



## **ELECTION OBSERVATION MISSION** **Republic of Moldova – Parliamentary Elections, 28 September 2025**

### **STATEMENT OF PRELIMINARY FINDINGS AND CONCLUSIONS**

#### **PRELIMINARY CONCLUSIONS**

The 28 September 2025 parliamentary elections in Moldova were competitive and offered voters a clear choice among political alternatives but the process was marred by serious cases of foreign interference, illicit financing, cyber-attacks and widespread disinformation. The legal framework was strengthened to protect against election corruption and provides a sound basis for conducting democratic elections although legislative changes shortly before the elections impacted legal certainty. The election administration managed preparations professionally and efficiently. However, some decisions along partisan lines by the Central Election Commission (CEC) on contentious issues brought into question its impartiality. Decisions in the two days before elections on the ineligibility of two parties, based on allegations of illicit funding, limited their right to effective remedy. In a highly polarized environment contestants campaigned freely throughout the country. Despite law enforcement efforts, extensive vote buying schemes to influence voters were credibly identified. Extensive disinformation on social networks, partisan coverage in most media and limited investigative and analytical reporting, hindered voters' ability to make an informed decision. Election day was well-prepared, orderly and transparent and the process assessed positively by IEOM observers.

Framed by a polarised political environment and deep divisions between the ruling party and the opposition regarding the country's geopolitical orientation, the 28 September elections were widely seen as decisive for Moldova's continued European Union (EU) integration process. Elections were held against the backdrop of the war caused by the Russian Federation's invasion of Ukraine, which posed significant challenges to the country's security and economy. In the run up to the elections, the authorities faced an unprecedented scale of hybrid attacks, including illicit financing, disinformation campaigns and cybersecurity incidents, identified as originating from the Russian Federation.

The legal framework provides a sound basis for conducting democratic elections, in line with international standards. Following the 2024 presidential election and referendum, a major revision through a new law introduced key improvements such as clearer definitions of electoral corruption, tougher penalties, and better regulation of campaign financing. In the law-making process, a number of ODIHR Urgent Opinion recommendations on the initial draft law were addressed, but a few key issues remain unresolved as do some ODIHR and Venice Commission recommendations on other aspects of the election process. Despite the legitimate aim of curbing abuses, frequent changes to the law, including shortly before these elections, undermined effective implementation, legal certainty and the stability of electoral legislation.

The CEC managed technical preparations for these elections professionally and efficiently, mostly respecting legal deadlines. The election administration at all levels was transparent in its work with sessions open to observers and the media, and CEC meetings streamed online. The election administration enjoyed stakeholder trust in its competency and efficiency. However, occasionally politically aligned decisions on contentious issues called into question its impartiality and independence.

The government digital infrastructure has been subject to cyberattacks ahead of the elections and cybersecurity in elections remains a serious concern. On 24 September, the Prime Minister announced that the countries' infrastructure had faced more than 1,000 cyberattacks in 2025. Authorities introduced

a risk-based framework to identify and mitigate threats, which strengthened resilience. The CEC's State Automated Information System 'Elections', which manages several applications, is now protected under the cyber security framework of the Information Technology and Cyber Security Service, alongside all government digital infrastructure to ensure a unified security approach. In the lead up to elections, and especially the week before, the CEC was the target of foreign based cyberattacks and disinformation campaigns, aimed at undermining its public credibility by amplifying false information.

No major issues were identified with the overall accuracy of the voter register. However, long-standing problems persist with entries for deceased persons, particularly for voters residing abroad or on the left bank of the Nistru river (Transnistria), as the mechanism for removing deceased citizens from the register depends on the initiative of the family in reporting such changes. Further, some voters lack a registered domicile or residence.

The CEC registered 4 electoral blocs, 15 political parties, and 4 independent candidates, from a wide political spectrum that offered voters a broad choice. At the same time, in considering some decisions, the CEC occasionally applied a formalistic and selective approach. Certain newly imposed candidate registration requirements were unduly burdensome and the pre-clearance of party eligibility by the Public Service Agency was not always clear. The decisions of the CEC and the Chişinău Court of Appeal in the last days before the election to revoke two parties' eligibility, citing serious campaign and campaign finance violations, undermined the legal certainty of the electoral contestants' status and given the timing limited their right to seek effective remedy, at odds with international standards.

The campaign was competitive, and fundamental freedoms were generally respected. Contestants complemented traditional campaign methods with extensive use of social media but the campaign was marred by hybrid attacks, including increased illicit funding and disinformation. An organised network, funded by foreign sources, coordinating targeted vote-buying schemes and disinformation campaigns, was credibly identified by the authorities and investigative journalists as originating from the Russian Federation. Proactive law enforcement efforts were seen to have a mitigating and deterring effect against vote buying.

In the election period, unofficial campaigns conducted by inauthentic networks of accounts sometimes using AI generated videos, 'troll farms' and automated bots spread alarmist disinformation on social network platforms. State efforts were notably strengthened, with the authorities deploying a wide range of mechanisms and engaging a number of agencies to detect foreign interference and disinformation. Despite these considerable efforts to protect against information threats, the endemic nature of the challenge meant that the campaign was negatively affected by disinformation. The platforms' responsiveness to notifications of harmful networks and narratives they received from state authorities and civil society organisations, was deemed inadequate. Together with platform algorithms that promoted 'echo-chambers', this undermined the availability of reliable information for voters.

Electoral contestants met legal requirements for gender quotas on their lists. Of the 1,403 candidates, 597 were women, accounting for 43 per cent of the total; however, only 3 of the 19 political entities were led by a woman. Women were participants in campaign events but were not given equal prominence at campaign rallies attended by ODIHR EOM Long-Term Observers.

National minorities comprise approximately 18 per cent of Moldova's population. No systemic barriers were identified to the ability of national minorities to freely participate in the election process. At the same time, some issues require further attention, such as voter registration procedures for Roma. Minority candidates were present across political party lists, indicating no formal barriers to their participation.

Campaign finance regulations provide sufficient grounds for transparency, accountability and integrity, and are largely in line with international standards. However, third party financing remains unregulated

and clear guidelines for valuing in-kind contributions are lacking. Positively, contestants generally complied with their obligation to submit weekly reports including fulfilling the legal requirement for reporting online spending. The CEC published and reviewed reports, performed additional checks, and imposed appropriate sanctions, playing an effective role and contributing to public transparency despite limited human resources.

The media environment is diverse and pluralistic but constrained by a limited and shrinking advertising market. Many IEOM interlocutors reported an increase in intolerant speech as well as instances of intimidation and harassment of journalists, both in person and online, mainly from non-state actors. The ODIHR EOM's media monitoring found broadcast media's coverage of the election reflected the pluralistic but polarized media environment. The monitored media provided contestants with numerous opportunities to present their views and opinions through debates, talk shows, current affairs programs, and news coverage. However, the partisan coverage in most media outlets, combined with event-driven and statement-focused news narratives, limited investigative and analytical reporting, and extensive disinformation on social networks, significantly hindered voters' ability to make well-informed decisions.

Electoral disputes were generally handled efficiently by the election administration and the courts within the prescribed deadlines. However, divergences in higher court decisions, demonstrated a lack of legal certainty on the application of some party eligibility requirements. The amended candidate registration deadline still did not guarantee the settling of disputes before the start of the campaign, limiting effective remedy. Despite some progress in judicial reform, including an ongoing vetting process, public trust in the judiciary remains low.

The legal framework allows for citizen and international observation, and by contestant representatives, both in-country and abroad. As of 27 September, the CEC accredited 2,496 citizen and 912 international observers, with Promo-LEX and the Union of Lawyers being the largest citizen groups. A new CEC regulation introduced new accreditation requirements, including disclosure of organizational capacity and funding, aimed at preventing fake observers. The registration of a high number of observers, both citizen and international contributed to the transparency of the process. The CEC denied accreditation to 16 prospective IEOM observers based on the Security and Intelligence Services' opinion.

Election day was well organized. The opening and voting processes were assessed positively in the overwhelming majority of polling stations observed, with established procedures largely followed. While most voters marked their ballots in secrecy, the layout of polling stations and the placement of video cameras did not always ensure the secrecy of the vote. Despite concerns about the number of polling stations and ballots available for voters from Transnistria, the voting process proceeded without excessive queues or shortages of ballots, albeit with some overcrowding. The few negative observations were mostly linked to unauthorized persons present at polling stations. A number of concerning security incidents took place. A large-scale cyberattack forced authorities to block the host.md platform, leaving about 4,000 websites offline on election day. A series of bomb threats were reported at some PEBs in Moldova and abroad, as well as at bridges over the Nistru river, which caused temporary suspensions to the process and contributed to queues at the river crossings. The majority of vote counts and tabulation processes observed by the IEOM were also assessed positively and found to be well-organized overall, orderly and professional.

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## PRELIMINARY FINDINGS

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### Background and Political Context

On 17 April 2025, the Speaker of the Parliament announced that regular parliamentary elections would be scheduled for 28 September. In the most recent snap parliamentary elections held in 2021, the Action and Solidarity Party (PAS) secured a majority with 63 out of 101 parliamentary seats.<sup>1</sup>

Framed by a polarised political environment and deep divisions between the ruling party and the opposition regarding the country's geopolitical orientation, the 28 September elections were widely seen as decisive for Moldova's continued European Union (EU) integration process. Since 2022, Moldova has held EU candidate status. The government launched accession negotiations in 2023 and further embedded this objective into the Constitution in 2024. The war caused by the Russian Federation's invasion of Ukraine has posed significant challenges to the country's security and economy, resulting in high inflation, and in particular increased energy prices.<sup>2</sup>

Investigations into foreign interference and illegal campaign financing during the 2023 and 2024 elections, as well as the November 2024 Constitutional Court (CC) ruling on the results, revealed an unprecedented scale of voter corruption in 2024 and underlined the need for stronger safeguards. Subsequent amendments to the legislation, coupled with coordinated efforts by law enforcement agencies, have shaped the pre-election period.

The governing party framed the elections as an existential choice between pursuing alignment and integration with the EU or risking the loss of sovereignty to the Russian Federation. The President and several government ministers and institutions warned the electorate about wide scale Russian interference aimed at securing a pro-Russian majority in parliament.<sup>3</sup> Some opposition parties asserted that such allegations of interference and actions by government agencies are being used politically and that not all opposition parties are pro-Russian. Others claimed that they are seeking to balance Moldova's ties with the Russian Federation and the EU.

Moldova has demonstrated its commitment to promoting gender equality as outlined in the Constitution and the 2006 Law on Equal Opportunities. The outgoing parliament comprises 41 per cent women. Women occupy many high-ranking and decision-making positions, including those of the President and Chairs of the Central Election Commission (CEC) and the CC.

### Electoral System and Legal Framework

Parliament's 101 seats are elected based on a single national constituency, by proportional representation from closed party or bloc lists, or as independents. These are the second parliamentary elections organized under this system. Thresholds of 5 and 7 percent of valid votes cast are in place for parties and electoral blocs, respectively.<sup>4</sup> For independents, this threshold is 2 percent. There is an

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<sup>1</sup> The Bloc of Communists and Socialists won 32 seats and the Șor Party won 6 seats. In June 2023, the Constitutional Court declared the Șor Party unconstitutional and ordered its removal from the register of parties. Five Șor Party MPs retained their mandates and sit as independent MPs, while the sixth seat remains vacant after. Mr Șor was stripped of his mandate, after being sentenced in absentia in April 2023 to 15 years in prison for fraud and money laundering.

<sup>2</sup> This is referred as "the Russian Federation's full-scale war of aggression against Ukraine" by the Parliamentary Assembly of the Council of Europe (PACE) and the European Parliament (EP) in their respective resolutions. See, for example, PACE 2506/2023 and 2285/2024 and EP 2024/2526/RSP. See also OSCE Parliamentary Assembly language since the adoption of the 2022 Birmingham Declaration.

<sup>3</sup> President Maia Sandu's speech in the European Parliament on 9 September 2025, and in the Joint Press Conference with the leaders of France, Germany and Poland, on the occasion of the Independence Day on 27 August 2025.

<sup>4</sup> [ODIHR and the Council of Europe's Venice Commission](#) have previously noted that there is no automatic reason to set it to a higher value, therefore, the threshold for alliances could be the same as for political parties.

overall 40 percent gender quota for candidate lists, and a placement requirement that at least 4 out of every 10 candidates be of the opposite gender. A minimum turnout requirement of one-third of registered voters is mandated.

The parliamentary elections were held under a revised legal framework that provides a sound basis for conducting democratic elections. The 2022 Electoral Code and its subsequent amendments implemented many prior ODIHR and Venice Commission recommendations, including strengthening campaign finance regulations and oversight, allowing voters to sign in support of more than one contestant, clarifying candidate nomination procedures, and revising the process for nominating CEC members to enhance impartiality.<sup>5</sup> Other ODIHR and Council of Europe recommendations on key issues remain outstanding; this includes clearer and more comprehensive provisions on the misuse of administrative resources, removing limitations to suffrage rights for people with intellectual or psychosocial disabilities, the extension of campaign finance regulations to third parties and online activities, ensuring dispute resolution related to candidate registration is concluded before the start of the campaign, transparency of ownership of print and online media, and rules for contesting election results. Moreover, frequent changes to the law, including shortly prior to these elections affected legal certainty and the stability of electoral legislation.<sup>6</sup>

Shortly after a CC ruling confirming the presidential election and constitutional referendum results, the PAS parliamentary majority initiated an extensive draft law in December 2024 aimed at addressing electoral corruption and related issues.<sup>7</sup> Law 100 was passed on 13 June 2025, although without the political support of the opposition parties, introducing substantial amendments to 13 laws, including the Electoral Code, the Law on Political Parties (LPP), the Criminal Code, and the Contravention Code. The amendments were considered in an expedited manner, but efforts were made to have an extensive public debate and seek input into the legislation.<sup>8</sup> Some ODIHR EOM interlocutors expressed concern about the meaningfulness of the consultations due to certain procedural shortcomings and the limited review time due to the late dissemination of the draft amendments.<sup>9</sup>

Law 100/2025 aims at strengthening Moldova's legal framework against electoral corruption by expanding the definition of passive and active corruption to include the promising of benefits to influence voters, thus addressing a broader range of corrupt practices.<sup>10</sup> The legal framework related to campaigning was also improved by the introduction of a ban on early campaigning, the prohibition of misuse of charitable organizations for political gain, and the limiting of campaigning to only registered competitors with related administrative sanctions now imposed. Positively, the definition of independent candidates was further defined, requiring them to have resigned from any political party at

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<sup>5</sup> In line with a prior ODIHR recommendation, the 2022 Electoral Code introduced a new formula, to be applied from 2026, that comprises seven CEC members nominated one each by the President, the Ministry of Interior, the Superior Council of Magistrates, civil society and the parliamentary opposition, and two by the ruling party.

<sup>6</sup> Paras II.B. 3 and 4 of the Venice Commission [Revised Interpretative Declaration on the Stability of the Electoral Law](#). Para. II.B.6 also prescribes that “once elections have been called, no amendments to electoral law should be made”, whereas most of the recent amendments were adopted after April 17. See also paragraph 60 of the 2016 Venice Commission [Rule of Law Checklist](#).

<sup>7</sup> Draft Law 381 was submitted to parliament on 17 December 2024. An [urgent ODIHR Opinion on the Draft Law](#) was published on 29 April 2025. In addition, Law 130, amending the Electoral Code and LPP, was adopted on 29 May without public consultation. Law no. 109/2024 on the partial implementation of postal voting was also amended.

<sup>8</sup> The adoption process included two rounds of public consultations, engaged a diverse range of stakeholders (including ministries, state agencies, external experts, and civil society organizations) and took into consideration several amendments that were proposed. The final version, Law 100/2025, was adopted in a third reading with 55 PAS votes in favour and 21 votes against from the Bloc of Communist and Socialists.

<sup>9</sup> See [ODIHR Urgent Opinion on the Draft Law 381/2025](#).

<sup>10</sup> In addition, expedited judicial procedure deadlines were introduced.



least 70 days before election day in order to be recognized as such.<sup>11</sup> The collection of identity documents and the publication of personal data on the internet became illegal.<sup>12</sup>

Recent amendments addressed a few of the most recent ODIHR recommendations, including enhancing institutional capacity and coordination to combat vote-buying and illicit campaign financing, further defining independent candidates, and introducing explicit grounds for candidate registration refusal with an opportunity to correct certain deficiencies. However, despite some alignment with ODIHR Urgent Opinion recommendations, some key issues remain unresolved.<sup>13</sup> These include certain terms in the criteria for banning successor parties and their definition,<sup>14</sup> along with the party register requirement that might allow for subjective interpretation.

The recent amendments further tightened rules that were already strict and, in some cases, broadly formulated on party activity and deregistration. Notably, they introduced a ban on camouflaged blocs<sup>15</sup> but also on parties that are successors of those declared unconstitutional (see *Candidate Registration*), and allowed, in certain cases without prior warning, for the temporary suspension of a party during the campaign, based on a Chişinău Court of Appeal (CCA) decision, the constitutionality of which has been unsuccessfully challenged twice.<sup>16</sup> While such measures have precedents in some European legal systems, restrictions on political parties are permissible only in exceptional cases, must be a last resort, and must be narrowly defined, pursue a legitimate aim (such as protecting democratic order or fundamental rights), and be proportionate and necessary to safeguard democracy.<sup>17</sup> The new obligation for parties to maintain and submit a party membership register to the CEC and Public Service Agency (PSA) was upheld by a recent Constitutional Court ruling.<sup>18</sup> However, failure to provide the required

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<sup>11</sup> In addition, Law 130, amending the Electoral Code and LPP, was adopted on 29 May without public consultation. Law no. 109/2024 on the partial implementation of postal voting was also amended.

<sup>12</sup> In addition, a new data protection law has been enacted on 25 July 2024, [Law No 195](#), scheduled to come into effect on 23 August 2026, aligned with the provisions of the [European General Data Protection Regulation \(GDPR\)](#).

<sup>13</sup> The amendments addressed a few [ODIHR Urgent Opinion](#) on Draft Law 381/2025 recommendations. For example, they removed Intelligence and Security Service (SIS) and CC involvement in party registration, reformulated certain rules and explicitly determined that decisions on successor parties will be taken by the CCA, explicitly stated that minor irregularities cannot limit party activity and that parties must be notified and present at the CCA hearing, stipulating that media coverage of extremist content does not restrict legal journalism, specified that unregistered individuals can't collect signatures. However, most other recommendations were not implemented.

<sup>14</sup> In the [Urgent Opinion](#) on Draft Law 381/2025, ODIHR recommended the revision of the provisions on successor parties to ensure clarity, legal certainty, and compliance with international standards. Specifically, it advised removing vague terms like “ties” and “substantial similarities” and instead establishing clear, objective, and narrowly defined criteria to determine when a party qualifies as a successor to one that has been banned. ODIHR also emphasized that any restrictions on successor parties should be based on concrete evidence and justified by a genuine threat to the constitutional order or democratic principles. Importantly, the evidentiary requirement has been addressed in the adopted law.

<sup>15</sup> In line with a 2014 CC decision, which held that it was necessary to exclude the informal association between political parties that carry out joint electoral activities, without officially registering as an electoral bloc, these ‘camouflaged blocs’ are now banned.

<sup>16</sup> On 2 September, *Renastere*, Chance, Alternative and Salvation Force of Moldova and Victory Party challenged the constitutionality of certain new legal provisions related to the definition of successors of unconstitutional parties and the application of temporary measures limiting the activity of parties to the CC; its decision is pending. The precautionary measure of the temporary limitation of a party's activity was also challenged by the Heart of Moldova party during related court hearings and dismissed as inadmissible on 25 September by the CC.

<sup>17</sup> See [2020 OSCE/ODIHR and Venice Commission Guidelines](#) on Political Party Regulation. According to Article 11 of the [European Convention on Human Rights](#) and Article 22 of the [International Covenant on Civil and Political Rights](#) (ICCPR), any limitation imposed on the rights of political parties must be necessary in a democratic society, proportionate in nature and time, and effective in achieving its specified purpose. In [Ignatencu and the Romanian Communist Party v. Romania \(2020\)](#), the European Court of Human Rights (ECtHR) upheld the refusal to register a party seen as the successor to the former totalitarian Communist Party, finding the authorities' reasons relevant, sufficient, and the measure proportionate. However, the Court reiterated that such drastic actions—like party dissolution or refusal of registration—are only justified in the most serious cases ([Herri Batasuna and Batasuna v. Spain, 2009](#), § 78; [Linkov v. the Czech Republic, 2006](#), § 45).

<sup>18</sup> In a [decision](#) of 12 September 2025, the CC concluded that the obligation to maintain a register of party members and to periodically submit it to the competent authorities is in the interest of transparency and democracy and cannot, in itself, be considered a measure contrary the Constitution.

register can now result in the limitation of party activity, which the ODIHR Urgent Opinion states appears disproportionate and falls short of international standards.<sup>19</sup>

## Election Administration

Parliamentary elections were administered by the CEC, 37 District Electoral Councils (DECs) and 2,274 Precinct Electoral Bureaus (PEBs), including an increased number of PEBs abroad totaling 301 polling stations in 41 countries for out-of-country and postal voting.<sup>20</sup> The CEC is a permanent body appointed in 2021 with a five-year mandate and broad responsibilities for administering elections, and consists of nine members.<sup>21</sup> Five CEC members, including the chairperson, are women. DEC members (except the permanent chairperson) are nominated before each election by local councils, district courts, and parliamentary parties. PEBs are temporary bodies nominated by local councils and parliamentary parties. All election officials must be certified by the CEC, which maintains a register of about 26,500 people. Women make up 72 per cent of DEC members and 59 per cent of DEC chairpersons.

The CEC managed technical preparations for these elections efficiently, mostly respecting legal deadlines. CEC sessions were announced in advance, open to observers and media, streamed live and available online. The adopted decisions have been published on the CEC website, mostly in a timely manner, thus enhancing transparency. However, the publication of session minutes came with significant delays, and many were not available. Some important regulations were also adopted late, due to the amendments to the Electoral Code shortly before elections, but this did not have notable impact on the process.<sup>22</sup>

The election administration enjoyed stakeholder trust in its competency and efficiency. CEC sessions were professional and collegial, and most decisions were adequately motivated and adopted by consensus. However, as a politically appointed body, party divisions led to split decisions (6:3) when contentious issues arose, putting their impartiality and independence in question. These decisions relate to the establishment of a lower number of polling stations in the Russian Federation and for voters residing on left bank of the Nistru river (Transnistria) compared to previous election cycles, as well as the decision on the number of ballots to be printed for Transnistria.<sup>23</sup> The CEC's decisions on these matters were substantiated with evidentiary support, but these issues have been exploited both by domestic and foreign actors for political purposes. In several other instances concerning the registration

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<sup>19</sup> See ODIHR Urgent Opinion. See also [2020 ODIHR and Venice Commission Guidelines](#) on Political Party Regulation, para 50 “The need for restrictions shall be carefully weighed. The limitation chosen shall be proportionate and the least intrusive means to achieve the respective objective.” Further, the ODIHR and Venice Commission [Joint Opinion](#) on the Draft Electoral Code notes that “the grounds for de-registration of candidates should be reviewed, and these measures should apply as a last resort against only the most serious actions that cannot be remedied by any other means.”

<sup>20</sup> Four PEBs will receive postal votes from 10 countries: Australia, Canada, Finland, Iceland, Japan, New Zealand, Norway, South Korea, Sweden, and United States of America (USA). In 2024, three PEBs covered six countries.

<sup>21</sup> The current CEC composition includes one member nominated by the president and eight by parliament, proportionally according to party representation.

<sup>22</sup> For example, the regulation on observer accreditation was adopted two weeks after the start of the election period. The regulations on candidate nomination and registration as well as the one on candidate representatives were modified and approved on 10 July.

<sup>23</sup> Based on average turnout, pre-registration, as well as information from the Ministry of Foreign Affairs, the CEC opened 301 polling stations abroad (231 were opened in 2024). Among these two PEBs in the Russian Federation, as in the 2024 presidential election and down from 17 in the last parliamentary elections, citing security reasons. The CEC also decided to establish 12 PEBs for voters from Transnistria, a significantly lower number compared to the 2024 presidential elections when 30 PEBs were established. According to the CEC, the decision was largely based on voter participation during the last three elections. The Intelligence and Security Service explained they recommended only 8 PEBs based on both security and vote-buying concerns and past turnout data. On 9 September, the CEC approved a total of 23,500 ballots for the 12 Transnistrian PEBs, a reduction from 90,000 ballots in 2024. All three opposition CEC members issued a dissenting opinion on the decision. Promo-LEX noted in its reporting that reduction of ballots may limit access of voters, result in long queues and discourage participation.

of candidates and observers, members appointed by the opposition abstained or voted ‘against’ without providing any reasoning leaving the basis for such decisions unspecified.

On 25 September, the CEC decided upon the recommendation of the security services<sup>24</sup> to relocate five polling stations for voters from Transnistria to urban areas located at least 30 kilometers from the Security Zone.<sup>25</sup> All three members appointed by the opposition criticized the late notice given on the matter (notice circulated only some 14 minutes before the CEC session) and made a dissenting opinion claiming that longer travel distances of around 45–50 km may discourage voter turnout, creating risks of impeding their constitutional right to vote.<sup>26</sup>

DECs and PEBs were formed within the legal deadline and provided with sufficient resources and logistical support from the authorities. Overall, DECs were professional and well-organized, and the DEC sessions attended by the ODIHR EOM Long-Term Observers were collegial. Contributing to transparency, DEC decisions were posted at the DEC premises, published on DECs’ Facebook pages, the websites of the local administration and of the CEC. However, two DECs faced significant challenges in forming the full membership of some PEBs due to few party nominations and investigations of former members linked to vote-buying, prompting their exclusion due to integrity concerns.<sup>27</sup> The CEC extended the certification deadline by an additional three weeks in order to accommodate the appointment of new members.

The government’s digital infrastructure has increasingly been subject to cyberattacks in the lead up to the elections and cybersecurity in elections remains a serious concern. To strengthen resilience, authorities supported by international partners, have introduced a risk-based framework to identify and mitigate attacks. In addition, the CEC’s State Automated Information System ‘Elections’ (SAISE), which manages several applications, is protected by the Information Technology and Cyber Security Service (STISC) to ensure a cohesive security framework. According to the CEC and STISC, the latter has no access to election data and only provides system security. However, some ODIHR EOM interlocutors questioned this information and have claimed potential risks of data breaches. A new Cybersecurity Agency (CSA) has been established to oversee risk management, promoting best practices for cyber incident management and operating the national Computer Security Incident Response Team. In the election period, it was able to effectively identify and take down a fraudulent CEC website on a look-alike domain. In the lead up to elections, and especially the week before, the CEC was the target of disinformation campaigns, which aimed to undermine its public credibility.<sup>28</sup>

From 2 August, the CEC through its Centre for Continuous Electoral Training (CICDE) conducted extensive in-person seminars for all DEC members and the majority of PEB members. The PEB trainings observed by ODIHR EOM Long-Term Observers were well-organized and interactive. Additionally, trainings were conducted for PEB operators, State Register of Voters (SRV) registrars, law-enforcement, civil society and media. The CEC and CICDE launched comprehensive voter education and information campaigns including podcasts, videos, and social media posts in Romanian,

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<sup>24</sup> The General Inspectorate of Police (IGP) warned about serious security risks, including possible bomb threats and provocations on election day. The IGP noted that due to political restrictions in the security zone, they would not be able to assure the security of voters or the process, following credible information obtained.

<sup>25</sup> Five PEBs from localities in Anenii Noi, Căușeni, and Dubăsari districts were moved to the cities of Anenii Noi, Căușeni, and Chișinău, while reserve sites were designated for other PEBs in the area. The IGP explained to the ODIHR EOM that emergency services must have full access to all polling stations, which was not ensured at the original locations of PEBs, which were within Security Zone, requiring clearance from United Control Commission.

<sup>26</sup> Alternative locations proposed by the opposition CEC members in Criuleni, Vadul lui Vodă, and Bulboacă were considered closer and better connected by transport routes, but were ultimately rejected by the majority because they remain within the Security Zone, and would face the same intervention constraints for emergency services.

<sup>27</sup> In Găgăuzia, based on the [decision of the DEC](#), by 3 September, 58 out of 68 PEBs were incomplete (85 per cent), lacking from 1 to 4 persons. In Taraclia, 9 out of 32 PEBs were [incomplete](#) (28 per cent). Following the deadline for establishing PEBs, the DECs made decisions to add lacking members.

<sup>28</sup> This included [blatant disinformation](#) against the CEC chairperson, a documented cyberattack, and a disinformation campaign about postal ballots.



Russian, Gagauz, Bulgarian, Ukrainian and Roma with subtitles and sign language interpretation. The General Inspectorate of Police also launched an awareness campaign warning against electoral corruption and established a ‘hotline’ to report related cases.

## Voter Registration

Voter registration is passive, based on data extracted from the population register maintained by the PSA. The SRV is maintained and updated by the CEC daily. Every citizen over the age of 18 by election day is eligible to vote, except those deprived of the right to vote by a court decision on the basis of intellectual or psychosocial disability;<sup>29</sup> this is at odds with international standards,<sup>30</sup> and in spite of prior ODIHR and Venice Commission recommendations.

As of 1 September, the SRV included 3,299,396 voters, with 2,763,678 in the voter lists. 258,624 voters without domicile and residence, including those who emigrated abroad, and the 277,094 registered voters residing in Transnistria, are not included in the main voter lists and can be added to supplementary voter lists on the election day.<sup>31</sup> ODIHR EOM interlocutors did not raise significant concerns on the overall accuracy and inclusiveness of the voter register. However, long-standing problems persist with entries for deceased persons, including voters residing abroad or in Transnistria, as the mechanism for removing deceased citizens from the SRV depends on the initiative of the family in reporting such changes. Further, some voters lack a registered domicile or residence; this particularly impacts the Roma population. The CEC noted as a challenge the lack of a unified address register, leading to identification documents occasionally reflecting outdated street names and addresses.

The CEC had optional online pre-registration for voters from abroad and obligatory pre-registration for postal voting available until 14 August. A total of 16,145 requests had been sent for in-person voting at the PEBs abroad, and 2,606 for postal voting. The CEC and other IEOM interlocutors raised concern about personal data misuse; it was suggested that the personal data of voters were compromised through online tools linked to vote-buying schemes such as the Russian defence-affiliated Promsvyazbank, TAITO, and Telegram applications and used for pre-registration, particularly in connection with voters from the Russian Federation, which increased significantly during these elections.<sup>32</sup>

The law ensures sufficient transparency and accessibility of voter lists, with the requirement for lists to be publicly displayed at PEBs no later than 8 September and the possibility of checking the lists online. Voters, representatives of contestants, and observers had the right to verify whether the data on voter lists are accurate and to submit requests for corrections to PEBs by 21 September. ODIHR EOM Long-Term Observers noted that voter lists were available at PEBs premises upon request but that voters’ interest in checking their accuracy was low since verification is possible online.

## Candidate Registration

Eligible voters have the right to be elected, with the exception of active military personnel, prisoners serving their sentence in the penitentiary system, persons whose active criminal records include crimes committed intentionally, and persons deprived of the right to hold positions of responsibility by a final court decision. Citizens can stand as candidates on party/bloc lists or independently. The nomination of

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<sup>29</sup> As per the CEC, 635 people cannot participate in elections, based on a court decision, being under legal guardianship.

<sup>30</sup> Articles 12 and 29 of the [UN Convention on the Rights of Persons with Disabilities](#) (CRPD), “State Parties shall recognize that persons with disabilities enjoy legal capacity on an equal basis with others in all aspects of life” and ensure their “right and opportunity [...] to vote and be elected”. Paragraph 48 of General Comment No. 1 to Article 12 of the CRPD states that “a person’s decision-making ability cannot be a justification for any exclusion of persons with disabilities from exercising [...] the right to vote [and] the right to stand for election”.

<sup>31</sup> The Electoral Code provides for electronic verification of voter data on election day against the centralized register to safeguard against multiple voting.

<sup>32</sup> 13,000 voters pre-registered from the Russian Federation compared to 1,125 for last year’s presidential election.

candidates lasted from 20 June to 19 August. Independent candidates must collect signatures from voters to support their nomination.<sup>33</sup>

Following recent legal amendments, political parties must submit data on the members of their central executive bodies to the PSA by the beginning of the electoral period (14 July). By the same date, the CEC published the list of eligible contestants based on information received from the PSA. Of 66 officially registered parties, 39 were considered to be fully or partially eligible (pending approval) to compete. Following decisions on the eligibility of 6, this was further reduced to 33 parties. ODIHR EOM interlocutors generally agreed with the PSA's eligibility clearances, citing inactivity of certain parties, although some alleged selective application of the law and noted the short timeframes for submitting their information. Two parties, in particular, were affected by the new regulations requiring pre-clearance from the PSA. The Liberal Democratic Party of Moldova (PLDM) challenged the CEC's decision, which found the party ineligible due to documents being filed with the PSA beyond the legal deadline. While the CCA reversed this decision, the SCJ ultimately upheld it. In a second case, while initially being cleared by PSA, the eligibility of the Modern Democratic Party of Moldova (PDMM) was later revoked by the PSA based on information provided by competent security authorities. This led them to be ultimately denied registration.

Based on the determination of the courts,<sup>34</sup> the registration of the Victory Bloc was rejected by the CEC and the activities of the four parties forming it, considered to be 'successor parties' were temporarily limited by a CCA decision dated 19 August, which was subsequently appealed. The decision followed a motion filed by the Ministry of Justice to dissolve the parties as alleged successors to the unconstitutional Șor Party. The SCJ rejected the parties' appeal against this temporary restriction, which will remain in place until a final decision by the CCA. Consequently, these parties were never registered.

The CEC registered 4 electoral blocs, 15 political parties, and 4 independent candidates, offering voters a broad choice across the political spectrum. Political parties Centrist Union of Moldova, 'For People, Nature and Animals', *Moldova Mare*, and New Historical Option, were initially rejected on the grounds of non-conformities with registration regulations, which resulted in the removal of some candidates from the list and affecting the gender quota.

Deadlines for adjudication of disputes related to candidate registration were amended in 2025, in line with prior ODIHR recommendations; however, these still fail to provide for effective remedy, as they did not guarantee that such disputes were settled before the start of the campaign.<sup>35</sup> Among these disputes not settled before the start of the campaign, New Historical Option was added on 4 September on the basis of the CEC's reconsideration following a CCA decision. On 5 September, following a SCJ ruling, *Moldova Mare* was registered by the CEC (see *Election Dispute Resolution*).

In considering these decisions, the CEC occasionally applied a formalistic and selective approach and did not always communicate clearly and in advance about correctable shortcomings. The CEC opined that, while it had provided guidance in some cases, it is not responsible for assisting contestants in properly filing their applications. Furthermore, certain newly imposed candidate registration requirements proved unduly burdensome. For example, the requirement for all candidates on the lists to appear in person in Chișinău and provide a signature poses a particular challenge for those living outside Chișinău (and abroad); these requirements are at odds with the principle of equality of

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<sup>33</sup> Male candidates had to submit a minimum 2,000 and a maximum 2,500 signatures while for female candidates, this number was 1,000 and 2,500, respectively. Independent candidates must not be, nor have been within 70 days of before the election, members of any political party, nor should they have publicly supported any party during that period.

<sup>34</sup> The court shall determine the status of a successor party by assessing its connections and substantial similarities with a party declared unconstitutional, if evidence shows that the new or registered party seeks to continue or resume the activities of the banned party.

<sup>35</sup> All 9 SCJ appeals related to candidate registration were decided between 29 August and 11 September, last case.

opportunity and the right to stand for election.<sup>36</sup> Delays in adjudicating certain cases related to candidate registration had a knock-on effect, delaying certain processes, such as ballot design.

All registered lists complied with the legal gender quota and placement requirements. Approximately 43 per cent of the 1,403 candidates registered are women but only 3 of the 19 political entities contesting are led by a woman.

On 19 September, the Ministry of Justice requested the CCA to limit the activities of the Heart of Moldova (part of the Patriotic Bloc) for a period of 12 months,<sup>37</sup> following a notification from the CEC citing alleged illegal financing of the party and ties to the unconstitutional Șor Party.<sup>38</sup> The CCA granted the Ministry of Justice's request on 25 September. Consequently, on 26 September the CEC excluded the Heart of Moldova candidates from the list of the Patriotic Bloc, requesting the revision of the candidates list according to the gender quota requirement within 24 hours. On 27 September, the SCJ upheld the CCA decision on appeal. Further, on 26 September, following a complaint from the PSDE and notifications from various law enforcement agencies and intelligence services, the CEC decided to cancel the registration of the *Moldova Mare* party. The notifications involved multiple assertions of serious violations, including the use of undeclared financial resources by the political party, foreign funding, voter bribery, and collaboration with parties considered successors of the unconstitutional Șor Party. The CEC also notified the Ministry of Justice to consider initiating procedures for restricting the party's activity. On election day, the CCA held the appeal hearing and rejected it, a few hours before the closing of the polls. Given the timing, actions impacting the two parties' eligibility undermined the legal certainty of the electoral contestants' status and limited their right to seek effective remedy, at odds with international standards.<sup>39</sup>

## Election Campaign

The campaign was competitive, and fundamental freedoms were generally respected. With only a few isolated incidents, parties and candidates were able to present their programmes to the electorate freely.<sup>40</sup> The official electoral campaign period ran from 29 August to 26 September. As the law permits pre-electoral political activities that do not include direct calls to vote, some parties took advantage of

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<sup>36</sup> Paragraph 7.5 of the [1990 Copenhagen Document](#) prescribes the participating States to “respect the right of citizens to seek political or public office, individually or as representatives of political parties or organizations, without discrimination”.

<sup>37</sup> According to Art 21 para (1) of the LPP, the activity of a political party may be limited if its actions cause serious harm to political pluralism or fundamental democratic principles and, according to para (5), during the period of limitation of the activity of a political party, it is prohibited from participating individually or jointly in elections. In addition, the Ministry of Justice also requested as a precautionary measure the temporary limitation of the activity until a CCA final decision on the merits, arguing that the party's illegal activities posed a real and imminent risk of causing irreparable harm to democratic values and the rule of law.

<sup>38</sup> In addition, following a complaint from ALDE against the Heart of Moldova Party, the CEC concluded that, although it cannot conclusively confirm serious violations of financing rules by the Party Heart of Moldova or the Patriotic Bloc, reasonable suspicions remains regarding their funding. Therefore, the CEC issued a warning to the bloc as a preventive measure to ensure strict compliance with financing regulations, recognizing that while the exact amount of illegal funding is unclear, its presence is suspected. An in-depth financial control was ordered and the Ministry of Justice notified.

<sup>39</sup> Art. 13 of the [European Convention on Human Rights](#). “Right to an effective remedy: Everyone whose rights and freedoms as set forth in this Convention are violated shall have an effective remedy before a national authority notwithstanding that the violation has been committed by persons acting in an official capacity”. Paragraph 5.10 of the 1990 Copenhagen Document calls on participating states to ensure that “everyone will have an effective means of redress against administrative decisions, so as to guarantee respect for fundamental rights and ensure legal integrity”. ECtHR [Abil v. Azerbaijan](#) (5 March 2020) “in order to prevent arbitrary disqualification of candidates, the relevant domestic procedures should contain sufficient safeguards protecting the candidates from abusive and unsubstantiated allegations of electoral misconduct, and that decisions on disqualification should be based on sound, relevant and sufficient proof of such misconduct.”

<sup>40</sup> The ODIHR EOM received information about police taking pictures of opposition parties' campaigners and supporters at campaign events in several areas. In one case, the arrangement of hospital premises in Cimișlia for the Alternative Bloc campaign meeting was revoked.

this provision by running various initiatives ahead of the official campaign, resulting in some complaints of early campaigning.<sup>41</sup>

The campaign initially appeared subdued but intensified in the closing weeks. Among the most visible and active contestants were PAS, the Patriotic Bloc, the Alternative Bloc, Our Party, Respect Moldova, the Coalition for Unity and Prosperity, Democracy at Home, the European Social Democratic Party and *Moldova Mare*. Traditional campaigning methods included rallies, community meetings, door-to-door canvassing, and leaflet distribution. Several instances of unlawful dissemination of campaign materials were reported.<sup>42</sup> PAS centred its campaign on its declared achievements and its commitment to EU integration, while the opposition focused on criticism of the government, appeals to traditional values, promoting development, and closer ties with the Russian Federation. ODIHR interlocutors also noted the involvement of clergy affiliated with the Moscow Patriarchate during the campaign, with attempts to influence voters through so-called traditional values and anti-EU rhetoric, which was also confirmed by several journalistic investigations. Issues such as foreign interference, corruption, and economic welfare also featured prominently in the campaign.

The law prohibits the use of administrative resources in the campaign, including the use of public funds, transport, budget allocations and official powers, as well as the use of state advertising. Previous ODIHR recommendations on preventing the misuse of administrative resources were not fully addressed in the law, though the CEC published additional guidelines on the issue. A few days before the start of election period, the government revised the budget and announced that EUR 51 would be paid to 295,000 school students in each of the next two academic years, starting with a payment at the beginning of September.<sup>43</sup> While this practice does not seem to violate the law it may have provided an unfair electoral advantage and is contrary to international standards.<sup>44</sup>

One member of the government, as a candidate, did not suspend his official duties at the start of the campaign, as required by law, while another minister was attending PAS campaign events in an official capacity;<sup>45</sup> these instances may have blurred the line between party and State, contrary to OSCE commitments and good practice.<sup>46</sup> There were a series of unsubstantiated allegations from both opposition and ruling parties on the potential misuse of administrative resources at the local level.<sup>47</sup>

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<sup>41</sup> For instance, the CEC received six complaints, five against PAS and one against the Heart of Moldova. The CEC rejected two complaints and readdressed four to the police for further investigation.

<sup>42</sup> As of 26 September, the CEC received 31 complaints, all of which were against PAS. All complaints were readdressed to the police and lower-lever commissions for further investigation and clarification, respectively. For instance, on 5 September in Durești and on 6 September in Chisinau, PAS posters were placed outside of designated areas.

<sup>43</sup> See adjustments to [the State Budget](#) introduced on 18 June by amendments to Law [No. 188](#), allocating EUR 15.3 million for school students. See [announcement](#) of 17 June by President of Parliament, Igor Grosu, and the Minister of Education, Dan Perciun.

<sup>44</sup> See Paragraph II. B. 1.1 of the 2016 ODIHR and Venice Commission's [Joint Guidelines](#) for Preventing and Responding to the Misuse of Administrative Resources during Electoral Processes, which states, the “legal framework should provide effective mechanisms for prohibiting public authorities from taking unfair advantage of their positions by ... the use of specific funds (state or local budget) as well as institutional resources”.

<sup>45</sup> On 7 September, Minister of Labour and Social Protection, Alexei Buzu, did not suspend his official duties after start of the campaign. On 17 September, the CEC warned Minister of Environment, Sergiu Lazarencu, for breaching the regulation related to conflict of interest.

<sup>46</sup> Paragraph 5.4 of the 1990 OSCE Copenhagen Document calls for “a clear separation between the State and political parties”. See also paragraph II. B. 1.1 of the of the 2016 ODIHR and Venice Commission Joint Guidelines on Preventing and Responding to the Misuse of Administrative Resources during electoral process.

<sup>47</sup> The ODIHR EOM received reports of such allegations, including 38 complaints filed with the CEC, of which 31 were against PAS, 2 against the *Alternativa* Bloc, 3 against Our Party, 1 against the Cities and Communes League Party, and 1 against the Chisinau mayor's office. The CEC rejected 10 complaints, 15 were readdressed to the police, and 13 were pending.

The campaign was marked by hybrid attacks, including illicit financing to influence the voters' choice, disinformation and cybersecurity incidents.<sup>48</sup> During the course of the election, and especially in the week preceding it, a series of credible, national and international journalistic investigations from outlets including the *BBC* and *Bloomberg* found that an organised network funded by foreign sources was co-ordinating targeted vote-buying schemes, and disinformation campaigns.<sup>49</sup> The authorities identified the above mentioned attacks as originating from the Russian Federation and being facilitated by a coordinated network of supporters affiliated with Ilan Șor, and involving cryptocurrency and electronic cards connected to accounts at the Russian Promsvyazbank.<sup>50</sup> The joint efforts of the General Inspectorate of Police (IGP), the Prosecutor's Office for Combating Organised Crime and Special Cases, the National Anti-Corruption Centre (CNA), and the State Tax Service, which were seen as effective by many ODIHR EOM interlocutors, resulted in 844 searches, the detention of 122 individuals, 13 criminal cases and 46 preventative measures imposed; a number of investigations are on-going.<sup>51</sup> Further, proactive efforts of law enforcement agencies to warn of such interference contributed to mitigating the impact and ODIHR EOM Long-Term Observers reported that new, harsher penalties for electoral corruption were widely viewed as a positive step and a strong deterrent against vote buying.

Even with the gender quota, only a few female candidates received significant visibility during the campaign. Women constituted a substantial portion of candidates, including three out of four independent candidates and 42 per cent of all candidates. Nevertheless, their involvement in campaign events, according to ODIHR EOM observations, was predominantly as participants rather than prominent figures. Almost half of participants in the campaign events observed by the ODIHR EOM Long-Term Observers were women but were not given equal prominence at campaign rallies attended.

### ***Online Environment***

Campaigning on social media platforms remains largely unregulated for both contestants and platforms. Contestants made extensive use of social media platforms, at national and local levels, primarily Facebook, Instagram, TikTok, and Telegram.<sup>52</sup> Parties and blocs presented their programmes and campaign activities, with PAS, the *Alternativa Bloc*, and Our Party also running over 400 paid campaign ads on Facebook. The tone of the official online campaign was largely issue-based, mirroring the in-person and media campaigns, but with some instances of personalised attacks and inflammatory rhetoric aimed at discrediting opponents.

Beyond the formal online campaign, ODIHR EOM social media monitoring identified extensive unofficial campaign posts published by content creators, many of which appeared to be polarising and coordinated inauthentically across networks of newly created accounts. These findings were

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<sup>48</sup> The Cybersecurity Agency (ASC) warned WhatsApp, Signal and Telegram users about the spread of phishing messages.

<sup>49</sup> See the investigation from [Bloomberg](#) published on 22 September and the [BBC report](#) from 21 September on Russian-funded fake news aimed at disrupting the election.

<sup>50</sup> According to the [information](#) from the chief of the General Inspectorate of Police, schemes involving more than 138,000 accounts and transactions were identified since the 2024 presidential election and referendum. The schemes entailed the transfer of personal data and coordination of voters through dozens of groups on Telegram. On 6 August, the Minister of the Interior [warned](#) voters about the liabilities associated with using the TAITO application in addition to Telegram groups for electoral corruption for the upcoming parliamentary elections.

<sup>51</sup> The data was received from the General Prosecutor's Office, the IGP, and the CNA for the period from 14 July to 25 September.

<sup>52</sup> According to the recently adopted Venice Commission's Interpretative Declaration of the Code of Good Practice in Electoral Matters as Concerns Digital Technologies and Artificial Intelligence, "[t]he State has an obligation to take effective steps to ensure a supportive environment for robust public debate, preventing and punishing infringements of the voters' freedom to form an opinion, including by private actors, as well as to prevent inequality in the media coverage during elections." Alternative paragraphs can be mentioned, e.g. paras 10 or 11".



corroborated by social media monitoring efforts by CSOs.<sup>53</sup> Some of these provided legitimate political opinion, albeit often with intemperate rhetoric, while others appeared to spread disinformation. The latter sometimes used unlabelled and misleading deep-fake AI generated videos, ‘troll farms’, or automated bots to artificially boost engagement and reach.<sup>54</sup> The police reported to the ODIHR EOM that some of the disinformation was also amplified by advertising on Facebook. Most content that appeared to use deceptive methods, violating the platforms’ community standards, promoted anti-PAS, anti-EU and anti-NATO narratives.

State efforts were notably strengthened with the authorities deploying a wide range of mechanisms and engaging a number of agencies to detect external interference and disinformation. State authorities and CSOs also worked to raise awareness of the risks of disinformation and manipulative content. Following a ‘whole of society’ resilience building approach used in a number of European countries, debunking and pre-bunking of disinformation was delegated to individual government ministries and supplemented by civil society efforts.<sup>55</sup> While government departments addressed the disinformation with journalists, they did not generally provide fact-based information to counter false narratives directly to the public on official websites or social media. Despite considerable efforts to protect against information threats, the endemic nature of the challenge meant that the campaign was negatively affected by disinformation. Some CSO counter-disinformation campaigns appeared to be directed against specific opposition parties and blocs.

Multiple state agencies separately assessed and flagged disinformation and inauthentic social media posts and accounts to platforms, with different offices acting as focal points for separate platforms.<sup>56</sup> However, co-ordination between the agencies did not appear to be comprehensive. The authorities assessed the different platforms as each having untimely and inadequate responses to around 1,000 ‘take down requests’ sent during the campaign, with Meta and Alphabet less responsive than TikTok, and Telegram entirely unresponsive.<sup>57</sup>

Divisive rhetoric from candidates and inauthentic networks spreading disinformation and inflammatory content had a negative impact on the reliability of information available to voters. This was exacerbated by platforms’ algorithms, which amplify emotional engagement and create ‘echo-chambers’ and ‘filter-bubbles’.<sup>58</sup> Further compounding this, on 23 September, state officials of the Russian Federation and media, particularly TASS (the Russian Federation’s state news agency), promoted an alarmist and false

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<sup>53</sup> EU funded European Digital Media Observatories ([FACT](#) and [BROD](#)), reported on disinformation and manipulative methods used throughout the campaign. Individual CSOs such as [Watchdog](#), [StopFals!](#), [Funky Citizens](#), and [Expert Forum](#) reported over 12,500 problematic posts, accounts and networks to the platforms. Less than half of these were acted upon by the platforms, and generally not in a timely manner, though the platforms increased the speed of reaction near the end of the campaign. The European Commission facilitated weekly meetings from 1 September between the platforms and CSOs to exchange information.

<sup>54</sup> See for instance the CSO [Context](#)’s reporting of [disinformation](#) and [coordinated inauthentic behaviour](#).

<sup>55</sup> Some of the CSOs include [Veridica](#) and [StopFals!](#) along with media outlets. On the other hand, there were some false narratives which were not addressed by the authorities, including a deep-fake video which claimed that the cost of gas would be cut by 50 per cent in September.

<sup>56</sup> Shortly before the start of the campaign, the CEC, Security and Intelligence Service (SIS), and the national police became the focal point for TikTok; the StratCom Center for Meta and Google; and the Audio-Visual Council for news videos on YouTube.

<sup>57</sup> TikTok released data on [16 September](#) indicating that they removed networks supporting pro-Russian opposition, which used a variety of coordinated inauthentic behaviours, including “likely commenting-for-hire schemes” from Bangladesh. It also prevented more than 2.2 million fake likes and 1.4 million fake follow requests, blocked more than 250,000 spam accounts from being created in Moldova and removed more than 100,000 fake accounts, 1.3 million fake likes, and 1.6 million fake followers. [Meta](#), [Google](#), [YouTube](#) and [Telegram](#) did not provide data on any measures that they may have taken specific to the Moldovan elections. Meta is the parent company of Facebook and Instagram. Alphabet is the parent company of Google and YouTube.

<sup>58</sup> An echo chamber is a social environment of like-minded views, whereas a filter bubble is an algorithmically curated information sphere reinforcing existing preferences”. See [Venice Commission](#) and the Directorate of Information Society and Action Against Crime of the Directorate General of Human Rights and Rule of Law (DGI) on Digital Technologies and Elections, paras 14, 30, 140.

narrative from Russia's Foreign Intelligence Service (SVR) claiming that the EU would "occupy Moldova", NATO intended to threaten Transnistria from Odesa, and "gross falsifications of electoral results would lead to Moldovans taking to the streets to defend their rights."<sup>59</sup>

## Campaign Finance

Campaign finance regulation provides sufficient grounds for transparency, accountability and integrity, and are largely in line with international standards.<sup>60</sup> Positively, recent legal amendments partially addressed most previous ODIHR recommendations, including those calling for reviewing the legal framework to address illicit financing and the CEC's role in oversight. Moreover, most GRECO recommendations on political financing transparency have been implemented.<sup>61</sup> These changes have contributed to a better handling of the issues by the CEC. However, other long-standing ODIHR recommendations remain unaddressed, including on third-party financing and the valuation of in-kind contributions.

Only political parties are entitled to monetary subsidies, which are allocated according to previous election results and the number of elected women and youth.<sup>62</sup> A previous ODIHR recommendation proposing that independent candidates should also be entitled to state budget allocations was not implemented. Interest-free loans were available, but most contestants thought they were too meagre to warrant applying. The CEC informed the ODIHR EOM that only one contestant applied (New Historical Option Party).

Private funding for campaigning consists primarily of donations, which may be either monetary or in-kind (reported at average market value). Different limits on donations apply to different types of donors. Legal entities, in particular, may donate a maximum of 12 average monthly salaries (not to exceed 30 per cent of entities' annual income).<sup>63</sup> Some contestants claimed legal entities were unwilling to donate due to perceived political consequences. While third party financing remains prohibited, detailed regulation is still lacking.

Campaign expenditure for each contestant is limited to EUR 3,912,764. Recent amendments provide that, in addition to monetary expenses, in-kind contributions should also be included within this spending limit, while also requiring advance payment for all goods and services. Moreover, all campaign-related monetary transactions must be made to and from a bank account specifically opened for this purpose with the mention "electoral fund". One party (*Moldova Mare*) reported to ODIHR EOM that they could not open a bank account, and the CEC informed the ODIHR EOM that this was due to the international sanctions applied to the party's president.

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<sup>59</sup> See TASS report of SVR claim.

<sup>60</sup> The legal framework for political party and campaign finance consists of the [Electoral Code](#) (Art. 50-59), the [Law on Political Parties](#) (Art. 24-31), and CEC Decisions, including [CEC Regulation 1102/2023](#) on the financing of political party activities and [CEC Regulation 1185/2023](#) on the financing of initiative groups and electoral campaigns.

<sup>61</sup> The [2023 GRECO Evaluation report](#) (5th evaluation round) stated that "in the [...] Evaluation Round [dedicated to Party Funding], 88 percent of recommendations were implemented" (paragraph 9).

<sup>62</sup> The [Law on Political Parties](#) provides that, annually, 0.1 per cent of state budget revenues, excluding revenues with a special purpose, is dedicated to the financing of political parties. For 2025, the [State Budget Law](#) allocated a total of EUR 3,195,466. This amount is then distributed among political parties according to the following formula: 30 per cent in proportion to the performance obtained in parliamentary elections, 30 per cent in local elections, and 15 per cent in presidential elections; 7.5 per cent in proportion to the women elected in parliamentary elections and 7.5 per cent in local elections; 5 per cent in proportion to the young people (under 35) elected in parliamentary elections, and 5 per cent in local elections. Parties, contesting individually or as part of a bloc, may then use up to 70 per cent of their state subvention for campaigning. [CEC Decision 3346/2025](#) set the following allocations for 2025: PAS (EUR 1,497,853); PSRM (EUR 654,885); PCRM (EUR 156,207); PN (EUR 155,775); PSDE (EUR 129,890); MAN (EUR 89,261); PDCM (EUR 87,392); PPDA (EUR 74,035). Other parties receive less than 2 per cent of the total amount.

<sup>63</sup> Maximum donations are set at EUR 5,000 for individuals and EUR 10,000 for legal entities.

During the electoral campaign, all contestants must submit weekly financial reports to the CEC as well as a final report no later than three days after election day. The reports follow detailed templates with dedicated sections for online campaign expenses. While no ODIHR EOM interlocutor complained about the required frequency of reporting, most expressed frustration about the cumbersomeness of reporting in-kind contributions, especially volunteers', party members' and candidates' work. This was compounded by the lack of specific guidelines for the valuation of in-kind contributions, despite previous ODIHR recommendations.

Contestants generally complied with the obligation to submit weekly reports, which were published on the CEC website within 24 hours. The reports showed a diversity of both of revenues and expenditures, with both public and private sources of income, and expenditure on both traditional campaign materials (banners, leaflets), TV and radio advertisement as well as online advertisement. As of the latest weekly report submitted on 22 September, the total expenditure reported by all contestants combined was EUR 2.2 million, of which PAS reported the highest spending at EUR 0.8 million (34 percent of the combined total), followed by Patriotic Bloc at EUR 0.5 million (20 percent), while both *Alternativa* Bloc and Our Party declared close to EUR 0.3m (12 percent) each. These four contestants accounted for almost 80 percent of all spending.<sup>64</sup>

The CEC exercises oversight and possesses a wide scope of powers to perform controls and impose sanctions. Recent amendments have expanded the type of financial checks that it may carry out as well as the scope of the sanctions, which may include the suspension of public funding for 6 months to 4 years in case of repeated offences. Given limited human resources, the CEC relied on other state institutions and international partners to support them. During the election campaign, the CEC review the reports, performed additional financial checks when necessary, and issued appropriate sanctions. They, thus, played an effective role and contributed to public transparency.

## National Minorities

Moldova is a multi-ethnic state, with persons belonging to national minorities comprising approximately 18 per cent of the population. No systemic barriers were identified to the ability of national minorities to freely participate in the election process.

As most minorities consume information primarily in Russian or their minority language, their access to official electoral information in Romanian is limited. Although the CEC website is available in Russian, this language version is not updated simultaneously with the Romanian one. As a result, minorities do not have immediate access to the full range of official electoral information. Positively, the law provides for ballots in minority languages upon request from DECes.

Roma voters faced particular barriers in voter registration. Many of them lack a registered domicile or residence, which particularly impacts this population. Rural Roma often faced long travel distances to reach polling stations.

Minority candidates were present across party lists, indicating no formal barriers to their participation. According to ODIHR EOM interlocutors, members of national minority communities are more exposed to disinformation than the general population, as they predominantly consume Russian-language social media, particularly TikTok, where such content circulates widely. Media also reported that minority communities and other vulnerable groups were allegedly exploited for paid protests and disruptive activities.

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<sup>64</sup> In terms of income, PAS, *Alternativa* Bloc and Our Party relied mostly on monetary donations (accounting for between 66 to 86 percent of their overall funding). While PAS declared donations from individuals and legal entities, donations to *Alternativa* Bloc and Our Party came almost exclusively from individuals. In turn, the Patriotic Bloc relied mostly on its own funds (44 percent of its overall funding) and declared a higher percentage of in-kind donations (24 percent of its overall funding) compared to the other three contestants (between 1 to 3 percent each).

## Media

The media environment is diverse and pluralistic but constrained by a limited and shrinking advertising market. This challenges financial sustainability and increases dependence on owner or corporate interests and donor funding.<sup>65</sup> Broadcast media are legally required to disclose their ultimate beneficial owners.<sup>66</sup> However, the ownership of print and online media outlets remains opaque. Social networks are perceived as the primary source of information, followed closely by television and, to a lesser extent, online news portals.

Following the 2022-23 suspension of several television stations on security and disinformation grounds, some affected outlets migrated to the less-regulated online environment.<sup>67</sup> On 16 September 2025, law enforcement authorities searched the offices of the *Trust Media* company, which operated two such media (*Canal 5* and *Primul în Moldova*) over tax evasion and money laundering charges. In 2024, the Intelligence and Security Service (SIS), was empowered to block websites outside of a state of emergency, and in 2025, it blocked over 60 websites on national security grounds, including 35 during this election campaign. Most blocking orders targeted multiple websites of the online TV service *MD24* and the free IPTV service *HaiTV*, which provides access to *MD24* and several Russian television channels, previously accused of spreading disinformation.<sup>68</sup> The lack of public access to official decisions on website blocking, and the absence of a consolidated register of blocked sites have raised concerns about the transparency of such processes.<sup>69</sup>

The Constitution guarantees freedom of expression and prohibits censorship. Article 7 of the ‘Law on Countering Extremist Activity’, as amended by Law 100/2025, contains provisions that can allow the suspension and permanent closure of a media outlet for vaguely defined “extremist activity”.<sup>70</sup> Many ODIHR interlocutors reported an increase in instances of intimidation and harassment of journalists,

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<sup>65</sup> The market [research](#) on broadcast media, conducted by the Audiovisual Council (AVC), found a 9.5 per cent decrease in broadcasters' advertising revenues in 2024 compared to 2023. It also noted that in 2024 international donors provided some 17 per cent of the broadcasters' total revenue through grants. Following the suspension of USAID operations, the EU and several embassies provided temporary emergency funding until the end of 2025. The Media Subsidy Fund, established in 2024 by the Ministry of Culture, provides, through decisions of the CSO-dominated Expert Council, grants of up to 2,000,000 MDL for short-term editorial projects. However, many national media outlets expressed reluctance to apply due to concerns over their editorial independence.

<sup>66</sup> On 27 March 2025, the Council for the Promotion of Investment Projects of National Importance [suspended](#) the broadcasting license of TVC21 for 60 days due to incomplete documentation and insufficient transparency regarding its ownership structure. The decision was widely [criticized](#) by civil society as "interference with the right to freedom of expression".

<sup>67</sup> The 2022 amendments to the Audiovisual Media Services Code prohibited the retransmission of “news, information and analysis, military and political content” produced in states other than EU member states, the United States, Canada, and states that have ratified the European Convention on Transfrontier Television, effectively prohibiting such content from the Russian Federation. Although the Code requires at least 80 per cent of content produced by broadcasters to be in Romanian, many national television channels have introduced Russian-language news into their programming.

<sup>68</sup> Both services are reportedly linked to Ilan Șor, with the Digital Forensic Research Lab [connecting](#) their digital infrastructure to the Russian state media ecosystem. On 15 July 2025 the EU has added one the of main hosts of *MD24* Dmitri Buimistru to the [list](#) of concerning restrictive measures in view of Russia’s destabilising activities for “intentionally engaging in coordinated information manipulation and interference by operating as a key propagandist on MD24, a Russia-based online TV channel created by Ilan Shor following license withdrawals from his previous stations for disseminating Russian disinformation.”

<sup>69</sup> Paragraph 43 of the UN HRC [General Comment 34](#) to the ICCPR notes that any restrictions on any internet websites should not violate freedom of expression, and that “permissible restrictions generally should be content-specific” while “generic bans on the operation of certain sites and systems” are not compatible with the principle of freedom of expression.

<sup>70</sup> The ODIHR Urgent [Opinion](#) on the Draft Law 381/2025 called on parliament to reconsider Article 7 of the Law “to avoid a risk of prohibitions being misused to illegitimately obstruct the work of independent media and journalists”. Following the opinion amendments, a clause was introduced stating that Article 7 “shall not impede the lawful activity of the media and journalists”. This generic safeguard clause failed to address the concern of legal vagueness and provided no meaningful protection against arbitrary application.

both in person and online, mainly from non-state actors, while also pointing to gaps in legal protections and institutional follow-up.<sup>71</sup> Following the adoption of the Law on Access to Information of Public Interest, which entered into force in 2024, many ODIHR interlocutors noted improved responsiveness and cooperation with the media in providing requested information.<sup>72</sup>

Recent amendments to the Audiovisual Code, which entered into force on 21 August, addressed several ODIHR recommendations by increasing the number of civil society nominations and by decreasing parliamentary control over appointments and dismissals of the management of the national public TeleRadio-Moldova (TRM) and media regulator Audiovisual Council (AVC).<sup>73</sup> They also revised the sanctioning system, providing the AVC broader discretion in determining fines, and removing one-term limits for members of the AVC and TRM supervisory council.<sup>74</sup>

The legal framework for media during the campaign combined detailed rules for broadcast outlets, while print and online media are subject to general obligations, to ensure fair, balanced, and impartial coverage of the contestants. A total of 22 television and 12 radio broadcasters committed to offering free time to contestants upon request, in order to qualify for paid political advertising. Although 14 contestants took advantage of free time,<sup>75</sup> most television broadcasters, however, chose to broadcast free time outside of peak viewership hours, thus potentially limiting their viewership.<sup>76</sup> Paid political advertising in the broadcast media, limited to 2 minutes per day for each contestant, was mainly bought by PAS, the only party to advertise on national television station in the first weeks of the campaign. They were joined in the last weeks of the campaign by the Patriotic Bloc, the *Alternativa* Bloc, Respect Moldova, Moldovan Alliance, Liberal Party and Our Party, although to a lesser extent as most contestants preferred to use the online environment. Over 80 debates on 16 national and regional broadcasters provided a platform for contestants to present their views and share opinions, although several contestants chose not to participate in these.<sup>77</sup>

ODIHR EOM media monitoring of the campaign concluded that while the Patriotic Bloc was the most visible election contestant, the majority of broadcasters displayed a partisan approach either by favoring

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<sup>71</sup> The Association of Independent Press (API) noted an increase in the number of attacks against journalists, from 43 in [2023](#) to 66 in [2024](#). As of 25 September 2025, API identified 95 such cases.

<sup>72</sup> Some noted persisting challenges in obtaining information from some institutions, including the Ministry of Health, as well as at the level of local administrations, most notably the Chişinău city hall, and in Găgăuzia.

<sup>73</sup> The amendments changed the composition of the AVC, which is now to be composed of two members nominated by the Parliament (instead of three), one member nominated by the President, one member nominated by the Government, and three members nominated by the CSOs (previously two members) and approved by the parliament. The supervisory board of the TRM is now appointed by the AVC; previously the parliamentary factions nominated three members, and civil society organizations nominated four members.

<sup>74</sup> The 2025 [Opinion](#) of the Venice Commission on the amendments noted that while the possibility of renewal of mandates “is not inherently incompatible with international legal standards, it may raise concerns regarding the independence of the officeholder, particularly where the renewal process is controlled by the same body responsible for the original appointment.”

<sup>75</sup> Several television stations, following informal consultations with the CEC, refused to broadcast the free advertisement spot submitted by the Patriotic Bloc. The advertisement was filmed during the bloc's campaign launch at Capriana Monastery, which conflicted with Moldova's electoral framework prohibiting the use of religious imagery for electoral purposes. The bloc subsequently submitted an alternative advertisement that was accepted by broadcasters.

<sup>76</sup> In particular, *Moldova 1* chose to broadcast 5-minute promotional spots between 13:45 and 14:20, *Jurnal TV* between 15:15 and 15:35, *Next TV* between 6:00 and 6:20, *ProTV Chişinău* between 13:54 and 14:10, *TV 8* between 6:38 and 6:55. [Research](#) into the viewership conducted by the Independent Journalist Center found the peak hours in Moldova to be between 19:00 and 22:10. Previously, the Venice Commission has [recommended](#) the Moldovan Authorities to guarantee “free airtime for all electoral contestants during prime time (for electoral advertising, election debates and broadcasting campaign meetings) and ensuring strict supervision.”

<sup>77</sup> On 8 September the leader of “Democracy at Home” party leader Vasile Costiuc [announced](#) that his party will not participate in any debates “out of respect for the society” due to “controlled media”. He later joined the debate on *Moldova 1* on 25 September, only to reiterate his prior statement and leave the studio.



or strongly criticizing it.<sup>78</sup> The public television channel *Moldova 1* was noticeably more critical, dedicating the Patriotic Bloc some 12 percent of its election-related news coverage to it with a neutral and negative tone. PAS and the *Alternativa* Bloc received 7 and 6 percent of such coverage, respectively, mostly in a neutral tone, while the other contestants received between 1 and 3 per cent of coverage. *Moldova 1* largely refrained from producing in-house analytical or investigative programs, which would have assisted voters to navigate the complex political environment. Instead, the monitored talk shows on *Moldova 1* supported a pro-European narrative and highlighted the government's anti-corruption efforts, indirectly favouring PAS and reinforcing a critical framing of the Patriotic Bloc.

Private broadcasters *Jurnal TV* and *TV8* demonstrated an even more partisan stance by heavily criticizing *Alternativa* and Patriotic Blocs in their news, talk shows, and satirical programs. *Jurnal TV* also indirectly promoted PAS through entertainment programmes.<sup>79</sup> Similarly, news on *ProTV Chişinău* displayed a more critical stance to the Patriotic Bloc (17 percent), and to a lesser extent, to *Alternativa* Bloc (9 percent) and PAS (9 percent), providing all three a mix of neutral and negative coverage. The newscasts of *Cinema 1* primarily focused on the campaign events and statements of contestants, providing most of their news coverage to PAS, some 11 percent, followed by the Patriotic Bloc and *Alternativa* Bloc, receiving around 8 and 6 percent of neutral and positive coverage, respectively. *Cinema 1* also dedicated extensive news coverage, over 29 percent, to the activities of the government, indirectly favoring PAS.

By contrast, private broadcaster *TVC21* dedicated one third of its election-relevant news to the Patriotic Bloc, 10 per cent to the *Alternativa* Bloc, and 6 per cent to Our Party. This was mainly positive or neutral in tone, while PAS received 8 per cent, mainly neutral in tone. Most of the guests of *TVC21*'s talk shows, mainly affiliated with the political opposition, aligned with the anti-PAS narrative established by hosts.

The Gagauzian public broadcaster (*GRT*) largely refrained from editorial coverage of contestants, focusing instead on electoral procedures and CEC activities. However, their journalists displayed a clearly anti-PAS stance in the talk shows.

Overall, the media provided contestants with numerous opportunities to present their views and opinions through debates, talk shows, current affairs programs, and news coverage. However, the partisan coverage in most media, combined with event- and statement-focused news narratives, limited investigative and analytical reporting, and extensive disinformation narratives on social networks, significantly hindered voters' opportunities to make an informed choice.

During the campaign, the AVC, with the support of a local CSO, monitored broadcasters' compliance with the electoral framework and issued 30 warnings along with 24 fines to the media. Most of the fines related to the content of political advertisements by PAS, which described the negative consequences of a potential transition of power, which, in the opinion of the AVC, could instil fear in voters. Additionally, fines were issued for content from Our Party, which addressed alleged LGBT propaganda in schools, considered discriminatory by the AVC. Three fines were handed down to *GRT*, *TVC21*, and *Pro TV Chişinău* due to the discriminatory behaviour of guests on talk shows. The AVC monitoring

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<sup>78</sup> The monitoring of the broadcast media focused on the prime-time (18:00-00:00) coverage of the main channel of the national public broadcaster *Moldova 1*, the Gagauzian public broadcaster *GRT* (only Romanian and Russian-language content), and private televisions *Cinema 1*, *Jurnal TV*, *ProTV Chişinău*, *TV8* and *TVC21*. The EOM also conducted qualitative analysis of news portals *newsmaker.md*, *noi.md*, *unimedia.info* and *zdg.md*.

<sup>79</sup> During the campaign, *Jurnal TV* broadcast several cultural programmes that featured violin player and conductor Nicolae Botgros and Olympic Champion Anastasia Nichita, both candidates from PAS. Furthermore, during the last two weeks of the campaign, *Jurnal TV* aired a 10-episode drama series titled "Plaha" centred on a fictionalized portrayal of Moldovan fugitive Vladimir Plahotniuc, his connections to organized crime, and to members of the political establishment, whose names resembled those of Patriotic Bloc leaders. On 18 September, *Jurnal TV* began broadcasting voter mobilisation spots, where messages presented by hosts resembled campaign slogans of PAS.

also found that broadcasters did not consistently label electoral content, as required by law, reportedly due to confusion regarding the use of labels and what constitutes election-related content, mainly regarding public officials or events that occurred prior to the official start of the campaign. The AVC has issued 17 warnings to the broadcasters in relation to content identification. While the AVC also provided monitored broadcasters with weekly updates of their compliance with the impartiality requirements, it will only formally assess this matter after the elections.

The online media outlets monitored by the ODIHR EOM also displayed distinct editorial alignments during the campaign period. *Ziarul de Gardă* provided multiple investigative reports on alleged Russian interference in elections and avoided critical coverage of PAS. *Unimedia* clearly supported the Patriotic Bloc and, the *Alternativa* Bloc, while *Newsmaker* provided more diverse coverage of contestants, including analytical reports on political platforms and financial statements of major contestants. However, *Noi.md* extensively promoted the Alliance of Moldovans and their leaders, to a lesser extent the Patriotic Bloc, and published a number of paid news items promoting Renato Usatii.

## Election Dispute Resolution

The 2022 Electoral Code removed inconsistencies regarding the bodies responsible for resolving electoral disputes and established a complaint and appeal procedure generally aligned with international standards, ensuring judicial review, access to a second instance, and timely submission and adjudication. However, the legal framework still lacks provisions for the partial invalidation of election results, as well as clearly defined procedures and evidentiary requirements for challenging nationwide results, as previously recommended by ODIHR. Despite some progress with judicial reform, including an ongoing vetting process, public trust in the judiciary remains low.<sup>80</sup>

Voters and contestants have the right to challenge all actions, inactions and decisions of election bodies and other contestants. Observers and members of the election administration can file complaints related to violations of their rights. In line with new legal amendments, the inadmissibility of a complaint is no longer decided by a plenary of the CEC but is notified through an act of the CEC chairperson.<sup>81</sup> Four such acts were contested at the CCA, who in one case decided in favour of the plaintiff and obliged the CEC to judge the case in the plenary on its merits.<sup>82</sup> The CEC taking the decision in plenary session rejected the complaint.

From the start of the electoral period from 14 July to 27 September, the CEC received 124 complaints and notifications related mainly to misuse of administrative resources, the registration of candidates, alleged violation of campaign rules, illegal financing, and electoral corruption.<sup>83</sup> The majority of complaints received were published online, and decisions were generally taken within the deadline although some were published with delay, limiting transparency. Only 6 complaints were accepted and CEC issued one warning for illegal financing and two for misuse of administrative resources, and two

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<sup>80</sup> See [European Commission Report Moldova 2024](#), p. 5. Also, [UNDP survey in 2024](#) concluded that 45 per cent of respondents expressed little or no confidence, and only 11 per cent reported high levels of trust in the justice system. Progress was made in vetting and appointing top judges and prosecutors. Both judicial and prosecutorial councils are now fully operational, with most members appointed, including a new vetted Prosecutor General and initial Supreme Court appointments.

<sup>81</sup> Complaints or notifications for which the CEC considered it was not primarily competent were referred directly to the GPI, under the obligation to inform the CEC about the results of the related decision or investigation.

<sup>82</sup> Candidate Irina Vlah filed a complaint with the CEC alleging the misuse of administrative resources by Prime Minister Dorin Recean. The CEC declared it inadmissible by an act of the President. The act was contested at the CCA who concluded that the CEC's response was superficial, failing to address key claims of electoral agitation and abuse of state resources, and ordered CEC to decide in plenary on the merits of the complaint. *Alternativa* Bloc and PAS filed similar complaints to CCA, who rejected them as ungrounded, decision upheld by the SCJ

<sup>83</sup> The CEC tracks complaints, notifications and court cases in an [online registry](#), updated every few days.

on party affiliation.<sup>84</sup> while the others were rejected as ungrounded, and more than 40 were referred to the police for further investigation. Most complaints were decided before election day.

Electoral disputes were generally handled efficiently by the courts and within the prescribed deadlines, although some decisions raised controversy. The CCA and the SCJ complied with the established deadlines. Fourteen CEC decisions denying candidate registration were challenged at the CCA. While 10 cases were rejected, 4 were accepted requiring the CEC to review the registration of the impacted contestants. Two decisions, however, were later reversed by the SCJ, while two were maintained,<sup>85</sup> raising concerns over the diverse interpretation of some new legal provisions.<sup>86</sup> In eight other cases appealed, the SCJ maintained the CCA decisions.<sup>87</sup> Appeals regarding polling stations abroad, in Transnistria, and sanctions against an independent candidate were all rejected by the CCA and the SCJ. All decisions were motivated and published on the website, although some with delay.<sup>88</sup> While CCA sessions are public, the SCJ held closed hearings without party participation, somewhat limiting transparency and contrary to international standards.<sup>89</sup> However, 2023 legal amendments led to some SCJ hearings being published on YouTube, improving public access.

## Citizen and International Observers

The legal framework provides for observation of the electoral process by citizen and international observers, as well as representatives of contestants. Observers may be accredited to observe the election both in-country and abroad. As of 27 September, the CEC accredited 2,496 citizen and 912 international observers. Promo-LEX with 1,229 observers and the Union of Lawyers with 1,175 are the largest citizen observer groups. Both have deployed long-term observers throughout the country and published four interim reports since the start of the electoral period.

A new CEC regulation requires citizen and international observer organizations to submit information, including on their technical and human capacity, experience in election observation, and funding sources, in order to obtain accreditation. According to the CEC, this has been done with the intention of verifying credentials and preventing fake observers. The new regulation also prohibits any action that

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<sup>84</sup> Warnings issued to one PAS minister and to *Alternativa* candidate Ion Ceban for abuse of administrative resources were challenged at the CCA, who upheld CEC decision.

<sup>85</sup> The CCA decisions on New Historical Option Party and *Moldova Mare* were upheld by SCJ. However, in the case of *Moldova Mare* the SCJ initially overturned this decision, upholding the party's exclusion. Citing concerns over judicial impartiality of one of the judges of the panel, *Moldova Mare* requested a revision. A new SCJ panel accepted the request, reversed prior ruling, and ordered the CEC to register the party, stating among other, that the CEC had wrongly rejected the party's registration due to not meeting the 40% gender quota. The SCJ concluded that the CEC failed to notify the party of the deficiencies and did not ensure transparency in the administrative procedure, applying a different treatment to *Moldova Mare* compared to the similar case of the PSDE.

<sup>86</sup> The CCA's decision ordering CEC to revise the registration of PDL was overturned by the SCJ, who ruled in favor of CEC arguing that the CEC has executive function and must base its decisions solely on the data provided by the PSA regarding eligible political parties. PDL leader condemned the decision and filed a complaint at the European Court of Human Rights for violation of the right to stand and access to justice. In a second case, while the CCA ordered CEC to register Centrist Union, the SCJ reversed the judgement, maintained CEC decision mainly on the ground that the resignation deadline imposed by the law to independents also applies to those nominated by parties, and concluded that this party was part of a "camouflage bloc", as some of its candidates didn't resign from other parties within the 70 days required. The CCA had previously maintained the contrary, citing that the deadline does not apply to candidates nominated by parties.

<sup>87</sup> The courts concluded that in exercising their discretionary power per Electoral Code, Article 40(3), the CEC provided a sufficiently thorough justification, outlining all relevant considerations and viewpoints within the legal limits.

<sup>88</sup> [General Comment 32](#) to the ICCPR states that "the publicity of hearings ensures the transparency of proceedings and thus provides an important safeguard for the interest of the individual and of society at large."

<sup>89</sup> Paragraph 12 of the 1990 OSCE Copenhagen Document states that "proceedings may only be held in camera in circumstances prescribed by law and consistent with obligations under international laws and international commitments". See also paragraph 100 of the Explanatory Report of Venice Commission's Code of Good Practice, which states that "the appeal procedure should be of a judicial nature, in the sense that the right of the appellants to proceedings in which both parties are heard should be safeguarded".

can hinder the activity of the electoral body or jeopardise the voting process. The registration of a high number of observers, both citizen and international, contributed to the transparency of the process. However, the CEC refused to accredit 16 prospective IEOM observers, citing an opinion of the Security and Intelligence Services as the basis for its decision.

## **Election Day**

Election day was well organized. There were a number of concerning security incidents. The CEC announced that turnout was 52.21 per cent and posted electoral information and results on its website in real time, contributing to transparency. Opening was observed in 143 polling stations and voting was observed in 1,314 polling stations across the country. Counting was observed in 122 polling stations, and the tabulation at 34 DEC. Women made up 86 per cent of PEB members, including 88 per cent of chairpersons. Positively, ballots in four minority languages were available where requested. The opening process was assessed positively in all but 1 of the 143 polling stations observed. Opening procedures were largely followed in the overwhelming majority of PEBs, with IEOM observers reporting only isolated instances of minor procedural omissions.

Despite concerns related to the number of PEBs and availability of ballots for voters from Transnistria, IEOM observers noted the voting process proceeded without excessive queues or shortage of ballots, albeit with some overcrowding.

IEOM observers assessed voting positively in 99 per cent of the 1,314 polling stations observed (more than half of PEBs across the country), describing the process as professional, calm and smooth. The few negative assessments were mostly linked to unauthorized persons present at polling stations (32 reports), including police (11) and local officials (6). IEOM observers also reported a few instances of candidate representatives keeping track of voters who had voted.

Voter identification and electronic verification were efficient in the polling stations observed, with only isolated cases of SAISE malfunction (8 cases). In 11 per cent of polling stations observed, one or more voters were turned away or redirected to a different polling station, mostly because they were not on the voter list of that polling station or could not present a proper identity document. The CEC reported 68 cases where voters were missing from main voter lists because they were marked as pre-registered for out-of-country voting, though some had never lived abroad, pointing to potential abuse of personal data by third parties, which is of concern.

Most voters marked their ballots in secrecy; however, the layout of the polling stations and the placement of the video camera did not always ensure the secrecy of the vote (6 per cent of observations). The secrecy of the ballot was also compromised in 4 per cent of PEBs observed. IEOM observers reported that voters took or attempted to take pictures of their marked ballot in five cases observed; in one of such cases the PEB reported two voters to the police, and they were detained after being given opportunity to vote. Some instances of group voting were also observed (1 per cent of observations) and cases of seemingly identical signatures on the voter lists were reported (2 percent). In 3 per cent of polling stations observed, the ballot boxes were not properly sealed.

Most observed polling stations were unsuitable for people with disabilities. Sixty-five per cent did not provide for independent access, and the interior layout was not suitable for voters with disabilities in 26 per cent of polling stations observed. Long queues of voters were noted outside 2 per cent of polling stations observed, and overcrowding inside 3 per cent.

Candidate representatives were present in 99 per cent of polling stations observed and in 6 cases they were observed to be interfering in the work of PEBs. Citizen observers were present in 61 per cent of polling stations observed, contributing to transparency.

According to the Prime Minister, on the day before and on election day, Moldova's electoral infrastructure was targeted by multiple cyberattacks. These attempts focused on the CEC website and some polling stations abroad but were reportedly detected and neutralized in real time without disrupting the electoral process. A large-scale attack on election day also forced STISC to block the host.md platform, leaving about 4,000 websites offline.

Throughout the day, bomb threats were reported at some PEBs for voters from Transnistria (37/6, 37/10, 37/11, 34/14) and one PEB in Drochia, in some of them repeatedly, as well as at bridges over the Nistru river. There was also a significant disinformation campaign purporting that many bridges were closed for construction; IEOM observers noted that this was not the case but long lines for vehicle movement were noted. The voting at the PEBs and movement over the bridges was suspended temporarily contributing to the long queues. Bomb threats were also reported at polling stations in Belgium, Italy, USA, Spain, and Romania.

The majority (113 of 122) of vote counts observed by the IEOM were assessed positively and IEOM observers assessed the counting as well-organized and transparent, overall. The IEOM evaluated the counting negatively in 9 polling stations observed, due to procedural errors or omissions. The PEB did not always establish the number of ballots issued by counting signatures on the voter lists (14 observations) or did not count the overall number of ballots found in the stationary ballot box (24 observations). In over one third of vote counts observed, the validity of disputed ballots was not decided by a vote of the PEB members, as required by law. In 19 counts, the PEBs had problems with reconciling the results in protocols, 15 protocols had been pre-signed and in 45 counts the PEB did not post the copy of the protocol at the PEB entrance, negatively impacting transparency. In 8 vote counts observed non-PEB officials were noted as interfering (contestant representatives 5, citizen observers 2, local officials 1).

Tabulation was observed in 34 of 36 DEC's for in-country voting and assessed positively in all but two of them. Seven DEC's were found by IEOM observers to be not adequate for the receipt of election materials from PEBs and had insufficient space and in four, not everybody had a clear view of the procedures. Some PEBs made technical mistakes in their protocols and other reports, and were unclear due to late instructions on invalidating a withdrawn party's votes. The DEC's required corrections, which led to long queues outside the tabulation room, creating tension and confusion among PEB members. Still, IEOM observers describe tabulation as generally orderly and professional.

Over the course of election day, IEOM observers noted 57 complaints filed at PEBs visited and 1 complaint at DEC's observed. Four complaints were lodged at the CEC on election day, concerning violation of campaign silence and organized transportation of voters, but CEC did not announce the decisions on them.

***The English version of this report is the only official document.  
Unofficial translations are available in the Romanian language.***



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## **MISSION INFORMATION & ACKNOWLEDGEMENTS**

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Chişinău, 29 September 2025 – This Statement of Preliminary Findings and Conclusions is the result of a common endeavour involving the OSCE Office for Democratic Institutions and Human Rights (ODIHR), the OSCE Parliamentary Assembly (OSCE PA), the Parliamentary Assembly of the Council of Europe (PACE) and the European Parliament (EP). The assessment was made to determine whether the election complied with OSCE commitments and other international obligations and standards for democratic elections and with national legislation.

Paula Cardoso was appointed by the OSCE Chairperson-in-Office as Special Co-ordinator and Leader of the OSCE short-term observer mission. Linnea Wickman headed the OSCE PA delegation, Chris Said headed the PACE delegation and Michael Gahler headed the EP delegation. Ambassador Jillian Stirk is the Head of the ODIHR EOM, deployed from 13 August.

This Statement of Preliminary Findings and Conclusions is delivered prior to the completion of the electoral process. The final assessment of the elections will depend, in part, on the conduct of the remaining stages of the electoral process, including the count, tabulation and announcement of results, and the handling of possible post-election day complaints or appeals. ODIHR will issue a comprehensive final report, including recommendations for potential improvements, some months after the completion of the electoral process. The OSCE PA will present its report at its Standing Committee Meeting in Istanbul on 17 November. The PACE will present its report at its Standing Committee in Chişinău on 21 November. The EP will discuss the report at the regular meeting of MD Delegation in Strasbourg on 9 October.

The ODIHR EOM includes 17 experts in the capital and 30 long-term observers deployed throughout the country. On election day, 391 observers from 50 countries were deployed, including 245 long-term and short-term observers deployed by ODIHR, as well as a 108-member delegation from the OSCE PA, a 24-member delegation from the PACE and a 14-member delegation from the EP. Opening was observed in 143 polling stations and voting was observed in 1,314 polling stations across the country. Counting was observed in 122 polling stations, and the tabulation in 34 DECes.

The observers wish to thank the authorities for their invitation to observe the elections, and the Central Electoral Commission and the Ministry of Foreign Affairs for their assistance. They also express their appreciation to other state institutions, political parties and civil society organizations and the international community representatives for their co-operation.

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