the country's geopolitical orientation; the tone was frequently confrontational, with mutual accusations and instances of personalized attacks that often detracted from substantive policy discussion. No in person campaigning was possible in localities on the left bank of the Nistru river, outside the effective control of the constitutional authorities, restricting voters' opportunities there to receive first-hand information. Allegations of misuse of administrative resources were recurrent, with high-ranking officials remaining highly visible in their official capacities on issues closely aligned with the ruling party's platform.

The campaign environment was strongly affected by large-scale disinformation, often traced to foreign-linked networks associated with Ilan Shor and the “Eurazia” organization, based in the Russian Federation, which amplified anti-EU and anti-government narratives and sought to erode public trust in the elections, democratic institutions, and the country’s overall democratic direction. Law-enforcement bodies maintained a strong and visible presence and significantly stepped up operations against electoral corruption and foreign-backed destabilization plots that were increasingly corroborated by domestic investigations and international sanctions measures. Despite these efforts, the scale and sophistication of malign influence at times outpaced institutional responses, indicating that further sustained and coordinated action remains necessary.

The legal framework for campaign finance is broadly in line with recommendations from the Venice Commission and GRECO. The 2022 Electoral Code and subsequent amendments significantly strengthened the regime by broadening the definition of electoral bribery, tightening rules on donations and in-kind contributions, and restricting the public promotion of philanthropic and sponsorship activities by contestants and public officials. ENEMO assesses that these measures responded to serious and legitimate concerns about illicit funding, foreign influence and vote-buying and partially addressed previous recommendations, but notes that interlocutors were divided; while many viewed them as necessary, others expressed concerns that the breadth of some provisions and the role of executive bodies could enable selective enforcement. Campaigns could be financed by public and private sources. Declared revenues and expenses were highly concentrated among a small number of contestants, with PAS, Patriotic Bloc, Alternative Bloc and Our Party accounting for the bulk of reported funding.

Contestants submitted weekly and final reports via a digital system, which was generally used on time and allowed prompt publication on the CEC website. The CEC’s oversight was active, including cross-checking of declared spending and, in one case, subjecting all donors of the Patriotic Bloc to enhanced verification on a risk basis, which uncovered several disproportionate contributions; while this reflected a more targeted approach in response to links with sanctioned individuals, it also highlighted the importance of clearly defined criteria for intensified scrutiny. Sanctions ranged from warnings and the transfer of illegal funds to the state budget to the suspension of state subsidies and, in one case, deregistration. Most contestants underlined that reporting obligations are highly demanding. Alongside declared finances, many interlocutors, including law-enforcement representatives, pointed to extensive illicit financing, including organized vote-buying and covert online operations.

The media environment is diverse but remains shaped by structural, financial and political pressures. Recent reforms to the Audiovisual Media Services Code and related legislation have brought the regulatory framework closer to European standards, including clearer definitions of illegal content and disinformation, stronger safeguards for the independence of the Audiovisual Council and tighter media ownership transparency. ENEMO notes these as important steps towards improving pluralism and accountability, but their impact is constrained by uneven implementation, outstanding gaps in the

regulation and self-regulation of online and print media, and provisions allowing the suspension of broadcasting licenses without sufficiently clear safeguards. Despite legislative and institutional progress, the combination of economic fragility, regional disparities, concentrated advertising markets and fast-evolving online disinformation continues to pose serious risks to media pluralism and the integrity of the information space. The media market remains highly concentrated and economically fragile, with independent and regional outlets facing chronic underfunding, and in some cases, harassment and safety risks.

During the campaign, monitoring by the Audiovisual Council and civil society organizations pointed to incremental improvements in professional standards but confirmed an overall uneven and often polarized media landscape, with coverage concentrated on a few leading contestants, persistent gender imbalance among sources, and repeated breaches of rules on balance, labelling and political advertising. Systematic monitoring and regular publication of the Council's reports, as well as civil society media monitoring, improved transparency of oversight and made violations more visible to the public and contestants. However, the sanctions applied had only a limited deterrent effect, as similar patterns of partisan and unbalanced coverage reappeared across monitoring periods, much problematic content shifted to less regulated online and cross-border spaces, and smaller outlets warned that cumulative penalties risked undermining their already fragile financial sustainability.

The online information space remained the most acute vulnerability in the media and electoral landscape. Social networks were the main vector for coordinated disinformation, foreign influence and covert financing, with monitoring by state bodies and civil society identifying extensive networks of inauthentic accounts across TikTok, Telegram and other platforms amplifying anti-EU, anti-government and election-delegitimizing narratives before, during and after election day. Despite some institutional developments, ENEMO assesses that enforcement in the digital sphere remains reactive and fragmented, with limited transparency around content blocking and a significant gap between the public commitments of platforms and the effective removal of harmful content.

The framework for electoral dispute resolution provided a broadly coherent hierarchy of remedies and a wide range of actors with standing, including voters, contestants, observers and electoral officials. Complaints were first examined by electoral bodies and could then be appealed to the Chisinau Court of Appeal and ultimately the Supreme Court of Justice, while electoral offences were also pursued through contravention and criminal proceedings. Most of the complaints registered by the Central Election Commission concerned misuse of administrative resources, campaign materials, campaign finance and alleged "camouflaged" blocs, alongside disputes over polling stations for left-bank voters and abroad. Although deadlines were generally respected and courts reviewed a number of cases, practice revealed shortcomings: many submissions were rejected on procedural admissibility grounds, some of which were later overturned on appeal; complaints forwarded to other bodies, particularly the police, were not systematically tracked or publicly reported; and the outcome of the large number of contravention and criminal investigations related to large-scale voter corruption and illegal funding,

remained largely opaque.

Disputes over campaign finance and party eligibility strained the system and the consistency and transparency of enforcement. Acting on information from law-enforcement and anti-corruption bodies, Heart of Moldova was removed from the race in the final days following a court decision suspending the parties' activities, based on CEC-initiated financial controls and complaints from other contestants; while Great Moldova was deregistered on the basis of consolidated complaints and information from law-enforcement bodies on serious financial irregularities. Post-election litigation focused on undeclared online campaigning and sanctions against parties and candidates, notably Democracy at Home. ENEMO assesses that reliance on expedited procedures and, in some cases, classified information, together with the late timing of key decisions, reduced legal certainty, limited judicial remedy and risked undermining the voters' ability to make an informed choice.

On election day, ENEMO's Core Team members visited a limited number of polling stations in five localities, including those established in Rezina for voters residing in Transnistria. Election day was generally calm and well-managed in the polling stations visited by ENEMO observers. Voting procedures were conducted in an orderly and transparent manner. Members of Precinct Electoral Bureaus appeared well prepared and performed their duties professionally. Observed procedural shortcomings were minor, appeared to stem from negligence rather than intent and did not materially affect the integrity of the process. Police presence around polling stations, while visible, was non-intrusive.

The legal framework guarantees non-partisan observation by domestic and international observers and generally provides for broad access to all stages of the process. Accreditation procedures for NGOs, international organizations and contestant proxies were largely implemented in line with the law, and observers accredited by the CEC could operate nationwide, including abroad. Amendments to the CEC Regulation in July 2025 introduced additional accreditation requirements on organizational capacity, expertise and funding that are not clearly grounded in the Electoral Code and whose purpose and application remain insufficiently defined. While the CEC stated that organizations would not be refused accreditation solely for failing to meet these supplementary criteria, their open-ended formulation raises concerns about legal certainty and the potential for discretionary interpretation.

The legal and institutional framework for gender equality provides important safeguards, including a 40 percent gender quota with placement rules on party and bloc lists and simplified registration procedures for women running as independents. Women made up 43.4 percent of candidates overall and three of the four independent candidates, and remain well represented in the election administration, including five of nine CEC members. Women's representation in the new parliament stands at 36.6 percent, lower than after the 2021 elections, and may decline further in the absence of provisions requiring that vacated mandates be filled by candidates of the same gender. Despite legal obligations for parties to invest part of their public funding in promoting women's

political participation, implementation and oversight remain uneven.

The legal framework provides protections for persons belonging to national minorities, and Moldova is party to key international instruments. Ballot papers were printed in Russian and Romanian and key voter information materials in five minority languages, enhancing access to electoral information for minority voters.

The legal framework contains specific guarantees for the participation of persons with disabilities (PWDs). However, there is no comprehensive official register of PWDs; and a 2025 evaluation by civil society and the Central Election Commission found that only some 5 percent polling stations were fully accessible to voters with locomotor disabilities, with 65.6 percent inaccessible and the rest partially accessible. ENEMO notes positive efforts to improve inclusivity for persons with disabilities. However serious structural barriers persist, falling short of the guarantees of equal participation in political and public life for PWDs.

INTRODUCTION AND ACKNOWLEDGMENTS

Following an invitation from the Central Election Commission, the European Network of Election Monitoring Organizations (ENEMO) deployed a Limited Election Observation Mission (LEOM), to observe the 28 September 2025 Parliamentary Elections in the Republic of Moldova. The Mission was deployed on 15 August and was composed of six Core Team members, based in Chisinau. No additional long- or short-term observers joined the Mission. The Mission was headed by Dritan Taulla.

This was ENEMO's 44th Election Observation Mission and the eighth in Moldova¹. The EOM's aim was to improve the transparency of the election process and assess its integrity and compatibility with international obligations of Moldova and standards for democratic elections, as well as the domestic legislative framework. To achieve this, ENEMO observers monitored and assessed the overall political and electoral environment, the right to elect and stand for election, conduct of election management bodies, campaigning, gender representation, electoral dispute resolutions and other crucial aspects of the process. The EOM paid particular attention to the fulfillment of previous recommendations of ENEMO, as well as those of other international and domestic stakeholders.

The Final Report is based on ENEMO observers' findings throughout the electoral period, including post-election developments, until the validation of the results by the Constitutional Court. The Report was preceded by an [Interim Report](#), issued on 16 September, and a [Statement of Preliminary Findings and Conclusions](#), issued on the day after election day, 29 September. Since their deployment, ENEMO observers conducted some 150 meetings with election management bodies, political parties and candidates, state institutions and high state officials, media, domestic civil society organizations, and other relevant stakeholders, besides observing the work of the CEC, as well as a limited number of campaign events. In order to gain a more comprehensive understanding from across the country, several of the meetings were held with stakeholders outside the capital. ENEMO would like to express its gratitude to all interlocutors of the EOM for their cooperation and support.

ENEMO's International Election Observation Mission for the 2025 Parliamentary Elections in Moldova was financially supported by the Kingdom of the Netherlands and the Soros Foundation in Moldova. The contents of this report are the sole responsibility of ENEMO and do not necessarily reflect the views of the donors.

¹ ENEMO previously observed the 2016 Presidential Elections, the 2019 Parliamentary Elections and Referendum, the 2019 Local Elections, the 2020 Presidential Elections, the 2021 Parliamentary Elections, the 2023 Local Elections, and the 2024 Presidential Elections and Constitutional Referendum in Moldova. Reports of previous elections can be found on the webpage of ENEMO.

I. BACKGROUND AND POST-ELECTION DEVELOPMENTS

Moldova is a parliamentary republic, with legislative authority vested in the unicameral 101-seat Parliament, executive authority exercised by the Government, and the President serving as head of state. In consultation with Parliament, the President designates a candidate for the position of Prime Minister. In line with the legal framework, on 17 April 2025 Parliament set parliamentary elections for 28 September 2025². Members of Parliament are elected for a four-year term.

In the 2021 early parliamentary elections the Party of Action and Solidarity (PAS) secured a majority of the seats. The Electoral Bloc of Communists and Socialists placed second, and the Shor Party, later declared unconstitutional, third³. Following the 2021 elections, the presidency, government, and parliament became politically aligned, enabling a unified reform agenda focused on anti-corruption and European integration.

Since 2021, the authorities have pursued an ambitious de-oligarchization agenda, leading to genuine, albeit fragile, progress in dismantling systemic corruption⁴ and strengthening the rule of law, as part of Moldova's broader EU accession process. Moldova applied for EU membership on 3 March 2022 and was granted candidate status on 23 June 2022. The European Council decided to open accession negotiations in December 2023, and negotiations were formally launched on 25 June 2024. A constitutional referendum was held on 20 October 2024, alongside the first round of the presidential election, in which voters narrowly approved the proposal to enshrine the country's EU accession objective in the Constitution⁵. As a result, Moldova is committed to aligning its national legislation with the EU acquis; this process is well under way, and the country successfully completed the screening process in September 2025. Moldova

² [Decision No. 77](#), of 17.04.2025 of the Parliament of the Republic of Moldova "On setting the date for the election of the Parliament"

³ In the early parliamentary elections of July 2021, the Party of Action and Solidarity (PAS) secured 63 of the 101 seats, Electoral Bloc of Communists and Socialists – 32 seats; Shor Party – 6 seats (later becoming independent candidates).

⁴ According to the Corruption Perceptions Index by the Transparency International, Moldova has improved its corruption perception index (CPI) from 30 in 2016 to 43 in 2023 (100 being "very clean").

⁵ The Preamble of the Constitution was supplemented with two new paragraphs: "RECONFIRMING the European identity of the people of the Republic of Moldova and the non-reversibility of the European course of the Republic of Moldova, DECLARING European Union integration as a strategic objective of the Republic of Moldova". In addition, the Constitution was supplemented with Chapter V, which stipulates the right of the Parliament to adopt the acts to accede to the constituent Treaties of the European Union, as well as to the acts revising the constituent Treaties of the European Union and stipulates that the provisions of the constituent Treaties of the European Union and other binding legal acts of the European Union shall take precedence over contrary provisions of domestic law, subject to the provisions of the Act of Accession.

has received substantial political⁶ and financial⁷ support from EU institutions.

Moldova's democratization efforts take place against the backdrop of Russia's ongoing war against Ukraine. The war has prompted Moldova to reduce its reliance on traditional energy supplies from Russia and to diversify energy sources⁸. The authorities have repeatedly condemned Russia's invasion and have expressed political and humanitarian support for Ukraine⁹.

Following attempts by former Moldovan politician Ilan Shor¹⁰, currently in exile, to destabilize the country, including through violent protests, the Constitutional Court declared the Shor Party unconstitutional in June 2023. However, successor structures quickly emerged. In April 2024, Ilan Shor and affiliated groups announced the establishment of the "Victory" bloc at an event in Moscow. This network continued to operate in the political sphere, including through extensive vote-buying schemes reportedly coordinated by Ilan Shor with financial and organizational support linked to Russian actors, aimed at mobilizing voters to select "No" in the 2024 constitutional referendum and to vote against the incumbent president in the 2024 presidential election.

In response to the unprecedented level of malign interference during the 2024 elections, the Parliament adopted legislation to counter successor entities, tackle electoral corruption and limit foreign influence¹¹, and law-enforcement authorities pursued

6 The European Parliament has adopted a series of resolutions underscoring support for Moldova's sovereignty, independence, and European integration path, while condemning Russia's hybrid threats and disinformation campaigns. During the electoral period, [Resolution TA-10-2025-0191](#), of September 10, 2025, condemned Russia's disinformation war, illicit financing, cyberattacks and other hybrid operations, and called for intensified EU political, financial and technical support. It also commended Moldova's progress on its accession path and urged accelerated reforms. Earlier resolutions and Association Council conclusions in 2022–2024 reaffirmed Moldova's European perspective, welcomed progress on the nine reform priorities, and urged increased macro-financial and security assistance. The European Council has likewise issued repeated conclusions confirming Moldova's EU perspective and encouraging continued reforms.

7 Since 2021, the EU has mobilized more than €2.2 billion in loans and grants for Moldova, including macro-financial assistance, budget support and humanitarian aid. In October 2024, the EU launched a €1.8 billion Growth Plan for Moldova, linked to reform progress and alignment with EU law. In addition, the EU has provided substantial energy support, including in budget aid and targeted measures to strengthen energy resilience and protect vulnerable consumers.

8 The 2025 energy crisis followed the expiration of Russian-Ukraine gas transit agreements and the suspension of deliveries to Transnistria, disrupting electricity generation and forcing Moldova to rely more heavily on imports from Romania and the European market.

9 According to [UNHCR](#), as of mid-2025 Moldova was hosting over 100,000 Ukrainian refugees, one of the highest per capita intakes in Europe.

10 Ilan Shor is a former Moldovan politician, mayor of Orhei and member of the Parliament, who was sentenced to 15 years in prison by the Chisinau Court of Appeal in April 2023 for involvement in a 2014 banking fraud. In 2022, the USA sanctioned Ilan Shor for colluding with Russia for undermining Moldova's EU bid. In 2024, the EU sanctioned Ilan Shor for orchestrating destabilizing protests funded illegally from Russia in fall of 2022.

11 Parliament of the Republic of Moldova (13.06.2025) [LAW No. 100 of 13-06-2025](#) for the amendment of certain normative acts (effectively combating the phenomenon of electoral corruption and related aspects).

related cases¹² while partner states imposed targeted sanctions on individuals and entities accused of destabilizing Moldova¹³. As a result of these measures, a number of parties were suspended or excluded from participation in the 2025 parliamentary elections¹⁴, and some were deregistered shortly before election day. Hybrid interference also included cyberattacks on electoral infrastructure, including the CEC platform, government servers, and diaspora polling stations¹⁵.

On 16 October, the Constitutional Court validated the results of the 28 September parliamentary elections, noting that no serious violations had been established that could have affected the overall outcome¹⁶. Five contestants obtained representation in the new Parliament: PAS won 55 seats; the Patriotic Bloc 27¹⁷; the Alternative Bloc 9¹⁸; and Our Party and Democracy at Home 6 seats each.

The Party of Socialists of the Republic of Moldova (PSRM) publicly rejected the 2025 election results¹⁹, alleging irregularities and abuse of administrative resources, and filed numerous complaints before and after validation. However, once the Constitutional Court confirmed the outcome, the party took up its seats and entered Parliament, continuing

12 Evgenia Gutsul - On 5 August 2025, was [found guilty](#) of two counts: knowingly accepting financing of the electoral competitor and the political party from an organized criminal group, in an extended form, as accomplices; Alexandr [Nesterovschi](#) - On 19 March, he was found guilty of passive corruption in particularly large proportions, in the interest of an organized criminal group and preparation of financing of political parties, from sources prohibited by law committed in large proportions.

13 In July 2025, the EU Council [imposed sanctions](#) on seven individuals and three entities for undermining Moldova's sovereignty and democracy, including vote-buying in the 2024 election and referendum. Among those sanctioned are close associates of Ilan Shor and leaders of successor parties. The entities include the Victory/Pobeda Bloc. On August 28, 2025, Canada [added](#) the leader of the Party Heart of Moldova, Irina Vlah, and 15 other individuals and two entities (including the Victory/Pobeda Bloc) to its sanctions schedule, citing Russian-backed interference ahead of Moldova's September 28, 2025 parliamentary elections.

14 Four parties widely regarded as successors to the Shor Party, Chance, Renaissance, Alternative and Salvation Force of Moldova, and Victory, were referred to the courts by the Ministry of Justice in August 2025; to legally dissolve as successor formations following evidence they operated under Shor's coordination. On 19 August, the Court of Appeal provisionally suspended their activities, and the Supreme Court upheld those suspensions pending final adjudication.

15 According to the Information Technology and Cyber Security Service (STISC), one of the distributed denial-of-service attacks was orchestrated simultaneously from multiple countries with over 16 million sessions generated.

16 In its Decision, the Constitutional Court determined that the appeals, along with the courts and relevant authorities, found no violations of electoral law in the election process or vote counting that could affect the results. Citing concerns over false information, political advertising, and foreign interference on video-sharing platforms, the Court will issue a document with recommendations to Parliament to safeguard electoral integrity while ensuring free expression.

17 The electoral bloc was composed of the following parties: the Party of Socialists of the Republic of Moldova (PSRM), the party of Communists of the Republic of Moldova (PCRM), political party for the Future of Moldova, political party the republican party "Heart of Moldova".

18 The electoral bloc was composed of the following parties: National Alternative Movement, Common Action Party - Civic Congress, Party of Development and Consolidation of Moldova.

19 On 5 September 2025, Igor Dodon announced that the Patriotic Bloc would stage a protest on 29 September to "defend our victory" if the authorities "stole the vote." On election night he repeated the call, urging supporters to "defend our vote" and to gather the following day at noon in front of Parliament "without party flags, only the national flag." A protest took place on 29 September in line with these appeals.

to criticize aspects of the process while operating within the institutional framework. The 12th legislature of the Parliament of the Republic of Moldova was constituted on 22 October. The inaugural session was chaired by Zinaida Greceanîi of PSRM as the eldest alternate member of the new legislature²⁰.

²⁰ In line with parliamentary rules, the first sitting was initially expected to be chaired by the oldest deputy, Vladimir Voronin, leader of the Party of Communists of the Republic of Moldova, who publicly refused to do so after disputing the legitimacy of the elections. Media subsequently reported that the role could pass to the next oldest deputy, PAS MP Nicolae Botgros, but the session was ultimately chaired by Zinaida Greceanîi as the eldest alternate member.

II. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

LEGAL FRAMEWORK

Parliamentary elections are primarily regulated by the 1994 Constitution, the Electoral Code, the Law on Political Parties and the Law on the State Automated Information System “Elections” (SAISE). Relevant provisions are further contained in the Administrative Code, the Contravention Code and the Criminal Code. The primary legislation is supplemented by binding secondary acts of the Central Election Commission (CEC), including regulations, instructions and decisions, which form an integral part of the legal framework. Moldova is a party to key international and regional human rights instruments that guarantee fundamental rights and underpin electoral integrity²¹.

These were the first parliamentary elections conducted under the new Electoral Code, adopted in 2022. The Code was broadly assessed as a step forward in consolidating the electoral legal framework, as it addressed a number of longstanding recommendations of international and domestic observers and was adopted through a transparent and inclusive process with wide public consultation²². Since its adoption, the Electoral Code has been amended on twelve occasions, including five times in 2025²³.

Following the 2024 presidential election, the authorities initiated an in-depth review of the legal framework aimed at combating electoral corruption and strengthening overall electoral integrity. The reform was prompted by massive vote buying and electoral interference during the presidential election, as well as by recommendations from the Constitutional Court and several international and domestic organizations, including ENEMO, to more effectively address these issues. The amendments significantly modified key elements of the Electoral Code, the Law on Political Parties, and other related legislation. Most interlocutors of the EOM described the process as overall transparent and inclusive. However, the parliamentary opposition did not participate.

On 29 May 2025, the Parliament adopted Law No. 130/2025, amending the Electoral Code and the Law on Political Parties. Among other changes, the law introduced

21 Inter alia, the [European Convention for the Protection of Human Rights and Fundamental Freedoms \(ECHR\)](#); [International Covenant on Civil and Political Rights \(ICCPR\)](#); [Convention on the Elimination of All Forms of Discrimination Against Women \(CEDAW\)](#); [Convention on the Political Rights of Women \(CPRW\)](#); [International Convention on the Elimination of All Forms of Racial Discrimination \(ICERD\)](#); [Convention on the Rights of Persons with Disabilities \(CRPD\)](#), [United Nations Convention Against Corruption \(UNCAC\)](#); [Framework Convention for the Protection of National Minorities \(FCNM\)](#), etc.

22 See [ENEMO’s Final Report](#) on the 2023 Local Elections in Moldova.

23 Since its adoption, the Election Code has been amended in 2023, by three legislative acts and one decision of the Constitutional Court; in 2024, by two legislative acts and one decision of the Constitutional Court; and in 2025, by five legislative acts.

the concept of a “camouflaged electoral bloc” to address covert electoral coalitions; clarified the definition of an independent candidate; strengthened financial oversight by requiring independent audits of party finances and public disclosure of their results; and established a more reasonable interval between the start of the election campaign and the deadline for candidate registration. It also clarified the procedural distinction between complaints, notifications and petitions, aiming to streamline the handling of electoral disputes and submissions.

Shortly thereafter, on 13 June 2025, parliament adopted Law No. 100/2025, which introduced an extensive package of amendments to the Criminal Code, Criminal Procedure Code, Electoral Code, Law on Political Parties, Law on Extremism and other legislation²⁴, with the stated purpose of more effectively preventing and combating electoral corruption and related phenomena. The law expanded the definition of electoral corruption to explicitly cover the promise, in addition to the offering or giving, of undue benefits to voters; significantly increased sanctions, including aggravated penalties where organized crime, foreign actors or unconstitutional entities are involved²⁵; and strengthened oversight of political finance, including through stricter limits and enhanced traceability of party and campaign funding, as well as broader grounds for financial sanctions. It also introduced expedited procedures for electoral-corruption cases, requiring that criminal investigations be completed within six months, with any extension granted by the prosecutor and notified to the Prosecutor General, and that first-instance and appeal proceedings be conducted within shortened timeframes.

The amendments further strengthened the regulatory framework for political parties. A party’s activity may be limited for up to twelve months, by decision of the Court of Appeals of Chisinau, at the request of the Ministry of Justice, where serious violations undermine sovereignty, independence, territorial integrity, national security, or public order, or where the party fails to submit mandatory financial reports or its register of members after being requested to remedy the violation. In particularly serious cases, including the subversion of electoral processes, large-scale vote buying or systematic illegal foreign funding, the Ministry of Justice may apply directly to the Court of Appeals of Chisinau without prior warning and may also seek interim limitation of a party’s activity as a protective measure for the duration of proceedings. As the law does not provide exceptions for electoral periods, such measures may be applied during an ongoing campaign. The law further prohibits the creation or use of “successor” parties to continue or resume the activity of a party declared unconstitutional.

24 Laws amended by Law no. 100/2025 were: Law No. 273/1994 on Identity Documents in the National Passport System; No.985/2002 Criminal Code; Law No. 1420/2002 on Philanthropy and Sponsorship; Law No. 54/2003 on Countering Extremist activity; Criminal Procedure Code No. 122/2003; Law No. 294/2007 on Political Parties; Law no. 26/2008 on Assemblies; Contravention Code No.218/2008; Law No.133/2011 on the Protection of Personal data; Law No. 59/2012 on Special Investigative Activity; Electoral Code No 325/2022; Law No. 136/2023 on the Intelligence and Security Service of the Republic of Moldova; Law No. 179/2023 on Counter-Informative activity and foreign informative activity.

25 Under Law No. 100/2025, the Criminal Code now punishes not only the offering or giving of benefits in electoral corruption, but also the promise of such benefits (new Art. 181¹), with significantly increased maximum penalties. Sanctions are particularly severe when such crimes involve organized crime networks or foreign actors, including fines and up to 15 years’ imprisonment.

The scope of the Law on Extremism was significantly broadened. The Intelligence and Security Service (SIS) was empowered to seek the suspension or liquidation of organizations engaged in such activity and to maintain a public register of extremist organizations and materials. The law introduced new criminal offences for leading, organizing, financing or participating in extremist organizations, and for disseminating extremist materials, and defined “persons associated with extremist organizations”, who become subject to extensive employment and financial-monitoring restrictions. The SIS was also authorized to order the provisional blocking of online content that denotes extremism, with a subsequent obligation to request a judicial determination of the material’s extremist nature from the Court of Appeals of Chisinau.

Additional provisions strengthened safeguards for personal data, including tighter restrictions and sanctions on the unlawful collection, processing or disclosure of personal data, such as the mass copying of identity documents or the collection of extensive personal data during assemblies. The amendments introduced specific contraventions related to corruption in the context of public gatherings and expanded sanctions for non-compliance with CEC decisions. They also introduced a prohibition on the public promotion of philanthropic or sponsorship activities by certain public officials and electoral contestants as a means of campaigning, while requiring reporting on such activities. Campaign rules were further reinforced through stricter sanctions for electoral corruption and limitations on direct and institutionalized third-party campaigning, partially addressing earlier ENEMO recommendations²⁶. Under the revised party and electoral legislation, the creation or use of “successor” parties for the continuation of a party declared unconstitutional is prohibited.

ENEMO assesses that the legal framework overall provides an adequate basis for democratic elections and is largely in line with international standards. The new Electoral Code and successive amendments addressed a number of longstanding concerns, including on political finance oversight and electoral-corruption offences. While the frequency and scope of amendments since 2022, in particular those adopted shortly before these parliamentary elections might reduce legal certainty, complicate implementation for electoral stakeholders and are not fully in line with good practice regarding the stability of electoral law²⁷, ENEMO notes that in view of recurring concerns about electoral corruption in previous elections, the amendments were necessary to

26 ENEMO [recommended](#) that legal provisions regulating third-party campaigning must be introduced, ensuring transparency and accountability in electoral processes and preventing unregistered entities from influencing elections without oversight. Legal amendments (Art. VIII, para 5 of Law 100/2025) tackle the most visible and institutionalized forms of third-party campaigning (NGOs, unions, employers’ associations, religious actors) but leave gaps for other actors and for transparency of third-party spending.

27 The Venice Commission’s Code of Good Practice in Electoral Matters (II.2.b.), [recommends](#) that “the fundamental elements of electoral law, in particular the electoral system proper, membership of electoral commissions and the drawing of constituency boundaries, should not be open to amendment less than one year before an election, or should be written in the constitution or at a level higher than ordinary law”

address integrity risks and safeguard the genuine will of voters²⁸.

To enhance legal certainty and in line with international good practice, substantial amendments to the electoral legal framework should not be adopted shortly before elections, and any necessary amendments should result from a broad, inclusive and transparent consultation process with all relevant stakeholders.

While the recent amendments, including those introduced by Law No. 100/2025, seek to address legitimate concerns regarding electoral integrity, several provisions are broadly formulated and confer wide discretionary powers on executive and security authorities, notably the Ministry of Justice and the SIS. In particular, provisions related to extremism, party activity limitation and dissolution, and the blocking of online content are worded in vague or open-ended terms, creating a risk of discretionary or inconsistent interpretation and enforcement. This raises concerns regarding proportionality and legal certainty and may have a chilling effect on the exercise of freedoms of expression, assembly and association. The impact of these changes will largely depend on consistent, impartial and good-faith implementation, accompanied by effective judicial oversight and robust safeguards against arbitrary or selective enforcement.

Legislation related to extremism, party regulation and security should be reviewed to ensure that key concepts and grounds for intervention are clearly defined and that any restrictions are necessary, proportionate and consistent with international human rights standards. Robust safeguards, including timely and effective judicial oversight and remedies, should be in place to prevent discretionary or selective enforcement and to protect freedoms of expression, assembly and association.

Despite improvements, the electoral legal framework would benefit from greater clarity and consistency in several areas. The framework on third-party campaigning does not comprehensively define permitted and prohibited activities or set out detailed transparency requirements for actors indirectly involved in electoral campaigns. Procedures for candidate registration remain relatively complex and are not fully standardized, leaving scope for administrative discretion and inconsistent correction of deficiencies in candidate lists. In addition, the legal framework lacks sufficiently clear provisions regulating the calculation, attribution and reporting of costs related to online campaigning and content production, despite the growing importance of social media and new technologies in election campaigns. The legislation also does not clearly delineate when an electoral subject is accountable for online content and where the boundary lies between a party's or candidate's official campaign and the personal opinions of individuals or supporters, which may affect both transparency and

²⁸ As per the Revised interpretative declaration on the stability of electoral law ([CDL-AD\(2024\)027](#)) of the Venice Commission, II.B.1: "The principle according to which the fundamental elements of electoral law should not be open to amendment less than one year prior to an election does not take precedence over the other principles of the Code of Good Practice in Electoral Matters." The Code of Good Practice on Electoral Matters ([CDL-AD \(2002\) 23](#)) of the Venice Commission, I.3.2.xv. also recommends that "the state must punish any kind of electoral fraud." See also, The [United Nations Convention Against Corruption](#), Article 5.

the balanced protection of freedom of expression in the online environment.

ELECTORAL SYSTEM

The Parliament of Moldova consists of 101 members elected through universal, equal, direct, secret, and freely expressed suffrage by proportional representation (closed lists), either submitted by political parties or electoral blocs, or as independents, in a single nationwide constituency²⁹.

Political parties, electoral blocs, and independent candidates are entitled to submit the required documentation to the CEC to be registered as election contestants. Candidate lists must include 51-111 names and comply with a 40 percent gender quota, ensuring at least four candidates of each gender within every ten positions. The nationwide electoral threshold is 5 percent for parties, 7 percent for blocs, and 2 percent for independents. An election is valid only if voter turnout reaches at least one-third of registered voters. According to the results the turnout was 52.24 percent³⁰. The Constitutional Court holds the ultimate responsibility for confirming the legality of the parliamentary elections and validating the mandates of elected MPs.

As prescribed by electoral law, the CEC established the results on 5 October³¹ and within a 24-hour deadline forwarded all required materials, including the list of MPs and alternative candidates, to the Constitutional Court. The Court then within 10 days, as 10 days timeframe is provided by the law, issued a decision confirming the election's legality³². By confirming the results and validating the mandates, the Court formally concluded the electoral process and recognized the new parliament.

29 Parliamentary mandates are allocated by the CEC to the electoral contestants using the D'Hondt method. For political parties and electoral blocs, the total number of valid votes received is divided successively by 1, 2, 3, 4 etc. until the number of seats in Parliament is reached. The seats are assigned in descending order according to the results. Independent candidates do not participate in this allocation process, instead, they are elected directly if they get at least 2 percent of all valid votes cast nationwide.

30 The CEC [Decision](#) No. 4149 regarding the centralization of results parliamentary elections of 28 September, 2025.

31 The CEC [Decision](#) No. 4153 for the approval of the Report on the results parliamentary elections of 28 September, 2025

32 On 16 October, 2025 the Constitutional Court issued [Decision](#) No. 12 on the confirmation of the results of the parliamentary elections of 28 September, 2025 and the validation of the mandates of the deputies elected to the Parliament of the Republic of Moldova

III. ELECTION ADMINISTRATION

The parliamentary elections were administered by a three-tier election administration composed of the Central Election Commission (CEC), 37 second-level District Electoral Councils (DECs), whose boundaries correspond to the second-level administrative-territorial units, and 2,274 Precinct Electoral Bureaus (PEBs).

The CEC is the highest and permanent electoral authority. It is composed of nine members appointed for a five-year term. At the time of the elections, five members were women, including the Chairperson and the Secretary. Eight members are appointed by Parliament, reflecting the representation of the parliamentary majority and opposition factions, while one member is appointed by the President.

The current composition formula will apply until the expiry of the present CEC mandate in 2026, after which a new appointment system will enter into force. Under the new system, one member will be appointed by the President, one by the Superior Council of Magistracy, and one by the government on the proposal of the Ministry of Internal Affairs. The remaining four members will be appointed by Parliament: two nominated by the majority, one by the opposition, and one proposed by civil society organizations active in the electoral field.

To further strengthen the independence of and public confidence in the election administration, the appointment of the next composition of the CEC should be conducted through an open and transparent process, based on clear, merit-based criteria.

The CEC held regular public sessions open to accredited observers, the media and representatives of electoral contestants. Sessions were livestreamed on several platforms and the recordings remained publicly accessible, while agendas were generally published in advance and CEC decisions were made available on the website shortly after adoption, contributing to transparency. However, the minutes of sessions were often published with significant delay, which reduced transparency and limited stakeholders' ability to follow the CEC's deliberations and reasoning in a timely manner. Furthermore, as election day approached, the section where entry and exit documents were published did not function, limiting access to information.

To further enhance transparency and facilitate effective public scrutiny, the CEC should ensure the prompt publication of session minutes and regular updating of all relevant sections of its website.

The CEC generally complied with its mandate to manage and organize the parliamentary elections, ensuring the largely uniform application of the electoral legislation and operating overall in a professional and efficient manner. It administered the process

within legal deadlines, while also coping with the additional workload arising from the need to revise and adopt secondary regulations following recent amendments to the electoral framework, with existing capacity gaps partly offset through support from international partners. Among other tasks, the CEC carried out financial and campaign oversight, registered electoral contestants, updated and maintained the SRV, examined and settled complaints, issued, printed and distributed ballot papers and other materials for the PEBs, and conducted voter education and awareness-raising campaigns. During the 2028 parliamentary elections, between 14 July and 5 October, the CEC held 54 official sessions and adopted 484 decisions, the majority of which related to the parliamentary elections.

The CEC generally complied with its mandate to manage and organize parliamentary elections, ensuring the largely uniform application of the electoral legislation and operating overall in a professional and efficient manner, despite limited human resources. It administered the process within legal deadlines, while also coping with the additional workload arising from the need to revise and adopt secondary regulations following extensive recent amendments to the electoral framework. Among other tasks, the CEC carried out financial and campaign oversight, registered electoral contestants, updated and maintained the SRV, examined and settled complaints, issued, printed and distributed ballot papers and other materials for the PEBs, and conducted voter education and awareness-raising campaigns. Between 14 July and 5 October, the CEC held 54 official sessions and adopted 484 decisions³³, the majority of which related to the parliamentary elections.

The decision-making process was generally collegial and characterized by mutual respect among Commission members³⁴. Agenda items were appropriately distributed and assigned for consideration. ENEMO noted that deliberations were conducted in a transparent manner, with discussions held publicly, contributing to the perception of the process as inclusive and credible. Decisions on technical matters, including procedural instructions and operational arrangements, were generally adopted unanimously, reflecting a shared understanding among members of the administrative aspects of the process. By contrast, on substantive and politically sensitive matters, the Commission was often divided, with up to three members dissenting. In several instances, voting patterns closely mirrored contestants' public positions³⁵. Many stakeholders acknowledged the CEC's professionalism and institutional credibility; however, some questioned its impartiality, a criticism that intensified after the Commission removed two electoral contestants from the race.

33 CEC [decisions](#) from 14 July and 5 October, 2025.

34 On 5 September, a CEC member alleged that colleagues attempted to intimidate him and influence his opinion. The Chairperson noted that the expression of divergent views during preparatory meetings cannot be construed as intimidation.

35 Such as the decisions on the number of polling stations and ballot papers for voters residing in Transnistria, the decision to exclude from elections the political parties Heart of Moldova and Great Moldova, etc.

While the CEC bears ultimate responsibility for registering election contestants, including verifying their compliance with electoral legislation and the Law on Political Parties, the Public Services Agency (PSA), operating under the executive, conducts a preliminary verification of parties' legal compliance and forwards to the CEC a list of those deemed eligible to contest. While this procedure is prescribed by law, the PSA's role as an intermediary effectively positions it as a gatekeeper in the registration process. ENEMO notes that the involvement of an executive institution at this stage may give rise to perceptions of bias in candidate registration and could undermine confidence in the impartiality of the process.

The CEC carried out financial and campaign oversight of electoral contestants. During the official campaign period political parties and contestants, in accordance with the law, filed regular financial statements on a weekly basis that were also subject to public scrutiny³⁶. In reviewing these reports, the CEC cooperated with other state institutions; verifying bank statements, comparing reports with publicly available data for online advertising expenditures; verifying individual donors to confirm that they have sufficient financial sources and all donations comply with legal requirements, etc. The CEC granted extensions to several parties to amend reports, while in some cases it imposed sanctions, mostly regarding late submission of reports and inaccurate information regarding online advertisement (see Campaign Finance section).

Several stakeholders informed ENEMO of heightened risks of cyberattacks by malign actors, reportedly originating from the Russian Federation, particularly targeting election-related infrastructure. In this context, ahead of the elections, the hosting of the State Automated Information System "Elections" (SAISE) was transferred to the Information Technology and Cybersecurity Service (STISC), as a measure to enhance cybersecurity and protect critical electoral infrastructure, in line with previous ENEMO recommendations³⁷. This decision nevertheless elicited criticism from some political parties, which expressed concerns about potential risks to the electoral process³⁸. According to the CEC, the operation, integrity, access to, and use of the system remained under its exclusive competence, while the STISC provided only technical hosting to ensure the secure transmission of information without access to electoral data. A number of international partners have provided support to mitigate cyber risks, including through the development and integration of a cyber hygiene module into training programs for electoral officials, which represents a positive step towards enhancing the capacity of the election administration to respond to cybersecurity threats.

36 Campaign finance reports submitted by electoral contestants can be found on the [designated webpage](#).

37 In its [Final Report](#) for the 2024 Presidential Elections and Constitutional Referendum in Moldova, ENEMO recommended reinforcing cybersecurity to ensure the CEC website remains operational during critical periods, maintaining access to voter data and preliminary results to bolster public confidence in the electoral process (priority recommendation no. 6).

38 They argued that entrusting the hosting of the SAISE system to the STISC, an institution directly subordinated to the Government, could undermine public trust in the electoral system's impartiality and security.

According to the information published by the CEC, on Election Day the digital infrastructure of the institution was subjected to one of the largest cyber campaigns observed in the Republic of Moldova. Distributed Denial of Service (DDoS) attacks were launched in a coordinated manner, with main targets being portals essential for informing voters and transmitting results³⁹. According to the CEC, during the day, almost 1 billion attack events were recorded, equivalent to about 925 gigabytes of hostile traffic⁴⁰. These large-scale attacks underscore the exposure of election-related digital infrastructure to external threats and highlight the importance of sustained investment in preventative and resilience measures.

The authorities should further enhance cybersecurity measures for electoral systems, including through regular independent security audits, the implementation and testing of incident-response plans, and clear communication protocols to inform the public and stakeholders in a timely manner about the nature and impact of any cyber incidents.

Through its Centre for Continuous Electoral Training (CICDE), the CEC implemented an extensive training program for election officials and other stakeholders⁴¹. CICDE developed standardized modules for District Electoral Councils, Precinct Electoral Bureaus and voter registrars, covering operational tasks and recent legislative amendments⁴². Training was delivered both online and in person, enabling PEB members serving abroad to participate. All materials and webinars were available in Romanian and Russian, and the mandatory certification window for election officials was extended through 26 September to accommodate late appointments⁴³. Overall, these efforts contributed to a more consistent application of procedures.

The CEC carried out voter education and public awareness campaigns throughout the process, producing multiple public service announcements and information materials. Content was available with sign language interpretation, and printed materials were distributed in Romanian and five minority languages⁴⁴.

ENEMO notes that the CEC managed the elections efficiently and within deadlines, despite limited human resources. Capacity gaps were partly mitigated through support from international partners.

39 Following web sites were attacked: voteaza.md; cec.md; alegator.md; diaspora.cec.md; pv.cec.md.

40 The CEC [Report regarding the results of the parliamentary elections of September 28, 2025](#); Subchapter 5.7.

41 Secretaries of local councils, law enforcement (police and carabinieri), representatives of electoral contestants, media representatives, service operators.

42 Training encompasses police officers (in coordination with PromoLEX), registrars, DEC and PEB members, and poll workers for postal and diaspora voting.

43 The qualification certificate is an electronic document issued by the Center for Continuing Education in the Electoral Field in accordance with the [Regulation](#) approved by the CEC, that validates an individual's completion of the required training/specialization exam, serving as confirmation of their professional knowledge of electoral and related legislation. For the position of member of the electoral council of any level as well as for the PEB members are required to hold a qualification certificate. Articles 34 (5); 38 (12). In total, out of 9,570 persons, 7,764 obtained the qualification certification in 2025.

44 Russian, Gagauz, Ukrainian, Bulgarian, and Romani.

To enable the CEC to effectively fulfil its expanded responsibilities in a sustainable manner, consideration should be given to reviewing and, where necessary, increasing its institutional and human resources, including specialized staff and technical support. Consideration could be given to developing a medium-term capacity-building strategy that progressively internalizes functions currently supported by international partners.

By law, the DECAs are permanent bodies responsible for organizing and conducting elections, coordinating the work of PEBs and overseeing their overall performance regarding the legal framework within respective second-level administrative territorial units. For the parliamentary elections, the CEC established 37 district electoral councils. No concerns were raised by the contestants regarding the composition process of the lower electoral commissions. DECAs and PEBs mostly enjoyed stakeholders' confidence.

For parliamentary elections, each DECAs was composed of seven to eleven members. The Chairperson serves on a permanent basis, while the remaining members serve for the duration of the electoral period. Two members were appointed by the court with jurisdiction over the respective district and two by the second-level local councils whose territorial mandate corresponds to the district. Furthermore, each political party represented in Parliament had the right to nominate one member to the DECAs. The CEC established two DECAs, headquartered in Chisinau, to manage polling stations abroad (No. 38) and to organize the voting process for voters residing in localities on the left bank of the Nistru River (No. 37).

The limited number of DECAs visited by ENEMO operated according to the electoral calendar, in close cooperation and coordination with the CEC and CICDE, receiving the necessary material and technical support from local administrations. Training programs were conducted in line with the calendar plan. The DECAs were responsible for organizing the PEB composition process on proposals from the local authorities at least 35 days before Election Day. Voting was conducted in 2,274 polling stations, established within designated precincts. Each polling station was managed by a PEB, composed of no less than five and no more than eleven members. The organization and establishment of these precincts were carried out by the DECAs.

For voters abroad and for those from the left bank of the Nistru (including localities temporarily outside constitutional control), the CEC decided to open 301 polling stations abroad and 12 for left-bank voters. The number and placement of polling stations abroad were determined mainly on the basis of turnout trends from the last three national elections, pre-registration data and input from the Ministry of Foreign Affairs. The configuration for left-bank voters drew on recent turnout data from the last three elections and security assessments from the Reintegration Bureau, the Police and SIS, and included the relocation of five polling stations on 25 September, just days before election day, citing specific security threats⁴⁵. Compared with the 2024 presidential election, the number of out-of-country polling stations increased (from 231 to 301),

⁴⁵ On 25 September, by [Decision No. 4098](#), the CEC relocated four polling stations for voters from the left bank of the Nistru following GIP and SIS security alerts.

while those for left-bank voters decreased (from 30 to 12), prompting criticism from some contestants and civil society representatives that access for left-bank voters was being narrowed. The authorities, however, maintained that the set-up sought to balance voter access with security considerations.

On 9 September, the CEC adopted a decision on the allocation of ballot papers for polling stations. Controversy arose around the allocation of 23,500 ballot papers for the 12 polling stations designated for voters from Transnistria, a sharp reduction from the 90,000 ballots printed for these polling stations in the 2024 presidential election, based on applying by analogy Article 40 of the Electoral Code, which regulates the determination of the number of polling stations but does not explicitly cover ballot allocation. According to the CEC's calculations, the average turnout in the first round of the last three elections was 23,264 voters and the average turnout in the second round was 28,954 voters, out of a total of 278,777 registered voters. This decision also drew objections from some stakeholders regarding the methodology used and the transparency of the process. All three opposition-appointed CEC members submitted dissenting opinions on the decision concerning the number of ballots.

ENEMO recalls that states have a positive obligation to adopt legislative and other measures to make it practically possible for all eligible citizens to exercise their suffrage without unreasonable restrictions⁴⁶. In this context, the combination of a significant reduction in the number of polling stations and ballots for voters from Transnistria, the late relocation of several stations to more distant locations on security grounds, and the absence of clear, pre-established and publicly communicated criteria for such decisions created a risk of unequal enjoyment of the right to vote⁴⁷ and fueled perceptions among some stakeholders that voters from this region were being placed at a disadvantage. An overreliance on previous turnout as the primary basis for determining the number and configuration of polling stations and for allocating ballot papers, without sufficiently taking into account the size and geographical distribution of the potential electorate, transport constraints and possible changes in voter mobilization, may not adequately reflect the actual electorate or ensure equal opportunity to participate.

To enhance transparency and predictability, clear and objective criteria should be established in law for determining the number and location of polling stations and for allocating ballot papers for voters from the left bank of the Nistru. These criteria should, in addition to historic turnout, take due account of the number of eligible voters, transportation and accessibility constraints and credible indications of voter mobilization. Any security-related changes should be based on written risk assessments, respect necessity and proportionality, and be accompanied by mitigating measures and timely, clear information to affected voters.

46 The International Covenant on Civil and Political Rights (ICCPR): "Every citizen shall have the right and the opportunity to vote and to be elected at genuine periodic elections without unreasonable restrictions". See also UN Human Rights Committee's [General Comment No. 25](#): Article 25, paras. 1 & 11.

47 The Venice Commission's Code of Good Practice in Electoral Matters (I.1.1.d) provides that deprivation of the right to vote and to be elected is permissible only if provided for by law and the proportionality principle is observed.

IV. VOTER REGISTRATION

Moldovan citizens who have reached 18 years of age on election day are eligible to vote. Citizens can be disenfranchised by a court decision imposing judicial protection measures, at odds with international obligations that prohibit discrimination based on disability⁴⁸. This blanket restriction also runs counter to the growing international trend towards supported decision-making for persons with intellectual or psychosocial disabilities, rather than automatic deprivation of legal capacity and political rights.

Voting restrictions linked to intellectual or psychosocial disabilities, including those imposed through individual court assessments, should be removed and replaced with safeguards that respect the autonomy and legal capacity of people with disabilities.

Voter registration is passive and continuous, with citizens included in the State Registry of Voters (SRV) using data from the State Registration of Population (SRP)⁴⁹. The CEC administered and updated the SRV, relying on information provided by relevant state institutions, including the Public Services Agency (PSA) and local public authorities. Voters having both domicile and residence address were included, during the period of validity of their temporary residence, on the voter's list corresponding to the polling station where they have temporary residence. Voters residing in Transnistria and those without a registered domicile or residence were not included in the main voters list and were recorded in the supplementary voter list on Election Day. Overall, the voter registration process was conducted transparently, and electoral stakeholders expressed confidence in the voter lists' inclusiveness and overall accuracy.

The SRV contained a total of 3,299,396 voters, 2,763,678 of whom were officially assigned to second level administrative territorial units within the country. The remaining 535,718 were not included in a specific location. This number included 258,624 citizens who do not have a residence, and 277,094 citizens eligible to vote with registered domiciles in the administrative-territorial units on the left bank of the Nistru River.

Voters that changed their residence or were away from their registered address on

48 Article 29 of the Convention on the Rights of Persons with Disabilities requires state parties to "...guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others" and to "Ensure that persons with disabilities can effectively and fully participate in political and public life on an equal basis with others, directly or through freely chosen representatives, including the right and opportunity for persons with disabilities to vote and be elected." According to the UN CRPD Committee's 2014 General Comment No.1, "a person's decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising their political rights, including the right to vote, the right to stand for election". In Paragraph 9.4 of its 2013 Communication No. 4/2011, the Committee states: "an exclusion of the right to vote on the basis of a perceived or actual psychosocial or intellectual disability, including a restriction pursuant to an individualized assessment, constitutes discrimination on the basis of disability".

49 The SRV is a unique integrated information system for voter registration, an integral part of the State Automated Information System for Elections, intended for the collection, storage, updating and analysis of information regarding citizens who have reached 18 years.

Election Day, could request an absentee voting certificate from their designated PEB. Voters who were unable to vote at the polling station because of health-related or other justified conditions had the possibility to request voting through a mobile ballot box, including in medical institutions, upon submission of a written request within the prescribed format and deadline; including on Election Day itself by proof of a medical certificate⁵⁰. Overall, these arrangements provided important safeguards for the participation of voters with limited mobility or those temporarily away from their domicile, and ENEMO did not receive reports that absentee or mobile voting was misused or applied in a discriminatory manner.

Voters were given sufficient opportunity to review their information in the voter list, both in person and online⁵¹. Until 21 September⁵², seven days before Election day, voters, representatives of election contestants, and observers had the right to request upon submission of the supporting documentation the PEB to include or exclude them from the list or to correct errors in their own data or that of others. In the 2025 parliamentary elections citizens had the possibility to use their new ID card as a valid document to vote⁵³. The law prescribes using the SRV to confirm a voter's domicile or temporary residence⁵⁴.

Citizens residing in ten designated countries⁵⁵ had the right to vote by mail⁵⁶. Introduced as a pilot in 2024, postal voting was extended for the parliamentary elections⁵⁷. For the 28 September elections, voting by mail was allowed for citizens with the right to vote, who during the voting period were on the territory of prior defined countries. To exercise their right to vote through postal voting eligible voters were required to register alternatively on two official dedicated websites. In total, out of 2,472 registered voters, 2055 cast their vote by mail.

Following a comprehensive evaluation of the pilot, consideration should be given to further expanding the availability of postal voting, where feasible and secure, in order to enhance opportunities for participation by citizens residing abroad.

This development is a positive step towards facilitating voter identification, provided that efforts continue to ensure that all eligible citizens, including those in rural and economically disadvantaged areas, can obtain valid identity documents in a timely and accessible manner.

50 On 26 August the CEC adopted [Decision No. 3870](#) on the voting procedure with the mobile ballot box

51 <https://verifica.cec.md/>

52 After the deadline the PEBs had to forward the information to relevant authorities for verification and update to the SRV.

53 Law [No. 112](#), Adopted on 22 May, 2025.

54 The CEC Decision [No. 3872](#), from 28 August, 2025 introduced amendments to the No. 1153/2023 Regulation, including a new Chapter on handling electronic voters list.

55 The United States, Canada, Norway, Sweden, Finland, Iceland, Japan, South Korea, Australia, New Zealand.

56 The postal voting was first piloted during 2024 presidential elections by the [Law](#) No. 109/2024 – partial implementation on postal voting; on 29 May, 2025 the [amendments](#) on technical and operational aspects on postal voting including its extension to the parliamentary elections were adopted.

57 Decision No. 109/2024 – partial implementation on postal voting

V. CANDIDATE REGISTRATION

Citizens with the right to vote were generally eligible to stand for election, except for those disqualified by law. Ineligible categories include active-duty military personnel, persons serving prison sentences or with unexpired criminal records for intentional crimes, and those deprived of the right to hold public office by a final court decision. Candidates could be nominated by registered political parties / electoral blocs or could stand as independents. In line with previous ENEMO recommendations, the legal framework no longer restricts voters to supporting only one candidate or list when collecting signatures, which enhanced equality of opportunity among candidates.

The candidate registration process took place between 20 July and 19 August⁵⁸. The CEC registered 23 electoral contestants - 15 political parties⁵⁹, four electoral blocs⁶⁰ and four independent candidates⁶¹ - from 32 applications submitted (25 by parties and blocs, and seven by independents). Eligibility for party contestants was based on data from the PSA⁶². Of 66 registered parties, the PSA identified 25 as fully eligible and 14 as under review⁶³. Of 21 individuals who requested subscription lists, seven returned them and three ultimately qualified as independents by submitting the required signatures⁶⁴. On 22 September, an electoral bloc informed its voters that it was withdrawing from the election and called upon its supporters to vote for PAS. The act did not follow the legal proceeding, as the legal way of withdrawing candidacy was 10 days prior to election day.

58 Decision [No. 3655](#) of the CEC, from 18 July, 2025.

59 The registered political parties included: the Action and Solidarity Party (PAS), Democracy Home Party (PPDA), Coalition for Unity and Welfare (CUB), Alliance of Liberals and Democrats for Europe (ALDE), Party of European Social Democrats (PSDE), Moldovan National Party (PNM), Respect Moldova Movement (MRM), League of Cities and Communes (LOC), Alliance for the Unity of Romanians (AUR), Moldovanii Alliance (MA), Respect Moldova Party (PMM), New Historical Option Party (NOI), Liberal Party (PL), Christian-Social Union of Moldova (UCSM), and Our Party. On 26 September the CEC canceled the registration of the political party Great Moldova.

60 The registered electoral Blocs were: The Patriotic Electoral Bloc of Socialists, Communists, Heart and Future of Moldova, the Alternative Electoral Bloc, the Together Bloc, and the National Union Bloc.

61 Four independent candidates were registered: Andrei Nastase, Olessea Stamate, Victoria Sanduta, and Tatiana Cretu.

62 PSA carries a key mandate in determining the eligibility of political parties, verifying that they had updated their statute, program and leadership composition in accordance with the recent legislative amendments. Under this mandate, the PSA submitted the data to the CEC, which published the list of parties eligible to stand in parliamentary elections.

63 On 14 July, based on the information provided by the PSA the [CEC published the list of political parties that have the right to participate in the parliamentary elections of September 28, 2025](#).

64 Independent candidates were able to stand upon collecting between 2000 and 2500 supporting signatures, with a reduced threshold of 1000 for women candidates.

The registration process was comprehensive and generally inclusive, with applications processed within legal deadlines. Eight parties/blocs⁶⁵ and three independents were not registered, mainly due to non-compliance with the gender quota, incomplete or ineligible lists, or failure to meet internal statutory requirements⁶⁶.

Recent amendments to the election legislation introduced a ten-day interval between the closing of candidate registration and the official start of the campaign period. This change partially addressed a long-standing ENEMO recommendation to ensure a reasonable timeframe between these stages, thereby promoting equal opportunities among contestants and greater legal certainty. The amendment enables the CEC to finalize registration decisions before the campaign begins, allowing all contestants in principle to commence campaigning on an equal footing. However, deadlines for resolving registration-related complaints and appeals continue to overlap with the campaign period. Consequently, two contestants were registered only after the campaign had started, following court decisions, which reduced their effective campaigning time, placed them at a disadvantage compared with contestants registered earlier, and contributed to delays in ballot finalization and printing.

To ensure equal opportunities for all contestants and avoid delays in subsequent electoral preparations, the deadlines for candidate registration and the resolution of related complaints and appeals should be streamlined so that all registration decisions, including those resulting from judicial review, are finalized before the start of the campaign period.

The candidate registration process was marked by numerous court interventions and instances of overlapping administrative and judicial proceedings, which highlighted persistent ambiguities in the application of new legal provisions and in the role of multiple state authorities in assessing party eligibility. The CEC's decisions were frequently contested, with courts ordering re-examination in some cases. Disputes often stemmed from the implementation of recently amended provisions concerning parties deemed "successors" to unconstitutional formations, gender quota compliance, and the use of classified information from security and law enforcement bodies. The extensive involvement of the judiciary and other institutions, including the Ministry of Justice and the Public Services Agency, contributed to delays in finalizing registration

65 Political party Moldovan National Party; Political Party "REMASTER" Party; Political Party Centrist Union of Moldova; Political Party "For People, Nature and Animals"; Professionals' Movement "Hope Nadezhda"; Political Party Modern Democratic Party of Moldova, "WE" Political Party; Electoral bloc "VICTORIE-POBEDA"

66 I.e. list of candidates of Respect Moldova and New Historical Option.

By the decisions of the [Court](#), the CEC was mandated to re-examine its [refusal](#) to register the candidate list of the Political Party New Historical Option. The CEC had initially rejected the party's candidate list, citing the alleged ineligibility of candidates. However, in its judgement, the CCA stated that the CEC had failed to properly inform the party about alleged deficiencies, preventing the party from properly following the remedy process. Moreover, the Court found that eligibility criteria were misapplied to two candidates. The Supreme Court, on [4 September, 2025](#) upheld CCA's decision and obligated the CEC to re-examine its decision regarding the political Party "Great Moldova".

decisions and reduced predictability of the registration process, and in some instances adversely affected contestants' ability to commence campaigning on an equal footing.

Procedures for candidate registration should be further streamlined and standardized, including by setting clear and uniform rules and timelines for correcting deficiencies in candidate lists and limiting administrative discretion, in order to ensure equal treatment of electoral contestants and consistent application of the law.

The mission analyzed 16 court cases regarding the registration process. On two occasions the Court of Appeals of Chisinau (CCA) ordered the CEC to re-examine its decisions rejecting parties' candidate lists, which subsequently resulted in the registration of those two parties, illustrating the overall complexity of the dispute-resolution framework⁶⁷.

In line with the new provisions prohibiting "successor" formations of parties declared unconstitutional, the CEC rejected on 19 July the registration of the "Victory" bloc, composed of four parties which the authorities considered to be successors to the banned Shor Party, and forwarded the case to the Ministry of Justice for additional legal steps under the Law on Political Parties. The bloc's appeal to the Court of Appeals of Chisinau (CCA) was dismissed as out of time (filed after the three-day legal deadline), a decision that was later upheld by the Supreme Court of Justice (SCJ). On 11 August, the Ministry of Justice filed an application with the Chisinau Court of Appeal seeking the temporary suspension of the four parties; on 19 August the court granted a temporary limitation of their activities pending a final decision on the merits. The parties appealed, but on 25 August the Supreme Court of Justice unanimously rejected the appeals and maintained the Court of Appeal's ruling, effectively preventing the bloc and its constituent parties from participating in the elections.

On 23 August, the CEC refused registration of the political party Great Moldova as the removal of one ineligible candidate led to non-compliance with the gender-quota of the list. After the party filed a complaint with the Chisinau Court of Appeals, the latter annulled the refusal on 26 August and ordered re-examination. The CEC filed a complaint to the Supreme Court of Justice, which on 30 August quashed the CCA decision. However, following a revision request, on 3 September the SCJ vacated its 30 August ruling over appearance-of-impartiality concerns and on 4 September a new SCJ panel declared the CEC's recourse inadmissible as manifestly unfounded, leaving the 26 August remedy in force. The CEC then registered the party on 5 September, after the official start of the campaign, further illustrating the impact of protracted litigation on legal certainty and effective campaigning.

⁶⁷ These political parties are Respect Moldova and New Historical Option.

By the decisions of the [Court](#), the CEC was mandated to re-examine its [refusal](#) to register the candidate list of the Political Party New Historical Option. The CEC had initially rejected the party's candidate list, citing the alleged ineligibility of candidates. However, in its judgement, the CCA stated that the CEC had failed to properly inform the party about alleged deficiencies, preventing the party from properly following the remedy process. Moreover, the Court found that eligibility criteria were misapplied to two candidates. The Supreme Court, on [4 September, 2025](#) upheld CCA's decision and obligated the CEC to re-examine its decision regarding the political Party "Great Moldova".

On 29 August, the CEC rejected the registration of the Modern Democratic Party of Moldova (MDPM) and its list of candidates, following notification from the PSA that, due to newly emerging information, the party was not deemed eligible to run for elections anymore after information was received from the security services about alleged subversive actions coordinated by individuals subject to international sanctions. The rejection was based on confidential information provided by the security and intelligence authorities⁶⁸. The absence of publicly available detail on the grounds and supporting evidence raised concerns regarding clarity, transparency and due process⁶⁹. In addition, on 22 September the Ministry of Justice filed a lawsuit before the CCA requesting the temporary suspension of the party, which was subsequently granted, limiting the party's activities for a 12-month period⁷⁰.

To ensure predictability and transparency of the candidate registration process, the Public Services Agency should provide public explanations for decisions concerning party eligibility, including the legal and factual grounds on which a party is deemed eligible, under review or ineligible to participate in elections. Furthermore, consideration could be given to establishing a cut-off date for updating PSA information for electoral purposes, to prevent reclassifications during the candidate registration period.

During the electoral campaign period, on 17 September, the CEC considered two complaints⁷¹ regarding alleged illicit financing involving the Republican Party Heart of Moldova, a member of the Patriotic Bloc⁷². Drawing on information from competent authorities, including the National Anticorruption Center, on an ongoing criminal investigation, the CEC partially upheld the claims and issued a warning to Patriotic Bloc, while also initiating comprehensive financial controls for both the party and the Bloc⁷³. In parallel, the CEC referred the matter to the Ministry of Justice to assess the applicability of Article 21 of the Law on Political Parties regarding possible limitation of the party's activities.

The following day, the Ministry of Justice petitioned the Chisinau Court of Appeal to restrict the party's activity and sought an interim order temporarily limiting its activities, pending a final judgment. The party requested a referral to the Constitutional Court for

68 PSA informed the CEC of the temporary suspension of the PDMM from the list of eligible contestants, citing information from law enforcement authorities. Letters submitted on 25 and 29 August, referred to communications from the Intelligence and Security authorities. The PSA noted that the Ministry of Justice had been formally notified to evaluate the case under Article 21 of the Law on Political Parties, with the state aim of preventing actions that could "seriously harm political pluralism and democratic principles."

69 The information regarding revocation of the political party was twice filed in the form of a letter, with no further information about appeals procedures. During a meeting with ENEMO, the Director of the PSA stated that judges adjudicating cases related to party eligibility may hold security certificates allowing them to examine classified material; however, ENEMO could not verify whether this was the case in the proceedings concerning PDMM.

70 Case file [No 2-16/25](#)

71 Submitted by the Alliance of Liberals and Democrats for Europe and the Moldovan National Party

72 CEC [decision No. 3993](#)

73 The financial control for the Heart of Moldova for the period 1 May–31 August and for the Patriotic Bloc for the period 3 August–October. The CEC request the submission of all required documents within 48 hours

a constitutional review of Article 21 paragraph 3⁷⁴ of the Law on Political Parties, which was granted by the CCA. On 25 September, the Constitutional Court issued a decision of inadmissibility⁷⁵, concluding that the contested provision did not infringe on the essence of the rights to stand for elections and for political parties. On the same day, the CCA limited the activity of the party for the period of the case examination, until the ruling on the merits⁷⁶. The next day, on 26 September, the CEC cancelled the registration⁷⁷ of the Party Heart of Moldova based on the enforceable decision of the CCA. The Patriotic Bloc, of which the party was a part, was requested to make the respective amendments to its candidate list within 24 hours, a request with which it complied.

Before the recent amendments, the Law on Political Parties guaranteed that the activity of political parties could not be limited during the electoral period. The newly introduced exception now allows the authorities to request the court to limit or suspend a party's activities during the campaign in cases of alleged grave violations⁷⁸. While this reflects legitimate concerns about protecting the integrity of the process, the broad terms of the provision and its application close to election day grant the authorities wide discretion to intervene at the most sensitive stage of the electoral process, while appeals may overlap with election day. This raises concern that late-stage restrictions may jeopardize the right to stand for election, undermine legal certainty, and leave insufficient time for an effective legal remedy⁷⁹.

74 Article 21 paragraph 32 of the Law No. 294/2007 on Political Parties was challenged. The newly amended article allows the Ministry of Justice to request a court to order the limitation of a political party's activity as a precautionary (interim) measure until a final decision on the merits of a case is rendered.

75 Constitutional Court [decision](#) from 25 September 25 2025.

76 The SCJ upheld the decision of the CCA.

77 The CEC decision No. 3993 regarding the appeal no. CEC-10AP/6 of September 2, 2025, and the notification no. CEC-7/22684 of 5 September 2025

78 Article 21(8) of the Law on Political Parties was amended by Law No. 100/2025 to permit limiting a party's activity during the electoral campaign in cases of serious violations, while maintaining that minor violations cannot justify such a limitation; previously, the provision categorically prohibited any limitation during the campaign.

79 While assessing the content of the limitation of political parties, In its [urgent opinion](#) no. 381, the OSCE/ODIHR highlighted that "It is essential that political parties are guaranteed due process, including a reasonable timeframe to respond and the opportunity to present a defense. At the same time, the proceedings should not be so prolonged as to effectively undermine their ability to participate in the political process, especially if the timeline falls during the election period. The suspension of a political party's activities during elections should be applied only in exceptional circumstances when no less drastic measures are justified, with effective means of redress and the possibility to appeal the suspension through an expedited procedure, while ensuring the right to participate in the respective court hearing." Para 86.

Two days before election day, following the examination of several complaints⁸⁰, the CEC cancelled the registration of the Political Party Great Moldova and its candidate list, citing evidence of numerous grave violations⁸¹. Furthermore, the CEC transmitted the decision to the Ministry of Justice to assess the applicability of Article 21 of the Law on Political Parties regarding possible limitation of the party's activities⁸². The CEC decision was appealed to the CCA, however, the examination of the claim was not completed before election day and continued on election day itself⁸³. The CCA rendered its decision on election day, upholding the CEC decision. On the same day, the SCJ declared the party's recourse inadmissible⁸⁴.

On 23 September the CEC reviewed information provided by the SIS and the Office of the President regarding the alleged ineligibility of two members of the party Democracy at Home list⁸⁵, on the grounds of simultaneous membership in the Alliance for the Unity of Romanians, which could constitute a hidden pre-electoral coalition (camouflaged electoral bloc)⁸⁶ under recent legal amendments. The revised list no longer met the gender quota requirements. Both parties were sanctioned with warnings, while the party Democracy at Home was requested to submit two additional candidates to bring the list into compliance with the requirements, which, according to the CEC, was fulfilled.

The possibility to limit activities of election contestants during the campaign and close to election day should be treated as an exceptional and last resort measure. Such decisions should be taken sufficiently in advance of election day, whenever possible; only in case of clearly established grave violations confirmed by judicial review; and be subject to an expedited but meaningful judicial review so that contestants in question have access to an effective legal remedy before election day.

When decisions affecting the registration or continued participation of electoral contestants rely on information provided by security or anti-corruption bodies, at least the non-sensitive elements of the factual basis and the legal grounds should be disclosed to the contestants and, whenever possible, to the public. The law should provide clear procedures on the use of classified information in electoral matters, ensuring that courts can fully examine the evidence and that contestants have a realistic opportunity to exercise their rights of defense within a reasonable timeframe.

80 Complaints were submitted by the European Social Democratic Party, the Orhei Police Inspectorate, the National Investigation Inspectorate, the Police Directorate of the Gagauzia Autonomous Territorial Unit, the Balti Police Inspectorate, the National Anticorruption Center, as well as the information presented by the Intelligence and Security Service of the Republic of Moldova.

81 Foreign and undeclared financing, voter corruption schemes, a connection with the informal "Victory" bloc, successor to the unconstitutional Shor Party, and the distribution of unmarked political materials, with indications of involvement of religious institutions

82 The CEC decision [No 4119](#)

83 The [Decision](#) of the Chisinau Court of Appeals

84 The [decision](#) of the Supreme Court of Justice

85 the CEC decision [No 4054](#).

86 A camouflaged electoral bloc is defined by article 1 of the Electoral Code, as irregular form of association between political parties and/or electoral competitors through which they carry out joint, concerted and/or coordinated electoral activities

VI. ELECTION CAMPAIGN AND CAMPAIGN FINANCE

ELECTION CAMPAIGN

The campaign is primarily regulated by the Electoral Code⁸⁷, which sets out the general rules for campaigning, including for the media and local public authorities. Other legislation, such as the Law on Advertising, the Law on Public Associations, the Contravention Code and the Criminal Code, also applies to campaign-related activities, in particular with regard to sponsorship, public order and sanctions. The CEC complements this framework through binding decisions and regulations.

The campaign begins upon the registration of an electoral contestant, but no earlier than 30 days before the election day. For the 28 September parliamentary elections, the campaign started on 29 August. Campaigning is prohibited on the day before and election day itself⁸⁸. The mission did not observe any campaign silence breaches in Chisinau⁸⁹, nor online.

Amendments to the Electoral Code introduced in 2025 established a ten-day interval between the deadline for filing candidate registration documents and the start of the campaign⁹⁰. While most electoral contestants were registered before the campaign began⁹¹, two parties were registered after its commencement, after being granted the right by court decisions⁹², highlighting a persistent misalignment between the timeframes for candidate registration, with implications for equal opportunities among

87 Election Code: Chapter VIII - electoral campaign, Chapter V - campaign financing. Electoral campaigning refers to “appeals, statements, as well as information dissemination actions aimed at determining voters to vote for one or other electoral contestants” and the electoral campaign is the period during which such activities take place, under the terms of this Code.

88 The Electoral Code defines electoral campaigning as appeals, statements, as well as information dissemination actions aimed at determining voters to vote for one or other electoral contestants. Under the Electoral Code, the electoral campaign is the period of activities that aim to convince voters to cast their votes for the election of one or another electoral contestant.

89 On election day the video appeal of the Romanian politician, George Simion to vote for Democracy at Home was published on [TikTok](#). Moldovan law prohibits foreigners from participating in election campaigning. The situation is further aggravated by the fact that the individual is banned from entering the country due to concerns over national security and public order.

90 Prospective electoral contestants are required to submit their registration applications no later than 40 days before election day. As the official campaign period begins 30 days prior to voting, the deadline for submitting applications by the contestants was 19 August for parties, blocs, and independent candidates, with the premise that the CEC should take the decision in seven days time.

91 Of the 23 electoral contestants, 15 were registered at least a week before the official start of the campaign (prior to 22 August), six were registered in the final week, and two parties after the campaign began.

92 New Historical Option and Great Moldova were registered after the campaign began, following court decisions overturning rejection by the CEC.

contestants (see Candidate Registration).

Before the official start of the campaign, the mission observed campaign-like activities, including the distribution of informational materials such as flyers, newspapers and banners⁹³, as well as political advertising on social media platforms⁹⁴. While these materials did not contain explicit calls to vote for a particular contestant, their messaging and branding blurred the distinction between permissible informational activities and the legal prohibition on early campaigning.

Most contestants were able to commence their campaign activities at the official start of the campaign period. However, some reported delays in opening dedicated bank accounts and in printing campaign materials⁹⁵, partly linked to the stricter reporting and documentation requirements introduced by recent legal amendments aimed at combating illicit funding (see Campaign Finance section). The measures were generally regarded as necessary to combat electoral fraud, including by many interlocutors among electoral contestants, but were also considered burdensome particularly for smaller parties (see Campaign Finance section).

Election contestants were generally able to campaign freely⁹⁶. The parties with the most on-field activities were PAS, the Patriotic Bloc, the Alternative Bloc and Our Party, with more limited nationwide visibility from Respect Moldova, the Party of European Social Democrats, Democracy at Home and others. Campaign activities mainly consisted of door-to-door meetings with potential voters, party activists distributing campaign materials through stationary tents, meetings at public institutions and public or private companies, media appearances, electoral debates, and campaigning on social networks. These forms of outreach were used, to varying degrees, by most major contestants; ENEMO noted that PAS often attracted larger audiences at campaign events held in public institutions and enterprises, which some interlocutors perceived as reflecting an incumbency advantage⁹⁷. Local authorities issued guidance on designated spaces for displaying campaign materials and holding campaign events, and access to such

93 The mission observed the advertising materials of Heart of Moldova, PSRM, PAS, and Great Moldova.

94 The Mission noticed a number of promoted political ads on Meta platforms (Facebook and Instagram) prior to the start of the campaign. For the 30 days preceding the election campaign (29 July - 28 August) the amount spent for ads on Meta platforms only from political parties that are contesting the elections or their candidates was at least 50,000 Euro.

95 These measures are aimed at preventing electoral corruption and illicit funding. Several electoral contestants reported to the mission delays in opening bank accounts (beyond the three-day deadline); there were few cases of banks refusing to open electoral funds for electoral contestants. The requirement for tax authorities to issue approval at printing houses prior to the production of electoral materials also contributed to delays.

96 A few contestants reported to the mission instances in which their campaign activities were obstructed by law enforcement authorities requesting additional documentation. Also a few interlocutors assessed the police presence at public gatherings and the documenting of participants as having an intimidating effect on their supporters.

97 The mission was informed that when meetings with certain contestants were scheduled, they were often set at less convenient times for institutional staff, whereas meetings with the ruling party were more likely to be scheduled at times facilitating greater attendance.

spaces was, in most cases, provided on equal terms⁹⁸. The regulations regarding the printing of the campaign materials were widely respected⁹⁹; however, the Alternative Bloc contested the placement of PAS posters in allegedly unauthorized locations¹⁰⁰, prompting the CEC to instruct the respective police inspectorate to take action. The contestants were also invited to various televised debates¹⁰¹.

Electoral messaging and media debates centered on social policies, the economy, and addressing corruption; however, foreign policy and the country's geopolitical orientation were also widely discussed¹⁰². Campaigning in the localities of the left bank of the River Nistru, temporarily outside the sovereign control of Moldovan authorities, was limited, with no parties able to meet voters in person, which continued to restrict voters' opportunities there to receive first-hand information from a broad range of contestants. Electoral contestants also carried out physical and virtual campaign activities targeting voters abroad¹⁰³.

The campaign was active and competitive, but also highly polarizing. One of the diverging topics of the campaign was the country's foreign policy direction. While some parties advocated for comprehensive alignment with the European Union, others promoted a multi-vector foreign policy, emphasizing state sovereignty, the preservation of neutrality, and traditional values. Opposition candidates blamed the ruling party for mis-management, corruption, and excessive foreign influence; for its part, the ruling party at times used strongly critical messaging, including personal attacks in its printed campaign materials¹⁰⁴. Such rhetoric contributed to a confrontational tone and occasionally detracted from substantive policy debate.

98 LOC reported not being given permission for placing a tent in Chisinau.

99 All of the printed campaign materials of the electoral contestants observed by the mission included information mandated by the law: information on the supplier, payment order information and invoice number, etc.

100 The posters referenced in the [complaints](#) were displayed on private properties and business premises.

101 The electoral debates were conducted on national and local television channels. The public broadcaster Moldova 1 invited all contestants to participate, but several did not participate: two independent candidates, political party "Christian-Social Union of Moldova", political party Great Moldova, and Electoral Bloc "Unity of the Nation".

102 The ruling party's campaign emphasized EU integration and the continuation of EU-funded development projects, while opposition parties and independent candidates criticized PAS governance, highlighting the need for judicial reform, anti-corruption measures, and greater government efficiency. In the pre-election period, public debate also focused on the intentions of opposition candidates, namely whether they would seek to form an alternative coalition or consider supporting the incumbent party.

103 The leader of the Alternative Bloc, Ion Cheban, was placed under a Schengen travel ban by the Romanian authorities, which prevented him from carrying out campaign visits to Moldovan diaspora.

104 The campaign materials presented the leaders of the opposition election blocs, Patriotic Bloc and Alternative Bloc, connected with Russia and with the criminal groups. The leaflets also included fear-based narratives, suggesting that a win in elections by the opposition would halt EU accession, restrict free travel to Europe, and involve Moldovan citizens in the Russian war. The campaign materials of PAS were challenged by the respective contestants on the grounds that they contained misleading and hate-inciting content, which is prohibited by law. The complaint was forwarded by the CEC to the police under Article 52(3) of the Contravention Code, concerning hate speech and incitement to discrimination.

Electoral contestants should exercise their right to free expression responsibly, in particular by refraining from inflammatory rhetoric and personalized attacks, and by ensuring that their messaging does not incite discrimination, undermine public order or detract from a constructive and respectful campaign environment¹⁰⁵.

The electoral campaign was marked by large-scale disinformation efforts on social media platforms (see Media section), often traced to foreign sources, with agents linked to Ilan Shor and the “Eurazia” organization identified as key actors. The coordinated networks primarily disseminated narratives aimed at discrediting the ruling party and the authorities, undermining the idea of European Union membership, and promoting broader anti-Western sentiments. The Constitutional Court, referencing opinions of the Venice Commission¹⁰⁶, noted the state’s positive obligation to counter organized disinformation campaigns.

Partially addressing previous ENEMO recommendations¹⁰⁷, recent amendments to the Contravention Code explicitly prohibit electoral campaigning during the electoral period by non-commercial organizations, trade unions, employers’ associations, subjects not registered as electoral competitors, and representatives of religious denominations¹⁰⁸. Throughout the election campaign, ENEMO nonetheless noted civil society groups and individuals engaging in political messaging that could have reasonably influenced voters’ opinions, while avoiding explicit calls to vote for or against particular contestants. The scope of the prohibition and its enforcement in respect of such borderline forms of political communication, particularly online, remained insufficiently clarified in practice.

The scope and implementation of the prohibition on third-party campaigning should be further clarified, including by distinguishing clearly between electoral campaigning and legitimate issue-based advocacy, and by ensuring that enforcement is transparent, proportionate and not used to unduly restrict freedom of expression and association. Consideration could be given to introducing transparency and reporting obligations for significant third-party spending on any political messaging that might influence the opinion of the voters during the election campaign.

105 The ICCPR guarantees freedom of expression (Article 19(2)), while Article 19(3) allows limited restrictions to protect the rights or reputations of others, as well as national security, public order, public health, or morals.

106 Venice Commission’s [Interpretative declaration of the Code of good practice in electoral matters as concerns digital technologies and artificial intelligence](#) (CDL-AD(2024)044-e).

107 See ENEMO’s [Final Report on the 2024 Presidential Elections and Constitutional Referendum](#), priority recommendation no. 4.

108 [Law No. 100 of 2025](#) (Article VIII para. 5) changed paragraph 2 of Article 52 of the Contravention Code to: “Carrying out electoral campaigning during the electoral period by non-commercial organizations, trade unions, employers’ associations, subjects not registered as electoral competitors, by representatives of religious denominations or their component parts, including in places of worship, shall be sanctioned with a fine of 100 to 140 conventional units applied to a natural person, with a fine of 200 to 400 conventional units applied to a person with a responsible position, with a fine of 500 to 800 conventional units applied to a legal person.”

Electoral contestants are prohibited from using administrative resources during the campaign¹⁰⁹. These restrictions are enforced through the Contravention Code and the Criminal Code¹¹⁰. Several interlocutors mentioned to the Mission the engagement of local level public servants in campaign activities during working hours, predominantly in favor of the ruling party¹¹¹. Prior to the official start of the election period, the Government launched an information campaign publicizing both past achievements and future plans¹¹², while the MAN party, part of the Alternative Bloc, promoted a Chisinau City Hall campaign featuring messages from the city's mayor, who is also the party leader. ENEMO assesses that such initiatives risk blurring the line between official communication in the public interest and electoral promotion.

A candidate who holds a public servant position is required to suspend their official duties from the start of the electoral campaign to prevent conflicts of interest and the illicit use of administrative resources¹¹³, with the exception of the Prime Minister and Speaker of the Parliament¹¹⁴. In this context, the Prime Minister engaged in activities in his official capacity whose timing and content closely aligned with the ruling party's campaign, and public remarks delivered in his institutional role rather than at party events blurred the line between his role as head of government and as an electoral contestant¹¹⁵. International standards urge states to ensure a clear separation between the government and political parties, thereby safeguarding the neutrality of public institutions and maintaining a level playing field for all electoral contestants¹¹⁶. A number of complaints were also submitted

109 The Electoral Code defines administrative resources as "human, financial and material resources equally available to persons with public dignified positions, persons with positions of responsibility and civil servants and which derive from the control of these persons over personnel, financial resources and allocations from the national public budget, from access to public facilities or from the administration by these persons of movable and immovable property that is part of the public domain of the state or of administrative-territorial units" (Article 1). Article 70 paragraph 6 and Article 54 paragraph 6.e. set limits on their use by election contestants.

110 Article 481 of the Contravention Code establishes penalties for illicit use of administrative resources, including favoring or consenting to the illegal use of administrative resources, during electoral periods, if this does not constitute a crime. In cases involving large-scale damage, Article 181² of the Criminal Code provides for more severe sanctions.

111 Findings from the largest domestic observation civil society organization, PromoLEX, also highlighted abuse of administrative resources in several of their interim reports.

112 Moldova Can" (from 21 May to 14 July) under the EU's Reform and Growth Plan for Moldova, the government foresees €1.9 billion in investments in roads, hospitals, digital infrastructure, childcare, and schools.

113 Election Code: Article 16, paragraph 3.

114 A review of the 26 September government press release shows that ministers jointly urged turnout and framed participation as essential to Moldova's "democratic and European" future, highlighting EU-supported investments in health, economic stability and "strong institutions," rule-of-law and anti-corruption commitments, energy resilience, and the security of the vote. These themes closely mirror PAS's campaign narrative for the 28 September elections, explicit pro-EU framing and slogans, appeals to the diaspora, emphasis on national sovereignty, and mobilization messages. Taken together, the overlap indicates that official messaging echoed key elements of the ruling party's campaign communication in the immediate pre-election period.

115 On 24 September, from the Government podium, Prime Minister Dorin Recean, also a PAS candidate, gave an official press briefing in which he commented negatively on another election contestant. The electoral bloc Alternative filed a complaint on the case (see Complaints and Appeals section).

116 Paragraph 5.4 of the 1990 OSCE Copenhagen Document.

against ministers, who were not candidates, regarding their involvement in campaign activities.

The President was also active in her official capacity throughout the electoral campaign and addressed the public with messages emphasizing Moldova's European integration path, resilience against Russian hybrid threats, and the fight against electoral corruption and foreign interference, as well as safeguarding national security and the integrity of the vote, which overlapped significantly with key campaign messages of the ruling party¹¹⁷. President Sandu also addressed the public through a number of targeted video addresses to diaspora, women, and youth on election day.

State authorities should ensure a clear separation between official duties and campaign activities during the election period, including through effective implementation of existing rules on the use of state resources. High public officials should avoid using official events and communication channels for campaign purposes and should ensure that campaign-related messages are clearly distinguished from their institutional functions.

Malign interference in the 28 September 2025 parliamentary elections was persistent, multi-layered and clearly aimed at distorting voters' will, as well as eroding public trust in democratic institutions, and the country's overall democratic direction. ENEMO's interlocutors and public information pointed to a combination of large-scale illicit financing schemes targeting pro-Russian forces, systematic vote-buying attempts, and coordinated disinformation campaigns, mainly online. Moldovan authorities reported extensive investigations into foreign funded "shadow" campaign structures and electronic wallets allegedly channeling very large amounts of money into networks designed to influence voters and destabilize institutions¹¹⁸.

Law-enforcement bodies maintained a strong and visible presence and significantly stepped up operations. From the start of the campaign, the Police launched a national information and civic awareness campaign¹¹⁹. Throughout the electoral period, law enforcement authorities also carried out operations primarily targeting alleged electoral corruption, illicit political party financing, and money laundering¹²⁰. Moreover, on 22 September, law enforcement authorities reported having conducted around 250 searches and detained 74 individuals, as part of an investigation into an alleged

117 President Maia Sandu (22.09.2025) President Maia Sandu's Address in the Context of the Parliamentary Elections of September 28, 2025; President Maia Sandu (09.09.2025) President Maia Sandu's [Speech](#) in the European Parliament.

118 The past two elections in Moldova - local elections in 2023 and presidential elections/referendum in 2024 - saw coordinated vote-buying schemes executed by Ilan Shor and political movements associated with him. In the 2022 report the Intelligence and Security Services (SIS) of Moldova [reported](#) on the Foreign interference in the electoral processes in the Republic of Moldova.

119 [Press release](#) of the General Inspectorate of Police (GIP) (03.09.2025); [Public interest messages](#) by the IGP. The information shared to the citizens through the telephone operators include the message that selling and buying the vote is fined with up to 37,500 lei (1,911 euro).

120 First operation being on 8 August, various law enforcement bodies (CNA, Police, National Anticorruption Center and the Anticorruption Prosecutor's Office) conducted around 450 searches nationwide and detained up to 40 individuals.

Russian-backed plot to incite mass riots and destabilize the country¹²¹ ahead of the elections. Many of those detained were suspected of having received training in Serbia. On 26 September, Serbian police arrested two Serbian citizens suspected of organizing combat-style training camps in western Serbia for Moldovan and Romanian citizens, allegedly aimed at preparing them to confront Moldovan law-enforcement officers during possible election-day disturbances¹²². Although institutions reacted more proactively than in previous cycles, including through tightened legislation and large-scale law-enforcement operations, the scope and sophistication of these malign activities at times outpaced institutional responses.

State authorities should further strengthen efforts to detect, investigate and sanction malign interference in elections, including vote-buying, illicit and foreign funding and other forms of external influence, by reinforcing the capacity and coordination of competent institutions and ensuring timely, proportionate legal responses that safeguard the integrity of the electoral process.

Law-enforcement bodies maintained an active presence throughout the campaign, both under the security mandate¹²³ and to detect potential election-related offences. Following the legal amendments of 2025 that introduced heightened penalties for electoral corruption¹²⁴, regulatory oversight and the enforcement of compliance were visibly scaled up. However, the public presentation by the police of printed campaign materials of the Alternative bloc as alleged evidence of “carousel voting” is of concern, as such communication preceded any judicial findings, which risked misleading voters about the facts of the case and may have unduly stigmatized a contestant¹²⁵. These extensive operations underscored the serious security challenges facing the electoral process but also prompted some concerns among interlocutors about the potential chilling effect of visible law-enforcement activity on voters and campaign participants.

While ENEMO commends law-enforcement efforts to address electoral violations, they should ensure that their security and investigative activities during the electoral process are conducted with the highest degree of professionalism, impartiality and transparency. Public communication should be balanced and strictly factual, avoid prejudging ongoing investigations, and not unduly influence voters’ perceptions of contestants. Attention should be paid to ensure that the presence of law-enforcement officers at campaign

121 [Police](#) (22.09.2025) Military camps in Serbia, organized by Russian secret services (including GRU), to create destabilization and mass disorder in the Republic of Moldova. 74 people detained.

122 [The arrested individuals](#) are accused of organizing combat-tactical training for citizens of Moldova and Romania, to resist Moldovan police officers in the event of riots during election day; Latar, the presence of Russian citizens at the Sunčana Reka military training camp was confirmed by the [President of Serbia](#).

123 Local public authorities notify the police of requests they receive regarding the establishment of campaign tents and gatherings expected to include more than 50 participants.

124 Sanctions for electoral bribery range from fines to 15 years in prison, with special penalties for candidates and campaign teams. If bribery is committed by organized criminal groups, extremist organizations, or a foreign state, penalties may increase to seven to 15 years imprisonment, alongside fines and the possible dissolution of any involved legal entities.

125 The ballots had an inscription that they were models and would have been called inadmissible for the counting at the polling stations.

events is proportionate and does not give rise to perceptions of pressure or intimidation among voters or participants.

The law prohibits electoral campaigning by the representatives of religious denominations and defines sanctions in the Contravention Code about such activity. On 31 August, the CEC publicly appealed to religious denominations to discourage and, where applicable, sanction any acts of political campaigning¹²⁶, which was acted upon by the religious authorities¹²⁷. At the same time, domestic observer organizations and media investigations reported instances in which clergy and church-affiliated channels disseminated anti-EU messages and politically charged narratives, raising concerns about the use of religious structures and authority for political purposes.

The legal framework should be effectively implemented and, where necessary, further strengthened and clarified to prevent the misuse of religious institutions and authority in electoral processes and political life, while fully respecting freedom of religion and belief.

CAMPAIGN FINANCE

Campaign finance is primarily regulated by the Electoral Code and related provisions of the Law on Political Parties, the Criminal Code¹²⁸, the Contravention Code¹²⁹, the Law on the Court of Accounts¹³⁰, and the Law on Advertising¹³¹. The CEC further details and implements this framework through binding regulations¹³² and decisions. The overall legal framework is broadly in line with recommendations issued by the Venice Commission and the Group of States Against Corruption (GRECO).

The 2022 Electoral Code and subsequent amendments introduced a more robust regulatory regime, aimed at enhancing transparency, mitigating foreign interference, preventing vote-buying, and reinforcing oversight mechanisms. Key legislative changes were introduced shortly before the 2025 elections by Law 100/2025¹³³, particularly by

¹²⁶ [The appeal of the CEC](#) (31.08.2025) to the representatives of religious denominations in the Republic of Moldova.

¹²⁷ The Metropolitanate of Bessarabia (under the Romanian Church) on 1 September, and the Moldovan Orthodox Church (under the Moscow Patriarchate) on 4 September, issued public statements urging clergy to refrain from political activity during the campaign period.

¹²⁸ Articles 181.1, 181.2, and 181.3.

¹²⁹ Chapter VI.

¹³⁰ Article 32.

¹³¹ Chapter II.

¹³² No. 1102/2023 and No. 1185/2023.

¹³³ Law No. 100/2025. The most recent law adoption was a significant legal reform aimed, among others, at fighting electoral corruption and strengthening the integrity of the electoral process. The law was passed in response to issues such as voter bribery, foreign interference, and the use of unregistered entities in recent elections.

broadening the legal definition of electoral bribery¹³⁴ and tightening rules on political donations and charitable or sponsorship activities with electoral relevance. Amendments to the Law on Political Parties and the Electoral Code clarified that donation ceilings also apply to in-kind contributions and extended the list of prohibited donors¹³⁵, while prohibiting parties from using goods or services offered on credit. Changes to the Law on Philanthropy and Sponsorship prohibit public promotion of philanthropic and sponsorship activities carried out by persons who are election contestants or subject to asset declaration obligations, and require such donors to publish an annual report on the website of the political party of which they are members; violations are sanctionable under the Contravention Code.

Taken together, these amendments, and in particular the broadened definition of electoral bribery and increased sanctions, partially address priority recommendations previously issued by ENEMO regarding the need to tackle illicit campaign financing¹³⁶. Mission interlocutors offered divergent views on these measures; while some considered them necessary and appropriate, others expressed concern that they could unduly restrict electoral competition or create avenues for the selective or politically motivated use of executive bodies under government control for political ends.

The campaign can be financed by both public funds and private donations. Public financing mechanisms include state subsidies¹³⁷ along with interest-free credits and the provision of free airtime on the public broadcaster¹³⁸. Political parties could allocate up to 70 percent of the state subsidies for campaign expenditures¹³⁹. Private donations, whether monetary or in-kind, are permitted. However, contributions originating from foreign entities, anonymous sources, and companies with significant state debts or active public procurement contracts are prohibited.

Electoral contestants were entitled to an interest-free credit of up to 50,000 MDL (approximately 2,544 EUR) from the state budget¹⁴⁰. For independent candidates a significantly lower credit ceiling of 10,000 MDL (approximately 508 EUR) was established. These low credit limits effectively rendered this public financing mechanism impractical. Final financial reports submitted to the CEC indicated minimal utilization of

134 In the Criminal Code, the offence of electoral corruption (Article 181¹) now covers not only the giving of money or goods but also the promise of such benefits (the expressed intention to reward a vote), as well as the acceptance of such promises for electoral purposes as passive bribery (Article 181³), with aggravated forms punishable by up to 15 years' imprisonment when committed in the interest of a criminal organization, using public funds or involving a large number of persons.

135 Including legal entities with tax or social security debts.

136 ENEMO's [Final report](#) on the 2024 presidential elections and constitutional referendum, priority recommendation No. 2.

137 The total annual subsidy is calculated as a percentage quota of the state budget revenues, currently set at 0.1 percent. Eligibility for and distribution of these public funds are primarily based on past electoral performance. Specific portions of the state allocation are distributed to parties based on the number of women and young people they successfully get elected in parliamentary and local elections.

138 Five minutes on television and 10 minutes on radio.

139 Election Code, Article 51.10.

140 CEC Decision No. 3668 of July 19, 2025.

the interest-free credit provision¹⁴¹. A financial instrument unutilized by the vast majority of participants is effectively redundant and does not meaningfully contribute to its stated objective of promoting a more equitable playing field in campaign funding.

To enhance the ability of smaller contestants to compete with candidates with greater financial resources, and thereby promote a more level playing field, consideration could be given to increasing the appeal of the mechanism by raising the credit ceiling.

Financial limits are applied to both contributions and overall expenditure. Donations from natural persons are capped at six average monthly salaries for the respective year¹⁴² but cannot exceed 30 percent of the donor's declared annual income from the preceding year¹⁴³. Contributions from legal entities are limited to twelve average monthly salaries¹⁴⁴.

The CEC is the primary authority responsible for the supervision and control of party and campaign finance. Its core competencies include ensuring financial transparency, monitoring compliance with legal regulations, and managing the distribution of state subsidies to eligible parties. The CEC is empowered to apply a range of sanctions, including issuing warnings, ordering the transfer of illegal funds to the state budget, initiating contravention proceedings, and, in severe cases, requesting the suspension or de-registration of a party or a contestant from the elections.

The CEC is mandated to verify the income sources for all donations from natural persons exceeding a threshold of three average monthly salaries¹⁴⁵. A distinct measure was applied to one electoral contestant. On 12 September, the CEC decided to proactively audit the income sources of all donors to the Patriotic Bloc, irrespective of the contribution amount¹⁴⁶. The CEC justified this pre-emptive measure by citing the inclusion of individuals under national and international sanctions on the Patriotic Bloc's candidate list. The verification process identified ten donors to the Patriotic Bloc whose contributions were found to be disproportionate to their declared income, thereby exceeding legal limits. The donations were ordered to be transferred to the state budget. This differentiated treatment reflected a heightened risk-based approach in response to concerns about sanctioned individuals and potential illicit funding, but also underlines the importance of applying enhanced scrutiny according to clear, objective and pre-defined criteria.

To strengthen confidence in the impartiality and predictability of campaign finance oversight, criteria and procedures for the application of enhanced scrutiny to specific contestants or donors should be exhaustively specified in the law or CEC regulations and

141 The political party "New Historical Option" was the only contestant to apply for this credit. in the amount of 50,000 MDL.

142 Based on the [Statistical Bureau](#) data it constitutes approximately 5,000 EUR.

143 10 percent for public officials.

144 Based on the [Statistical Bureau data](#) it constitutes approximately 10,000 EUR.

145 CEC regulations No. 1185/2023.

146 Decision No. 3971 of September 12, 2025.

applied consistently in a risk-based but non-discriminatory manner.

The campaign expenditure ceiling was set at a level that far exceeded actual spending by contestants¹⁴⁷. Reported campaign revenues and expenditures were highly concentrated among a few contestants, with PAS, the Patriotic Bloc, the Alternative Bloc and Our Party accounting for the bulk of declared spending, while most other contestants reported revenues below one percent of the ceiling¹⁴⁸.

To promote a more level playing field, consideration could be given to reviewing the campaign spending ceiling so that it is set at a realistic and appropriate level, better reflecting actual campaign costs and facilitating meaningful competition among all contestants.

All campaign funds must be channeled through a dedicated bank account (“electoral fund”), and contestants were not allowed to buy goods or services on credit. Contestants were required to open this account and inform the CEC of its details within three days of registration; those who did not open an electoral fund had to notify the CEC and were then not permitted to incur any campaign expenses. Some contestants reported procedural difficulties and delays in opening their electoral fund accounts. One contestant was unable to open such an account at all, as banks are not legally obliged to provide this service¹⁴⁹. The selection of banks for electoral funds was highly concentrated¹⁵⁰.

To further enhance campaign finance transparency, consideration could be given to legislative changes that would introduce a system known as “transparent accounts” for electoral campaign purposes.

ENEMO assesses that the requirement for contestants to prepay for campaign materials, combined with the short campaign period, difficulties in opening electoral fund accounts and reported delays in bank transfers, limited the ability of some contestants to conduct their campaigns effectively.

Electoral contestants were mandated to submit detailed weekly financial reports via a dedicated digital system. The CEC verified this data and ensured its publication on the

147 By law, the total amount transferable to a contestant’s dedicated electoral fund may not exceed 0.1 percent of total revenues in the State Budget for the respective year. For these elections, the CEC set the per-contestant ceiling at 75,932,486.3 MDL (approximately 3,918,495 EUR).

148 PAS reported campaign revenues of 18,105,330.36 MDL (about 926,268 EUR, some 24 percent of the limit), the Patriotic Bloc around 14 percent of the ceiling, Bloc Alternativa 11 percent and Our Party 7 percent.

149 The party Great Moldova was unable to open the bank account. Ten banks formally rejected the party’s request (MAIB, Victoriabank, FinComBank, EuroCreditBank, ProCredit Bank, Moldinconbank, Eximbank, Energbank, Comerțbank, and Otpbank).

150 A significant majority of contestants (16) chose Moldova Agroindbank, followed by three contestants who opened accounts at FinComBank. The remaining contestants were distributed one each to Moldindconbank, Eximbank, and Victoriabank.

official website. With one exception¹⁵¹, contestants adhered to the reporting deadlines, and the digital reporting system was observed to function adequately. Upon submission, these reports were made publicly accessible on the CEC's website. A final campaign finance report was due from contestants no later than three days following election day. Except for one, all contestants submitted their final reports within the deadline¹⁵².

Violations of campaign finance regulations are subject to a range of sanctions. These include administrative warnings, the transfer of illegal funds to the state budget and the suspension of state subsidies for up to four years. In the most serious cases, in particular where national security is considered to be at risk, the authorities may also request the deregistration of entire parties or candidate lists.

Until 26 September, the CEC applied sanctions sparingly, primarily issuing warnings for minor infractions related to financial reporting¹⁵³. On 26 September, two days before election day, the CEC deregistered the Great Moldova party from the contest, citing, inter alia, extensive violations of campaign finance regulations.

A further strict sanction was imposed only three days after election day. On 1 October, the political parties constituting the Unity of the Nation Bloc were deprived of state budget allocations for six months due to repeated campaign finance violations. On the same day, a warning was issued to Democracy at Home, based on an investigative report¹⁵⁴ that identified an undeclared, coordinated social media campaign benefiting the party¹⁵⁵. Four days later, on 5 October, the party was deprived of state budget allocations for 12 months for failing to comply with the CEC's request to correct its report by declaring expenditures for the aforementioned campaign. Also on 5 October, an additional six-month deprivation of state funding was imposed on the Unity of the Nation Bloc. On the same date, warnings were issued to independent candidate Andrei Nastase, the Alternative and Together electoral blocs, and the Action and Solidarity Party¹⁵⁶.

While some electoral contestants commended the regulations for their efficacy in countering illicit financing and foreign interference, many at the same time underlined the significant administrative burden they impose. A broad consensus was noted among electoral stakeholders that the campaign finance reporting requirements are overly burdensome, with contestants asserting that the associated workload reduced the time and resources available for core campaign activities and direct voter outreach. The

151 Political party New Historical Option formally missed the 15 September deadline due to technical issues and informed the CEC about the issue. The CEC took the party's justification into consideration.

152 The Christian-Social Union of Moldova party submitted its report in paper form one day after the legal deadline. The party attributed this delay to the detention of its president by law enforcement authorities. See Decision No.4148 of 5 October 2025.

153 The Respect Moldova party was issued a warning on 19 September, followed by the Unity of the Nation Bloc on 25 September.

154 Context.ro: [A TikTok network with thousands of followers raises Simion's ally from the Republic of Moldova in the algorithm.](#)

155 Decision No. 4135 of October 1, 2025.

156 Decision No. 4148 of October 5, 2025.

CEC's decisions pertaining to campaign finance were observed to be detailed, and the sanctions imposed were generally comprehensively justified within the corresponding decisions. With the exception of a few isolated cases, electoral contestants perceived the CEC's enforcement of financial reporting rules as impartial.

During the campaign period, the CEC adopted three specific decisions pertaining to the supervision of campaign financing. These decisions were adopted with a significant delay after the submission of weekly reports, which may have limited their corrective effect¹⁵⁷. Mission interlocutors, including CEC representatives, emphasized that the commission lacks sufficient institutional capacity and resources for comprehensive and timely oversight. Despite these constraints and delays, the CEC fulfilled its core duties in line with the legal framework, supported in this task by international partners. Contestants also highlighted the Commission's proactive engagement, noting its willingness to provide guidance and consultations throughout the electoral process. Nonetheless, the CEC faced criticism regarding its regulation of in-kind contributions, specifically volunteer work. Contestants were obligated to assign a monetary value to volunteer labor; however, the CEC did not furnish clear or standardized guidelines for this valuation, resulting in differing practices among contestants and affecting the comparability of reported data¹⁵⁸.

To enhance legal certainty and ensure consistent reporting among all contestants, the CEC should establish clear regulations and valuation methods for volunteer labor, including guidance on how such contributions are to be calculated and declared.

In addition to officially declared campaign expenditures, most interlocutors, including relevant law enforcement authorities, corroborated the presence of significant illicit financing during the cycle, reportedly utilized to subvert the electoral will of voters. Alleged schemes included the use of smartphone applications for voter inducement, the creation of influencer networks to disseminate targeted narratives, the operation of so-called "troll farms," and direct vote-buying. Law enforcement authorities conducted a number of searches related to illegal campaigning throughout the campaign period (see Electoral Campaign section).

While ENEMO's interlocutors acknowledged that law enforcement bodies are actively undertaking measures to counter these activities, they also expressed concern that these institutions may lack the requisite capacity to effectively address the full scope of

157 Specifically, the decision concerning reports submitted on 1 September (Decision No. 3971) was adopted on 12 September (after 11 days); the decision on reports from 8 September (Decision No. 4025) was issued on 19 September (after 11 days); and the decision regarding reports from 15 September (Decision No. 4082) was issued on 25 September (after 10 days). The decision on supervision of the reports submitted on 22 September (Decision No. 4135) regarding the fourth reporting week was issued after the election day on 1 October (after nine days). Finally, the decision regarding the last reporting week and the final reports (Decision No. 4148) was issued on 5 October (after six and four days respectively).

158 Point 68 of the [CEC regulation on campaign finance](#) stipulates that volunteer labor be valued at the average market value. This general stipulation lacks a comprehensive methodology for its application, creating significant potential for inconsistent interpretation. Consequently, the methodologies employed and the resultant declared values varied significantly among contestants.

these illicit financial operations. ENEMO positively notes the initiative by the CEC¹⁵⁹ and law enforcement bodies¹⁶⁰ to conduct a wide-ranging civic education campaign, aimed at informing the public about the illegality of vote-selling and delineating the associated legal penalties.

According to the final reports, contestants' electoral funds received 54,552,014.59 MDL (2,775,606 EUR) in total and spent 54,421,658.17 MDL (2,769,518 EUR) during the official electoral campaign¹⁶¹. The Party of Action and Solidarity reported both the highest income and expenditures, declaring revenues at 18,105,330.36 MDL (921,380 EUR) and spending 18,105,140.55 MDL (921,370 EUR), respectively.

According to data from Meta, advertisers spent approximately 86,000 EUR on content related to elections and politics in the 30 days before the campaign's official start. ENEMO estimates that during the official campaign, contestants spent approximately 224,000 EUR. Notably, some social media accounts that were not officially affiliated with contestants appeared to show signs of third-party campaigning in their sponsored content (see Electoral Campaign section). ENEMO commends the CEC for using the Meta Ad Library to cross-reference the contestants' declared campaign spending. Through this analysis, the CEC identified significant discrepancies in the data submitted by some contestants and subsequently requested further clarification.

159 See [example](#).

160 See [example](#).

161 Methodological note: as the final report of the party Christian-Social Union of Moldova was not available in the reporting system, missing data was substituted with the data from last reporting week.

VII. MEDIA

MEDIA ENVIRONMENT

Moldova's media environment is diverse but remains affected by significant structural, financial and political pressures. Recent legal reforms have brought the regulatory framework closer to European standards; however, implementation remains uneven, and the sustainability of independent outlets continues to be undermined by limited funding, staff shortages and recurring threats to journalists' safety. According to ENEMO interlocutors, these persistent vulnerabilities constrain the media's ability to ensure balanced, impartial and professional coverage and raise concerns about the integrity of the information space, despite formal guarantees of pluralism.

Economic sustainability remains a key challenge for the media sector. While financial assistance schemes, such as the Media Subsidy Fund and state support for print distribution, have provided a degree of stability, these mechanisms only partly offset chronic underfunding and do not guarantee editorial independence. The overall structure of the advertising market exacerbates this fragility. Television advertising revenue is highly concentrated among a small number of major advertising agencies, many of which, according to ENEMO interlocutors, are linked to political or economic interests. A number of independent outlets reported financial losses following the withdrawal of major advertisers or the redirection of spending towards online platforms. Some broadcasters, in turn, chose to decline political advertising from controversial actors in order to preserve credibility, which further undermined their financial sustainability. ENEMO interlocutors also noted that the growing migration of campaign advertising to digital media, where spending transparency and regulation remain limited, has placed independent and smaller outlets at an additional disadvantage in competing for financial resources.

To support the financial sustainability and independence of independent media, the funding of the Media Subsidy Fund and other state support schemes should be increased and distributed on transparent, non-partisan criteria. Furthermore, steps should be taken to address the high concentration of advertising revenues and to ensure fair and non-discriminatory access to campaign advertising across broadcasters and digital platforms.

Regional disparities continue to undermine media pluralism. In Gagauzia, political and informational control was described by several ENEMO interlocutors as almost absolute, with Russian-language and pro-Russian narratives dominating local media. Independent voices were reported to face harassment, limited access to information, and cyberattacks, while initiatives promoting multilingual content, fact-checking, or civic education remained underfunded. Similar vulnerabilities were reported to exist in Transnistria and parts of northern Moldova, where targeted narratives exploit local

grievances and fuel distrust toward central institutions. In contrast, independent broadcasters in the Security Zone were assessed as playing a vital role in bridging divided communities, often exceeding their legal obligations in providing voter information and countering disinformation. However, they reported being penalized for minor infractions, with fines equivalent to several staff salaries, which they considered a threat to their operational continuity.

Regional and minority-language outlets should be supported through targeted grants and incentives for multilingual programming and coverage of underrepresented communities, especially in Gagauzia, Transnistria, and rural districts.

Some ENEMO interlocutors expressed concern about the potential adoption of a “foreign agents” law, as periodically raised in public discourse, which could, if enacted, negatively affect the sustainability of independent journalism by targeting donor-funded outlets and thereby weakening media pluralism and democratic accountability.

LEGAL FRAMEWORK

Freedom of opinion and expression, as well as access to information, are guaranteed under the Constitution. The Audiovisual Media Services Code (AMSC) is the main legal act regulating broadcasting and audiovisual media services. Moldova is also party to key human-rights treaties protecting freedom of expression and media freedom and continues to uphold its obligations as a Council of Europe member state.

On 10 July 2025, Parliament adopted a legislative package amending the AMSC and related laws in order to align the national framework more closely with the EU Audiovisual Media Services Directive¹⁶² and the European Media Freedom Act¹⁶³. These amendments were prepared in consultation with the Council of Europe, and the Venice Commission’s opinion of June 2025 informed a number of key provisions¹⁶⁴.

The July 2025 amendments introduced clearer definitions of “illegal content”, “disinformation” and “hate speech”, extended regulatory obligations to video-sharing and other online platforms, and strengthened protections for minors and the general public. They also strengthened the institutional independence of the Audiovisual Council and

¹⁶² [Directive 2010/13/EU of the European Parliament and of the Council of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services \(Audiovisual Media Services Directive\).](#)

¹⁶³ [European Media Freedom Act](#)

¹⁶⁴ In Opinion [CDL-AD\(2025\)027](#) (16 June 2025), the Venice Commission broadly welcomed Moldova’s media-law package but recommended harmonizing the material scope and key definitions across the three drafts to prevent overlaps and gaps; reinforcing independence through transparent, criteria-based appointments with access to judicial review, and refining the Teleradio Moldova Director-General regime; ensuring that severe sanctions (e.g., licence suspension/retransmission bans) have suspensive effect pending court review; applying proportionate, ECTT-consistent measures to foreign providers; and regulating essential registration rules in primary law while avoiding mandatory registration of freelance journalists.

the supervisory body of the public broadcaster by revising appointment procedures and reducing opportunities for direct political influence. The Audiovisual Council's mandate was expanded to cover illegal content, disinformation and non-linear (on-demand) audiovisual services, reflecting the evolving media environment. While this extension is in line with European practice, several interlocutors noted that its scope has generated uncertainty, particularly regarding the regulation of online influencers and small-scale digital content creators.

The Audiovisual Council should develop and publish clear guidelines on the application of its extended mandate, including with regard to online platforms and smaller digital content providers, and ensure that monitoring and sanctioning in these areas are applied in a proportionate, transparent and predictable manner.

Complementary measures accompanied these reforms. Amendments to the Criminal Code introduced a specific offence of obstructing the work of the media or intimidating journalists, addressing long-standing safety concerns raised by domestic and international stakeholders. In parallel, rules on media ownership transparency were tightened, including by lowering the threshold that triggers disclosure obligations for significant shareholdings¹⁶⁵, with a view to limit excessive concentration of control. To promote transparency, the Audiovisual Council, the Ministry of Culture and the Global Media Registry signed a Memorandum of Cooperation to systematically monitor media ownership structures and identify political or economic affiliations¹⁶⁶.

ENEMO assesses that these reforms constitute an important step towards aligning Moldova's media legislation with European standards and improving safeguards for pluralism and accountability in the media sector. Their effectiveness, however, will depend on consistent implementation, adequate institutional resources and further progress in ensuring transparency and effective self-regulation.

Gaps in the regulatory framework persist nonetheless. Oversight of online and print media remains incomplete, as the adoption of a comprehensive law on mass media, extending transparency and regulatory obligations to print and online outlets, is still pending and the legal status, mandate and safeguards of the Press Council as the national self-regulatory body has not yet been fully defined in legislation. Concerns can also be raised about the mechanism by which the Council for the Promotion of Investment Projects of National Importance (CPIPNI) may initiate the suspension or withdrawal of broadcasting licenses without a prior court decision. The applicable legal

¹⁶⁵ The ownership disclosure threshold was lowered from 35 to 25 percent.

¹⁶⁶ Appointment procedures for both the Audiovisual Council and the Supervisory Council of the public broadcaster are now based on open public competitions with civil-society participation, while Parliament's authority to dismiss Supervisory Council members was repealed. [The Media Ownership Monitor Moldova](#) was launched in November 2024 by Global Media Registry and Media Guard. The first edition listed 45 outlets, including 13 television stations, 9 radio stations, 6 newspapers, 17 online portals, and 12 local influencers, with information on their legal and beneficial owners as well as their political and economic affiliations.

provisions lack sufficiently clear criteria and safeguards¹⁶⁷ and may permit arbitrary interference with media freedom, raising questions as to their compatibility with the requirements of legality, necessity and proportionality¹⁶⁸.

The adoption of the law on mass media and legal clarification of the Press Council's status as an independent self-regulatory body should be prioritized to strengthen oversight of online and print media, ownership transparency and self-regulation. This framework should follow inclusive public consultations and be aligned with Council of Europe and Venice Commission recommendations.

Provisions governing the CPIPNI's suspension or withdrawal of broadcasting licenses should be revised to ensure that such measures are based on clear legal criteria, necessary and proportionate, time-bound and subject to prompt and effective judicial review.

TRADITIONAL MEDIA

Traditional media continue to face structural and systemic weaknesses that limit their ability to function as fully independent and pluralistic sources of information. Balanced and issue-based coverage increasingly coexists with persistent bias, limited regional pluralism, and economic fragility. The sector struggles with low salaries, precarious employment conditions and an ongoing talent drain, particularly among young journalists. This decline in professional capacity coincides with the growing influence of unregulated online content creators, who often command larger audiences without adhering to journalistic standards.

Television and radio remain prominent sources of information for large segments of the population, despite the growing influence of online media. Yet, several broadcasters maintain close political affiliations or rely heavily on retransmitted foreign programming, particularly from Russia and Romania. Financial pressures, aggravated by a shrinking advertising market, have forced many broadcasters to depend on external or politically linked support, which might undermine editorial autonomy. Although electoral debates were designed to inform voters and allow direct comparison among contestants, their impact was diminished by the refusal of some candidates to participate, reducing voters' ability to make an informed choice.

¹⁶⁷ The provisions governing this mechanism are formulated in broad terms, rely extensively on information provided by security services and allow decisions to take immediate effect with only ex post judicial review.

¹⁶⁸ Under Article 10 of the [European Convention on Human Rights](#), any restriction on freedom of expression, including measures affecting broadcasting licenses, must be "prescribed by law", pursue a legitimate aim such as national security, and be "necessary in a democratic society". The European Court of Human Rights has interpreted this to require that restrictions be based on accessible and sufficiently precise legal norms, respond to a pressing social need, and remain proportionate to the legitimate aim pursued, with reasons that are relevant and sufficient. In media cases, the Court has repeatedly underlined the essential role of the press and audiovisual media in ensuring pluralism and democratic debate and has subjected licensing and frequency-allocation measures to particularly careful scrutiny.

Parties and candidates should participate in televised debates and civic programs to enable voters to compare platforms and leadership on an equal basis, and broadcasters should schedule such debates at accessible times and under clear, non-discriminatory participation criteria.

The 2025 parliamentary elections provided the first significant test of the revised media legislation. Broadcasters participating in campaign coverage were required to submit editorial policies and disclose advertising tariffs; by August, 33 providers had complied. The Audiovisual Council (AC) and the CEC) facilitated implementation through consultations and the launch of a free advisory service for media representatives on electoral coverage rules. The AC also strengthened its monitoring capacity by hiring additional staff, updating its methodology, and adopting transcription software in both Romanian and Russian. ENEMO assesses that these measures contributed to increased transparency and professionalism in media oversight during the campaign. However, sanctions such as fines or temporary advertising bans, while necessary to ensure compliance, may have a disproportionate impact on smaller or underfunded outlets.

Media monitoring conducted by the AC, and independent monitoring by civil society organization Independent Journalism Center (CJI) during the election campaign indicated that while professional standards improved in some outlets, the overall media environment remained uneven and often polarized.

Between 29 August and 26 September 2025, the AC monitored 22 national and regional broadcasters and recorded some 2,300 electoral news and current-affairs items, accounting for roughly one-third of total airtime. Coverage was heavily concentrated on three contestants, the Party of Action and Solidarity (PAS), the Patriotic Bloc, and the Alternative Bloc, while several smaller parties received limited visibility, which falls short of the principle of equal access for electoral contestants and remains concerning for media pluralism. Regional disparities persisted. In the first monitoring period Gagauzia Radio Television (GRT) did not feature any contestants in its electoral news, and throughout the campaign its coverage remained narrow and at times discriminatory. Gender imbalance also remained pronounced across all periods, with men consistently over-represented as sources and guests. Complementing the AC findings, monitoring by the domestic civil society organization Center for Independent Journalism (CJI) largely confirmed these patterns, noting that while many outlets maintained a formally neutral tone, indirect advantages for PAS arose from frequent positive references to government authorities and uneven framing in debates and talk shows¹⁶⁹.

¹⁶⁹ CJI's monitoring for both [13–19](#) and [20–26 September](#) confirmed the trends highlighted by the AC's monitoring. Coverage by GRT again failed to provide balanced access to contestants and presented the governing party negatively, reinforcing structural bias. Most national broadcasters, including TVR Moldova, Pro TV Chisinau, TV8, Cinema 1, and Exclusiv TV, generally adhered to professional standards, while Jurnal TV and One TV showed isolated instances of selective visibility or unbalanced moderation. Debates remained uneven in quality, and interlocutors warned that regulatory and financial pressures risk discouraging pluralistic coverage if not balanced with safeguards for editorial independence.

Broadcasters should ensure more equitable access and visibility for all electoral contestants, including smaller parties, in line with the principle of equal treatment.

Persistent non-compliance by Gagauzia Radio Television with public-service and electoral obligations should be addressed through a time-bound remedial action plan, including commitments on balanced and inclusive electoral coverage, internal editorial guidelines and staff training, with progress jointly monitored; continued failure to comply should trigger appropriate governance and management review in line with national and regional law.

Over the four monitoring periods the AC applied a range of sanctions for unbalanced or discriminatory reporting, failure to label or correctly place electoral content, misuse of opinion-poll data and breaches of advertising rules. In total, the Council imposed a series of public warnings and fines, including 12,000 lei in the first period¹⁷⁰, 16,000 lei in the second¹⁷¹, 70,000 lei in the third¹⁷², and 69,000 lei in the fourth¹⁷³, on a number of broadcasters such as GRT, Pro TV Chisinau, Jurnal TV, TVC21, Agro TV Moldova and others, and adopted additional measures following violations of the silence-period rules

170 [First AC monitoring report](#) (29 August – 5 September 2025): Of 22 monitored broadcasters, 18 included election-related content, generating 505 news items (31.4 percent of total airtime). Coverage was disproportionately concentrated on PAS, BEP, and Alternativa, which together received more than half of all exposure. GRT provided no coverage of competitors, violating its public service obligations. The AC issued 15 public warnings and two fines totaling 12,000 lei, including sanctions against GRT and Pro TV Chisinau. Gender imbalance persisted (64 percent male vs 36 percent female sources). Debates were scarce, and 20 conflict-related reports lacked the required balance. Moldova 1 provided broader coverage than in past campaigns but still fell short of its legal obligation to guarantee impartiality and pluralism.

171 Second AC monitoring report (5 – 11 September 2025): Election-related content decreased slightly to 29.9 percent of airtime, again totaling 505 news items. Nearly half (47.7 percent) of competitor coverage went to PAS, BEP, and Alternativa. Nine broadcasters covered all 23 registered contestants, but disproportionate visibility persisted. Conflict-related reporting increased, with 171 reports, 31 of which lacked balance. Gender disparities continued (65 percent male vs 35 percent female sources). A total of 21 debates were broadcast, though with scheduling irregularities. Eleven broadcasters aired 292 electoral ads, with repeated violations such as exceeding daily limits and misplacing ads within news. The AC issued nine public warnings and fines totaling 16,000 lei against seven broadcasters, including Pro TV Chisinau, TVC21 and Jurnal TV.

172 [Third AC monitoring report](#) (12 – 18 September 2025): Electoral news totaled 515 items (31.4 percent of airtime), with PAS, BEP, and Alternativa again the most visible competitors. Gender imbalance persisted (66.6 percent men vs 33.4 percent women). A total of 43 debates were broadcast, while electoral advertising reached 413 spots, with widespread irregularities including mislabeling, misplacement, exceeding legal limits, and missing contract details. The AC imposed fines totaling 70,000 lei and issued six public warnings. Pro TV Chisinau, TVC21, and Jurnal TV were among those sanctioned for repeated breaches, while moderators were criticized for failing to challenge false narratives, enabling the spread of manipulative content.

173 [Fourth AC Monitoring Report](#) (19 - 26 September) Stations fined included TVC21 (15,000 lei), Jurnal TV (12,000 lei), GRT (10,000 lei), Next TV (7,000 lei), One TV (6,000 lei), Canal Regional (6,000 lei), Exclusiv-TV (5,000 lei), Star TV (4,000 lei), and Agro TV (4,000 lei). Public warnings were issued to Moldova 1, TVR Moldova, TV8, R Live TV, Cinema 1, Pro TV Chişinău, and Vocea Basarabiei. Violations included failure to respect declared editorial policy commitments and labelling requirements, improper presentation of electoral polls, discriminatory content, and breaches of advertising rules under Art. 7(3) and Art. 9(2) of Law No.62/2022, as well as Art. 13(d) of the Audiovisual Media Services Code on preventing discrimination. Monitoring covered all 22 broadcasters participating in campaign coverage (AC report, 3 October 2025).

on 27–28 September¹⁷⁴.

While AC monitoring has become more systematic and transparent, the repetition of similar violations across periods, particularly regarding balance, labelling and discriminatory content, suggests that current sanctions have had a limited deterrent effect and that enforcement remains constrained by structural vulnerabilities in the media sector. ENEMO's interlocutors cited delays in sanctioning, limited follow-up capacity, and political or financial pressures that outweigh the cost of fines.

The Audiovisual Council's monitoring capacity should be strengthened by increasing staffing, analytical tools and professional training, while ensuring that enforcement remains proportionate and does not unduly burden smaller or regional outlets. To enhance accountability and public confidence, monitoring results and sanctions should be published promptly and in a user-friendly format, with clear methodologies and accessible data. Consideration could be given to simplifying reporting requirements and regulations for small local audiovisual media outlets, to reduce excessive burden.

In view of repeated breaches of balance, labelling and advertising rules, the sanctioning framework should be reviewed to improve its deterrent effect, including through clearer escalation for recurrent violations, the use of corrective measures (such as obligations to broadcast corrections, rights of reply or remedial programs), and more systematic follow-up on non-compliance.

ONLINE MEDIA

The digital information sphere remains the most acute vulnerability in Moldova's media and electoral landscape¹⁷⁵. Social networks dominate information consumption, but also serve as major channels for disinformation, foreign influence, and covert financing. ENEMO assesses that despite recent regulatory extensions, cooperation between authorities and technology companies is limited and enforcement remains weak, leaving the online space a key channel for manipulation and hybrid interference.

The Center for Strategic Communication (CSC) was established by Parliament in 2023 to coordinate Moldova's institutional response to disinformation. Its mandate covers the analysis of information threats and the provision of strategic advice to public authorities, media, and civil society, though it does not exercise regulatory powers. In August 2025,

¹⁷⁴ In the post-election period, the Audiovisual Council sanctioned four broadcasters for breaching the election-silence rules on 27–28 September, imposing fines totaling 11,000 lei and issuing one public warning. Eighteen of the 22 monitored television stations complied fully with the ban on electoral agitation during the silence period, while four aired content considered to influence voter preferences in violation of Article 90 of the Electoral Code.

¹⁷⁵ Between June and August 2025, investigators and civil society organizations/observers [documented a Belarus-based foreign information manipulation and interference \(FIMI\) campaign](#) systematically promoting pro-Russian narratives, delegitimizing democratic institutions, and amplifying claims of electoral fraud. Parallel investigations under the so-called "[PobedaLeaks](#)" disclosures exposed large-scale financial support to domestic actors engaged in coordinated propaganda operations.

the Center was placed under the authority of the Presidency, with representation on the Supreme Security Council, with the stated aim of improving interinstitutional coordination. ENEMO assesses that during the 2025 parliamentary elections, the CSC contributed to improved situational awareness and information-sharing among state institutions, including through analytical briefings for regulators. However, its activities remained largely reactive, its public visibility limited, and several civil-society and media interlocutors expressed concern that the transfer to the Presidency may affect its perceived independence and accountability¹⁷⁶.

The institutional independence, transparency and accountability of the CSC should be strengthened, including through clear public reporting, a balanced and pluralistic composition, and regular consultation with independent media and NGOs. ENEMO also recommends that the authorities develop a comprehensive digital strategy addressing disinformation, online harassment and covert financing, coordinated among relevant state institutions and civil society.

The Security and Intelligence Service (SIS) retains the authority to block websites accused of disseminating disinformation or malign influence, a measure authorities justify as necessary to protect national security. While intended to counter hybrid threats, the lack of clear, publicly accessible criteria for blocking and limited avenues for appeal have raised concerns among stakeholders regarding proportionality and due process. During the campaign, the SIS ordered the blocking of more than 35 websites identified as pro-Kremlin or as sources of coordinated disinformation. The measure was presented as temporary, with internet providers instructed to maintain blocklists “for as long as circumstances persisted”, yet ENEMO interlocutors noted that several of these sites reappeared under new domains, illustrating both the scale of the challenge and the limits of enforcement in the digital sphere¹⁷⁷.

ENEMO recommends reviewing and codifying procedures governing the SIS’s authority to block online content, ensuring that any restrictions are based on clear and foreseeable legal criteria, are necessary and proportionate, strictly time-bound, and subject to independent judicial oversight and effective appeal.

Monitoring by a number of civil society organizations collectively identified more than 900 coordinated accounts across TikTok, Telegram, Facebook, Instagram, YouTube, and

¹⁷⁶ [Presidential Decree on the Center for Strategic Communication](#) set the CSC’s staffing ceiling at 29 positions and created directorates for situational awareness and resilience. Following its transfer, several pro-Russian outlets and coordinated online networks (including *Canal 5*, *Komsomolskaia Pravda*, and related Telegram channels) sought to discredit the institution by portraying it as a “Ministry of Truth” and spreading false narratives about censorship and repression.

¹⁷⁷ See also, Rise Moldova [Report](#), September 2025.

Threads amplifying anti-EU, anti-government, and election-delegitimizing narratives¹⁷⁸. These networks combined AI-generated content, cloned videos, and microtargeting techniques to create the illusion of organic popularity, with TikTok and Telegram¹⁷⁹ emerging as central channels of manipulation. ENEMO's mission observed similar patterns, including clusters of TikTok accounts using the hashtag #AlegMoldova, with seemingly AI-generated profile images and near-identical names, as well as Telegram channels promoting narratives that aimed to discredit the legitimacy of elections, erode trust in institutions, and polarize voters.

Following election day, these networks rapidly adapted to platform enforcement measures by migrating content to newly created clone accounts¹⁸⁰. The narratives recycled across these accounts remained consistent with pre-election disinformation themes, including claims that Moldova had "lost sovereignty" to the EU, attacks against the ruling party, and allegations of electoral fraud. On and after voting day, these messages intensified, alleging bomb threats, the exclusion of Transnistrian voters, and broader manipulation of results.

In the post-election period, the disinformation shifted to two central narratives, that PAS's victory was secured only through diaspora votes, and that the elections were not a genuine democratic exercise but an "exercise in maintaining power." These messages were accompanied by calls for protests and demands for early elections. ENEMO assesses that this post-election continuation of coordinated disinformation demonstrates both the adaptability of malign networks and the persistent vulnerability of Moldova's digital information space despite platform cooperation and enforcement efforts.

178 - A [PromoLex Report](#), September 2025, confirmed that in just three days, coordinated posting by nearly 500 fake accounts propelled this hashtag to over one million views, primarily through automated or duplicated content spreading anti-EU and anti-government messaging.

- Complementary monitoring by the CIJ [identified broader pro-Kremlin narratives on TikTok](#), such as fear of war, claims of "European colonization" and portrayals of Europe in crisis, designed to erode support for EU integration while casting Russia as a protector.

- [Monitoring by Disinfo.md](#) further revealed the expansion of a network of around 25 Telegram channels, collectively reaching over 30,000 followers, which present themselves as local community pages sharing useful information such as weather updates or cultural events. In practice, roughly one-third of their content promotes Ilan Shor and his associates, including Evghenia Gutul and Victoria Furtuna, or attacks the ruling PAS, blending propaganda seamlessly into otherwise ordinary local news to disguise its political intent.

- [YouTube monitoring by CIJ](#) revealed at least 15 coordinated channels disseminating narratives portraying President Maia Sandu's administration as illegitimate, accusing the government of political persecution, and alleging fabricated election results. Comment sections on these channels showed copy-paste messaging and synchronized posting, simulating large-scale domestic support for opposition narratives.

179 Telegram played a dual role as both a messaging platform and a tool of coordinated harassment. ENEMO's interlocutors reported smear campaigns, doxing, and the circulation of deepfake materials targeting journalists and public figures, often linked to pro-Russian information networks. Law enforcement traced several such operations to Belarusian and Russian IP addresses, illustrating the cross-border dimension of these influence efforts.

180 E.g., According to [monitoring by Mediaticritica.md](#), major blocked accounts such as TV6.press and primulinmoldova re-emerged under new profiles within hours, continuing to disseminate coordinated messaging.

Although law enforcement agencies announced a cooperation framework with TikTok in early September to accelerate the suspension of harmful accounts within one to three hours, the General Police Inspectorate reported that 95 percent of official takedown requests were rejected. TikTok publicly committed to introduce electoral safeguards and launched an in-app Election Center in partnership with the CEC and Stop Fals!, alongside expanded fact-checking partnerships and the removal of coordinated inauthentic behavior. Nevertheless, the gap between public commitments and effective enforcement demonstrates the platform's ambiguous role, remaining simultaneously a key information source and a conduit for malign content.

Cooperation with technology companies and social media platforms should be strengthened through formal agreements for rapid removal of illegal or manipulative content, transparent reporting on takedown requests, and improved moderation in Romanian and Russian.

Social media platforms should assume greater responsibility for safeguarding electoral integrity by strengthening real-time monitoring and removal of disinformation and unauthorized political content, and by cooperating proactively with national authorities and independent observers so that coordinated disinformation campaigns and illegal electoral interferences are swiftly detected, transparently addressed and prevented from recurring.

Domestic countermeasures, such as fact-checking initiatives, media literacy campaigns, and digital monitoring, have expanded in recent years but remain under-resourced relative to the scale and sophistication of online threats. Initiatives such as Factual.md, Stop Fals!, and WatchDog.md continued to debunk false narratives and provide real-time corrections, yet their reach is limited, especially among audiences in rural areas and Russian-speaking audiences.

Media literacy initiatives should be strengthened through sustainable funding, integration into educational programs and targeted outreach in vulnerable regions such as Gagauzia, Transnistria and rural districts. To maximize their impact, independent media and fact-checking organizations should enhance collaboration, share methodologies, coordinate debunks and avoid duplication.

Amid these challenges, independent online outlets, especially those targeting youth and local audiences, made efforts to expand civic engagement, using multilingual subtitling, explanatory videos and live coverage of electoral events. However, their financial and operational sustainability remains precarious, undermined by donor dependency, shrinking advertising revenues, and rising online harassment. Cases of content impersonation, coordinated reporting attacks, and denial-of-service attempts were also reported.

International partners and donors should continue supporting independent and regional media, particularly those producing multilingual or investigative content, by prioritizing capacity-building, digital security, and cross-border collaboration against disinformation,

as well as promoting cooperation with EU media regulators to harmonize standards and strengthen journalist protection.

ENEMO assesses that, despite some progress in cooperation between authorities, platforms and civil society, the speed, scale, and sophistication of online disinformation continue to outpace institutional and civic responses. The digital space remains one of the most significant risks to Moldova's information integrity and democratic resilience, requiring sustained investment in strategic communication, platform accountability, and digital literacy to prevent further erosion of public trust.

VIII. ELECTION DISPUTE RESOLUTION

Election-related dispute resolution is governed primarily by the Electoral Code and CEC regulation¹⁸¹, complemented by the Administrative Code, the Law on Advertising and the Law on Freedom of Expression. Administrative electoral offences are regulated by the Contravention Code, while criminal offences are covered by the Criminal Code. The legal framework guarantees the right to an effective legal remedy and stipulates that electoral dispute resolution should be guided by the principles of independence, impartiality, collegiality, transparency, legality, certainty and professionalism. Election-related cases are dealt with in three main forms: complaints (electoral disputes) under the Electoral Code, administrative contraventions under the Contravention Code, and criminal offences under the Criminal Code.

The Electoral Code defines a complaint (*contestație*) as a written claim submitted in accordance with Articles 91–95, challenging actions, inactions or decisions that allegedly violate electoral rights. In parallel, the CEC also receives notifications (*sesizări*)¹⁸², which inform the authority of electoral issues of personal or public interest without necessarily alleging a concrete rights violation¹⁸³. Recent amendments removed references to notifications from the article regulating complaints, but in practice both instruments continued to be used during these elections. Complaints may be submitted in person, by e-mail or by post. Once registered, the chair of the competent electoral body designates a rapporteur from among its members to verify admissibility, prepare the file and present it for consideration.

The right to seek legal remedy is granted to individual voters, registered candidates, initiative groups, electoral blocs, election contestants and referendum participants, as well as political parties with the right to participate in elections. Electoral officials, accredited observers and associations whose accreditation was refused also have standing to challenge decisions of electoral bodies that directly affect their rights, particularly where sanctions have been imposed. In line with the principle of hierarchical review, such challenges must first be addressed to the higher-level electoral commission. The Electoral Code establishes a clear and hierarchical appeal mechanism, preventing parallel examination of the same matter by different bodies: complaints against electoral bodies are submitted to the hierarchically superior commission, decisions of the CEC are appealed to the Chisinau Court of Appeal, and decisions of the latter may be challenged before the Supreme Court of Justice (SCJ). Courts may only examine electoral disputes

¹⁸¹ Regulation No. 1128/2023 on the examination procedure of complaints during the electoral period

¹⁸² Individuals whose rights are not directly violated may send a notification to the CEC about alleged violations of electoral legislation. Electoral bodies are now required to verify *ex officio* whether appeals meet admissibility requirements. In the case of inadmissibility, the appeal is rejected without being considered on the merits.

¹⁸³ Article 9.3 Administrative code. “By notification, the public authority is informed about a problem of personal or public interest.”

after the mandatory administrative review before the competent commission has been exhausted.

According to CEC data, between 19 August and 28 September 2025 the Commission received and registered 92 complaints under Article 91 of the Electoral Code, and a further six complaints were submitted after election day. Most concerned alleged misuse of administrative resources, unlawful placement or format of campaign materials, participation in campaigning by electoral officials, violations of campaign finance rules and the existence of a “camouflaged electoral bloc”. Between 30 July and 1 October, the CEC also published 67 notifications.

Several complaints and notifications were declared inadmissible on procedural grounds, including for lack of proof of an injured right, failure to attach supporting evidence or submission outside legal deadlines. Complaints concerning defamation, hate speech or discrediting content were rejected as falling outside the CEC’s competence¹⁸⁴. On 16 September, the Chisinau Court of Appeal partially upheld an appeal against one such inadmissibility decision, annulled the CEC’s letter and ordered re-examination on the merits of a complaint alleging misuse of administrative resources, noting that blanket reliance on inadmissibility does not provide a timely, reasoned and effective remedy¹⁸⁵.

To prevent inconsistent application of admissibility rules, the CEC should adopt uniform procedural guidelines for assessing complaints and notifications, including clear requirements for standing and evidence. The distinction between complaints and notifications should be based on transparent criteria, contributing to greater predictability and consistency in dispute resolution.

While the legal framework provides mechanisms to address electoral violations within short deadlines, many complaints and notifications were forwarded to other state institutions, most frequently to the General Police Inspectorate for examination as contraventions. Once forwarded, the status and outcome of these cases are not systematically tracked or made public. ENEMO assesses that this practice reduces transparency, complicates public scrutiny and risks undermining the right to a timely and effective legal remedy.

The CEC, in cooperation with law enforcement bodies and other competent institutions, should establish accessible mechanisms to track and publicly report on the status and outcome of complaints and notifications, including those forwarded for contravention or criminal proceedings, in order to safeguard the right to a timely and effective remedy.

Several disputes concerned the number and location of polling stations for voters in sensitive areas. Three appeals¹⁸⁶ by two individual voters and the Patriotic Electoral

184 In these cases, the CEC requires these claims to be resolved under the Law No. 64/2010 on freedom of expression.

185 Case No. [3-104/25](#).

186 Case No. [3-82/25](#); Case No. [3-83/25](#); Case No. [3-87/25](#);

Bloc challenged CEC decisions reducing the number of polling stations for voters from the Left Bank of the Nistru River. The Chisinau Court of Appeal rejected the complaints, holding that the CEC had acted within its powers under Article 40 of the Electoral Code, and the SCJ declared the Patriotic Bloc's recourse inadmissible. On 1 September, the Court of Appeal dismissed as unfounded a lawsuit by the Patriotic Bloc¹⁸⁷ seeking to increase the number of polling stations in the Russian Federation from two to fifteen, and to establish additional polling stations in Ukraine and Israel.

On election day, the Patriotic Bloc filed an appeal against the CEC based on three original complaints submitted on Election Day concerning the voting process for citizens from Transnistria. The original complaints filed to the CEC alleged a reduced number of ballots and the exhaustion of ballots at specific polling stations¹⁸⁸. The CEC responded that the administrative issues raised in the Bloc's complaints were dealt with immediately on Election Day through coordinated, legally compliant actions by the electoral and police authorities, and that the alleged threats were external acts of destabilization. In relation to the exhaustion of ballots at two polling stations, the CEC stated that affected voters had been redirected to nearby polling stations in Anenii Noi and Căușeni. The Chisinau Court of Appeal declared the Bloc's action inadmissible, and the SCJ upheld this decision¹⁸⁹.

Complaints and disputes related to campaign finance and the eligibility of contestants were prominent in the pre-election period, and tested the consistency and transparency of the enforcement framework. The CEC, in coordination with the Ministry of Justice and other state institutions, initiated proceedings against a few contestants on grounds of alleged financial irregularities and prohibited funding sources. These cases resulted in the suspension or cancellation of registration for two political parties shortly before Election Day, following expedited judicial review.

Acting on complaints filed by the Moldovan National Party and the Alliance of Liberals and Democrats for Europe (ALDE)¹⁹⁰ alleging campaign finance violations by the Patriotic Bloc and, in particular, its member party Heart of Moldova, the CEC partially upheld the claims¹⁹¹, issuing a warning to both the Bloc and Heart of Moldova and initiating a complex financial control. The parties were required to submit documentation within 48 hours. The CEC also forwarded the case to the Ministry of Justice for possible application of Article 21 of the Law on Political Parties. The Ministry subsequently brought proceedings before the Chisinau Court of Appeal, which granted its request, following which the CEC cancelled the registration of Heart of Moldova and its candidates¹⁹². On the eve

187 Case No. [3-86/25](#);

188 PEC no. 37/5 Copanca and PEC no. 37/2 Gura Bicului.

189 The SCJ [Decision](#) Dated 12 October 2025.

190 Appeal/Notification No. CEC-10AP/6 and No CEC-7/22684

191 The CEC decision [No. 3993](#).

192 Case No. 2-15/25; The CEC Decision No. [4114](#).

of election day, the SCJ rejected a recourse lodged by Heart of Moldova¹⁹³, thereby upholding the interim limitation of the party's activities. Separate complaints filed by the party against CEC Decision No. 3993 were rejected or declared inadmissible by the Court of Appeal¹⁹⁴ and the SCJ, respectively¹⁹⁵.

On 26 September, the CEC examined a number of consolidated complaints¹⁹⁶ against the party Great Moldova alleging serious financial violations. Considering the gravity of the alleged breaches, the CEC cancelled the party's registration and its list of candidates¹⁹⁷. The Court of Appeal rejected an appeal against this decision on election day.

ENEMO notes that the cancellation of registration of two contestants immediately before election day left a very limited timeframe for the affected parties to pursue judicial remedies and for voters to be informed, at odds with international standards^{198,199}.

Overall, ENEMO assesses that the legal framework for electoral dispute resolution provides a broadly coherent hierarchy of remedies and a wide range of actors with standing to seek redress. At the same time, practice during these elections revealed shortcomings in the consistent application of admissibility rules, limited transparency and follow-up once complaints are forwarded to other institutions, and the use of late-stage financial sanctions leading to cancellation of contestants' registration immediately before election day, with constrained opportunities for appeal.

193 Decision [No 2r-355/25](#) of the Supreme Court of Justice. The SJC justified the interim measure that the evidence of illegal financing presented by relevant authorities created real and imminent danger to the integrity of electoral processes.

194 Case No [3-110/25](#).

195 Case No 3ra-690/25.

196 Notifications no. CEC-7/23379 of the European Social Democratic Party, no. CEC-7/23334; the Orhei Police Inspectorate, no. CEC-7/23413; no. CEC-7/23492; 2025 and no. CEC-7/23636 of the National Investigation Inspectorate, no. CEC-7/23420 of the Police Department of the Autonomous Territorial Unit of Gagauzia, no. CEC-7/23454, no. CEC-7/23487, no. CEC-7/23514 and No. CEC-7/23515 of the Balti Police Inspectorate, No. CEC-7/23557 of the National Anticorruption Center, as well as the information presented by the SIS with address no. CEC-7/23556 of 25 September 2025.

197 The CEC relied on Article 102(5, a and c) of the Electoral Code, which allows the deregistration of electoral contestants committed grave violations.

198 In their [Joint opinion](#), para. 106; ODIHR and the Venice Commission comment that "de-registration of electoral contestants as a sanction applied by the election administration, namely that such severe interference with suffrage rights as de-registration should be a measure of last resort, applied only for the most serious violations, and subject to effective judicial oversight, in line with international standards and good practice.

199 Paragraph 7.6 of the 1990 OSCE Copenhagen Document provides that OSCE participating States must ensure that contestants are able "[...] to compete with each other on the basis of equal treatment before the law and by the authorities." The Code of Good Practice, paragraph I.2.3.a, states that "Equality of opportunity must be guaranteed for parties and candidates alike."

POST-ELECTION COMPLAINTS

Following election day, electoral disputes focused mainly on campaign finance and transparency issues. Complaints submitted to the CEC and subsequently to the courts challenged, inter alia, the alleged existence of “camouflaged” electoral blocs, undeclared or coordinated online promotion and funding of several major contestants, and sanctions imposed on parties and candidates for financial reporting violations.

Independent candidate Olivia Stamate filed two complaints against PAS and two of its candidates²⁰⁰, alleging inaccurate financial declarations and the creation of an unregistered political coalition amounting to a “camouflaged electoral bloc”, as well as a separate complaint alleging financial transparency violations in PAS’s online campaign. These complaints, and subsequent appeals, were rejected or declared inadmissible by both judicial instances.

The Democracy at Home party submitted four complaints alleging undeclared funding and coordinated promotion by PAS; illegal coordination and extensive undeclared resources in the Patriotic Bloc’s campaign; undeclared campaign financing and lack of transparency in campaign materials by the Alternativa Bloc; and use of undeclared resources and an artificial support network by Our Party. The CEC rejected these complaints; the Court of Appeal dismissed the party’s challenge as unfounded, and the SCJ declared the recourse inadmissible.

The Democracy at Home party also appealed CEC Decision No. 4140 of 3 October 2025, which imposed a warning and suspended the party’s entitlement to state budget allocations for 12 months due to repeated financial irregularities in its online campaign²⁰¹. The CEC found that the party had benefited from a large, coordinated and undeclared promotion campaign on TikTok through a network of up to 33 inauthentic accounts, generating over 42 million views, and had failed to correct its financial reports after a prior warning²⁰². The Court of Appeal partially admitted the appeal, upholding the warning but annulling the suspension of state funding. On further appeal, the SCJ quashed the Court of Appeal’s ruling and upheld the CEC’s position, thereby restoring both sanctions.

In view of the growing use of social media in electoral campaigns, the legal framework on online campaigning should be further developed to provide clear rules on the calculation, attribution and reporting of online campaigning and content-production costs, and to define when electoral subjects are accountable for online content, including that disseminated by supporters, while drawing a clear boundary between official campaign materials and independent expressions of opinion by individuals, with a view to ensuring transparency while safeguarding freedom of expression online.

200 The complaint registered [No. CEC-10AP/93](#).

201 Article 102, para 2(c1) and para 4 of Electoral Code

202 The CEC Decision No. 4135, 1 October 2025.

In a separate case, independent candidate Andrei Năstase challenged a CEC decision²⁰³ ordering him to transfer 5,926.95 lei to the state budget. The Court of Appeal partially admitted his appeal and annulled the order to transfer the funds²⁰⁴, but the SCJ overturned that ruling and adopted a new decision rejecting Năstase's action as unfounded²⁰⁵.

CRIMINAL CASES AND CONTRAVENTIONS

Beyond the complaint and appeal process before electoral bodies and courts, election-related violations were also pursued through contravention and criminal proceedings. According to information made public by the Ministry of Internal Affairs, police drew up more than 26,000 administrative offence reports in connection with electoral corruption. The National Anticorruption Centre informed the Constitutional Court that, under the coordination of several prosecutor's offices and in cooperation with the Anticorruption Prosecutor's Office, it was investigating twenty criminal cases involving alleged large-scale voter corruption and illegal party financing ahead of the 28 September 2025 parliamentary elections. Investigators reported uncovering an electronic wallet through which the equivalent of over USD 107 million (around 1.8 billion lei) had allegedly been transferred to finance pro-Russian parties and influence voters. In total, 192 special investigative measures and some 2,500 procedural actions were carried out, resulting in the detention of thirty-six individuals identified as organizers responsible for distributing illicit funds.

According to information provided by the General Inspectorate of Police to the Constitutional Court, between 14 July and 26 September 2025 the police registered 554 complaints of alleged violations of electoral legislation. Most concerned breaches of advertising rules, prohibited campaigning and photographing of ballots and were processed as administrative contraventions. In addition, one criminal case was initiated for hooliganism, and five cases were registered as minor hooliganism. While the scale of contravention and criminal investigations suggests an active law-enforcement response, the limited information available on their outcomes makes it difficult to assess their effectiveness and deterrent impact.

Law-enforcement and anti-corruption bodies should improve public reporting on the handling and outcome of election-related contravention and criminal cases, including data on indictments, convictions and sanctions, in order to enhance transparency and the deterrent effect of enforcement.

203 The CEC Decision No. 4148

204 The CCA [decision](#) 13 October 2025.

205 The SCJ [decision](#) 21 October 2025

IX. ELECTION DAY

On election day, ENEMO's Core Team members visited a limited number of polling stations in five localities²⁰⁶, including those established in Rezina for voters residing in Transnistria. The overall atmosphere around the observed polling stations was calm and orderly. Police were present in the vicinity of all polling stations visited, but their presence was assessed as discreet and non-intrusive. No instances of organized or repeated transportation of voters, campaign activity, or intimidation in or around the observed polling stations were observed.

In the polling stations visited, voting proceeded in an orderly manner. ENEMO observers also visited one of the bridges connecting Transnistria to the rest of Moldova, near the town of Rezina. While no restrictions on movement were observed, long queues of vehicles formed due to heavy traffic and the time required for document checks by law enforcement.

Voting was conducted in a generally well-organized and transparent manner. Voter identification procedures were correctly implemented; ballot boxes were properly sealed and the SAISE system functioned without interruption in all polling stations visited. The secrecy of the vote was largely respected, although in a few polling stations the placement of cameras and voting booths did not fully safeguard secrecy. Members of Precinct Electoral Bureaus appeared well prepared and performed their duties efficiently and professionally. Minor procedural shortcomings were observed but appeared to result from negligence rather than intent and did not materially affect the conduct or integrity of the process.

The process unfolded in a calm environment, with the presence of candidate representatives and observers contributing to transparency. According to media reports and official statements, several bomb alerts were received at polling stations abroad, including in Italy, Romania, Spain, Belgium and the United States, as well as at polling stations in Rezina and within the Security Zone. Law enforcement authorities conducted checks and voting resumed after short interruptions. The Ministry of Foreign Affairs described the alerts as false and confirmed that contingency plans had been in place to address such incidents. While these alerts temporarily disrupted voting in several locations, they did not significantly affect the overall process.

According to the Prime Minister²⁰⁷ and the State Information Technology and Cybersecurity Service (STISC), Moldova's electoral infrastructure was targeted by multiple cyberattacks on the day before and on election day, mainly against the CEC website and several polling stations abroad. These attacks were reportedly detected and mitigated in real time without disrupting the conduct of voting. A large-scale attack on election day also prompted STISC to block the host.md platform, temporarily disabling around 4,000 websites²⁰⁸.

206 Chisinau, Cimislia, Comrat, Taraclia, and Rezina

207 See the [post on Facebook](#) by Prime Minister Recean on 28 September.

208 See the [Press Release](#) of STISC, from 28 September 2025.

X. ELECTION OBSERVATION

The law guarantees non-partisan observation by domestic and international observers and allows contestants to appoint proxies. Domestic observers may be accredited on behalf of NGOs whose statutes promote human rights or democratic values. Accreditation is issued by the CEC or by DEC's in accordance with legal requirements. Observers accredited by the CEC may monitor the process nationwide, including at polling stations abroad, while those accredited by DEC's are limited to the district where they were accredited²⁰⁹.

Organizations seeking accreditation must submit their requests no later than seven days before election day. The competent electoral body is required to decide within five days for domestic observers and ten days for international observers, but in any case, no later than election day. Decisions to deny registration or accreditation must be reasoned and may be appealed to the Chisinau Court of Appeal in the case of CEC decisions, and to the CEC in the case of DEC decisions.

The CEC Regulation on the status of observers and the procedure for their accreditation²¹⁰ sets out accreditation procedures, as well as the rights, obligations, guarantees and liability of observers. The Electoral Code grants observers full access to all stages of the electoral process and related information, including sessions of electoral bodies and voting, counting and tabulation procedures. Observers may record proceedings provided that the secrecy of the vote and personal data protection are ensured and must remain neutral and refrain from interference. Domestic observers may also submit notifications of observed irregularities through an online platform linked to the SAISE system, enabling electoral authorities to review such cases promptly.

Amendments to the CEC Regulation adopted in July 2025 introduced additional requirements obliging applicant organizations to demonstrate their technical and human capacities, professional expertise and the source of financing of their observation activities²¹¹. Several stakeholders criticized these changes on the grounds that the Electoral Code does not provide a legal basis for rejecting applications on the basis of such criteria. According to the CEC, monitoring organizations should not be denied accreditation solely for failure to comply with these supplementary requirements. Nevertheless, the rationale for collecting this information remains unclear and the

209 Observers have access to electoral information, voter lists, and minutes prepared by electoral bodies. They may take photographs and videos with prior notification to the chair of the Precinct Electoral Bureau, provided this does not compromise the secrecy of the vote or the protection of personal data. National observers may submit notifications on observed irregularities and inform the public of their findings. On election day, observers are prohibited from expressing opinions that could favor or disadvantage any contestant.

210 [Regulation](#)

211 CEC Decision no. 368 4 /2025, published in the Official Gazette of the Republic of Moldova, 2025, no. 417-419, s. 664.

open-ended formulation of the criteria raises concerns about legal certainty and the risk of discretionary interpretation.

To ensure compliance with the principle of legality, the CEC should refrain from introducing additional eligibility or procedural requirements for observer accreditation without explicit backing in the Electoral Code. Any supplementary conditions relating to organizational capacity or funding transparency should be clearly regulated at the level of primary legislation, with a well-defined purpose and consistently applied criteria.

The CEC accredited eight domestic observer organizations²¹² with 2,660 observers, as well as twenty-two embassies, fifteen foreign election administrations and twenty international organizations, totaling 877 accredited international observers. The CEC declined to accredit Russian representatives as short-term observers within the OSCE/ODIHR election observation mission²¹³. ENEMO observers did not face restrictions or obstruction in carrying out their activities; however, some domestic organizations reported isolated instances of impediments on election day and during other stages of the process²¹⁴.

212 Public association "Promo-LEX", Public Association "Union of Jurists from Moldova", Public Association for Participatory Democracy „ADEPT” and Public Association Institute for Human Rights of Moldova (IDOM), Public association „Alliance INFONET”, Public Institution „Center for continuous training in the electoral field” (CICDE) and Public association of the East European Foundation from Moldova, Public Association Movement „War Veterans Force for Nation and Country”

213 [The Ministry of Foreign Affairs](#) and the Central Election Commission of the Russian Federation issued a note of protest and condemned the decision of the CEC.

214 [See here.](#)

XI. PARTICIPATION OF WOMEN AND GENDER EQUALITY

The Constitution guarantees equality before the law and in relation to public authorities, regardless of gender. The 2013 Law on Ensuring Equality²¹⁵ established the Council for Preventing and Eliminating Discrimination and Ensuring Equality²¹⁶. Moldova is party to key international conventions on gender equality and has made notable progress in advancing women's political representation at the highest levels of state institutions²¹⁷.

Party and bloc lists must include at least 40 percent of candidates from the less represented gender, and in every group of ten candidates at least four must be of each gender. All parties and blocs complied with these provisions at the registration stage; on average, women constituted 43.4 percent of candidates on registered lists²¹⁸ and three of the four independent candidates contesting these parliamentary elections were women²¹⁹. The Electoral Code provides simplified registration procedures for women running as independent candidates: they are required to collect only half the number of supporting signatures required from men.

The new parliament includes 36.6 percent women²²⁰, a decrease compared with the outcome of the 2021 parliamentary elections. In addition, the law does not require that a vacated mandate be replaced by a candidate of the same gender, which may further erode women's representation over the course of the mandate.

The legal framework should be amended to ensure that vacated parliamentary mandates are, as a rule, filled by candidates of the same gender from the respective list, so that the gender quota is preserved throughout the entire mandate.

Under the Law on Political Parties²²¹, parties receiving state funding must allocate at least 20 percent of these funds to promoting and encouraging women's participation in political and electoral processes. In 2024, political parties received some 9.7 million MDL (approximately 495,000 EUR) for this purpose. However, seven of the twenty-nine

215 Law No. 121 on Ensuring Equality.

216 See the website of the Equality Council.

217 Currently, women hold 40 percent of the seats in Parliament, exceeding the average representation in national parliaments across the EU. In the executive branch, six of the 14 ministerial positions are held by women, including two of the four deputy prime ministers. The President of the Republic, the first woman to hold this office, was successfully re-elected in 2024.

218 Two political parties, ALDE and LOC, included more than 50 percent women on their electoral lists; On average, the four political blocs included 45 percent women on their candidate lists.

219 Initially, seven women candidates applied for registration.

220 Women's representation from the elected candidates of PAS, DA, and AB is below 40 percent, Our Party had an equal number of men and women, BP had more women than men.

221 The article 28 paragraph 21.

parties reported no expenditure in this area²²², indicating gaps in implementation and oversight.

While many electoral programs addressed broad socio-economic issues, they rarely contained specific, measurable measures to advance gender equality or to respond to the distinct needs and priorities of women. Legal provisions requiring gender balance in political debates and talk shows also proved difficult to implement, reflecting both the underrepresentation of women in politics and weak compliance mechanisms. Monitoring by the Audiovisual Council showed that most televised debates were dominated by male candidates, despite women comprising around 40 percent of contestants (see Media section)²²³.

Measures should be taken to reduce gender imbalance in news and political programs, including targets for more balanced representation of women and men as sources and guests, editorial guidelines on inclusive coverage, and regular monitoring of gender representation with publicly available data.

Women were well represented across different levels of the election administration. The CEC is composed of nine members, five of whom are women, including the Chairperson and the Secretary. Women were also well represented in district electoral councils²²⁴. In the limited number of polling stations visited by ENEMO on election day, women predominated among members of Precinct Electoral Bureaus.

The mission received information that women involved as campaign activists or members of election management bodies were more frequently targeted by intimidation than their male counterparts. A local observer organization also reported instances of sexist language used by candidates during the campaign²²⁵.

222 [CEC Report on the financing of political parties, electoral campaigns and initiative groups in 2024](#) (p.14).

223 See also, the [analysis](#) by the Center for Partnership for Development (CPD).

224 In this electoral process, 70 percent of the members of the DECAs were women, 59 percent of chairperson positions (15 out of 37) were held by women, reflecting significant female participation in the electoral administration.

225 Platforma pentru Egalitate de Gen (20.09.2025) Facebook [post](#).

XII. NATIONAL MINORITIES

The protection of national minorities is primarily regulated by the Law on the Rights of Persons Belonging to National Minorities and the Legal Status of Their Organizations²²⁶. The law defines a person belonging to a national minority as a Moldovan citizen who resides in the country and has distinct ethnic, cultural, linguistic or religious characteristics that set them apart from the majority population and who self-identifies as being of another ethnic origin. Moldova is a party to key international instruments, including the Council of Europe Framework Convention for the Protection of National Minorities and the International Convention on the Elimination of All Forms of Racial Discrimination.

According to the 2024 census²²⁷, the largest national minority groups are Ukrainians (4.9 percent), Gagauz (4.2 percent), Russians (3.2 percent), Bulgarians (1.6 percent) and Roma (0.4 percent). Several ENEMO interlocutors considered that the Roma minority is significantly undercounted in official statistics and may represent around one percent of the population.

ENEMO noted that electoral contestants frequently produced campaign materials in Russian in addition to Romanian but did not observe a widespread use of other minority languages. Some contestants indicated that they did not view minority communities as a key target group for their campaigns. Political outreach to these communities appeared to be undertaken primarily by opposition parties and those with pro-Russian orientations. Based on ENEMO's limited observation and interlocutors' feedback, major parties generally did not target voters with tailored messages or policy proposals addressing the interests and needs of national or ethnic minorities.

Although state authorities, notably the Agency for Interethnic Relations, together with civil society organizations, implement civic and voter education initiatives aimed at national minority communities, interlocutors consistently assessed these efforts as insufficient in scope and impact. Minority communities were widely described as socially and informationally isolated and particularly vulnerable to propaganda and disinformation, a vulnerability attributed to the limited presence of active civil society organizations within these communities and to insufficient access to reliable, independent information in minority languages.

Several interlocutors reported that hate speech and intolerant rhetoric against minorities remain a concern in public and political discourse, with Roma cited as one of the groups most frequently targeted. Such language was often seen as overlapping with broader propaganda and disinformation narratives.

226 Law No. LP382/2001.

227 [National Statistical Office of the Republic of Moldova](#).

Political parties and candidates should adopt and implement clear codes of conduct prohibiting hate speech and discriminatory remarks during campaigns, and electoral and other competent authorities should monitor and address such conduct promptly.

ENEMO positively notes the established practice of electoral management bodies producing key voter information materials, such as instructional posters and voter guides, in five minority languages (Russian, Ukrainian, Gagauz, Bulgarian and Romani) thereby enhancing access to electoral information for minority voters²²⁸.

228 See the [press information](#).

XIII. INCLUSION OF PERSONS WITH DISABILITIES

The legal framework contains specific guarantees for the participation of persons with disabilities (PWDs) in public and political life. Moldova ratified the Convention on the Rights of Persons with Disabilities in 2012, and the Law on the Social Inclusion of Persons with Disabilities provides for the right to participate in elections. The Regulation on the Accessibility of the Electoral Process²²⁹ further regulates and seeks to improve the accessibility of electoral procedures.

Despite these guarantees, there is no comprehensive official register of PWDs. Specialized central and local authorities are expected to keep records, including type and degree of disability, and to provide this information to the CEC upon request, but no official statistics are maintained. Estimates based on social benefits, pension data and information from organizations working with PWDs suggest there are around 160,000 persons with disabilities in Moldova.

An evaluation conducted by the NGO INFONET Alliance, in cooperation with the CEC, found that only 112 of Moldova's 1,974 polling stations are fully accessible to voters with locomotor disabilities, 567 stations (28.7 percent) are partially accessible, and 1,295 stations (65.6 percent) remain inaccessible²³⁰. ENEMO acknowledges the significant efforts made by electoral management bodies and local authorities to improve accessibility, including where polling stations are located in older public buildings that are not fully adapted.

Local authorities should take more proactive measures to ensure that all polling stations are progressively made fully accessible to voters with locomotor disabilities, including through broader investments in accessible public buildings.

The CEC and other state bodies have taken a number of steps to facilitate participation. The Centre for Continuous Electoral Training, in partnership with civil society, organized training for election officials on accessibility of the electoral process²³¹, in line with previous ENEMO recommendations. Electoral management bodies provided special voting booths, ballots with Braille, rulers, lamps and magnifying glasses for voters with visual impairments. The CEC introduced a questionnaire to assess the accessibility of polling stations, with criteria and scoring to classify them as fully, partially or not

229 Decision of the Central Electoral Commission no. 1187/2023 (Official Gazette of the Republic of Moldova, 2023, no. 347-350, art. 883.

230 [See here.](#)

231 [CICDE.](#)

accessible²³², and created an interactive accessibility map on its website to allow voters to verify the accessibility of their polling station²³³. Voter education videos with sign language interpretation were produced to improve access for deaf and hard-of-hearing voters²³⁴. Homebound voters could request a mobile ballot box by submitting a written request, including electronically via e-mail through a family member, social worker or another person, which simplifies procedures and reduces the need for in-person visits²³⁵.

At the same time, important shortcomings remain. The CEC website has been redesigned to be more accessible to visually impaired users, but it is still not fully accessible to blind users, as it does not support automatic text-to-speech and key information is not consistently available in machine-readable formats. An analysis conducted by a coalition of civil society organizations of the websites of parties contesting the 2025 parliamentary elections revealed generally low compliance with international web accessibility standards (WCAG), with only a few contestants achieving acceptable scores²³⁶. Given the increasing role of digital platforms in electoral communication, this lack of accessibility hampers the ability of PWDs to obtain information and participate fully in political and electoral processes.

The CEC should further improve the accessibility of its website so that it meets the needs of all users, including blind persons, by enabling automatic text-to-speech functionality and providing key information in machine-readable formats, in line with international accessibility standards.

Political parties should ensure that their official websites and online campaign materials comply with web accessibility standards and that political communication is available in accessible formats.

The mission did not record instances of electoral contestants using alternative communication formats accessible to PWDs, such as easy-to-read materials or dedicated captioning and sign language in campaign content, nor were there campaign messages specifically targeting the rights and interests of PWDs. State institutions' voter information efforts also remain insufficiently accessible and user-friendly, which may hinder PWDs from fully exercising active and passive suffrage and falls short of the equal participation guarantees set out in Article 29 of the CRPD.

232 An evaluation conducted by the NGO INFONET Alliance, in cooperation with the CEC, found that only 112 of Moldova's 1,974 polling stations are fully accessible, 567 stations (28.7 percent) are partially accessible, and 1,295 stations (65.6 percent) remain inaccessible. [See here.](#)

233 [Map.](#)

234 [Video.](#)

235 For the parliamentary elections on 28 September 2025, applications for homebound voting were accepted starting 14 September (two weeks before voting day) until 14:00 on 27 September 2025. Requests for mobile box voting were submitted to the PEB in writing starting 14 days before Election Day until 18:00 on the day before Election Day. On Election Day, written requests were accepted until 3 p.m. if a medical certificate was presented.

236 The INFONET Alliance within the "Access to Voting for All" campaign, in partnership with about 10 non-governmental organizations and initiative groups.

RECOMMENDATIONS

PRIORITY RECOMMENDATIONS

1. State authorities should further strengthen efforts to detect, investigate and sanction malign interference in elections, including vote-buying, illicit and foreign funding and other forms of external influence, by reinforcing the capacity and coordination of competent institutions and ensuring timely, proportionate legal responses that safeguard the integrity of the electoral process.
2. Legislation related to extremism, party regulation and security should be reviewed to ensure that key concepts and grounds for intervention are clearly defined and that any restrictions are necessary, proportionate and consistent with international human rights standards. Robust safeguards, including timely and effective judicial oversight and remedies, should be in place to prevent discretionary or selective enforcement and to protect freedom of expression, assembly and association.
3. To enhance legal certainty and in line with international good practice, substantial amendments to the electoral legal framework should not be adopted shortly before elections, and any necessary amendments should result from a broad, inclusive and transparent consultation process with all relevant stakeholders.
4. The possibility to limit activities of election contestants during the campaign should be treated as an exceptional and last resort measure. Such decisions should be taken sufficiently in advance of election day, whenever possible; only in case of clearly established grave violations confirmed by judicial review; and be subject to an expedited but meaningful judicial review so that affected parties have access to an effective legal remedy before election day.
5. To further strengthen the independence of and public confidence in the election administration, the appointment of the next composition of the CEC should be conducted through an open and transparent process, based on clear, merit-based criteria.

OTHER RECOMMENDATIONS

To the Parliament

6. Procedures for candidate registration should be further streamlined and standardized, including by setting clear and uniform rules and timelines for correcting deficiencies in candidate lists and limiting administrative discretion, in order to ensure equal treatment of electoral contestants and consistent application of the law.
7. To enhance transparency and predictability, clear and objective criteria should be established in law for determining the number and location of polling stations and for allocating ballot papers for voters from the left bank of the Nistru. These

criteria should, in addition to historic turnout, take due account of the number of eligible voters, transportation and accessibility constraints and credible indications of voter mobilization. Any security-related changes should be based on written risk assessments, respect necessity and proportionality, and be accompanied by mitigating measures and timely, clear information to affected voters.

8. When decisions affecting the registration or continued participation of electoral contestants rely on information provided by security or anti-corruption bodies, at least the non-sensitive elements of the factual basis and the legal grounds should be disclosed to the contestants and, whenever possible, to the public. The law should provide clear procedures on the use of classified information in electoral matters, ensuring that courts can fully examine the evidence and that contestants have a realistic opportunity to exercise their rights of defense within a reasonable timeframe.
9. Voting restrictions linked to intellectual or psychosocial disabilities, including those imposed through individual court assessments, should be removed and replaced with safeguards that respect the autonomy and legal capacity of persons with disabilities.
10. To ensure equal opportunities for all contestants and avoid delays in subsequent electoral preparations, the deadlines for candidate registration and the resolution of related complaints and appeals should be streamlined so that all registration decisions, including those resulting from judicial review, are finalized before the start of the campaign period.
11. Following a comprehensive evaluation of the pilot, consideration should be given to further expanding the availability of postal voting, where feasible and secure, in order to enhance opportunities for participation by citizens residing abroad.
12. The scope and implementation of the prohibition on third-party campaigning should be further clarified, including by distinguishing clearly between electoral campaigning and legitimate issue-based advocacy, and by ensuring that enforcement is transparent, proportionate and not used to unduly restrict freedom of expression and association. Consideration could be given to introducing transparency and reporting obligations for significant third-party spending on any political messaging that might influence the opinion of the voters during the election campaign.
13. The legal framework should be effectively implemented and, where necessary, further strengthened and clarified to prevent the misuse of religious institutions and authority in electoral processes and political life, while fully respecting freedom of religion and belief.
14. To enhance the ability of smaller contestants to compete with candidates with greater financial resources, and thereby promote a more level playing field, consideration could be given to increasing the appeal of the interest-free credit mechanism by raising the ceiling
15. To promote a more level playing field, consideration could be given to reviewing the campaign spending ceiling so that it is set at a realistic and appropriate level, better reflecting actual campaign costs and facilitating meaningful competition among all contestants.
16. To further enhance campaign finance transparency, consideration could be given to legislative changes that would introduce a system known as "transparent accounts"

- for electoral campaign purposes.
17. The adoption of the law on mass media and legal clarification of the Press Council's status as an independent self-regulatory body should be prioritized to strengthen oversight of online and print media, ownership transparency and self-regulation. This framework should follow inclusive public consultations and be aligned with Council of Europe and Venice Commission recommendations.
 18. Provisions governing the Council for the Promotion of Investment Projects of National Importance's suspension or withdrawal of broadcasting licenses should be revised to ensure that such measures are based on clear legal criteria, necessary and proportionate, time-bound and subject to prompt and effective judicial review.
 19. ENEMO recommends reviewing and codifying procedures governing the Security and Information Services' authority to block online content, ensuring that any restrictions are based on clear and foreseeable legal criteria, are necessary and proportionate, strictly time-bound, and subject to independent judicial oversight and effective appeal.
 20. The legal framework on online campaigning should be further developed to provide clear rules on the calculation, attribution and reporting of online campaigning and content-production costs, and to define when electoral subjects are accountable for online content, including that disseminated by supporters, while drawing a clear boundary between official campaign materials and independent expressions of opinion by individuals, with a view to ensuring transparency while safeguarding freedom of expression online.
 21. The legal framework should be amended to ensure that vacated parliamentary mandates are, as a rule, filled by candidates of the same gender from the respective list, so that the gender quota is preserved throughout the entire mandate.

To Election Management Bodies

22. To further enhance transparency and facilitate effective public scrutiny, the CEC should ensure the prompt publication of session minutes and regular updating of all relevant sections of its website.
23. To strengthen confidence in the impartiality and predictability of campaign finance oversight, criteria and procedures for the application of enhanced scrutiny to specific contestants or donors should be exhaustively specified in the law or CEC regulations and applied consistently in a risk-based but non-discriminatory manner.
24. To enhance legal certainty and ensure consistent reporting among all contestants, the CEC should establish clear regulations and valuation methods for volunteer labor, including guidance on how such contributions are to be calculated and declared.
25. To prevent inconsistent application of admissibility rules, the CEC should adopt uniform procedural guidelines for assessing complaints and notifications, including clear requirements for standing and evidence. The distinction between complaints and notifications should be based on transparent criteria, contributing to greater predictability and consistency in dispute resolution.
26. The CEC, in cooperation with law enforcement bodies and other competent institutions, should establish accessible mechanisms to track and publicly report on the status and outcome of complaints and notifications, including those forwarded

for contravention or criminal proceedings, in order to safeguard the right to a timely and effective remedy.

27. To ensure compliance with the principle of legality, the CEC should refrain from introducing additional eligibility or procedural requirements for observer accreditation without explicit backing in the Electoral Code. Any supplementary conditions relating to organizational capacity or funding transparency should be clearly regulated at the level of primary legislation, with a well-defined purpose and consistently applied criteria.
28. The CEC should further improve the accessibility of its website so that it meets the needs of all users, including blind persons, by enabling automatic text-to-speech functionality and providing key information in machine-readable formats, in line with international accessibility standards.

To Government and other state authorities

29. The authorities should further enhance cybersecurity measures for electoral systems, including through regular independent security audits, the implementation and testing of incident-response plans, and clear communication protocols to inform the public and stakeholders in a timely manner about the nature and impact of any cyber incidents.
30. To enable the CEC to effectively fulfil its expanded responsibilities in a sustainable manner, consideration should be given to reviewing and, where necessary, increasing its institutional and human resources, including specialized staff and technical support. Consideration could be given to developing a medium-term capacity-building strategy that progressively internalizes functions currently supported by international partners.
31. To ensure predictability and transparency of the candidate registration process, the Public Services Agency should provide public explanations for decisions concerning party eligibility, including the legal and factual grounds on which a party is deemed eligible, under review or ineligible to participate in elections. Furthermore, consideration could be given to establishing a cut-off date for updating PSA information for electoral purposes, to prevent reclassifications during the candidate registration period.
32. State authorities should ensure a clear separation between official duties and campaign activities during the election period, including through effective implementation of existing rules on the use of state resources. High public officials should avoid using official events and communication channels for campaign purposes and should ensure that campaign-related messages are clearly distinguished from their institutional functions.
33. Law enforcement bodies should ensure that their security and investigative activities during the electoral process are conducted with the highest degree of professionalism, impartiality and transparency. Public communication should be balanced and strictly factual, avoid prejudging ongoing investigations, and not unduly influence voters' perceptions of contestants. Attention should be paid to ensure that the presence of law-enforcement officers at campaign events is proportionate and does not give rise to perceptions of pressure or intimidation among voters or participants.

34. To support the financial sustainability and independence of independent media, the funding of the Media Subsidy Fund and other state support schemes should be increased and distributed on transparent, non-partisan criteria. Furthermore, steps should be taken to address the high concentration of advertising revenues and to ensure fair and non-discriminatory access to campaign advertising across broadcasters and digital platforms.
35. Regional and minority-language outlets should be supported through targeted grants and incentives for multilingual programming and coverage of underrepresented communities, especially in Gagauzia, Transnistria, and rural districts.
36. The Audiovisual Council should develop and publish clear guidelines on the application of its extended mandate, including with regard to online platforms and smaller digital content providers, and ensure that monitoring and sanctioning in these areas are applied in a proportionate, transparent and predictable manner.
37. The Audiovisual Council's monitoring capacity should be strengthened by increasing staffing, analytical tools and professional training, while ensuring that enforcement remains proportionate and does not unduly burden smaller or regional outlets. To enhance accountability and public confidence, monitoring results and sanctions should be published promptly and in a user-friendly format, with clear methodologies and accessible data. Consideration could be given to simplifying reporting requirements and regulations for small local audiovisual media outlets, to reduce excessive burden.
38. In view of repeated breaches of balance, labelling and advertising rules, the sanctioning framework should be reviewed to improve its deterrent effect, including through clearer escalation for recurrent violations, the use of corrective measures (such as obligations to broadcast corrections, rights of reply or remedial programs), and more systematic follow-up on non-compliance.
39. The institutional independence, transparency and accountability of the Centre for Strategic Communication should be strengthened, including through clear public reporting, a balanced and pluralistic composition, and regular consultation with independent media and NGOs. ENEMO also recommends that the authorities develop a comprehensive digital strategy addressing disinformation, online harassment and covert financing, coordinated among relevant state institutions and civil society.
40. Media literacy initiatives should be strengthened through sustainable funding, integration into educational programs and targeted outreach in vulnerable regions such as Gagauzia, Transnistria and rural districts. To maximize their impact, independent media and fact-checking organizations should enhance collaboration, share methodologies, coordinate debunks and avoid duplication.
41. Law-enforcement and anti-corruption bodies should improve public reporting on the handling and outcome of election-related contravention and criminal cases, including data on indictments, convictions and sanctions, in order to enhance transparency and the deterrent effect of enforcement.
42. Measures should be taken to reduce gender imbalance in news and political programs, including targets for more balanced representation of women and men as sources and guests, editorial guidelines on inclusive coverage, and regular monitoring of gender representation with publicly available data.

43. Local authorities should take more proactive measures to ensure that all polling stations are progressively made fully accessible to voters with locomotor disabilities, including through broader investments in accessible public buildings.

To political parties and candidates

44. Electoral contestants should exercise their right to free expression responsibly, in particular by refraining from inflammatory rhetoric and personalized attacks, and by ensuring that their messaging does not incite discrimination, undermine public order or detract from a constructive and respectful campaign environment.
45. Parties and candidates should participate in televised debates and civic programs to enable voters to compare platforms and leadership on an equal basis, and broadcasters should schedule such debates at accessible times and under clear, non-discriminatory participation criteria.
46. Political parties and candidates should adopt and implement clear codes of conduct prohibiting hate speech and discriminatory remarks during campaigns, and electoral and other competent authorities should monitor and address such conduct promptly.
47. Political parties should ensure that their official websites and online campaign materials comply with web accessibility standards and that political communication is available in accessible formats.

To other stakeholders

48. Broadcasters should ensure more equitable access and visibility for all electoral contestants, including smaller parties, in line with the principle of equal treatment.
49. Persistent non-compliance by Gagauzia Radio Television with public-service and electoral obligations should be addressed through a time-bound remedial action plan, including commitments on balanced and inclusive electoral coverage, internal editorial guidelines and staff training, with progress jointly monitored; continued failure to comply should trigger appropriate governance and management review in line with national and regional law.
50. Cooperation with technology companies and social media platforms should be strengthened through formal agreements for rapid removal of illegal or manipulative content, transparent reporting on takedown requests, and improved moderation in Romanian and Russian.
51. Social media platforms should assume greater responsibility for safeguarding electoral integrity by strengthening real-time monitoring and removal of disinformation and unauthorized political content, and by cooperating proactively with national authorities and independent observers so that coordinated disinformation campaigns and illegal electoral interferences are swiftly detected, transparently addressed and prevented from recurring.
52. International partners and donors should continue supporting independent and regional media, particularly those producing multilingual or investigative content, by prioritizing capacity-building, digital security, and cross-border collaboration against disinformation, as well as promoting cooperation with EU media regulators to harmonize standards and strengthen journalist protection.

ABOUT ENEMO

The European Network of Election Monitoring Organizations (ENEMO) is an international organization, representing a network²³⁷ composed of 21 leading national election monitoring civil society organizations from 17 countries of Central and Eastern Europe, and Central Asia, including three European Union countries. ENEMO was formed on 29 September 2001 and operated as an informal network for 17 years before it was formally registered in Montenegro on 11 April 2018. To date, ENEMO has organized 42 international election observation missions to 11 countries²³⁸.

ENEMO seeks to support the international community's interest in promoting democracy in the region by assessing electoral processes and the political environment and offering accurate and impartial observation reports. ENEMO EOMs use international benchmarks and standards for democratic elections to evaluate the electoral process and the host country's legal framework. ENEMO and all its member organizations have endorsed the 2005 Declaration of Principles for International Election Observation and the Declaration of Global Principles for Nonpartisan Election Observation and Monitoring by Citizen Organizations. Each ENEMO observer signed the Code of Conduct for International Election Observers.

246 ENEMO member organizations are: Center for Civic Initiatives CCI, Bosnia and Herzegovina; Center for Democratic Transition – CDT, Montenegro; Centre for Monitoring and Research – CeMI, Montenegro; Center for Free Elections and Democracy – CeSID, Serbia; GONG, Croatia; International Society for Fair Elections and Democracy – ISFED, Georgia; KRIIK Association, Albania; Citizens Association MOST, Macedonia; Promo- LEX, Moldova; OPORA, Ukraine; Society for Democratic Culture SDC, Albania; Transparency International Anti-Corruption Center (TIAC), Armenia; Election Monitoring and Democratic Studies Center (EMDS), Azerbaijan; Belarussian Helsinki Committee (BHC), Belarus; FSCI, Kazakhstan; Kosovo Democratic Institute (KDI), Kosovo; Coalition for Democracy and Civil Society, Kyrgyzstan; Center for Research, Transparency and Accountability (CRTA), Serbia; Obcianske OKO (OKO), Slovakia; Committee of Voters of Ukraine (CVU), Ukraine.

247 Moldova 2024, Presidential Elections and Constitutional Referendum; Georgia 2024, Parliamentary Elections; Hungary 2024, Municipal Elections; Moldova 2023, Local Elections; Serbia 2022, Presidential and Early Parliamentary Elections; Hungary 2022, Parliamentary Elections; Kosovo 2021, Local Elections; Georgia 2021, Local Elections; Moldova 2021, Parliamentary Elections; Albania 2021, Parliamentary Elections; Moldova 2020, Presidential Elections; Montenegro 2020, Parliamentary Elections; Serbia 2020, Parliamentary Elections; Ukraine 2020, Local Elections; Moldova 2019, Local Elections; Ukraine 2019, Early Parliamentary Elections; Ukraine 2019, Presidential Elections; Moldova 2018-19, Parliamentary Elections; Armenia 2018, Early Parliamentary Elections; Moldova 2016, Presidential Elections; Ukraine 2015, Regular Local Elections; Ukraine 2014, Parliamentary Elections; Ukraine 2014, Presidential Elections; Ukraine 2013 – re-run of Parliamentary Elections 2012 in 5 MECs; Kosovo 2013, Local Elections, first round; Ukraine 2012, Parliamentary Elections; Kosovo 2011, Re – run of Parliamentary Elections; Kosovo 2010, Parliamentary Elections; Kyrgyzstan 2010, Parliamentary Elections; Ukraine 2010, Presidential Elections; Kosovo 2009, Local Elections; Moldova 2009, Parliamentary Elections; Georgia 2008, Presidential Elections; Kyrgyzstan 2007, Parliamentary Elections; Ukraine 2007, Parliamentary Elections; Ukraine 2006, Local Elections in Poltava, Kirovograd and Chernihiv; Ukraine 2006, Parliamentary Elections; Kazakhstan 2005, Presidential Elections; Albania 2005, Parliamentary Elections; Kyrgyzstan 2005, Presidential Elections; Kyrgyzstan 2005, Parliamentary Elections; Ukraine 2004, Presidential Elections.

LIST OF ABBREVIATIONS

- **A.T.U. GAGAUZIA** - AUTONOMOUS TERRITORIAL UNIT GAGAUZIA
- **AC** - AUDIOVISUAL COUNCIL
- **ALDE** - POLITICAL PARTY ALLIANCE OF LIBERALS AND DEMOCRATS FOR EUROPE
- **AMS** - AUDIOVISUAL MEDIA SERVICES
- **AMSC** - AUDIOVISUAL MEDIA SERVICES CODE
- **AUR** - POLITICAL PARTY ALLIANCE FOR THE UNITY OF ROMANIANS
- **CCA** - CHISINAU COURT OF APPEAL
- **CEC** - CENTRAL ELECTION COMMISSION
- **CEDAW** - CONVENTION ON THE ELIMINATION OF ALL FORMS OF DISCRIMINATION AGAINST WOMEN
- **CICDE** - CENTRE FOR CONTINUOUS ELECTORAL TRAINING
- **CPIPNI** - COUNCIL FOR THE PROMOTION OF INVESTMENT PROJECTS OF NATIONAL IMPORTANCE
- **CPRW** - CONVENTION ON THE POLITICAL RIGHTS OF WOMEN
- **CRPD** - CONVENTION ON THE RIGHTS OF PERSONS WITH DISABILITIES
- **CSC** - CENTER FOR STRATEGIC COMMUNICATION
- **CSO** - CIVIL SOCIETY ORGANIZATION
- **CUB** - POLITICAL PARTY COALITION FOR UNITY AND WELFARE
- **DEC** - DISTRICT ELECTORAL COUNCIL
- **ECHR** - EUROPEAN CONVENTION FOR THE PROTECTION OF HUMAN RIGHTS AND FUNDAMENTAL FREEDOMS
- **E-DAY** - ELECTION DAY
- **EMB** - ELECTION MANAGEMENT BODY
- **ENEMO** - EUROPEAN NETWORK OF ELECTION MONITORING ORGANIZATIONS
- **EOM** - ELECTION OBSERVATION MISSION
- **EU** - EUROPEAN UNION
- **FCNM** - FRAMEWORK CONVENTION FOR THE PROTECTION OF NATIONAL MINORITIES
- **GIP** - GENERAL INSPECTORATE OF POLICE
- **GRT** - GAGAUZIA RADIO TELEVISION
- **GRECO** - GROUP OF STATES AGAINST CORRUPTION
- **ICCPR** - INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS
- **ICERD** - INTERNATIONAL CONVENTION ON THE ELIMINATION OF ALL FORMS OF RACIAL DISCRIMINATION
- **LOC** - POLITICAL PARTY LEAGUE OF CITIES AND COMMUNES
- **LPA** - LOCAL PUBLIC AUTHORITY
- **MA** - POLITICAL PARTY MOLDOVANII ALLIANCE
- **MRM** - POLITICAL PARTY RESPECT MOLDOVA MOVEMENT
- **NAC** - NATIONAL ANTICORRUPTION CENTRE
- **NGO** - NON-GOVERNMENTAL ORGANIZATION
- **NOI** - POLITICAL PARTY NEW HISTORICAL OPTION
- **OSCE** - ORGANIZATION FOR SECURITY AND CO-OPERATION IN EUROPE
- **OSCE/ODIHR** - OSCE OFFICE FOR DEMOCRATIC INSTITUTIONS AND HUMAN RIGHTS
- **PACE** - POLITICAL PARTY WE BUILD EUROPE AT HOME

- **PAS** - PARTY OF ACTION AND SOLIDARITY
- **PATRIOTIC BLOC** - THE PATRIOTIC ELECTORAL BLOC OF SOCIALISTS, COMMUNISTS, HEART AND FUTURE OF MOLDOVA
- **PEB** - PRECINCT ELECTORAL BUREAU
- **PL** - LIBERAL PARTY
- **PMM** - POLITICAL PARTY RESPECT MOLDOVA
- **PNM** - POLITICAL PARTY MOLDOVAN NATIONAL PARTY
- **PPDA** - POLITICAL PARTY DEMOCRACY HOME
- **PS** - POLLING STATION
- **PSA** - PUBLIC SERVICES AGENCY
- **PSDE** - POLITICAL PARTY OF EUROPEAN SOCIAL DEMOCRATS
- **PSRM** - PARTY OF SOCIALISTS OF THE REPUBLIC OF MOLDOVA
- **PWDS** - PERSONS WITH DISABILITIES
- **SAISE** - STATE AUTOMATED INFORMATION SYSTEM "ELECTIONS"
- **SCJ** - SUPREME COURT OF JUSTICE
- **SRP** - STATE REGISTER OF POPULATION
- **SRV** - STATE REGISTER OF VOTERS
- **STISC** - INFORMATION TECHNOLOGY AND CYBER SECURITY SERVICE
- **UCSM** - POLITICAL PARTY CHRISTIAN-SOCIAL UNION OF MOLDOVA
- **UNCAC** - UNITED NATIONS CONVENTION AGAINST CORRUPTION
- **UN** - UNITED NATIONS
- **WCAG** - WEB CONTENT ACCESSIBILITY GUIDELINES

ANNEXES

ANNEX 1. Election results

Number of voters in the main voter lists	2,738,735
Number of voters in supplementary voter lists	342,244
Number of voters who received ballot papers	1,609,715
Number of voters who participated in voting	1,609,579
Invalid ballots	30,857
Valid votes	1,578,722
Voters abroad	281,224
Voters residing in Transnistria	12,274

Number on the ballot	Name of the party/electoral bloc	Number of votes	Percentage of the vote	Seats
1	Political Party "Action and Solidarity Party"	792,557	50.20%	55
2	Political Party "Democracy at Home"	88,679	5.62%	6
3	Political Party "Coalition for Unity and Welfare"	13,314	0.84%	-
4	Andrei Năstase - Independent candidate	13,420	0.85%	-
5	Political Party "Alliance of Liberals and Democrats for Europe"	3,576	0.23%	-
6	Olesea Stamate - Independent candidate	5,257	0.33%	-
7	Political Party "European Social Democratic Party"	15,060	0.95%	-

Number on the ballot	Name of the party/electoral bloc	Number of votes	Percentage of the vote	Seats
8	Political Party "Moldovan National Party"	4,813	0.30%	-
9	Electoral Bloc "Patriotic Bloc of the Socialists, Communists, Heart and Future of Moldova"	381,984	24.20%	26
10	Electoral Bloc "ALTERNATIVE"	125,706	7.96%	8
11	Political Party "Respect Movement Moldova"	10,144	0.64%	-
12	Electoral Bloc "TOGETHER"	5,030	0.32%	-
13	Political Party "League of Cities and Communes"	6,120	0.39%	-
14	Political Party "Alliance for the Union of Romanians"	1,604	0.10%	1
15	Victoria Sanduța - Independent candidate	2,862	0.18%	-
16	Political Party "Alliance 'MOLDOVANS'"	3,509	0.22%	-
17	Political Party "Great Moldova"	Registration was cancelled. However, the party was still on the ballot on election day, under number 17. Votes cast for it were declared invalid.		
18	Electoral Bloc "Union of the Nation Bloc"	797	0.05%	-
19	Political Party "New Historical Option"	1,412	0.09%	-
20	Liberal Party	1,591	0.10%	-
21	Political Party "Christian-Social Union of Moldova"	1,837	0.12%	-
22	Tatiana Crețu - Independent candidate	1,598	0.10%	-
23	Political Party "Our Party"	97,852	6.20%	6

ANNEX 2. ENEMO Observers

NAME AND SURNAME	POSITION	COUNTRY	ENEMO MEMBER ORGANIZATION
Dritan Taulla	Head of Mission	Albania	KRIK
Ana Mihajlovic	Deputy Head of Mission	Serbia	CESID
Nino Rizhamadze	Election Administration and Legal Analyst	Georgia	ISFED
Mariam Chubabria	Political and Campaign Analyst	Georgia	ISFED
Daniel Kerekes	Political and Campaign Analyst	Slovakia	Obcianske oko
Maja Milikic	Media Analyst	Montenegro	CeMI
Dubravka Tomic	Financial and Logistics Officer	Montenegro	CeMI

EUROPEAN
NETWORK
OF ELECTION
MONITORING
ORGANIZATIONS

ENEMO