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MOLDOVA 2025 Country Report Chisinau





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Promo-LEX

Advancing democracy and human rights

CSO Meter 2025: Moldova

Country Report

Reporting period: January-November 2025

Author: Florin Gîscă, Promo-LEX Association

Cristina Durnea-Frumosu and Ilie Chirtoacă contributed to the report.

Promo-LEX Association is a non-governmental organisation established in 2002. It aims to advance democracy in Moldova, including in the Transnistrian region, by promoting and defending human rights, monitoring democratic processes, and strengthening civil society.

Promo-LEX Association operates through two programmes:

- (1) the Human Rights Programme, which aims to promote and implement international human rights standards in the Republic of Moldova; and
- (2) the Monitoring Democratic Processes Programme, which aims to improve the quality of and to increase the confidence of citizens' in democratic institutions and processes in the Republic of Moldova.

European Center for Not-for-Profit Law (ECNL) Stichting is a leading European resource and research centre in the field of policies and laws affecting civil society. ECNL creates knowledge, empowers partners and helps set standards that create, protect and expand civic freedoms.

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TABLE OF

CONTENTS

ACRONYMS & ABBREVIATIONS	5
I. EXECUTIVE SUMMARY	8
II. MOLDOVA – IN NUMBERS	14
III. FINDINGS	16
3.1 FREEDOM OF ASSOCIATION	16
3.2 EQUAL TREATMENT	23
3.3 ACCESS TO FUNDING	27
3.4 FREEDOM OF PEACEFUL ASSEMBLY	33
3.5 RIGHT TO PARTICIPATION IN DECISION-MAKING	42
3.6 FREEDOM OF EXPRESSION	52
3.7 RIGHT TO PRIVACY	59
3.8 STATE DUTY TO PROTECT	64
3.9 STATE SUPPORT	70
3.10 STATE-CSO COOPERATION	79
3.11 DIGITAL RIGHTS	84
IV. KEY PRIORITIES	92
V. METHODOLOGY	94
VI. REFERENCES	97

ACRONYMS & ABBREVIATIONS

AI	Artificial intelligence
AML/CTF	Anti-money laundering and counter-terrorist financing
ANRCETI	National Regulatory Agency for Electronic Communications and Information Technology (<i>Agenția Națională pentru Reglementare în Comunicații Electronice și Tehnologia Informației</i>)
ASP	Public Services Agency (<i>Agenția Serviciii Publice</i>)
CJI	The Center for Independent Journalism (<i>Centrul pentru Jurnalism Independent</i>)
CLLD	Community-Led Local Development
CLT	Local Transparency Council (<i>Consiliul Local de Transparență</i>)
CNPDCP	National Centre for Personal Data Protection (<i>Centrul Național pentru Protecția Datelor cu Caracter Personal</i>)
CPA	Central Public Administration
CRP	District Participation Council (<i>Consiliul Raional de Participare</i>)
CSO	Civil society organisation
CSODP	Civil Society Organisation Development Programme 2024-2027
CUPS	Unified Public Services Centres (<i>Centrele unificate de prestare a serviciilor publice</i>)
EaP	Eastern Partnership
ECNL	European Center for Not-for-Profit Law
EGA	Electronic Governance Agency
EU	European Union
EU GDPR	General Data Protection Regulation (Regulation U) 2016/679)
EUR	Euro
FATF	Financial Action Task Force

FIU	Financial Intelligence Unit (Office for Prevention and Combating of Money Laundering, <i>Serviciul Prevenirea și Combaterea Spălării Banilor</i>)
GDP	Gross Domestic Product
GIZ	German Agency for International Cooperation (<i>Deutsche Gesellschaft für Internationale Zusammenarbeit</i>)
GNI	Gross National Income
ICNL	International Center for Not-for-Profit Law
IDA	Intercommunity Development Association
IoT	Internet of things
IRI	International Republican Institute
LAG	Local Action Group
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, Asexual, Ally, etc.
LPA	Local Public Authority
LRCM	Legal Resources Centre from Moldova
MDED	Ministry of Economic Development and Digitalisation (<i>Ministerul Dezvoltării Economice și Digitalizării</i>)
MDL	Moldovan Leu
NCO	Non-Commercial Organisation
NDI	National Democratic Institute
NPO	Non-profit organisation
ODIHR	OSCE Office for Democratic Institutions and Human Rights
OGP	Open Government Partnership
OSCE	Organisation for Security and Co-operation in Europe
ASP	Public Services Agency (<i>Agenția Servicii Publice</i>)
RRSI	Register of State Information Resources and Systems (<i>Registrul Resurselor și Sistemelor Informaționale de Stat</i>)
RSF	Reporters Without Borders
SCIA	Sub-Council on Artificial Intelligence and Data Governance (<i>Sub-Consiliul pentru Inteligența Artificială și Guvernanța Datelor</i>)

SIS	Security and Intelligence Service of the Republic of Moldova (<i>Serviciul de Informații și Securitate al Republicii Moldova</i>)
SLAPPs	Strategic litigation against public participation
STDM 2023-2030	Digital Transformation Strategy of the Republic of Moldova 2023-2030 (<i>Strategia de transformare digitală a Republicii Moldova 2023-2030</i>)
STISC	Information Technology and Cyber Security Service (<i>Serviciul Tehnologia Informației și Securitate Cibernetică</i>)
TRM	Tele-Radio Moldova
UAV	Unmanned aerial vehicle
UBO	Ultimate beneficial owner
USD	United States Dollar
VAT	Value Added Tax

I. EXECUTIVE SUMMARY

Country context and important trends relevant to the civil society environment

Throughout 2025, the Republic of Moldova continued consolidating its path to European integration. In September 2025, Moldova swiftly and successfully completed the bilateral screening process with the European Commission, which was launched in July 2024.¹ Once the member states agree to open accession negotiations, the process will move forward through negotiation chapters organised into thematic clusters.

The political agenda was dominated by the parliamentary elections held on 28 September 2025, widely viewed as a pivotal moment for determining the country's future trajectory. Political options were strongly polarised between the pro-European and anti-European perspectives, reflecting a fragile balance ahead of the elections. It is generally acknowledged that the objective of the anti-European vector was to block EU accession, to draw the Republic of Moldova back into Russia's sphere of influence, and to use the country as a base for hybrid attacks against the EU and operations in Ukraine. Following the elections, the ruling Pro-European Party of Action and Solidarity won 55 out of 101 seats, thereby securing a simple majority in Parliament. In November 2025, the new Government, led by Prime Minister Alexandru Munteanu, was sworn in.

The electoral process was undermined by an unprecedented campaign of disinformation and manipulation, which was largely orchestrated and financed by the Russian Federation through intermediaries, as uncovered and documented by numerous undercover journalistic investigations² and operations³ conducted by law

¹ Delegation of the European Union to the Republic of Moldova, Moldova successfully completes its screening process, 23 September 2025, https://www.eeas.europa.eu/delegations/moldova/moldova-successfully-completes-its-screening-process_en

² Ziarul de gardă, The Kremlin's Digital Army. Undercover Investigation. "They pay, let me tell you, the payment comes directly from Moscow.", 04.09.2025, <https://www.zdg.md/investigatii/ancheta/video-armata-digitala-a-kremlinului-investigatie-sub-acoperire-se-plateste-hai-sa-va-spun-se-plateste-direct-de-la-moscova/>; NordNews, Five Months Under Cover: Money, Propaganda, and Electoral Manipulation, 22 September 2025 [https://youtube.com/watch?v=IO_fQcSkPw&si=MB_8MMbnL5IGSTLp](https://youtube.com/watch?v=IO_fQcSkPw&si=MB_8MMbnL5IGSTLp;);

BBC World Service Rigged: Undercover in a fake news network - BBC World Service Documentaries, 22 September 2022, <https://www.youtube.com/watch?v=pf8arQ03-lc>

³ Police of the Republic of Moldova: 46 searches conducted in the case concerning electoral bribery, illegal financing of political parties, and money laundering, 18 September 2025,

[https://politia.md/ro/politia-actiune/46-de-perchezitii-dosarul-privind-coruperea-electorala-finantarea-ilegala](https://politia.md/ro/politia-actiune/46-de-perchezitii-dosarul-privind-coruperea-electorala-finantarea-ilegala;);

National Anti-Corruption Centre, the CNA and prosecutors are conducting searches in Chişinău in a case involving the illegal financing of certain political parties. Over 20 million lei have been seized, 16 September 2025,

enforcement and public security authorities. The methods exposed by these investigations included illegal funding amounting to hundreds of millions of dollars, propaganda and disinformation media networks, the exploitation of front non-profit organisations, a “digital army” conducting smear and manipulation campaigns on social networks, voter bribery, covert support for certain political actors, and preparations for mass unrest. The online environment was the main channel for spreading disinformation throughout the year.

Before elections, two resonant judicial cases captured public attention: in August, the head of Gagauzia, Evghenia Guțul, was sentenced to seven years in prison for accepting political party funding from an organised criminal group;⁴ and in September, the fugitive Vladimir Plahotniuc, accused in four criminal cases, was arrested and brought back to the country.⁵

Russian hybrid aggression against Moldova’s security was felt throughout the year. In February, Gazprom halted natural gas deliveries to the Transnistrian region, triggering a local crisis and a nationwide energy crisis, which was overcome thanks to emergency measures.⁶ In 2025, the Republic of Moldova hosted over 135,000 Ukrainian refugees, while incidents involving Russian-made drones posed a direct threat to the population.

Caught between the pressure of hybrid threats and the imperative of European integration, Parliament adopted several pieces of legislation aimed at combating electoral corruption and harmonising national legislation with the EU acquis. However, many of these were advanced without public consultations or disregarding civil society’s input, resulting in provisions with potentially negative impacts on the CSO environment.

Key developments and priorities in the civil society environment

The overall situation of the operating environment for CSOs in the Republic of Moldova underwent several changes in 2025. Both positive and negative developments occurred,

<https://cna.md/ro/comunicate-de-presa/cna-si-procurorii-efectueaza-perchezitii-chisinau-intr-un-dosar-de-finantare>; Police of the Republic of Moldova, Military camps in Serbia, organised by Russian intelligence services (including the GRU), aimed at creating destabilization and mass disorder in the Republic of Moldova. 74 people have been detained, 22 October 2025, <https://politia.md/ro/politia-actiune/tabere-militare-din-serbia-organizate-de-serviciile-secrete-ruse-inclusiv-gru>

⁴ Anti-Corruption Prosecutor's Office: Evghenia Guțul and a secretary of the Șor Party sentenced to 7 and 6 years in prison and ordered to pay over 56.4 million lei, 5 August 2025, <https://procuratura.md/anticoruptie/comunicate/comunicate-de-presa/evghenia-gutul-si-o-secretara-pp-sor-condamnate-la-7-si-6-ani-de>

⁵ BBC, Greece extradites oligarch to Moldova in \$1bn fraud case, 25 September 2025, <https://www.bbc.com/news/articles/clyldynzg48o>

⁶ Parliament of the Republic of Moldova, Parliament Decision 286/2024 on the Declaration of a State of Emergency, 12 December 2024, https://www.legis.md/cautare/getResults?doc_id=146220&lang=ro

leading to score changes in six of the eleven monitored areas, without affecting the overall score. The overall score for the CSO environment in Moldova remained at 4.8, the same as in 2024. The average scores for legislation (5.1) and practice (4.4) also remained unchanged.

The CSO environment went through a crisis at the beginning of the year following the withdrawal of U.S. funding, which was overcome with the support of European donors who compensated for part of the financial gap. Another reference point was the draft law on ‘foreign agents’ promoted by the parliamentary opposition, which was not supported by the pro-European majority. Following the parliamentary elections, the Republic of Moldova has maintained its European integration trajectory, which implies the continuation of reforms with expected benefits also for the CSO environment. The autumn Public Opinion Barometer shows that public trust in CSOs increased from 19% in 2024 to 28% in 2025.⁷

Net score improvements were recorded in three areas. In Area 7, *Right to Privacy*, the overall score increased (from 4.3 to 4.4), due to an improvement in the legislation score (from 5.2 to 5.3) after Parliament adopted a set of amendments criminalising digital violence. In Area 10, *State–CSO Cooperation*, the overall score increased (from 4.3 to 4.4), as a result of an increase in the legislation score (from 4.6 to 4.7) following the Government’s approval of three roadmaps containing actions aimed at improving the CSO operating environment. In Area 5, *Right to Participate in Decision-Making*, the practice score improved (from 4.5 to 4.6) after Parliament and the Government launched several web portals facilitating participation, access to information, and petitioning, and after the State Chancellery led a participatory process to draft a new law on participation.

In Area 8, *State’s Duty to Protect*, opposite dynamics were recorded at the level of legislation and practice scores. As a result, the overall score in this area remained unchanged. The legislation score decreased (from 5.0 to 4.9) due to legislative amendments that pose risks to CSOs, such as the ambiguous expansion of the definition of extremist activity, the possibility of suspending CSOs, restrictions on access to information provided by the Law on the State of Emergency/Crisis, and the obligation for CSOs to provide information included in the National Security Law. The practice score increased (from 4.2 to 4.3) as a result of the intensified efforts of public institutions to counter hybrid attacks and protect democracy.

In two areas, overall score decreases were recorded. In Area 2, *Equal Treatment*, the overall score decreased (from 4.7 to 4.6) as a result of a decline in the practice score (from 4.5 to 4.4). The Commission for Emergency Situations applied unequal treatment

⁷ Institutul de Politici Publice (IPP), Public Opinion Barometer, September 2025, https://ipp.md/wp-content/uploads/2025/09/BOP_09.2025_anexe.pdf

toward CSOs in the allocation of compensation for energy consumption, directing funds exclusively to commercial enterprises and neglecting CSOs, including social enterprises established by them.

In Area 4, *Freedom of Peaceful Assembly*, the overall score decreased (from 5.3 to 5.2), due to declines in both legislation and practice scores. The legislation score decreased (from 5.5 to 5.4) following the decision of the Chişinău Municipal Council to ban assemblies promoting sexual and gender diversity, as well as legislative amendments introducing vague and interpretable sanctions. The practice score decreased (from 5.0 to 4.9) due to a series of unjustified sanctions imposed by the police and the inadequate conduct of law enforcement during the Pride March.

The top three areas by score remain the same as in 2024: *Freedom of Association* (5.5), *Access to Funding* (5.3), and *Freedom of Peaceful Assembly* (5.2). The areas with the lowest overall scores are *Right to Privacy* (4.4), *State Support* (4.4), *State–CSO Cooperation* (4.4), and *Digital Rights* (4.3).

Out of the 61 recommendations in the CSO Meter 2024 report, three have been fully implemented (none of which were key priorities). These relate to the Government launching the process of drafting a law on the protection of human rights defenders (i), the Government approving and Parliament voting in the first reading on the new law on volunteering (ii), and the improvement of the information publishing system on the Parliament’s website through the launch of a new web portal (iii). Another 20 recommendations that have been partially implemented or are in the process of implementation are listed among the key developments below.

Key developments

In addition to the above changes, the following developments were recorded:

Freedom of Association

- Parliament amended the Law on Local Action Groups (GALs) to align it with EU Regulation 2021/1060, creating the framework necessary for integrating the national LEADER Program into future European mechanisms.
- The State Register of Legal Entities has not yet been implemented, although it was developed in 2024.
- The Ministry of Justice obtained court rulings to liquidate at least 17 CSOs that had not amended their founding documents in accordance with the Law on Non-Commercial Organisations.

Access to Funding

- Total CSO revenues decreased from 7.57 billion MDL in 2023 to 7.55 billion MDL in 2024, while the number of reporting CSOs increased by 15%.

Freedom of Peaceful Assembly

- Parliament also voted in the first reading on Law 294/2025 on the organisation and conduct of public events, which contains inconsistencies that could create confusion and abuse regarding applicable legislation on gatherings.

Right to Participate in Decision-Making

- Parliament adopted a new law establishing uniform minimum rules on open data and the reuse of information from the public sector. The index of access to public interest information has increased.

Freedom of Expression

- Legislation was supplemented with regulations on video-sharing platform services, along with additional safeguards to protect media service providers and editorial staff from detention, sanctions, interception, searches, or seizure.
- Non-commercial media, alongside commercial outlets, benefited from subsidies from the Media Subsidy Fund, but these were criticised for allocation to politically affiliated outlets or those not complying with the Journalistic Code of Ethics.

Right to Privacy

- The Ministry of Justice publicly consulted on the draft law regarding personal data processing for the prevention and combatting of crime, transposing EU Directive 2016/680.

State Duty to Protect

- The Moldovan Service for Prevention and Combating Money Laundering presented a Risk Assessment Report for the Non-Commercial Sector, concluding that the risk of CSO abuse for terrorism financing remains low.

State Support

- The Regulation on the percentage allocation mechanism was amended to increase transparency and efficiency, including extending the submission deadline from one to four months.

State-CSO Cooperation

- The State Chancellery presented the first report on the implementation of the Civil Society Development Program 2024–2027 (PDOSC), noting that 75% of actions for 2024 were completed.

Digital Rights

- New Law on Electronic Communications was adopted (effective in 2026), confirming the right to internet access and net neutrality.

Key priorities

1. The Ministry of Finance should increase tax benefits for philanthropic donations and sponsorship to a level that would provide real benefits for philanthropic activity;
2. The legal framework for public procurement should be adjusted, with a legal mechanism for social contracting with clear instructions, a standard package of model documents, and knowledge being built in public institutions based on this mechanism;
3. Local Public Authorities (LPAs) and law enforcement should adopt non-violent and non-intrusive assistance and response procedures regarding peaceful assemblies based on the observance of human rights, including for critical and anti-government assemblies;
4. The Service for the Prevention and Combating of Money Laundering (FIU) and the National Bank should implement anti-money laundering and counter-terrorism financing (AML/CTF) measures impacting CSOs (including banking policies) only to Financial Action Task Force (FATF) NPOs, in line with FATF Recommendation 8 arising from the Terrorist Financing Risk Assessment of the NPO Sector;
5. LPAs should increase transparency in decision-making by developing modules on their webpages similar to those used by the Government (particip.gov.md) and establish District Participation Councils (CRPs) based on existing functional models;
6. The Government and Parliament should ensure that the Public Participation Law is drafted and finalised with broad civil society involvement; and,
7. The Government should ensure the allocation of financial resources for the implementation of the Civil Society Development Program (PDOSC).

II. MOLDOVA – IN NUMBERS

Basic data

Population: 2.3813 million⁸ | GDP per capita: USD 7,617.5⁹ | Number of CSOs: 13,466 (out of 16,604 non-commercial organisations)¹⁰ | CSOs per 10,000 inhabitants: 57 | Registration fee for CSOs: None (for most forms, except for LAGs, IDAs and Associations of Water Consumers at 60 EUR) | Freedom in the World: 60/100 (Partly Free)¹¹ | World Press Freedom Index: 73.36 (35 out of 180 countries)¹² | Public trust in CSOs: 28,3 percent¹³



Country score: **4.8**
 Legislation: **5.1**
 Practice: **4.4**

The scores range from 1 to 7, where 1 signifies the lowest possible score (an extremely unfavourable (authoritarian) environment for CSOs) and 7 signifies the highest possible score (an extremely favourable – ideal democratic - environment for CSOs).

Areas	Overall	Legislation	Practice
Freedom of Association	5.5	5.6	5.3
Equal Treatment	4.6 ↓	4.8	4.4 ↓
Access to Funding	5.3	5.7	4.8
Freedom of Peaceful Assembly	5.2 ↓	5.4 ↓	4.9 ↓
Right to Participation In Decision-Making	5.0	5.4	4.6 ↑
Freedom of Expression	5.0	5.4	4.6
Right to Privacy	4.4 ↑	5.3 ↑	3.4
State Duty to Protect	4.6	4.9 ↓	4.3 ↑
State Support	4.4	4.7	4.0
State-CSO Cooperation	4.4 ↑	4.7 ↑	4.0

⁸ National Bureau of Statistics of the Republic of Moldova, 'Population and demographic processes', 12 August 2025, https://statistica.gov.md/en/statistic_indicator_details/25.

⁹ World Bank Group, 'Moldova', 2024, <https://data.worldbank.org/country/moldova>.

¹⁰ Public Services Agency (ASP), State Registry of Non-Commercial Organisations (in Romanian), <https://asp.gov.md/ro/informatii-utile/date-statistice>. In this report the term 'CSO' includes public associations (11,296), foundations (512), private institutions (250), employers' unions (160), periodic publications (101), unions of legal persons (108), trade unions (599) and other non-commercial organisations (258). Other legal forms of non-commercial organisation which are not considered CSOs include religious cults (1,833), public institutions (1,146) and political parties (59), last visited 1 November 2025.

¹¹ Freedom House, Freedom in the World, <https://freedomhouse.org/countries/freedom-world/scores>.

¹² Reporters Without Borders, World Press Freedom Index, <https://rsf.org/en/index>

¹³ Institutul de Politici Publice, Public Opinion Barometer, op. cit.

Digital Rights	4.3	4.5	4.1
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The arrows indicate improvement or deterioration compared to last year's scores.

III. FINDINGS

3.1 Freedom of Association

Overall score per area: **5.5/7**

Legislation: **5.6/7**

Practice: **5.3/7**

Freedom of association is constitutionally protected in a limited form, guaranteeing only the right to create and join trade unions, while broader association rights are regulated by the 2020 Law on Non-Commercial Organisations (NCO Law). Any person or legal entity may establish or join a CSO, except public authorities and state or municipal enterprises. CSOs are free to determine membership, objectives, and governance structures, and individuals may associate offline or online without registration, although unregistered groups cannot access benefits reserved for legal entities.

The NCO Law recognises three main forms of CSOs: public associations, foundations, and private institutions, all of which can operate nationally. Other specific types include Local Action Groups (LAGs), trade unions, employers' unions, and Intercommunity Development Associations (IDAs). Amendments to the Law on LAGs aligned national legislation with EU Regulation 2021/1060, strengthening the framework for community-led local development by introducing new definitions, governance requirements, and the Moldova LEADER IT System (MLIS) for monitoring and transparency.

Registration procedures remain relatively simple and free of charge (except for a EUR 60 fee for LAGs, IDAs, and water user associations) and must be completed within 15 days. However, inconsistent interpretation of procedures by registrars and imposing statutory provisions according to predefined models continue to pose isolated difficulties. Applications must include a declaration on the ultimate beneficial owner (UBO) as part of AML/CTF requirements, a provision criticised as disproportionate for CSOs. In 2025, ASP rejected 15 applications (less than 1%) mainly for incomplete documentation.

Although formal registration is free, administrative services such as name verification, approval, or registry extracts involve indirect costs. CSOs must also purchase paid extracts for audits or banking. Electronic registration using a qualified e-signature is possible, and 723 CSOs have used it since 2022. A new State Register of Legal Units, developed in 2024, aims to integrate all legal entities into a unified digital system, though its implementation is pending.

CSOs have several reporting obligations, most of which can be performed online, including publishing annual narrative reports, submitting periodic financial and tax reports, a report on the use of funds received as percentage designation, and a report of the host volunteer organisation.

Sanctions, including dissolution, are legally possible but must meet proportionality standards. CSOs may be forcibly liquidated through court decisions if they do not submit an activity report upon request, a measure deemed disproportionate by CSOs, or if they fail to update their constitutive documents per the 2020 NCO Law. By 2025, around 19% of CSOs still lacked updated statutes aligned with the 2020 NCO Law, and the Ministry of Justice obtained court-ordered forced liquidation of at least 17 CSOs that had not amended their

statutory documents. CSOs may be subject to sanctions for violations of legislation not specifically targeting CSOs, but there is no recorded systemic use of such sanctions.

The overall score for the area of Freedom of Association, as well as the legislation and practice scores, remained the same as in the previous reporting period. Overall, the legal environment for CSOs remains stable and largely enabling, though administrative difficulties persist. Main recommendations include operationalising the new State Register and the online registration facilities, eliminating de facto fees, ensuring consistent registration practices and reducing registration timelines.

Standard I. Everyone can freely establish, join, or participate in a CSO.

Freedom of association is protected narrowly by the Constitution,¹⁴ provided for only as the right to join and create trade unions. Freedom of association is regulated by the Law on Non-Commercial Organisations¹⁵ adopted in 2020. Any legal or natural person may establish a CSO and become a member of one or more organisations. However, certain legal persons, including public authorities and institutions, as well as state and municipal enterprises, may not establish non-commercial organisations or become members of such organisations, except for educational institutions (including public ones), which may establish foundations and private institutions. CSOs are free to accept or refuse new members according to their statutes. Any interested person has the possibility to engage in volunteering or to support CSO activities.

There are three legal forms of CSO provided for by law: (i) public association; (ii) foundation; and (iii) private institution, all of which can operate without territorial limits. Other rarer forms of association are regulated by special laws: LAGs,¹⁶ trade unions,¹⁷ employers' unions,¹⁸ Condominium co-owners' associations,¹⁹ savings and loan associations,²⁰ and IDAs (only four such organisation registered to date).²¹ In May 2025, Parliament amended²² the Law on LAGs in order to align it with the provisions of Regulation (EU) 2021/1060²³ concerning the activity of LAGs. The amendments ensure the incorporation of provisions related to community-led local development

¹⁴ Constitution of the Republic of Moldova, 1/1994, Art. 42 (in Romanian), 29 July 1994, https://www.legis.md/cautare/getResults?doc_id=111918&lang=ro.

¹⁵ Law No. 86/2020 on Non-Commercial Organisations, (in Romanian), 11 June 2020, https://www.legis.md/cautare/getResults?doc_id=122391&lang=ro.

¹⁶ Law No. 50/2021 on Local Action Groups, (in Romanian), 9 April 2021, https://www.legis.md/cautare/getResults?doc_id=126245&lang=ro.

¹⁷ Law No. 1129/2000 on Trade Unions, (in Romanian), 07 July 2000 https://www.legis.md/cautare/getResults?doc_id=97457&lang=ro.

¹⁸ Law No. 976/2000 on Employer's Unions, (in Romanian), 11 May 2000, https://www.legis.md/cautare/getResults?doc_id=64325&lang=ro.

¹⁹ Law No. 187/2022 on Condominiums, (in Romanian), 14 July 2022, https://www.legis.md/cautare/getResults?doc_id=148246&lang=ro#.

²⁰ Law No. 139/2007 on Savings and Loan Associations, (in Romanian), 21 June 2007 (amended 11 July 2024), https://www.legis.md/cautare/getResults?doc_id=144419&lang=ro#.

²¹ Law No. 17/2023 on Intercommunity Development Associations, (in Romanian), 2 February 2023, https://www.legis.md/cautare/getResults?doc_id=135808&lang=ro.

²² Law No. 71/2025 amending Law 50/2021 on Local Action Groups, (in Romanian), 27 June 2025, https://www.legis.md/cautare/getResults?doc_id=149565&lang=ro.

²³ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021, laying down common provisions on territorial community-led local development, Title III, Chapter II, 24 July 2021, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1060>.

(CLLD/LEADER) and establish the necessary framework for integrating the national LEADER Programme into future European financing mechanisms. At the same time, they set out the mandatory elements of local development strategies, establish the rules for multi-fund management, and outline measures to prevent double financing. In addition, the existing concepts are redefined and new terms are introduced ('rural areas', 'financial plan', 'Moldova Leader It Soft Information System – MLIS'), together with measures aimed at improving the internal governance of Local Action Groups (LAGs), the monitoring and oversight system (including the introduction of MLIS and a mandatory triennial audit), enhancing transparency, and preventing conflicts of interest.

People are free to associate online and offline without registration but cannot operate bank accounts or access other benefits reserved for legal persons. CSOs can freely request and receive financial and material support.

Currently, there are no systemic practical obstacles imposed by the state related to establishing or joining an organisation.

Standard II. The procedure to register a CSO as a legal entity is clear, simple, quick, and inexpensive.

The registration procedure for CSOs is free of charge (except for a fee of around 60 EUR for LAGs, IDAs and Associations of Water Consumers) and, according to law, takes up to fifteen days, although sometimes the procedure is performed more quickly. The ASP reported zero cases of exceeding the legal deadline in 2025. Registrars provide preliminary consultations, which are not counted within the legal timeframe until the application is officially submitted. Registration of public associations is usually done at the ASP's regional centres distributed across the country.²⁴ A single universal registrar now handles the registration of several types of organisations at the regional level, unlike previously when only public associations were registered at the local level, while other forms of organisation were processed by the ASP's central unit. Experts in the field have pointed out that registrars lack expertise in CSOs and often apply the legal provisions governing document content inconsistently. They frequently insist on strict compliance with the proposed document templates, even though these are provided for illustrative purposes only.

Registering a CSO as a legal entity requires the body to submit a pre-defined list of documents provided by law and a declaration on the UBO of the legal entity²⁵ required by AML/CTF legislation. The requirement has been criticised as irrelevant for CSOs, since their head neither owns nor benefits from the CSO's activities, and their name

²⁴ Law No. 220/2007 regarding the state registration of legal entities and individual entrepreneurs, 19 October 2007, https://www.legis.md/cautare/getResults?doc_id=144421&lang=ro.

²⁵ Law No. 308/2017 on Preventing and Combating Money Laundering and Terrorist Financing, (in Romanian), 22 December 2017, https://www.legis.md/cautare/getResults?doc_id=110418&lang=ro.

already appears in official records. The 2023 amendments²⁶ complicate the procedure for CSOs, requiring them to list a broader range of stakeholders, including founders, council or general assembly members, as UBOs. The ASP may only refuse registration in a limited number of circumstances provided by law, including the absence of a declaration on the UBO. Judicial review is available in cases of refusal. In 2025, the ASP reported 15 cases of registration refusal, representing less than one percent of all registered applications. The most frequently cited reasons for refusal included incomplete documentation, non-payment of service fees, and applicants' failure to comply with legal requirements. The ASP charges CSOs for several services carried out during the registration process, such as issuing certificates for emergency name-availability verification,²⁷ approving proposed organisation names,²⁸ and providing extracts for private institutions.²⁹ All CSOs must submit an extract from the state register with limited validity at the request of banks, donors, accreditation and audit institutions, as well as to obtain tax and VAT exemptions, although information can be accessed through information systems. This requirement creates an additional financial and administrative burden for CSOs. In the first nine months of 2025, the ASP issued 1,147 extracts.

The ASP can receive registration documents electronically and documents can be signed using a qualified electronic signature.³⁰ Since the introduction of this option in 2022, over 723 CSOs have submitted registration documents or requests for amendments online, with a total of 359 applications submitted online in 2025 — the highest annual number recorded since online submissions became available. The new State Register of Legal Units³¹ was developed in 2024 but is not yet functional. The Register will replace the State Register of Non-Commercial Organisations and the official Register of Commercial Units, aiming for greater efficiency, improved data access, and further facilitation of online registration via a dedicated module.

Standard III. CSOs are free to determine their objectives and activities and operate both within and outside the country in which they were established.

CSOs are free to establish their own goals and activities and can operate without restrictions throughout the territory of the country under the control of the

²⁶ Ibid., Arts 5 and 14; Law No. 66/2023 on the Modification of Some Normative Acts, (in Romanian), 30 March 2023, https://www.legis.md/cautare/getResults?doc_id=136851&lang=ro.

²⁷ Public Services Agency (ASP), Terms and fees for elaboration and approval of the names of legal units (in Romanian), <https://www.asp.gov.md/ro/servicii/persoane-juridice/22>.

²⁸ Public Services Agency (ASP), Terms and fees for drafting and editing and approval of the names of legal units (in Romanian), <http://asp.gov.md/ro/servicii/persoane-juridice/101>.

²⁹ Public Services Agency (ASP), List of documents required for registration of a private institution (in Romanian), <http://asp.gov.md/sites/default/files/documente-necesare/institutiei-private.pdf>; Public Services Agency (ASP), Term and fees, Issuing the extract from the State Registry (in Romanian), <https://www.asp.gov.md/ro/servicii/persoane-juridice/25/251>

³⁰ Law on the State Registration of Legal Entities and Individual Entrepreneurs, Art. 8, para.1 (a), op. cit.

³¹ Government of the Republic of Moldova, Government Decision 955/2022 on approval of the Information System Concept 'State Register of Legal Entities' (in Romanian), 22 December 2022, https://www.legis.md/cautare/getResults?doc_id=135259&lang=ro.

constitutional authorities. CSOs engage in different legal areas of operation both nationally and internationally, through different structures, platforms and other formats, without obstacles imposed by state authorities.

Standard IV. Any sanctions imposed are clear and consistent with the principle of proportionality and are the least intrusive means to achieve the desired objective.

CSOs may be subject to sanctions for violations of general legislation applicable to all legal entities; however, there is no recorded systemic use of such sanctions. Involuntary termination of a CSO is possible if its activities are contrary to the interests of national security, public security, the protection of the rule of law or the prevention of crime, or the protection of the health, morals, rights and freedoms of others. Failure to present an annual activity report following repeated requests from the Ministry of Justice is also a basis for involuntary termination of a CSO on the condition that this is ‘necessary in a democratic society’. To date, there is no established procedure to collect and review reports. The court may suspend a CSO during the settlement of a liquidation claim, but only if ‘necessary in a democratic society’. The court may allow CSOs to remove, within six months, the deficiencies that led to the liquidation claim.

The Law on Non-Commercial Organisations required CSOs to adjust their registration documents with the ASP by September 2022 or face potential forced liquidation by the Ministry of Justice (MoJ). In 2025, at least 3,455 Organisations (19%) still did not have an assigned IDNO, meaning they had not yet amended their statutes. In 2024, the Ministry of Justice sent 124 notifications informing CSOs of their obligations to make the required amendments and filed the first lawsuit seeking forced liquidation. In the first ten months of 2025, the MoJ filed 28 actions requesting the forced liquidation of CSOs that had not made the required amendments to their founding documents. In one of the referenced cases, the basis for requesting forced dissolution was the failure to submit the annual activity report after repeated requests from the MoJ (Article 16 (3) of the Law on Non-Commercial Organisations). In 2025, courts have issued at least 17 decisions ordering the forced liquidation of certain CSOs.³² The MoJ does not have a fixed deadline for completing the process and is carrying out the actions in stages, based on the list provided by the ASP of Organisations that have not made the required

³² Chişinău Court decisions on forced liquidation, including: AO Societatea Culturală Revista “Lolocur” (17 June 2025); AO Societatea de Prietenie Moldova–Cuba (20 June 2025); AO Asociația de Creație pentru Copii și Tineret “INSOLENS” (26 June 2025); AO Asociația de Cooperare Culturală Italia–Moldova (26 June 2025); AO Organizația Obștească Societatea Culturii Islamice în Moldova (26 June 2025); AO Asociația Națională Știința Apelor (26 June 2025); AO Centrul Rector (30 July 2025); AO Asociația Studenților Juriști din Moldova (31 July 2025); AO Asociația Oamenilor de Știință din Moldova N. Spătaru Milescu (20 August 2025); AO Societatea Obștească Cireșarii (1 October 2025); AO Liga Națională a Boxului Profesionist din Republica Moldova (13 October 2025); AO Centrul Noilor Strategii Educaționale (16 October 2025); AO Societatea pentru Democrație și Umanism (17 October 2025); AO Центр Экономико-Социальной Инициативы (28 October 2025); AO Asociația Copiii Moldovei (27 October 2025); and AO Societatea Pomicultorilor din Republica Moldova (27 November 2025). Accessed at <https://instante.justice.md/ro/hotaririle-instantei>.

amendments to their founding documents. At the current pace, completing the procedure for approximately 3,000 CSOs could take more than 100 years.

Standard V. The state does not interfere in the internal affairs and operations of CSOs.

CSOs are free to decide their own internal structure, governing bodies and operations. The law requires the existence of an executive or administrative body but does not require a permanent management body (such as a board of directors) or a supervisory body, provided that the organisation opts for an external annual audit. The registering authority only collects documents related to registration and changes in the administrative structure of the CSO.

CSOs must submit online periodic reports, including on income tax withholding, health and social insurance contributions (monthly), consumables and expenditures (quarterly), their financial situation (annually) and, if applicable, on the usage of percentage designation funds and of the volunteer host. CSOs must publish their annual narrative reports within six months of the end of the year or present a copy of the report to anyone who requests to see it.

CSOs are rarely subject to financial and tax inspections performed by government institutions.³³ CSOs that provide medical and social services are regularly verified by specialised institutions for compliance with hygiene and sanitation requirements. CSOs that provide medical services under contract with the National Medical Insurance Company are also checked periodically. CSOs that provide accredited social services are inspected by the State Social Inspectorate based on planned controls, in order to correctly apply the law and normative acts that regulate the provision of given services. CSOs that employ persons with disabilities that have the right to receive subsidies³⁴ are also verified periodically.

³³ Tax Code of the Republic of Moldova No. 1163/1997, Title V, Chapter 11 ("Tax Audit"), art. 57 (in Romanian), 24 April 1997, https://www.legis.md/cautare/getResults?doc_id=79111&lang=ro.

³⁴ Government of the Republic of Moldova, Government Decision 49/2021 for the approval of the Regulation on Subsidising Jobs (in Romanian), 29 April 2021, https://www.legis.md/cautare/getResults?doc_id=126195&lang=ro.

Specific recommendations:

- The ASP should simplify the CSO registration process by eliminating de facto registration fees, such as the requirement to obtain an extract when extracts can be generated autonomously, and should conduct the CSO name-availability check at the time of the registration appointment (with the option to verify this online in advance via the State Register of Legal Units);
- The ASP should put in place the necessary systems, building on the positive new practice of electronic submission of documents, to enable CSOs to register fully online;
- The ASP and the Ministry of Justice, in collaboration with CSOs, should identify a legal solution to the situation of CSOs that have not adjusted their documents according to the provisions of the Law on Non-Commercial Organisations, to prevent arbitrary application of the provisions, which could infringe on the freedom of association;
- The ASP should implement an interoperable State Register of Legal Units in the form of an automated information system that integrates CSOs and streamlines the registration process. This should include the digitisation of ASP services, enabling CSOs to register online and obtain all registration documents and certificates electronically. When preparing the technical specifications, the ASP should consider the needs of people with sensory disabilities. The register should also include filters and functionality features that allow access to other public interest information on CSOs (such as membership, public benefit status, and percentage designation mechanism);
- The ASP should strengthen the capacities of its universal registrars in the field of CSO registration in order to prevent violations in the registration procedure;
- The ASP and the Parliament should reduce the length of the CSO registration procedure;
- Parliament and the Ministry of Justice should repeal the provisions that allow the Ministry of Justice to initiate the forced liquidation procedure if an organisation has not submitted an activity report upon request; and
- The Ministry of Justice should draft a separate law to regulate CSOs with a sports profile.

3.2 Equal Treatment

Overall score per area: **4.6/7**

Legislation: **4.8/7**

Practice: **4.4/7**

The law provides that public authorities should treat all non-commercial organisations equally and should not discriminate against them. However, in practice, there are situations of unequal treatment towards some CSOs. An issue of unequal treatment is the preferential annual subsidy from the state budget available only to five selected CSOs for persons with disabilities. A special situation concerns hundreds of previously registered CSOs not listed in the state register due to the loss of registration documentation by LPAs, requiring these CSOs to re-register in order to obtain legal extracts, despite otherwise holding fiscal codes and functioning effectively.

Commercial entities are favoured over CSOs in the registration process – the statutory documents require more complexity and the registration duration for CSOs can take up to 15 days, while commercial entities can register within 24 hours or even four hours through the priority service. Although a new State Register of Legal Units is being developed, it is not yet operational, and the Register of Non-Commercial Organisations remains outdated and non-interoperable. Meanwhile, businesses benefit from a faster, automated system. Only CSOs are required to submit annual activity reports—failure to do so may result in forced dissolution, a rule not applied to businesses.

There are also issues regarding the different treatment of CSOs compared to commercial entities, the latter being favoured by a faster registration procedure, less complex registration documents, and more favourable public procurement procedures. While financial reporting requirements are subject to similar provisions, in contrast to CSOs, business entities are not required to submit annual activity reports. Failure to submit this report may serve as a reason for termination of a CSO. Access to funding, including from outside the country, is subject to similar conditions irrespective of whether the entity is for-profit or not-for-profit. Commercial entities are favoured in public procurement procedures but are more exposed to tax audits compared to CSOs.

In 2025, the withdrawal of U.S. funding led to intensified stigmatisation of independent media and watchdog CSOs, by illiberal political leaders, fuelled by conspiracy narratives portraying them as agents of foreign influence, particularly during the September electoral campaign.

The overall score in the area of Equal Treatment decreased from 4.7 in 2024 to 4.6 in 2025, as a result of a decline in the Practice score. The Legislation score remained unchanged. The practice score decreased from 4.5 in 2024 to 4.4 in 2025, largely due to the decision of the Commission for Emergency Situations to grant energy-consumption compensation to businesses, but not to CSOs, even though CSOs had submitted such a request.

The recommendations in this area focus on amending the legal mechanisms to facilitate social services contracting, simplifying the registration procedure for eligibility under the percentage designation mechanism, and ensuring access to annual subsidies for persons with disabilities for all interested CSOs.

Standard I. The state treats all CSOs equitably with business entities.

Commercial entities benefit from more favourable treatment than CSOs in several respects. The duration of CSO registration (up to fifteen days) is longer than that for commercial entities, which can register within twenty-four hours, or in four hours if the priority service is used.³⁵ Currently, there is no system to support online registration for either commercial entities or for CSOs. The State Register of Legal Entities has not yet been implemented by the ASP. At the time the report was drafted, the data migration process to the new register had not been completed.

The registration of commercial entities is supported by an automated registration system that provides data and an overall quicker registration procedure. The State Register of Non-Commercial Organisations³⁶ is outdated and not interoperable with other registration systems. This slows down the registration procedure for CSOs. Hundreds of CSOs that were previously registered by LPAs are missing from the state register due to lost local documentation. These CSOs hold fiscal codes and are otherwise effectively functional.

Registration is free for most CSOs, while commercial entities are charged different amounts based on entity type.³⁷ Fees for the issuance of certificates and extracts are equally applied to CSOs and commercial entities.

While financial reporting requirements are subject to similar provisions, in contrast to business entities, CSOs are required to submit annual activity reports. Failure to submit annual reports may serve as a reason for termination of a CSO.

Voluntary termination of a legal entity is preceded by a liquidation procedure, both for commercial entities and CSOs. The liquidation procedure may take several years and is more complicated and time-consuming than registration.

There are certain disadvantages for CSOs when participating in public procurement compared to commercial entities. CSOs' participation is hindered by burdensome requirements such as bank certificates, a certificate of proper performance of the contract and delayed payment for services, which cannot be fulfilled by CSOs in the absence of available liquidity. In addition, it is difficult for most CSOs to provide services without receiving payments in advance.

CSOs also lack in their ability to provide social services, when compared with public providers. The concept of social order (a form of contracting social services by the state)

³⁵ Public Services Agency (ASP), Terms and fees, State register of a legal person (in Romanian), <https://asp.gov.md/ro/servicii/persoane-juridice/21/211>.

³⁶ Public Services Agency (ASP), State Registry of Non-Commercial Organisations (in Romanian), <https://asp.gov.md/ro/informatii-utile/date-statistice>.

³⁷ Public Services Agency (ASP), Terms and fees, Registration of an individual entrepreneur (in Romanian), <http://asp.gov.md/ro/servicii/persoane-juridice/21/211-3>.

Public Services Agency (ASP), Terms and fees, Registration of legal persons (in Romanian), <http://asp.gov.md/ro/servicii/persoane-juridice/21/211>.

is provided for in law, but there is no regulatory mechanism to support it. Contracting social services from private providers (including CSOs) remains underdeveloped. Since the adjustment of the social services accreditation system in 2023,³⁸ to date, 34 services provided by CSOs have been accredited,³⁹ based on the updated social services nomenclature.⁴⁰ These services represent 23% of the total accredited services, compared to 76% belonging to public institutions and 1% to commercial entities. However, the model contracting package for CSOs has not been adopted and cost standards have not been approved for all services.

In November, the Ministry of Labour and Social Protection submitted several regulations and standards for public consultation, which could lead to the favouring of public service providers to the detriment of private providers, including CSOs.⁴¹

Access to funding, including from abroad, is subject to similar conditions irrespective of whether the entity is for-profit or not-for-profit. The State Tax Service operates less controls on non-commercial organisations compared to commercial organisations, as these are less susceptible to fiscal irregularities such as tax evasion and ‘under the table’ salaries. In the first nine months of 2025, 5.2% of all commercial organisations went through inspection, compared to 0.2% of all non-commercial organisations.

In the context of the energy crisis, the Government, based on the decision of Commission for Emergency Situations granted compensation for electricity costs to commercial Organisations⁴², not even for those engaged in social entrepreneurship activities, but did not provide similar support to CSOs. More than 100 CSOs submitted a request to the Government to grant compensations to CSOs on equal terms, but it wasn’t accepted.

³⁸ Government of the Republic of Moldova, Government Decision 313/2023 on the amendment of some Government decisions (concerning the strengthening of the capacities of the State Social Inspectorate in the context of the assignment of accreditation powers of social service providers) (in Romanian), 24 May 2023, https://www.legis.md/cautare/getResults?doc_id=137150&lang=ro.

³⁹ State Social Inspectorate (ISS), Electronic Register of Accredited Social Services (in Romanian), <https://iss.gov.md/accreditation>.

⁴⁰ National Council for the Assessment, Accreditation and Monitoring of Social Services (CNAPSS), Social Services Nomenclature, <https://cnapss.gov.md/nomenclatoralserviciilorsociale>

⁴¹ Government of the Republic of Moldova, Draft Government Decision 872/MMPS/2025 on the amendment of certain normative acts (regarding the provision of social services and the protection of the rights of persons with disabilities to independent living and community inclusion), 2025, <https://particip.gov.md/ro/document/stages/se-plaseaza-spre-consultare-publica-proiectul-hotararii-guvernului-pentru-modificarea-unor-acte-normative-privind-prestarea-serviciilor-sociale-pe-domeniul-asigurarii-drepturilor-persoanelor-cu-dizabilitati-la-trai-independent-si-incluziune-in-comunitate/15403>

⁴² Commission for Emergency Situations, Disposition 5/27.01.2025, https://gov.md/sites/default/files/media/documents/2025-03/5.dispozitia_cse_nr.5_din_27.01.2025_stamp.pdf
MDED, The Government will provide electricity cost compensations for economic agents.
<https://mded.gov.md/guvernul-va-acorda-compensatii-la-energia-electrica-pentru-agentii-economici/>

Standard II. The state treats all CSOs equally with regard to their establishment, registration, and activities.

The law⁴³ stipulates that public authorities should treat all non-commercial organisations equally and should not discriminate against them. The law does not differentiate based on the nationality of a CSO's founders or members, nor does it require the managers of CSOs to be resident in Republic of Moldova.

However, for at least a decade, state authorities have been applying continuous preferential treatment to five CSOs for persons with disabilities⁴⁴ which receive an annual subsidy from the state budget on the basis of a legal provision.⁴⁵ Other CSOs that work with disabled persons do not benefit from this support. A draft set of legal amendments⁴⁶ provides new facilities in procurement procedures for the same three CSOs.

In 2025, following the announcement of the withdrawal of U.S. funding, Moldovan CSOs faced an increasing number of stigmatisation attacks.⁴⁷ These smear campaigns exploited conspiracy-driven narratives about external influence through funding and targeted CSOs as well as non-profit media, particularly those supported by USAID programs.⁴⁸ The label of 'criminal organisation'⁴⁹ attached to USAID subsequently fuelled similar accusations against the activities of CSOs and independent media.⁵⁰

During the September 2025 electoral period, several candidates echoed attacks against CSOs, drawing from the same set of narratives. CSOs involved in the campaign against disinformation were subjected to unprecedented online intimidation and threats. Several representatives of CSOs were included in a list of 171 individuals, published on a website entitled "Traitors – Enemies of the Sovereignty of the Republic of Moldova",⁵¹ alongside deputies, ministers, and journalists. Most attacks are anonymous, but some

⁴³ Law No. 86/2020 on Non-Commercial Organisations, art. 5(2) (in Romanian), https://www.legis.md/cautare/getResults?doc_id=122391&lang=ro.

⁴⁴ The Society of Invalids of the Republic of Moldova; the Society of the Blind of the Republic of Moldova and the Association of the Deaf of the Republic of Moldova.

⁴⁵ Law No. 60/2012 on the Social Inclusion of Persons with Disabilities, art. 36(2) (in Romanian), https://www.legis.md/cautare/getResults?doc_id=146155&lang=ro#; Law No. 158/2022 Amending Law No. 60/2012 on the Social Inclusion of Persons with Disabilities (in Romanian), https://www.legis.md/cautare/getResults?doc_id=131893&lang=ro.

⁴⁶ Draft Law No. 133/2024 Amending the Law on Public Procurement (Law No. 131/2015), art. 65 (in Romanian), <https://www.parlament.md/material-details-md.nspx?param=b1fc57f8-f71c-4403-8e24-820454701019>

⁴⁷ Centrul pentru Jurnalism Independent (CJI), "We condemn the attacks and smear campaigns against the press that exploit the issue of external funding to stigmatize journalists.", 14 February 2025, <https://cji.md/condamnarea-atacurile-si-campaniile-de-denigrare-a-presei-prin-exploatarea-subiectului-privind-finantarea-externa-pentru-stigmatizarea-jurnalistilor/>

⁴⁸ CRJM – Legal Resources Centre from Moldova, "Radiography of attacks on civil society organisations and human rights defenders in the Republic of Moldova 1 January 2024 – 28 February 2025", <https://crjm.org/en/radiography-of-attacks-on-civil-society-organisations-and-human-rights-defenders-in-the-republic-of-moldova-in-2024/26486/>

⁴⁹ X, Elon Musk, 2 February 2025, <https://x.com/elonmusk/status/1886102414194835755?lang=en>

⁵⁰ Infotag, "In 24 hours, former Prime minister Ion Chicu changed his position on USAID's activities in Moldova", <https://www.infotag.md/politics-en/322001/>; LIBERTV, "USAID has left, Soros has come. Victoria Furtună denounces foreign influence over Moldova", https://libertv.md/politica/usaia-a-plecat-soros-a-venit-victoria-furtuna-denunta-influenta-straina-asupra-moldovei/?utm_source=chatgpt.com

⁵¹ Facebook, Angelica Frolov, <https://www.facebook.com/share/p/1ANpzE69mu/>

also come from politicians, such as those from the Șor group, the Patriotic Bloc, or actors based in Gagauzia.

Specific recommendations:

- State institutions should ensure equitable access to and distribution of annual subsidies dedicated to persons with disabilities to all organisations whose work is centred on persons with disabilities, and not only to a limited number of them;
- The Government should adjust the legal framework to facilitate social contracting, including costing standards, an accreditation system, a legal mechanism for public procurements, a standard package of model documents and the removal of barriers for CSOs (e.g., bank guarantees); and
- The Government should ensure equal and fair treatment in the provision of compensation, for both commercial and non-commercial entities.

3.3 Access to Funding

Overall score per area: **5.3/7**

Legislation: **5.7/7**

Practice: **4.8/7**

CSOs are free to request, receive and use financial and material means, from within the country or from abroad, including public funds, to achieve their statutory purposes. While they may legally use diverse fundraising methods like traditional donations, membership fees, crowdfunding, the percentage designation mechanism, and state or business support, as well as engage in economic activities, including social entrepreneurship, international donors remain their main source of income. They may also finance programmes and provide grants, scholarships, and aid both domestically and abroad. The Law on Crowdfunding Services regulates crowdfunding for businesses and local authorities, but excludes CSOs. Banks also treat CSO crowdfunding as e-commerce, requiring a six-month security deposit, which hinders implementation.

Access to funding is not subject to government pre-approval, except in the case of state funding under the Framework Regulation on Non-Reimbursable Financing. However, banking regulations treat CSOs as high-risk under AML/CTF provisions, demanding extensive documentation for international transactions and donor refunds, often causing transfer delays.

According to the National Bureau of Statistics, total CSO revenues decreased slightly from MDL 7.57 billion in 2023 to 7.55 billion in 2024, despite a 15% rise in reporting CSOs. Public associations and foundations maintained growth, while private institutions and religious associations declined. The withdrawal of USAID funding in early 2025 triggered a major financial shock, with numerous project closures and staff layoffs. Though partial EU support mitigated the loss, the longer-term impact remains uncertain.

CSOs' capacity to raise funds locally remains limited. Barriers include the absence of SMS donation infrastructure (offered by only one operator), a ban on cryptocurrency donations, and high technical costs for online donation systems. Although tax law allows a 5% deduction for philanthropic or sponsorship donations, the incentive remains weak.

Funding provided by international donors that falls within the scope of international treaties that the Republic of Moldova is party to may be exempt from taxes and customs clearance. However, political exploitation of the 'foreign funding' narrative intensified in 2025, including attempts to introduce a 'Foreign Agents Law', which would restrict CSO freedoms and access to funding. These proposals were rejected by the pro-European parliamentary majority.

The overall score for the area of Access to Funding, as well as the legislation and practice scores, remained the same as in the previous reporting period.

The recommendations in this area remain the same as in 2024 and aim to increase tax benefits for philanthropic donations (including those made by individuals) and amend the law on crowdfunding services to regulate CSO crowdfunding activities.

Standard I. CSOs are free to seek, receive, and use financial and material resources for the pursuit of their objectives.

CSOs are free to request, receive and use financial and material resources from within the country or from abroad, including public funds, to achieve their statutory purposes.⁵² A CSO can also finance programmes within the country and abroad, by providing grants, scholarships, material and financial aid. CSOs can also engage in economic activities, including social entrepreneurship.⁵³

CSOs can use any legal methods and sources of fundraising, such as international donors, traditional donations, SMS or online donations, a percentage designation mechanism, membership fees, support from the state, support from business entities, economic activities and crowdfunding. The Law on Crowdfunding Services,⁵⁴ in force since 1 March 2024, sets out the types of services, competences, and supervision procedures for service providers. It also regulates access to and the development of crowdfunding for start-ups, small and medium-sized enterprises, and local public authorities, but does not apply to CSOs. At the same time, banks ignore the non-profit nature of CSO crowdfunding and treat it similarly to e-commerce, requiring platforms to hold a percentage of collected funds in a security deposit for up to six months.⁵⁵

Access to funding is not subject to Government pre-approval which is in line with international standards. Only state funding is subject to the Framework Regulation regarding the Non-Reimbursable Financing Mechanism for Projects of Non-

⁵² Law No. 86/2020 on Non-Commercial Organisations, arts. 3(3) and 7(1)(d) (in Romanian), https://www.legis.md/cautare/getResults?doc_id=122391&lang=ro.

⁵³ Ibid., Art. 6(2).

⁵⁴ Law 181/2023 on Crowdfunding Services, (in Romanian), https://www.legis.md/cautare/getResults?doc_id=138188&lang=ro.

⁵⁵ European Center for Not-for-Profit Law (ECNL) and International Center for Not-for-Profit Law (ICNL), 'Assessment of the Legal Framework for Philanthropy in Moldova', September 2024, <https://ecnl.org/sites/default/files/2024-10/Environment%20for%20Philanthropy%20in%20Moldova%20-%20Assessment%20Report%20by%20ECNL%20and%20ICNL.pdf>.

Commercial Organisations.⁵⁶ Despite the state not subjecting organisations to any pre-approval in practice (besides donor rules), in order to access, receive, use and report funding, CSOs must follow excessive banking regulations which categorise CSOs as high risk for money laundering and terrorism financing.

According to the latest official data from the National Bureau of Statistics, and contrary to the trend of previous years, the total revenues of CSOs decreased from 7.57 billion MDL in 2023 to 7.55 billion MDL in 2024, despite the number of reporting CSOs increasing by 15%. The decline in revenues may be related to the reduction of budgets for projects targeting refugees. Although the cause of this decline is not yet clear, the situation should be treated as a warning signal until the factors behind it are clarified. The analysis by legal forms of organisation shows that the trend remained positive for public associations and foundations, while the revenues of private institutions, unions of legal entities, and religious associations recorded a negative dynamic. In 2025, the CSO sector went through a crisis due to the withdrawal of US funding at the beginning of 2025. It led to the abrupt termination of numerous projects, dismissed staff and several organisations. This led to local branches of NDI and IRI reducing their activity to the level of keeping only a country representative. Part of the financial commitments were covered by USAID until the final closure of its programs, whilst European donors partially compensated for the gap left behind. Therefore, the financial statistics for the first half of 2025 (3.3 billion MDL) indicate an increase in CSO revenues compared to the same period in 2024 (2.7 billion MDL).⁵⁷ The broader impact on CSOs is expected to materialise in the coming years, as the U.S funding will be entirely discontinued, concomitant with the implementation of external funding reductions announced by other international partners.⁵⁸ The unexpected withdrawal of financial support has affected the perception of the United States as a reliable partner. The experience of funding withdrawal has highlighted the vulnerability of CSOs in the Republic of Moldova to external funding fluctuations.

Most CSOs' financial operations are conducted through banking operations, but CSOs face limitations in this respect due to AML/CTF legislation which requires additional documentation for international donor refunds which can delay transfers.

CSOs and other stakeholders have limited knowledge of the fiscal and financial regulations on fundraising and philanthropy, whilst there are little to no campaigns

⁵⁶ Government of the Republic of Moldova, Government Decision 656/2022 for the approval of the Framework Regulation regarding the non-reimbursable financing mechanism of projects of non-commercial organisations (in Romanian), https://www.legis.md/cautare/getResults?doc_id=133924&lang=ro.

⁵⁷ Biroul Național de Statistică (BNS), Revenues and expenditures of non-commercial organisations in the first and second quarters, 2025 https://statistica.gov.md/ro/statistic_indicator_details/21

⁵⁸ UK Parliament, UK aid: Reducing spending to 0.3% of GNI by 2027/28

https://commonslibrary.parliament.uk/research-briefings/cbp-10243/?utm_source=chatgpt.com; Government of the Netherlands, Foreign trade and development minister Reinette Klever: Dutch interests at the heart of development policy <https://www.government.nl/latest/news/2025/02/20/minister-reinette-klever-dutch-interests-at-the-heart-of-development-policy>

targeting individual donors.⁵⁹ Limitations on fundraising include: lack of SMS donation services (due to its unpopularity and availability via only one telecoms operator), a ban on cryptocurrency⁶⁰ ('virtual assets')⁶¹ transactions, and the high cost and complexity for CSOs to install a donation function on their websites.

The legislation on sponsorship and philanthropy⁶² governs transparency, record-keeping and the use of donations; defines key terms; and provides a revised and extended list of the goals of philanthropic activities. Donors have the right to deduct any donations for philanthropic or sponsorship purposes (but not more than 5% of taxable income), though this is not a strong incentive. The Platform for the Promotion and Development of Philanthropy advocates for legal changes to increase tax benefits for donors that are not yet accepted by the Ministry of Finance. There is, however, philanthropic potential in Moldova. According to 2024 data, 19.7% of companies are willing to contribute money or resources to CSOs and 36.7% of individuals are willing to donate money to those in need.⁶³

Standard II. There is no distinction in the treatment of financial and material resources from foreign and international sources compared to domestic ones.

CSOs can receive and use funds from abroad and from within the Republic of Moldova without barriers and under the same tax conditions. Additionally, funding provided by international donors that falls within the scope of international treaties that the Republic of Moldova is party to, may be exempt from taxes and customs clearances.⁶⁴ Until the withdrawal of U.S. funding, local CSOs were beneficiaries of stable budgets provided by the main international donors, while the dependence of CSOs on external donors was estimated at around 73%.⁶⁵

The subject of foreign funding has been intensively exploited by political actors as a basis to attack CSOs. The closure of the USAID Agency, against the backdrop of a negative media environment, also triggered legislative initiatives targeting external assistance in the Republic of Moldova. On 12 March 2025, opposition deputies affiliated

⁵⁹ European Center for Not-for-Profit Law (ECNL) and International Center for Not-for-Profit Law (ICNL), 'Assessment of the Legal Framework for Philanthropy in Moldova', op. cit.

⁶⁰ Contraventions Code of the Republic of Moldova No. 218/2008, art. 263 (in Romanian), https://www.legis.md/cautare/getResults?doc_id=144641&lang=ro#.

⁶¹ Law No. 308/2017 on Preventing and Combating Money Laundering and Terrorist Financing, op. cit.

⁶² Law No. 1420/2002 on Philanthropy and Sponsorship (in Romanian), https://www.legis.md/cautare/getResults?doc_id=148959&lang=ro.

⁶³ Centrul Contact, 'Survey: What Moldovans think about NGOs', 2024, (in Romanian), <https://contact.md/sondaj-peste-50-la-suta-dintre-moldoveni-au-incredere-in-osc-uri/>

⁶⁴ Government of the Republic of Moldova, Government Decision 246/2010 on how to apply the tax and customs facilities related to the implementation of investment and technical assistance projects that fall within the scope of international treaties that the Republic of Moldova is party to (in Romanian), https://www.legis.md/cautare/getResults?doc_id=116618&lang=ro.

⁶⁵ Centrul CONTACT, 'Survey: What Moldovans think about CSOs', op. cit.

with Ilan Șor introduced a draft resolution⁶⁶ to establish a parliamentary inquiry commission for the ‘*investigation of suspicious and non-transparent external funding from USAID and the ‘SOROS’ network,*’ thereby insinuating the allegedly illegitimate and suspect nature of external financing. Although the parliamentary majority did not support the initiative, the draft fuelled smear campaigns against CSOs, normalised antagonistic discourse, and legitimised future legislative initiatives of a similar nature.

On 27 March 2025, the opposition faction, the Bloc of Communists and Socialists, submitted a draft Foreign Agents Law to the Parliament.⁶⁷ The draft law poses a serious threat to freedom of association and access to funding, aiming to silence independent voices and shrink civic space. It would require ‘foreign agent’ to register within 30 days of receiving foreign funds, submit quarterly activity and funding reports, and label public materials. CSOs could face restrictions limiting election monitoring, participation in decision-making, and advocacy for human rights and democratic institutions. Non-compliance could lead to fines, suspension of activities for up to six months, or court-ordered dissolution.⁶⁸ Overall, the draft would undermine the legal and financial viability of CSOs, damage their reputation and public support, and exclude them from political and civic life, violating freedoms of association, expression, and participation, thereby weakening democratic governance and civil society’s watchdog role. The National Anticorruption Centre and the Legal Department of the Parliamentary Secretariat issued negative opinions on the draft law. The latter criticised the vague definitions and warned that the ‘foreign agent’ status is stigmatising, and that the draft could be used arbitrarily to suppress and silence critical voices and restrict civil society activities.⁶⁹

CSOs criticised the opposition’s action⁷⁰ and the pro-European majority did not advance the draft. It is expected that such draft laws will not be promoted or supported

⁶⁶ Parliament of the Republic of Moldova, Draft Resolution No. 76/2025 on the establishment of an Inquiry Commission to investigate the circumstances of the unprecedented attack on the democracy, independence, and national security of the Republic of Moldova through suspicious and non-transparent external funding from the USAID agency and the ‘SOROS’ network. <https://www.parlament.md/material-details-md.nspx?param=aa257402-ca3f-41ce-b849-9af2e925b240>

⁶⁷ Parliament of the Republic of Moldova, Draft Foreign Agents Status Law 101/2025, <https://www.parlament.md/material-details-md.nspx?param=21fa86ed-8c64-413e-b19a-a796e037c1fb>

⁶⁸ CSO Meter, Moldova: Opposition introduces draft Foreign Agents Law in Parliament, <https://csometer.info/updates/moldova-opposition-introduces-draft-foreign-agents-law-parliament>

⁶⁹ Parliamentary Secretariat, Legal Department, Opinion on Draft Law 101/2025 on the Status of Foreign Agents in the Republic of Moldova, 14 April 2025, <https://www.parlament.md/preview?id=97e6128b-221c-4c0c-b900-3a8f0fe3a847&url=https://ep-sp.parlament.md/legislativedocuments/638791208426199179/Documents/20250414134749.pdf&method=GetDocumentContent>

⁷⁰ Civil Society Organisations of Moldova, Statement: 127 civil society organisations condemn the defiant action of the deputies of the Bloc of Communists and Socialists who submitted in Parliament the initiative to regulate “foreign agents.” <https://ipre.md/2025/04/03/declaratie-135-organizatii-a-societatii-civile-condamna-gestul-sfidator-al-deputatilor-blocului-comunistilor-si-socialistilor-care-au-inregistrat-in-parlament-initiativa-privind-reglementarea/>

NGO Council, Position Note on the Draft Law on the Status of Foreign Agents. <https://www.facebook.com/Consiliul.ONG/posts/-consiliul-na%C8%9Bional-al-ong-urilor-a-elaborat-%C8%99i-transmis-parlamentului-nota-de-p/684590630851430/>

by the new pro-European majority formed after the parliamentary elections on 28 September 2025. Although the draft law was not approved, the narratives circulated against CSOs negatively affected public perception and attitudes toward their activities.

Another risk related to the external funding of CSOs arises from the 2024 version of the Criminal Code article on *Treason against the State*, which criminalizes ‘providing assistance’ for ‘hostile activities’ ‘in the interest of a foreign state or organization’, allowing any broad interpretations that could target CSOs funded from external sources. CSOs implementing projects funded by embassies, development agencies, or foundations under strategic documents adopted by donor governments are exposed to the risk of arbitrary interpretation of the article.⁷¹

The PISA report on Russia’s hybrid war against the Republic of Moldova⁷² identified CSOs as one of the targets of hybrid attacks. These attacks primarily exploit vulnerabilities related to their dependence on external financial resources and their lack of public trust.

Specific recommendations:

- The Parliament must halt initiatives that broadly limit external funding for CSOs or restrict their activities on the basis of receiving external assistance, as such measures endanger the independence, sustainability, and essential role of civil society in strengthening democracy and protecting fundamental rights;
- The Ministry of Finance should carry out a detailed analysis of the budgetary impact with recommendations for measures to stimulate philanthropy. These measures could include increased tax benefits for philanthropic donations and sponsorship to a level that would provide real incentives and benefits for philanthropic activity (e.g., from 5% to 10-20 % of taxable income, or a certain percentage (for example 0.4%) of the total sum of income and wages) or directing up to 20% of the corporate income tax, or 0.75% of the turnover (the lower of the two amounts), to a philanthropic cause, at no additional cost;
- The Ministry of Finance should reintroduce tax benefits for philanthropic donations made by individual taxpayers to CSOs;

⁷¹ Contact Centre, Legal Resources Centre from Moldova (LRCM), Analysis of the Legal Framework Applicable to the Activities of Civil Society organisations in the Republic of Moldova, 2025.

⁷² Platform for Security and Defence Initiatives (PISA), DCAF, Democracy under siege. Challenges to national security and countering hybrid threats in the Republic of Moldova, 2025 https://pisa.md/wp-content/uploads/2025/09/EN_Sumar-2-1-1.pdf

- The MDED and the Parliament should amend the Law on Crowdfunding to also regulate the crowdfunding activities of CSOs;
- CSOs should increase their capacity to raise funds from all available legal sources, aside from solely international grants;
- CSOs should promote good models and practices for accessing other sources of financing;
- CSOs should build resilience against attack; the civil society sector requires a shift in the paradigm and funding model, oriented towards greater engagement from the business community and the population. Achieving this transition requires the establishment of a legal framework to facilitate the process, the strengthening of public and business community trust, and the development of functional financing instruments; and
- Parliament should revise Article 337(1) of the Criminal Code to limit the crime of *Treason against the state* to serious and violent acts, remove vague terms, and explicitly exclude lawful civic activities, ensuring clarity, predictability, and protection for CSOs.

3.4 Freedom of Peaceful Assembly

Overall score per area: **5.2/7**

Legislation: **5.4/7**

Practice: **4.9/7**

The right to free assembly is guaranteed by the Constitution and the Law on Assemblies provides the effective framework for organising and conducting assemblies. Any person or group of persons with full legal capacity, including minors over fourteen (if accompanied by an adult) or any legal person has the freedom to organise public assemblies. Anyone can freely and voluntarily participate in or assist at an assembly, as well as record images of it. Assemblies are allowed to use any graphical or acoustic means and temporary constructions to express ideas and attitudes.

There is a free of charge and quick notification procedure (five days in advance) to hold an assembly that is not mandatory in the case of spontaneous assemblies or assemblies with less than fifty participants. Simultaneous assemblies are allowed. Online assemblies are not regulated, despite a widespread practice of assembling online and online mediation of offline assemblies. Organisers and participants are accountable only for their own actions during an assembly. A change of conditions for conducting assemblies or their prohibition is the prerogative of the court of law based on clear evidence that the assembly will be unlawful, especially if it is violent or endangers public security.

While not fully aligned with the UN Human Rights Committee's General Comment No. 37, it neither prohibits assemblies in private spaces nor online, where digital and hybrid forms of assembly have become increasingly common.

LPAs, the police and the carabineer troops support and protect peaceful assemblies free of charge with legal provisions generally in line with a human rights-based approach, but practical shortcomings persist, particularly inconsistencies in intervention procedures, related to the lack of standard operating procedures and a lack of identification markings on tactical units.

Despite generally effective facilitation, the 2025 Pride March revealed coordination gaps, with police citing an unlawful municipal ban adopted by Chişinău Council to restrict assemblies promoting sexual and gender diversity, a move assessed as contrary to the law by the State Chancellery.

In 2024, police created a dedicated service for unmanned aerial vehicles (UAVs) for monitoring assemblies, regulated by an internal order.

In March 2025, opposition parties introduced a draft law seeking to prohibit assemblies promoting LGBT visibility, exposing discriminatory attitudes, but it was not passed. Later, a controversial legislative package on electoral corruption introduced new sanctions affecting assemblies, including fines up to 50,000 MDL for paid participation or organising undeclared assemblies. The vague and overlapping wording of these provisions risks arbitrary enforcement and undermines the right to assembly. The article penalising payments for participation was widely and rightfully used against protests organised by fugitive politician Ilan Şor.

Online assemblies were also affected by hybrid manipulation tactics. An investigation by Ziarul de Gardă revealed that the Moscow-funded InfoLeader network orchestrated numerous online astroturfing campaigns to influence Moldovan public opinion ahead of elections.

Police continue to monitor assemblies with drones operated by a specialised unit created in 2024, though regulations remain unpublished. The overall situation in 2025 reflects stable legal guarantees but persistent challenges in practice, particularly regarding hybrid warfare, political interference, discriminatory local decisions, and vague legislative amendments.

In July 2025, Parliament voted in the first reading on Draft Law No. 294/2025 concerning the organisation of various public events, such as commercial, sports, religious, or artistic ones. While the draft aims to clarify distinctions between assemblies and other public events, it still lacks clear definitions and criteria, raising concerns over potential overlap and legal ambiguity.

There were no reported cases of anyone being forced to participate in or being prohibited from participating in peaceful assemblies.

The overall score in the area of Freedom of Peaceful Assembly decreased from 5.3 in 2024 to 5.2 in 2025, due to declines in both the Legislation and Practice scores. The Legislation score decreased from 5.5 in 2024 to 5.4 in 2025, following several amendments that introduced vague and open-to-interpretation sanctions, as well as a decision by the Chişinău Municipal Council to prohibit assemblies aimed at promoting sexual and gender diversity. The practice score decreased from 5.0 in 2024 to 4.9 in 2025, due to an increase in unjustified sanctions imposed by the police for violations of the freedom of assembly and the deficient conduct of law enforcement during the Pride march.

The main recommendations in this area remain the same and focus on the adoption and implementation by law enforcement and LPAs of non-violent and non-invasive procedures based on respect for human rights and prioritising the use of communication tools. Furthermore, it is recommended that law enforcement agencies develop their capacities to monitor and safeguard digital assemblies, while the Parliament should amend the draft Law on public events to exclude any provisions that could negatively affect the exertion of freedom of assembly.

Standard I. Everyone can freely enjoy the right to freedom of peaceful assembly by organising and participating in assemblies.

The right to free assembly is guaranteed by the Constitution⁷³ and the Law on Assemblies provides the effective framework for organising and conducting assemblies.⁷⁴ The Law defines public assemblies as gatherings held in outdoor public spaces, including in the form of spontaneous assemblies or counter manifestations. The Law is not fully aligned with General Comment No. 37 of the UN Human Rights Committee,⁷⁵ therefore it does not regulate assemblies held in private spaces or online, but neither does it prohibit them. Nevertheless, digitally based assemblies and digitally mediated assemblies are a common phenomenon, as well as assemblies held in private spaces with public access. In 2023, the Ministry of Internal Affairs concluded that no amendments were needed to align the existing legislation with General Comment No. 37. Spontaneous assemblies are exempt from a notification procedure. In the case of simultaneous assemblies, LPAs summon organisers to agree on how to divide the public space.

Any person, local or foreign, with full exercise capacity, groups of persons, or any legal person, can organise assemblies. Minors over the age of fourteen years old can organise an assembly only if accompanied by a person with full exercise capacity. Anyone can freely and voluntarily participate in or assist at an assembly, as well as record images of it.

2025 was the second consecutive year without restrictions on freedom of assembly, which had previously been in place during the state of emergency caused by COVID-19 and later by Russia's invasion of Ukraine.

On 10 July 2025, Parliament voted in first reading on Draft Law 294/2025 on the organisation and conduct of certain public events.⁷⁶ The draft, developed by the Ministry of Internal Affairs, is intended to regulate commercial, sports, religious, and artistic events, which have been regulated under the Law on Assemblies for over 17 years. The Law on Assemblies explicitly provides for the need to adopt separate normative acts to regulate other types of events beyond public assemblies. CSOs raised concerns about some unclear provisions in the draft Law, notably those related to the notification procedures, the authorisation by courts, and the rights and responsibilities of organisers and participants.⁷⁷ Although the draft law was improved following public

⁷³ Constitution of the Republic of Moldova, Art. 40 (Freedom of Assembly), op. cit.

⁷⁴ Law No. 26/2008 on Assemblies (in Romanian), https://www.legis.md/cautare/getResults?doc_id=110166&lang=ro.

⁷⁵ UN Human Rights Committee, General comment no. 37 (2020) on the right of peaceful assembly (article 21): Human Rights Committee, <https://digitallibrary.un.org/record/3884725?ln=en>.

⁷⁶ Parliament of the Republic of Moldova, Draft law 294/2025 on public events <https://www.parlament.md/material-details-md.nsp?param=7818eeeb-af0e-4a8e-be44-ad5c805fc25b>

⁷⁷ European Commission Staff Working Document, Republic of Moldova 2025 Report https://enlargement.ec.europa.eu/document/download/23fa6af0-89b3-4532-a3d9-d1638727d14c_en?filename=moldova-report-2025.pdf

consultations held in April 2025,⁷⁸ it still contains some critical inconsistencies.⁷⁹ The main concern regarding freedom of assembly, is the absence of definitions for each type of regulated event and more importantly, the lack of criteria to distinguish between public assemblies regulated by the Law on Assemblies and the types of events listed in the draft law.

CPR and Promo-LEX observed an increased trend in recent years of police issuing administrative sanctions against participants and organisers for alleged violations of assembly laws (Art. 67). The number of sanctions increased from seven in 2021 to 23 in 2022 and 50 in 2024. In 2024, courts examined 60 cases and dismissed 72% of these administrative cases, indicating the unjustified nature of the sanctions, with guilt established in only 28% of cases.⁸⁰ The unjustified application of sanctions has a chilling effect on participation in assemblies and is regarded as a restriction on the freedom of assembly. In the cases where guilt was established, the following violations were identified: *holding an assembly without the organiser submitting a notification* (11 cases), *failure to fulfil legal obligations, possession of explosives, prohibited items, or other dangerous objects and obstruction of access to buildings* (a couple of cases each). In 2025, the practice of imposing sanctions under Article 67 continued, but to a lesser extent than the previous year, with only 17 sanctions applied in the first ten months.

Standard II. The state facilitates and protects peaceful assemblies.

Organisers of public assemblies are required to submit a notification to the relevant LPA at least five days in advance, which is free of charge and processed relatively quickly. Spontaneous assemblies and assemblies with less than fifty participants, as well as online assemblies, do not require notification.

Everyone has the right to disseminate information about the holding of an assembly and to encourage the public to attend the assembly by any legal offline or online methods, even prior to the submission of the notification to the authorities.⁸¹ Almost every offline assembly uses online methods for organisation and dissemination purposes and there have been no reported barriers regarding the use of the internet, virtual tools or other electronic means to organise and disseminate such information. There are no reported cases of limitations on internet access being used as a means to restrict peaceful assemblies either online or offline.

⁷⁸ Government of the Republic of Moldova, Public Consultations on the draft Law on Public Events <https://particip.gov.md/ro/document/stages/anunt-privind-consultarile-publice-asupra-proiectului-de-lege-cu-privire-la-organizarea-si-desfasurarea-unor-evenimente-publice/12447>

⁷⁹ CSO Meter, Moldova: New draft Law on Public Events could curb Freedom of Peaceful Assembly <https://csometer.info/updates/moldova-new-draft-law-public-events-could-curb-freedom-peaceful-assembly>

⁸⁰ Centre for Policies and Reforms (CPR) and Promo-LEX Association, Report on Freedom of assemblies 2024, <https://promolex.md/wp-content/uploads/2025/04/raport-intruniri-2024.pdf>

⁸¹ Law No. 26/2008 on Assemblies, art. 13 ("Notifying the Public"), op. cit.

A change of conditions for conducting assemblies or their prohibition is the prerogative of the court of law based on clear evidence that the assembly will be unlawful, especially if it is violent or endangers public security. The legal deadline for court review of notifications of assemblies does not impede the conduct of assemblies.

In March 2025, the Bloc of Communists and Socialists introduced a legislative initiative⁸² seeking to ban assemblies promoting messages *aimed at increasing the visibility of LGBT persons*. Although the parliamentary majority did not support the draft, the initiative clearly revealed the opposition's undemocratic and discriminatory views and intentions on this issue.

On 15 May 2025, ahead of the Pride March, the Chişinău Municipal Council adopted a decision⁸³ banning assemblies aimed at promoting sexual and gender diversity, with the votes of councillors from the "National Alternative Movement" Political Party, the "Party of Socialists of the Republic of Moldova," and the "Party of Communists of the Republic of Moldova." Although the decision contradicts the law, as confirmed by the State Chancellery,⁸⁴ the Chişinău City Hall invoked the document to avoid facilitating the Pride March, and the Police also referred to it in a report sanctioning the organisers of the Pride March,⁸⁵ for the intentional *blocking of a traffic lane or transport arteries* (although the blocking had been suggested in the prior notification). However, the justice court subsequently annulled the sanction and dismissed the case.⁸⁶

There have been isolated reports of restrictions imposed by law enforcement without legal basis, such as the prohibition of wearing medical masks at pro-Palestine gatherings.

Standard III. The state does not impose unnecessary burdens on organisers or participants in peaceful assemblies.

LPAs and law enforcement are responsible for maintaining and restoring public order during assemblies, which they do so free of charge. The procedure for intervention by public authorities in assemblies is provided for in law only for the purposes of eliminating violence. Organisers and participants are accountable only for their own actions during the assembly, and generally not for those of others. Organisers could

⁸² Parliament of the Republic of Moldova, Draft law 86/2025 for amending the Law 26/2008 on Assemblies (art.8) <https://www.parlament.md//material-details-md.nspx?param=b8d39a98-563c-44e4-bc8c-e43473ec117d>

⁸³ Chişinău Municipal Council, Decision 2/2 of 15 May 2025, on the organisation of public assemblies addressing sensitive topics related to gender identity and sexual orientation in the municipality of Chişinău. https://www.chisinau.md/ro/preview_upload/279358/attached_files/6821dfc533c77.pdf

⁸⁴ State Chancellery of the Republic of Moldova, Notification 1304/OT4-104 of 6 June, 2025, addressed to the Chişinău Municipal Council. <https://www.facebook.com/share/v/16udQcGhKr/>

⁸⁵ Centre for Policies and Reforms (CPR) and Promo-LEX Association, Report on the Conduct of the 2025 Pride March <https://cpr.md/wp-content/uploads/2025/08/Raport-privind-desf%C4%83%C8%99urarea-Mar%C8%99ului-Moldova-Pride-2025-2.pdf>

⁸⁶ National Courts' Web Portal, Case No. 5r-4202/2025 4-25094799-12-5r-03072025, https://instante.justice.md/ro/pigd_integration/pdf/10BCBC92-2234-4867-B598-FEB7EF804F08

only be found accountable for the actions of participants if a court of law finds that the participants acted upon the organiser's instigation.

LPAs are also obliged to provide services requested by the assembly organiser free of charge, which usually include public lighting, cleaning, and access to a power source. The power itself is, however, provided for at a cost.

Assemblies are allowed to use any graphical or acoustic means to express ideas and views, including sound amplification equipment (between the hours of 7.00 a.m. and 11.00 p.m.), as well as to erect temporary structures and other objects specific to the assembly.

On 30 April 2025, Parliament adopted a legislative package⁸⁷ aimed at combating electoral corruption, which included several sanctions related to public assemblies as a means to counter paid protests—a tool widely used in Russia's hybrid war against the Republic of Moldova. The new provisions do not strengthen the protection of freedom of assembly but rather create confusion and risks of abuse. Moreover, some amendments were adopted in violation of transparency legislation, having been introduced just one day before adoption, non-transparently and without any public debate.⁸⁸

Another sanction⁸⁹ introduced through this legislative package is a maximum fine of 3,000 MDL for holding assemblies or other public events contrary to the provisions of the prior declaration. The term "contrary" is unclear, vague, and open to subjective interpretation in relation to the prior declaration's provisions, such as purpose, time, or declared number of participants. An assembly may occur under conditions different from those indicated in the prior declaration, independently of the organisers or participants' will, without violating the legal framework, and this should not be punishable.

Another sanction⁹⁰ targets the organised transportation of participants to assemblies and public events by political parties or electoral competitors without a prior declaration. This contradicts the Law on Assemblies, under which the declaration serves only an informative role and is not mandatory for spontaneous or small assemblies. The new article reflects a misunderstanding of the function of the prior declaration, allows the sanctioning of organisers of lawful assemblies, introduces

⁸⁷ Law No. 100/2025 on Amending Certain Normative Acts (for the Effective Combat of Electoral Corruption and Related Issues) (in Romanian), https://www.legis.md/cautare/getResults?doc_id=148941&lang=ro.

⁸⁸ Centre for Policies and Reforms and Promo-LEX Association Statement: The amendment introducing sanctions for "bribery for organized assemblies" was adopted non-transparently and violates the freedom of assembly. <https://promolex.md/declaratie-amendamentul-privind-sanctionarea-coruperii-pentru-intruniri-organizate-este-adoptat-netransparent-si-incalca-libertatea-de-intrunire/>.

⁸⁹ Code of Contraventions of the Republic of Moldova, art. 67(11), "Violation of the Law on Assemblies."

⁹⁰ Code of Contraventions of the Republic of Moldova, art. 67(12), "Violation of the Law on Assemblies."

discriminatory treatment against political actors, and undermines the principles of equality, freedom of association, and democratic participation.

The same legislative package also amended the Law on Assemblies,⁹¹ requiring organisers who collect signatures to limit the data to name, surname, year of birth, locality, phone number, and signature, which may only be processed for the declared purpose and in accordance with data protection legislation. This provision is redundant, as such matters are already regulated by the special law on personal data protection.

The most controversial amendment is the newly introduced Article 47/2,⁹² under which receiving or offering undue payments for participation in public assemblies aimed at violating public order, public morality, or the rights of others, or for political publicity, constitutes an administrative offense. Fines are up to 7,500 MDL for receiving payments and 50,000 MDL for offering payments. This provision is redundant since assemblies that aim to violate the law are already prohibited. The sanction for receiving payments for participation in assemblies promoting political publicity is at least questionable. The sanction lacks a clear basis in international standards; most standards do not establish an explicit prohibition on payments to participants, and the principle of voluntary participation does not exclude logistical or material support from organisers. The article was widely applied in 2025 to combat paid protests organised by Ilan Șor and his intermediaries ahead of the parliamentary elections. For example, in relation to the protest of 15 August 2025, the Police applied 60 contravention reports for ‘corruption regarding organised assemblies’⁹³ after Ilan Șor had promised monthly salaries of USD 3,000 to each participant in the protests.⁹⁴ During the electoral period (July–October), 581 fines were applied under this article. The Venice Commission, reviewing a similar provision from Armenia, underlined that regulating paid participation in assemblies may be justified particularly in the context of electoral campaign financing, in order to ensure fair political competition. At the same time, vague terms such as ‘material incentivising’ (in Armenian legislation) carry the risk of arbitrary interpretation, and legitimate forms of support, such as covering transport or organisational costs, could be wrongly criminalised, affecting the right to peaceful assembly. It recommended excluding such activities from the scope of the article and ensuring that any measures necessary to ensure transparency are clearly

⁹¹ Law No. 26/2008 on Assemblies, art. 18(3)–(4).

⁹² Code of Contraventions of the Republic of Moldova, art. 472, “Bribery for Organised Assemblies.”

⁹³ Facebook, Poliția Republicii Moldova, 17 August 2025,

https://www.facebook.com/story.php?story_fbid=1198911792279503&id=100064820795803&rdid=48qm59ZKiPCYLpnO#

⁹⁴ NewsMaker.md, Șor calls for a permanent protest and promises monthly “salaries” of \$3,000. PAS and the Police respond, 11 August 2025, <https://newsmaker.md/ro/sor-cheama-la-protest-permanent-si-promite-salarii-de-3000-lunar-pas-si-politia-reactioneaza>

defined and proportionate.⁹⁵ There are concerns, though unsupported by evidence, that the term ‘undue’ in the Moldova legislation could be interpreted arbitrarily, with the risk of being extended to legitimate forms of support noted by the Venice Commission.

Online assemblies in Moldova were also targeted by the phenomenon of paid protests. An undercover investigation by Ziarul de Gardă exposed⁹⁶ an online group called *InfoLeader*, coordinated and funded from Moscow. Throughout 2025, InfoLeader members organised dozens of online assemblies aimed at influencing public opinion on sensitive topics in order to favour certain electoral competitors through techniques such as astroturfing and sockpuppeting.⁹⁷

Standard IV. Law enforcement supports peaceful assemblies and is accountable for the actions of its representatives.

LPAs, the police and the carabineer troops are the public institutions legally empowered to support peaceful assemblies. Their duties, obligations and procedures for intervention are clearly described by law⁹⁸ and their gradual involvement is provided for if an assembly should turn violent. Although the legal provisions are in line with a human rights-based approach, such interventions are, in practice, sometimes at odds with the law, revealing weaknesses in the standard operating procedures of law enforcement. The excessive use of force by law enforcement, or a failure to protect participants in peaceful assemblies can lead to disciplinary⁹⁹ and penal sanctions.¹⁰⁰ However, individual identification is almost impossible in the case of tactically-equipped police and carabineers, who do not wear individual identification markers.

After three years of efficiently managing the Pride March, in 2025 the law enforcement authorities, although providing protection for participants throughout the event, performed in a less coordinated manner, causing confusion and a sense of insecurity

⁹⁵ Venice Commission of the Council of Europe, Armenia - Amicus curiae brief on the compatibility of Article 236 of the Criminal Code with the European standards on legal certainty, October 2025,

https://www.coe.int/en/web/venice-commission/-/opinion-1252?fbclid=IwZXh0bgNhZW0CMTAAYnJpZBExSGVWdGVIVVaQ0xsZGtoWAEei_DL-k602v218h0Q5kzlkiiXLif2wMkcAc9Ttx5xpxlg2PV66Uj_t9XE62A_aem_IYALu9CzZiIUbs2GXH7tQ

⁹⁶ Ziarul de gardă, The Kremlin’s Digital Army. Undercover Investigation. “They pay, let me tell you, the payment comes directly from Moscow.”, 4 September 2025, <https://www.zdg.md/investigatii/ancheta/video-armata-digitala-a-kremlinului-investigatie-sub-acoperire-se-plateste-hai-sa-va-spun-se-plateste-direct-de-la-moscova/>

⁹⁷ Astroturfing – the artificial creation of the impression of popular support or a mass movement. In practice, behind so-called “citizens’ initiatives” or “the voice of the people” often stand organisations, political parties, or companies that conceal their real role.

Sockpuppeting – the use of multiple fake identities (accounts or profiles) to manipulate discussions, support or attack opinions, and create the illusion of consensus.

⁹⁸ Law No. 26/2008 on Assemblies, arts. 21–22, op. cit.; Law No. 218/2012 on the Use of Physical Force, Special Means and Firearms, (in Romanian), https://www.legis.md/cautare/getResults?doc_id=106326&lang=ro.

⁹⁹ Contraventions Code of the Republic of Moldova, Art. 67 (Violation of the Law on Assemblies), cit.

¹⁰⁰ Criminal Code of the Republic of Moldova No. 985/2002, Art. 184 (Violation of the Right to Peaceful Assemblies), 985/2002 (in Romanian), https://www.legis.md/cautare/getResults?doc_id=109495&lang=ro.

for the participants.¹⁰¹ At the start of the march, law enforcement falsely claimed that (i) the organisers had not submitted a notification, (ii) the City Hall had not allowed the march (though it has no such authority), (iii) participants' actions were illegal (although they only acted based on the notification), and (iv) the march be held on the sidewalk (against the notification and the number of participants clearly made this impossible under normal conditions). Only after the organisers insisted on their right to proceed under the conditions provided in the submitted notification did law enforcement comply, diverting the route due to the failure of public authorities to ensure the necessary conditions for the march. The police even cited the legally non-compliant decision of the municipal council to justify some of their actions.

Furthermore, police use drones to monitor public assemblies. The use of such UAVs is operated by a dedicated service created in 2024 (the Unmanned Aircraft Service) under an internal regulation which has not been published. There is no reported use of complementary technologies for UAVs during assemblies, however. Traditionally, law enforcement uses conventional video monitoring during assemblies, but the regime for the use and preservation of the resulting footage is not public, unlike the portable 'body camera' system which is regulated.¹⁰²

Specific recommendations:

- The Chişinău Municipal Council should annul the Decision No. 2/2 of 2025 prohibiting the assemblies aimed at promoting sexual and gender diversity, as it is contrary to the law.
- Parliament should revise the contraventions introduced in 2025 related to public assemblies in order to align to the standards of the European Convention on Human Rights and eliminate elements that unjustifiably limit or restrict the right to freedom of assembly.
- LPAs and law enforcement should adopt non-violent and non-intrusive methods and use standard operating procedures when policing peaceful assemblies that are based on the observance of human rights, including for anti-government assemblies;
- LPAs and law enforcement should apply legal provisions in a non-discriminatory manner and guarantee the safety and integrity of participants, journalists and peaceful observers, regardless of their social and political affiliation by use of communication, dialogue, mediation and negotiation tools to facilitate effective assistance of assemblies;

¹⁰¹ Centre for Policies and Reforms (CPR), Promo-LEX Associations, Report on the Moldova Pride March 2025, <https://cpr.md/wp-content/uploads/2025/08/Raport-privind-desf%C4%83%C8%99urarea-Mar%C8%99ului-Moldova-Pride-2025-2.pdf>

¹⁰² Government of the Republic of Moldova, Government Decision 441/2022 regarding the approval of the 'Body Camera' Portable Video Surveillance Information System Concept and the Regulation regarding its organisation and operation (in Romanian), https://www.legis.md/cautare/getResults?doc_id=132264&lang=ro.

- Police and carabinieri should mark the uniforms of public order officers with visible individual identification numbers;
- Police and carabinieri should train staff in order that they know how to apply the provisions of international standards in the field of online assemblies; and
- The Parliament should revise the draft law on public events, based on the recommendations provided by specialised CSOs, by introducing clear definitions of the types of events and removing provisions that may generate normative ambiguities likely to affect the conduct of public assemblies.

3.5 Right to Participation in Decision-Making

Overall score per area: **5.0/7**

Legislation: **5.4/7**

Practice: **4.6/7**

The legal mechanism for public consultation in the decision-making process establishes clear stages, deadlines, and consultation methods that are mandatory for public authorities and legal entities managing public resources. Exceptions apply to urgent matters or documents adopted by the Central Electoral Commission during election periods, provided that justifications for bypassing consultations are published. Authorities are obliged to ensure participation by all interested stakeholders, while violations of transparency provisions may trigger disciplinary or contravention sanctions. However, there are still no effective legal remedies in cases of non-compliance.

Lobbying activities are not legally regulated and CSOs have no obligation to register or comply with other rules in order to engage in lobbying and advocacy.

The decision-making process in Parliament remains the weakest link in terms of transparency and participation. It is governed by the Parliament Regulation, which does not set out clear consultation rules. The draft Parliament Code initiated in 2023 and intended to replace the Regulation remained pending after the legislature's mandate expired in July 2025. In the first half of 2025, the Parliament publicly consulted less than 10% of adopted legislation. Nevertheless, a new 'e-Parliament' portal was launched in December 2024 with UNDP and Sweden's support, improving public access to legislative documents, agendas, and committee activities. The expert councils established alongside nine of the 11 parliamentary committees, as participatory formats, held a limited number of meetings, and the insufficient representation of CSOs raise serious questions about their effectiveness.

The Government and its subordinated institutions continue to use the online platform particip.gov.md, which is being upgraded following a 2024 evaluation. Public consultations at the central level increased from 75% of draft acts in 2022 to 96% in 2024, while the number of CSO contributions rose nearly threefold. All ministries have now established permanent consultation platforms, yet doubts persist about representativeness and the substantive participation of CSOs. The State Chancellery launched new trainings for public officials and initiated a Guide on ensuring transparency in the decision-making process.

At the local level, a few local authorities observe legal obligations, publish agendas and drafts and carry out public consultations. Only one third of local administrations have a

website that is regularly updated. Most local councils lack transparent decision-making processes and only publish decisions that have already been adopted on the platform actelocale.gov.md, often with relevant information excessively hidden.

Participatory formats such as District Participation Councils and Local Transparency Councils, supported by development partners, continue to function and enhance local civic involvement, though coverage remains limited.

The 2024 Law on Access to Information of Public Interest aligns with EU standards, improving proactive publication and open data. However, local transparency remains inconsistent, with excessive anonymisation and delays in publishing local acts. The Government initiated the review of the legislation on transparency in decisions-making with ample involvement of CSOs and a new draft law on participation was prepared in 2025.

The overall score, as well as the Legislation score, in the area of the Right to Participation in Decision-Making remained the same. The Practice score increased from 4.5 in 2024 to 4.6 in 2025, following the launch of the new parliamentary web portal, the eDemocracy platform (with modules for petitions, access to information, and surveys), the development of a template for proactive information web pages, and the implementation by the State Chancellery of a participatory process to improve legislation in this area. The increase in the practice score did not lead to an increase in the overall score for the area.

The main recommendations in this area are the adoption of a new law on public participation, development of a unified online platform to enhance transparency and participation at all stages of the decision-making processes, ensuring the representativeness and functionality of the recently-created consultative platforms, and scaling-up positive models of participation and transparency at the LPA level.

Standard I. Everyone has the right to participation in decision-making.

Public authorities and legal persons that manage and use public financial resources must consult draft normative and administrative acts that can have an impact on society.¹⁰³ The mechanism for public consultations in the decision-making process¹⁰⁴ provides clear steps and tools to engage citizens, CSOs and other interested parties. The transparency of this process is based on the principles of information sharing and ensuring equal participation opportunities for all stakeholders.

Decisions may be submitted for elaboration and adoption without observing the stages provided for by law, but only as a matter of emergency, in the case of exceptional situations and in cases where documents are adopted by the Central Electoral Commission during an election period.¹⁰⁵ In such cases, the reasons for the urgency and lack of public consultation should be brought to the public's notice within a maximum of ten working days from the adoption of the decision.

¹⁰³ Law No. 239/2008 on Transparency in Decision-Making, art. 3 (in Romanian), https://www.legis.md/cautare/getResults?doc_id=106638&lang=ro.

¹⁰⁴ Government of the Republic of Moldova, Government Decision 967/2016 on the mechanism for public consultations with civil society in the decision-making process (in Romanian), https://www.legis.md/cautare/getResults?doc_id=119856&lang=ro.

¹⁰⁵ Law No. 239/2008 on Transparency in Decision-Making, art. 14, op. cit.

Public authorities are obliged to take all necessary measures to ensure the participation of all stakeholders in decision-making.¹⁰⁶ Violators of transparency provisions¹⁰⁷ can be subject to disciplinary and contravention sanctions.¹⁰⁸ There are no legal remedies in cases of non-compliance with the rules of participation and transparency.

The transparency of the decision-making process in Parliament is not subject to the Law on Transparency in Decision-Making and is conducted in accordance with Parliament Regulation, which does not set out clear rules for public consultations.¹⁰⁹ The draft Parliament Code¹¹⁰ initiated in 2023, that should replace the existing regulation and is expected to resolve the legal deficiencies, was still pending upon the expiration of the legislature's mandate in July 2025. This points to a lack of political will to change the state of affairs in Parliament.

On 24 December 2024, Parliament launched a new website (portal),¹¹¹ created with the support of UNDP and funded by Sweden. The portal is the publicly visible component of the 'e-Parliament' information system. The other components of the system include the Legislative Document Management System (partially publicly visible), which provides the ability to track and view the process of each initiative, draft law, amendment, report, or opinion that is uploaded and monitored digitally; e-Vote – the electronic voting system used by MPs in plenary sessions, which ensures vote traceability; e-Commissions – the module for parliamentary committee meetings and activities, allowing digital management of agendas, minutes, and reports; and, e-Agenda (publicly visible) – displays the schedule of plenary sessions, public hearings, committee activities, and the activities of the Speaker of Parliament.

The Government, with its subordinated institutions, uses the online platform *particip.gov.md*. In 2025, the platform was undergoing improvements based on the recommendations of the analytical report 'Evaluation of Particip.gov.md' for modernising the user interface, developed in 2024 with the support of the 'Policy Advisory Fund' project implemented by GIZ.¹¹² In its annual report, State Chancellery noted an improvement in access to decision-making processes at the level of APC. Draft

¹⁰⁶ Ibid., Art. 7(1).

¹⁰⁷ Ibid., Art. 16(1).

¹⁰⁸ Contraventions Code of the Republic of Moldova, Art. 326(1) (Violation of the Law on Local Public Administration), Contraventions Code, op. cit.

¹⁰⁹ Law No.797/1996 for the Adoption of the Parliament Regulation, (in Romanian), https://www.legis.md/cautare/getResults?doc_id=111777&lang=ro.

¹¹⁰ Parliament of the Republic of Moldova, Public Consultation on the draft Code of the Parliament 221/2024 (in Romanian), <https://www.parlament.md/material-details-md.nspx?param=73466ef3-3d82-4f44-8fe4-aca677ab9076>.

¹¹¹ Parliament of the Republic of Moldova, The Parliament of the Republic of Moldova launched its new website, which is part of the e-Parliament information system., 24 December 2025, <https://www.parlament.md/ns-newsarticle-A-fost-lansat-noul-site-al-Parlamentului-care-este-parte-a-sistemului-informaional-eParlament.nspx>

¹¹² State Chancellery of the Republic of Moldova, Report on Ensuring Transparency in the Decision-Making Process by Central Public Administration Authorities in 2024 (2025), https://old.cancelaria.gov.md/sites/default/files/document/attachments/raport_tpd_apc_2024.pdf

normative acts consulted publicly increased from 75% in 2022 to 96% in 2024, and contributions from the associative sector to government projects rising from 2,000 in 2022 to 5,768 in 2024.¹¹³

In June, the Government launched the platform to support participatory democracy (<https://edemocratie.gov.md/>), which includes a petitions module designed to gradually centralise the petitions collected by APC.¹¹⁴

At the beginning of 2025, State Chancellery reported that all ministries had permanent consultation platforms, within which CSO representatives were included as permanent members of the working groups,¹¹⁵ which function based on the Regulation of the Permanent Consultative Platform adopted in 2023.¹¹⁶ Doubts persist regarding the effectiveness of the consultation platforms and the substantive representation of CSOs. Four out of 14 ministries had not published information about these platforms, while the remaining 12 reported a total of 22 platforms. The majority of members of these platforms are employees of public institutions. Of the 22 platforms, five do not publish a list of members, and in eight platforms no individual CSO representatives are listed, only the note: 'according to the stakeholder list'. In nine platforms, CSO participation is often marginal (e.g., only two out of 15 members at the Ministry of Finance,¹¹⁷ or two out of 28 at the Ministry of Culture).¹¹⁸ Problems with CSO representation were also highlighted in the previous CSO Meter report.¹¹⁹ In 2025, The State Chancellery launched a new round of trainings for the network of civil servants (*TeConsult*)¹²⁰ specialised in public consultation procedures. CS, together with the Center for Policies

¹¹³ State Chancellery of the Republic of Moldova, Report on the Implementation of the Civil Society Organisations Development Program (PDOSC) for the Period 2024–2027 (Year 2024), (2025)

<https://gov.md/sites/default/files/Filepdf/RAPORT%20implimentarea%20PDOSC%20anul%202024%20.pdf>

¹¹⁴ Government of the Republic of Moldova, Government Decision 564/2024 on the Approval of the Concept for the Platform Supporting Participatory Democracy (e-Democracy),

https://www.legis.md/cautare/getResults?doc_id=144700&lang=ro

¹¹⁵ State Chancellery of the Republic of Moldova, Report on the Implementation of the Civil Society Organisations Development Program (PDOSC) for the Period 2024–2027 (Year 2024), (2025)

<https://gov.md/sites/default/files/Filepdf/RAPORT%20implimentarea%20PDOSC%20anul%202024%20.pdf>

¹¹⁶ Government of the Republic of Moldova, Government Decision 435/2023 for the amendment of Government Decision 967/2016 regarding the Mechanism of Public Consultation with Civil Society in the Decision-making Process (in Romanian), https://www.legis.md/cautare/getResults?doc_id=137916&lang=ro.

¹¹⁷ Accounting and Financial Reporting Council of the Ministry of Finance (Republic of Moldova),

https://www.legis.md/cautare/getResults?doc_id=149539&lang=ro

¹¹⁸ Permanent Consultative Platform in the Field of Arts, Creative Industries, and Artistic Education of the Ministry of Culture, https://www.army.md/inf/9036/componenta_platformei_consultative.pdf

¹¹⁹ National Social Insurance House (CNAS), 'List of members of the permanent consultative platform within the National Social Insurance House'

(2 CSO representatives out of 10 members) (in Romanian),

<https://cnas.gov.md/pageview.php?l=ro&idc=734&t=/Transparenta-decizionala/Platforma-consultativa-permanenta>;

National Agency for Food Safety (ANSA), 'List of members of the permanent advisory platform within the National Agency for Food Safety (ANSA advisory platform)' (4 CSO representatives out of 23 members) (in Romanian),

[https://ansa.gov.md/sites/default/files/documents/Rapoarte/Lista%20membrilor%20Platformei%20consultative%20permanente%20C3%AEn%20cadrul%20Agen%C8%9Biei%20Na%C8%9Bionale%20pentru%20Siguran%C8%9Ba%20Alimentelor%20\(Platforma%20consultativ%C4%83%20ANSA\).docx](https://ansa.gov.md/sites/default/files/documents/Rapoarte/Lista%20membrilor%20Platformei%20consultative%20permanente%20C3%AEn%20cadrul%20Agen%C8%9Biei%20Na%C8%9Bionale%20pentru%20Siguran%C8%9Ba%20Alimentelor%20(Platforma%20consultativ%C4%83%20ANSA).docx);

Ministry of Education and Research, Consultative platform for the Ministry of Education and Research (5 CSO representatives out of 18 members) (in Romanian), <https://mec.gov.md/sites/default/files/20240112-054.pdf>.

¹²⁰ State Chancellery of the Republic of Moldova, 'Test Platform for the involvement of civil society in the decision-making process' (in Romanian), <https://cancelaria.gov.md/ro/node/10317>.

and Reforms, launched the development of the Guide on Ensuring Transparency in the Decision-Making Process at All Stages of Legislative Decision-Making, in support of the TeConsult network and consultative platforms.

In 2025, nine out of 11 parliamentary committees had expert councils as part of a permanent consultative platform with CSOs for dialogue and transparency in the decision-making process.¹²¹ At the end of November, expert councils were established for two additional parliamentary committees,¹²² and in December the expert council for the newly created Committee on European Integration was to be set up. Expert councils were established as consultative entities with regulations (based on the Framework Regulation adopted in December 2023),¹²³ composed of representatives from civil society, academia, and other stakeholders, who contribute to improving the national legal framework through the preparation of expertise and analyses within their areas of competence. In the first semester, only nine working sessions of the expert councils were organised.¹²⁴ There is also a lack of substantial representation in the case of some expert councils which count only 4¹²⁵ or 6¹²⁶ members.

Standard II. There is regular, open and effective participation of CSOs in developing, implementing and monitoring public policies.

The legal framework sets out the mechanism¹²⁷ for public consultation within civil society and includes stages, deadlines and conditions for conducting public consultations in the decision-making process. The mechanism includes methods of consultation such as requesting the opinions of CSOs, permanent or temporary working groups, public debates, public hearings, surveys and other methods that can

¹²¹ Parliament of the Republic of Moldova, Expert Councils of Parliament, <https://www.parlament.md/consilii-de-exper-i.nspix>

¹²² Committee on Economy, Budget and Finance (CEB), Decision of the Committee on Economy, Budget and Finance CEB-07 No. 18 of 26 November 2025 on the establishment of the expert council attached to the committee and the adoption of its regulation. <https://www.parlament.md/ns-newsarticle-anun%C5%A3-privind-crearea-consiliului-de-exper%C8%9Bi-pe-l%C3%A2ng%C4%83-comisia-pentru-economie-buget-%C8%99i-finan%C8%9Be.nspix>

Decision of the Committee on Social Protection, Health and Family CPS-06 No. 156 of 26 November 2025 on the establishment of the expert council attached to the committee and the adoption of its regulation.

<https://www.parlament.md/ns-newsarticle-anun%C5%A3-privind-crearea-consiliului-de-exper%C8%9Bi-pe-l%C3%A2ng%C4%83-comisia-pentru-protec%C8%9Bie-social%C4%83-s%C4%83n%C4%83state-%C8%99i-familie.nspix>

¹²³ Committee on Social Protection, Health and Family (CPS), Decision 35/20.12.2023 of the Permanent Bureau of the Parliament for the approval of the Framework Regulation on the organisation and operation of expert councils in addition to the permanent committees of the Parliament of the Republic of Moldova (in Romanian), <https://parlament.md/ns-newsarticle-ANUN%C8%9A-privind-crearea-consiliului-de-exper%C8%9Bi-pe-l%C3%A2ng%C4%83-Comisia-juridic%C4%83-numiri-%C8%99i-imunit%C4%83%C8%9Bi.nspix>

¹²⁴ Parliament of the Republic of Moldova, Information Sheet on Cooperation between Parliament and Civil Society, First Semester 2025,

[https://www.parlament.md/content/SPRM2025/DSP/Fi%C8%99%C4%83%20informativ%C4%83_Societatea%20civil%C4%83%20\(3\).pdf](https://www.parlament.md/content/SPRM2025/DSP/Fi%C8%99%C4%83%20informativ%C4%83_Societatea%20civil%C4%83%20(3).pdf)

¹²⁵ Committee for Foreign Policy and European Integration, Decision No.126 of 24 April 2024 (in Romanian), https://www.parlament.md/content/content/Decizii_CPEIE_consilii%20exper%C8%9Bi.pdf

¹²⁶ Committee for Public Administration and Regional Development, Decision No. 233 of 29 May 2024 (in Romanian), https://www.parlament.md/content/content/Decizii_CAPDR_consilii%20exper%C8%9Bi.pdf

¹²⁷ Government of the Republic of Moldova, Government Decision No. 967/2016 on the Mechanism for Public Consultations with Civil Society in the Decision-Making Process (in Romanian), https://www.legis.md/cautare/getResults?doc_id=119856&lang=ro

either be used separately or in combination with each other. Consultation methods have been criticised as not being clearly described and differentiated, and for causing confusion regarding the forms and modalities of public participation.¹²⁸ Any CSO is free to express its opinion and participate in the decision-making process on its own without being forced to become part of a consultative body. Public consultation, approval, compatibility review of the draft normative act with EU legislation, and the summary of objections, proposals, and recommendations from the approval and public consultation process are¹²⁹ mandatory stages in the drafting of normative acts.¹³⁰ Following the recommendations of the 2024¹³¹ evaluation on transparency in CPA and LPA, the State Chancellery initiated¹³² amendments to the normative framework on decision-making transparency in January 2025. The evaluation highlighted the main difficulties faced by authorities in ensuring transparency: (i) insufficient resources (staff, digital tools), (ii) complex and uncoordinated bureaucratic procedures, and (iii) low awareness among officials of legal obligations and among citizens of their right to access information. After consultations with CSOs, the State Chancellery opted¹³³ to draft a new law on participation. The draft law had not yet been published at the time of preparing the report.

In 2025, Parliament did not repeat the previous years' good practice of adopting a Legislative Programme, thus decreasing the predictability of legislative activity.¹³⁴

In 2025, several participatory forums continued to operate at the local level, developed at the initiative of CSOs and with the support of international partners. District Participation Councils (CRPs) expand from six to nine districts, running with the support of the East Europe Foundation until at least 2028. Local Transparency Councils (CLTs) consolidated in three municipalities (Bălți, Cahul and Strașeni) with the support of GIZ. In addition, there are formats aimed at participation in local decision-making processes: the Councils comprise a network of Local Councils of Youth (marginally

¹²⁸ CPR Moldova, 'Seven measures for effective public participation', 16 August 2024 (in Romanian), <https://cpr.md/2024/08/16/sapte-masuri-pentru-o-participare-publica-eficienta/>.

¹²⁹ Law No. 49/2024 for Amending Some Normative Acts (Process of Elaboration and Promotion of Normative Drafts) (in Romanian), https://www.legis.md/cautare/getResults?doc_id=142636&lang=ro.

¹³⁰ Law No. 100/2017 on Normative Acts (in Romanian), https://www.legis.md/cautare/getResults?doc_id=142658&lang=ro.

¹³¹ Council of Europe, 'Draft Study on the practical aspects of ensuring transparency in the decision-making processes of central and local public authorities', (2024). [Need Link].

¹³² Government of the Republic of Moldova, Announcement of the Initiation of Amendments to the Normative Framework on Transparency in the Decision-Making Process and Public Consultation (Law No. 239/2008 on Transparency in the Decision-Making Process and Government Decision No. 967/2016 on the Public Consultation Mechanism with Civil Society in the Decision-Making Process <https://particip.gov.md/ro/document/stages/anunt-de-initiere-a-modificarii-cadrului-normativ-privind-transparenta-in-procesul-decizional-si-consultarea-publica-legea-nr-2392008-privind-transparenta-in-procesul-decizional-si-hotararea-guvernului-nr-9672016-cu-privire-la-mecanismul-de-consultare-publica-cu-societatea-civila-in-procesul-decizional/13845>

¹³³ Centre for Policies and Reforms (CPR), How Civil Society Views the New Public Participation Legislation? <https://cpr.md/2025/02/11/cum-vede-societatea-civila-o-noua-legislatie-a-participarii-publice/>

¹³⁴ Parliament of the Republic of Moldova, Parliament Decision 454/2023 regarding the Legislative Programme of the Parliament for 2024 (in Romanian), https://www.legis.md/cautare/getResults?doc_id=141350&lang=ro.

participating in decision-making processes at local and regional level),¹³⁵ 37 initiative groups of seniors (the elderly) united in a registered national structure in 2025,¹³⁶ Local Participatory Budgeting Coalitions, and short-term groups of local participation and strategic planning.

The law does not regulate the involvement of CSOs in the implementation, monitoring and evaluation of public policies. Nevertheless, in practice, an important segment of CSOs has always been actively involved in these stages.

Standard III. CSOs have access to information necessary for their effective participation.

The right of 'Access to Information' is provided for by the Constitution.¹³⁷ The new Law on Access to Information of Public Interest came into force in 2024,¹³⁸ and currently meets international standards.¹³⁹ The Law provides that public authorities have an obligation of proactive publication and the obligation to respond to requests for 'official information' within a maximum of ten calendar days.¹⁴⁰

The law guarantees access to information without the requirement of a signature on requests, sanctions the refusal to examine them, and prohibits restricting access to public officials' data on their professional activity (name, position, salary, conflicts of interest, etc.). The law also introduced, starting in 2024, a new form of legal liability for information providers (quasi-administrative liability), which involves the court automatically imposing a fine for violations of legal provisions. The Contraventions Code sets out sanctions for violations of the legislation on access to information¹⁴¹ and for refusal to receive, register, or examine an electronic request for access to information.¹⁴² Public authorities are entitled to charge a fee¹⁴³ for copying, translating or sending the information (five eurocents per page of information, with an additional 20 pages for free). Some issuing authorities set their own fees, which can be as high as 70 eurocents per value provided.

¹³⁵ National Network of Local Youth Councils from Moldova (in Romanian), <https://tineret.gov.md/reteaua-nationala-a-consiliilor-locale-ale-tinerilor-din-moldova/>.

¹³⁶ CASMED Association, 'Senior empowerment' (in Romanian), <https://casmec.md/abilitarea-seniorilor/>.

¹³⁷ Constitution of the Republic of Moldova, art. 34 ("Right to Information"), op. cit.

¹³⁸ Law No. 148/2023 on Access to Information of Public Interest, (in Romanian), https://www.legis.md/cautare/getResults?doc_id=137908&lang=ro.

¹³⁹ Council of Europe, Baseline Evaluation Report, Implementation of the Council of Europe Convention on Access to Official Documents (CETS No. 205 - Tromsø Convention), <https://rm.coe.int/baseline-evaluation-report-moldova/1680b0f65c>.

¹⁴⁰ Law No. 148/2023 on Access to Information of Public Interest, op. cit.

¹⁴¹ Contraventions Code of the Republic of Moldova, Art. 71 (Violation of the legislation on access to information and on petitioning), op. cit.; Law 148/2023 on Access to Information of Public Interest, Article 28: (Acts constituting violations of the legislation on access to public interest information, subject to monetary sanctions), op. cit.

¹⁴² Ibid., Art. 313⁷ (Excess of power in the case of documents in electronic format), op. cit.

¹⁴³ Law No. 148/2023 on Access to Information of Public Interest, art. 22, op. cit.

Based on the latest available information, in 2024, Moldova's Access to Information Index score increased by 11 points from 59/100 (in 2023)¹⁴⁴ to 70/100 (in 2024).¹⁴⁵ The progress was due to improvement of scores for proactive transparency (from 14/30 to 18/30 in 2024) and access to information upon request (from 11/30 to 18/30 in 2024) while the legislative improvements score is unchanged (34/40).

The State Chancellery report¹⁴⁶ on access to information requests addressed to the Government in 2024 shows that CSOs were the main requesters, accounting for 32% of requests, followed by media institutions with 24% of requests. In May 2025, Parliament adopted a new law aimed at establishing uniform minimum rules on open data and the reuse of information from the public sector,¹⁴⁷ complemented in September by methodological norms for the application of the law.¹⁴⁸ The law partially transposes Directive (EU) 2019/1024¹⁴⁹ on open data and the reuse of public sector information.

The participation legislation clearly stipulates timelines for each step of the decision-making process, including publication of the announcement, publication of the draft decision, consultation with stakeholders, and receipt and examination of recommendations.

Central public authorities regularly publish announcements, draft decisions and call for consultation on the participation platform *particip.gov.md* which is free to access.¹⁵⁰

An analysis made by the State Chancellery in 2024 found that 27% of users consider the information unclear, irrelevant or poorly organised. The main shortcomings include rigid, stereotyped language and confusing titles that do not clearly reflect the content of the projects. In addition, it lacks updates on amendments, does not clarify the stage of the draft, and requires additional monitoring of Government and Parliament webpages, complicating trackability due to the absence of integrated systems. It is difficult for users to identify a public consultation because their titles are not informative, and often a summary or brief description of the proposed changes is missing. Recommendations for improvements include better organisation of content, increased accessibility, a notification and feedback system for civil society, expansion

¹⁴⁴ Freedom House Moldova, 'Index of Access to Information: measuring the transparency of public institutions in the Republic of Moldova 2022 (in Romanian), https://freedomhouse.org/sites/default/files/2022-11/fh-Moldova_Access-to-Info-Report-2022_Rom-v2.pdf.

¹⁴⁵ Ibid., 2023 (in Romanian), https://freedomhouse.org/sites/default/files/2023-12/fh-Moldova_Access-to-Info-Report-12-2023_Eng.pdf.

¹⁴⁶ State Chancellery of the Republic of Moldova, Information on the Analysis of Statistical Data from the Register of Requests for Public Interest Information of the State Chancellery for 2024 (2025) https://gov.md/sites/default/files/users-media/media-13/informatie_aiip_2024_0.pdf

¹⁴⁷ Law No. 109/2025 on Open Data and the Reuse of Public Sector Information https://www.legis.md/cautare/getResults?doc_id=148946&lang=ro

¹⁴⁸ Government of the Republic of Moldova, Government Decision No. 563/2025 for the Approval of the Methodological Norms for the Application of Law No. 109/2025 on Open Data and the Reuse of Public Sector Information https://www.legis.md/cautare/getResults?doc_id=150592&lang=ro

¹⁴⁹ Directive (EU) 2019/1024 on open data and the re-use of public sector information (recast) <https://eur-lex.europa.eu/eli/dir/2019/1024/oj/eng>

¹⁵⁰ Public Consultation Platform of the Republic of Moldova (in Romanian), <http://www.particip.gov.md>.

of analytical data, interconnection with other systems (such as *legis.md*), and a calendar of public consultations.¹⁵¹

The State Chancellery continued training public officials on access to information, including through an online course accessed in 2025 by 1,500 public officials. The State Chancellery, with the support of the Information Technology and Cyber Security Service (STISC) and a working group established under the Open Government Action Plan, developed a template for the official websites of central public authorities, subordinated bodies, and autonomous authorities, designed to ensure compliance with proactive disclosure requirements.¹⁵² The template was adapted to the needs of local public authorities (LPAs) and will be provided to them free of charge. Additionally, an option was made available for hosting websites on the government infrastructure, offering maintenance services at a reduced cost. The objective for the following year is to connect all LPAs to this system. Previous data showed that only about 30% of LPAs had websites.¹⁵³

LPAs publish local decisions on the platform *actelocale.gov.md*¹⁵⁴ – over 260,000 decisions were published in the first eleven months of 2025, a figure similar to previous years. However, excessive anonymisation delayed publication; an issue which remains common.

In June 2025, the Government launched the platform for supporting participatory democracy (*e-Democrație*),¹⁵⁵ which includes three modules: (i) collective and individual petitions and requests for access to information; (ii) evaluation of public services; and (iii) online surveys. The Government plans to connect all CPAs to the platform by the end of 2025 and to transfer the record-keeping registers to it, ensuring real-time tracking of all requests. By the time the report was prepared, the platform registered and submitted 24 petitions, 12 surveys, and seven information requests.

In the first semester of 2025, only 13.3% (25 out of the 188) draft laws registered in Parliament were analysed with the involvement of civil society. Of the 46 contributions received from CSOs, 30.4% were accepted, 17.4% were not accepted, and 52.2% were

¹⁵¹ State Chancellery of the Republic of Moldova, Mariana Rostas, GFA-Group GmbH, Analytic Report (particip.gov.md), (2024).

¹⁵² State Chancellery of the Republic of Moldova, 'Self-Assessment Report on the Implementation of the Action Plan for Open Government 2023–2025', (2024), https://cancelaria.gov.md/sites/default/files/raport_intermediar_de_autoevaluare_a_implementarii_pagd_2023-2025.pdf

¹⁵³ State Chancellery of the Republic of Moldova, 'Report on the degree of compliance with legal provisions of official websites of public authorities', (2024) (in Romanian).

¹⁵⁴ Government of the Republic of Moldova, Government Decision 672/2017 for the approval of regulations regarding the State Register of Local Acts (in Romanian), https://www.legis.md/cautare/getResults?doc_id=128145&lang=ro.

¹⁵⁵ Government of the Republic of Moldova, Government Decision 564/2024 to approve the concept of the platform for supporting participatory democracy (e-Democracy) (in Romanian), https://www.legis.md/cautare/getResults?doc_id=144700&lang=ro.

under review.¹⁵⁶ In the last year of the mandate (2024-2025), the Parliament consulted 13.8% (49 out of 356) of the adopted draft laws.¹⁵⁷

Standard IV. Participation in decision-making is distinct from political activities and lobbying.

CSOs are prohibited from materially supporting or providing free services to political parties or socio-political organisations, except for CSOs founded by political parties, which can provide capacity-building services free of charge. CSOs are allowed to provide paid services to electoral candidates during an election campaign.

Lobbying activities are not legally regulated. Participation in the design, monitoring, or implementation of public policies is not prohibited by law and CSOs have no obligation to register or comply with other rules in order to engage in lobbying and advocacy.

The draft law on the status of foreign agents provided for restrictions applicable to CSOs receiving foreign funding, including the prohibition to carry out lobbying activities in favour of foreign interests without notifying the Committee.¹⁵⁸ However, Parliament did not proceed with this draft law.

¹⁵⁶ Parliament of the Republic of Moldova, Information Sheet on Cooperation between Parliament and Civil Society, First Semester 2025, [https://www.parlament.md/content/SPRM2025/DSP/Fi%C8%99%C4%83%20informativ%C4%83_Societatea%20civil%C4%83%20\(3\).pdf](https://www.parlament.md/content/SPRM2025/DSP/Fi%C8%99%C4%83%20informativ%C4%83_Societatea%20civil%C4%83%20(3).pdf)

¹⁵⁷ Promo-LEX Association, The Activity of the Parliament of the XIth Legislature: Good Practices and Recommendations, 2025 (in Romanian), <https://promolex.md/activitatea-parlamentului-de-legislatura-a-xi-a-bune-practici-si-recomandar/>

¹⁵⁸ Parliament of the Republic of Moldova, Draft Law No.101/2025 on the Status of Foreign Agents, art. 5, <https://www.parlament.md/material-details-md.nsp?param=21fa86ed-8c64-413e-b19a-a796e037c1fb>

Specific recommendations:

- The Government should ensure the implementation of the Law on Access to Information of Public Interest and ensure respect for the standards of access to information;
- The EGA/public institutions should improve transparency and participation in decision-making by developing a unified online platform which includes updated information on legal initiatives at all stages and reflects all changes from launch to adoption;
- The Parliament and the Government should ensure the functionality of the consultative platforms created, under clear conditions of representativeness, transparency and relevance;
- The Parliament should adopt a new legislative act aimed at ensuring that it functions in a transparent and predictable manner with guarantees of application of participation principles;
- LPAs should increase transparency in decision-making by developing modules on their websites similar to those used by the Government (*particip.gov.md*) and establish local structures for dialogue with CSOs and participatory structures using existing good practices, including CRPs based on existing functional models;
- The Government should draft and approve a new law on public participation in decision-making, including for the establishment of effective mechanisms to ensure implementation and harmonisation to create a coherent and seamless consultation process; and
- The State Chancellery should review the instruction and mechanisms to prevent excessive anonymisation of information of public interest.

3.6 Freedom of Expression

Overall score per area: **5.0/7**

Legislation: **5.4/7**

Practice: **4.6/7**

Any person has the right to freedom of expression, including the freedom to seek, receive and communicate facts and ideas, offline and online. There is no legal barrier to the free use of any media and no one may prohibit or prevent the media from disseminating information of public interest in accordance with the law. Concerns persist regarding the mechanism introduced at the end of 2023 allowing extrajudicial suspension of broadcasting licenses, criticised by CSOs for its lack of transparency and lack of alignment

with international standards. Under this mechanism, the broadcasting license of TVC21 was suspended. The media landscape remains polarised and heavily influenced by fugitive oligarch Ilan Șor, with much content shifting online after license suspensions. Censorship and public authorities for the control of information disseminated by the media are prohibited. The confidentiality of journalists' sources of information is protected and in 2025, additional safeguards from the European Media Freedom Act were transposed. Deliberate incitement of national, ethnic, racial, or religious strife is a criminal offense. Moldova ranked in thirty-fifth place in the Press Freedom Index remaining in the 'satisfactory' category.

Journalists continued to face aggression, including hacking of personal and YouTube accounts, death threats, physical assaults, intimidation, verbal threats, and denial of access to courts, while the public television station was vandalised again. Politicians frequently file defamation lawsuits against critical media, leading to wasted time and resources for media Organisations.

Individuals and CSOs use online resources and other means to express opinions that are not subject to regulations applicable to media. Crimes motivated by prejudice are sanctioned and inciting national, ethnic, racial or religious strife is forbidden. The definition of hate speech was amended in 2025 to align with the recommendation of the Committee of Ministers of the Council of Europe.

Hate speech remains widespread, primarily online, and is difficult to sanction effectively. The Police are empowered to address hate speech, but enforcement has been limited despite instructions issued in 2025. The Audiovisual Council can sanction disinformation and hate speech in media, and issued fines under the 2023 methodology. In May 2025, the Government approved a procedure for blocking access to web pages used in the commission of crimes.

In July 2025, Parliament amended the Audiovisual Media Services Code to ensure the independence of Teleradio-Moldova and the Audiovisual Council and to regulate video-sharing platforms. Platforms are required to protect minors and the public from harmful content, while the Audiovisual Council can restrict foreign media. Non-commercial media continued to benefit from subsidies, totalling 35 million MDL. However, the subsidies were publicly criticised for being granted to media outlets with political affiliations or those that do not comply with the Journalists' Code of Ethics.

Analysis by the Legal Resources Centre from Moldova found that up to 70% of media cases in the Supreme Court between 2019–2023 were SLAPPs, mostly targeting media sources, with over half filed by politicians or state officials. The Ministry of Justice initiated a draft set of amendments to counter SLAPPs.

There is no systemic hindering by the state of persons expressing ideas and opinions contrary to official policy. The SIS continued to block websites labelled as promoting "fake news," including more than 35 pro-Kremlin propaganda pages.

The overall score for the area of Freedom of Expression, as well as the legislation and practice scores, remained the same as in the previous reporting period.

The recommendations focus on combating disinformation within a predictable, clear, and transparent framework, as well as enhancing the capacity of the Audiovisual Council to monitor online broadcasters. The recommendations also include the adoption of legislation to counter the use of strategic litigation against public participation (SLAPPs). One of the previous recommendations regarding amending the legislation on video-sharing platform services in line with the EU acquis was implemented.

Standard I. Everyone has the right to freedom of opinion and expression.

The Constitution guarantees¹⁵⁹ freedom of opinion and expression by word, image or any other possible means. Any person (natural or legal) and groups of persons (through the right of each individual) have the right to freedom of expression, including the freedom to seek, receive and communicate facts and ideas.¹⁶⁰ There is no legal barrier to the free use of any media and no one may prohibit or prevent the media from disseminating information of public interest in accordance with the law.¹⁶¹ From a legislative perspective, concerns remain regarding the legal mechanism adopted at the end of 2023,¹⁶² which allows for the suspension of broadcasting licenses through extrajudicial decisions. CSOs have also criticised¹⁶³ the lack of transparency in the process of adopting and implementing this new mechanism. In 2025, under this mechanism, the broadcasting license of TVC2I was suspended.¹⁶⁴

In 2025, the Republic of Moldova, for the second year in a row, moved down four positions in the world ranking of the Press Freedom Index¹⁶⁵ to thirty-fifth place, classified in the same 'satisfactory' category as the previous year. The decrease in the score from 74.86 in 2024 to 73.36 in 2025 was driven by slight declines in the political, legislative, social, and security indicators.

The media landscape continues to be polarised and heavily influenced by fugitive oligarch Ilan Șor. After the suspension of broadcasting licenses for several television channels due to the control exercised and manipulative content, much of the media content has migrated to online platforms.

Moldova has also dropped 11 points in the Global Expression Report 2024 versus the previous report but stayed in the 'Less Restricted' category with 66 points, however, is approaching the Restricted category (less than 60 points).¹⁶⁶

¹⁵⁹ Constitution of the Republic of Moldova, art. 32 ("Freedom of Opinion and Expression"), op. cit.

¹⁶⁰ Law No. 64/2010 on Freedom of Expression, art. 3(1) (in Romanian), https://www.legis.md/cautare/getResults?doc_id=83916&lang=ro.

¹⁶¹ Ibid., Art. 4(1).

¹⁶² Government of the Republic of Moldova, Council for the Promotion of Investment Projects of National Importance (in Romanian), <https://gov.md/ro/content/consiliului-pentru-promovarea-proiectelor-investitionale-de-importanta-nationala>.

¹⁶³ Centrul pentru Jurnalism Independent (CJI), 'Statement on the new legal mechanism for suspending the licenses of audiovisual media service providers', 27 March 2024 (in Romanian), <https://cji.md/declaratie-cu-privire-la-noul-mecanism-juridic-de-suspendare-a-licentelor-furnizorilor-de-servicii-media-audiovizuale/>.

¹⁶⁴ Council for the Promotion of Investment Projects of National Importance, Minutes No. 19, dated 24 March 2025, https://gov.md/sites/default/files/media/documents/2025-04/pr_verbal_19.pdf

¹⁶⁵ Reporters Without Borders (RSF), World Press Freedom Index 2024, <https://rsf.org/en/index>.

¹⁶⁶ Article 19, Global Expression Report 2024, <https://www.globalexpressionreport.org/regions-europe-and-central-asia>.

In 2025, journalists continued to be targeted by various forms of aggression, including the hacking of personal and YouTube accounts,¹⁶⁷ death threats,¹⁶⁸ physical assaults,¹⁶⁹ intimidation and verbal threats,¹⁷⁰ and denial of access to courts,¹⁷¹ while the public television station was once again vandalised.¹⁷² Against the backdrop of aggression toward journalists, media CSOs called on the authorities to strengthen legal safeguards for the safety and protection of journalists and to address the prevailing culture of impunity.¹⁷³

There is no evidence of the state systemically hindering persons expressing ideas and opinions contrary to official policy, however, politicians are often sued for defamation as are the authors of statements that scrutinise their activities, leading to wasted time and resources for media institutions.

Deliberate actions aimed at inciting national, ethnic, racial or religious strife or division constitute a criminal offence.¹⁷⁴ Hate speech, in various forms, is forbidden under

¹⁶⁷ MAPMF – Media Alert Platform Moldova Freedom, Unknown sources hack Youtube account of journalist Nicolae Chicu, 3 September, 2025 <https://www.mapmf.org/alert/33695>

¹⁶⁸ MAPMF – Media Alert Platform Moldova Freedom, Journalists in Moldova receive death threats ahead of Independence Day celebrations, 27 August 2025, <https://www.mapmf.org/alert/33693>

¹⁶⁹ MAPMF – Media Alert Platform Moldova Freedom, Protesters physically attack journalists at protest in support of Evghenia Guțul, 5 May 2025, <https://www.mapmf.org/alert/33674>; MAPMF – Media Alert Platform Moldova Freedom, Protesters at Chișinău court house push TV8 camera operator and hit him with flag, female journalist insulted, 3 July, 2025, <https://www.mapmf.org/alert/33560>; MAPMF – Media Alert Platform Moldova Freedom, Jurnal.md journalist insulted and physically attacked at Chișinău city council, 27 June 2025, <https://www.mapmf.org/alert/33558>; MAPMF – Media Alert Platform Moldova Freedom, Protesters assault Ziarul de Gardă reporting crew in front of courthouse in Chișinău, 7 March 2025, <https://www.mapmf.org/alert/33100>; MAPMF – Media Alert Platform Moldova Freedom, Fără Filtre journalists insulted and physically removed from protest in Chișinău, 23 June 2025, <https://www.mapmf.org/alert/33522>; MAPMF – Media Alert Platform Moldova Freedom, Mayor of Bălți insults journalists, pushes them out of his office, 12 March 2025, <https://www.mapmf.org/alert/33103>.

¹⁷⁰ MAPMF – Media Alert Platform Moldova Freedom, President of Șansă party threatens Măriuța Nistor with criminal case "after elections", 1 July 2025, <https://www.mapmf.org/alert/33559>; MAPMF – Media Alert Platform Moldova Freedom, Irina Mah and party colleagues denigrate and insult Ziarul de Gardă journalist Natalia Zaharescu, 3 April, 2025, <https://www.mapmf.org/alert/33136>; MAPMF – Media Alert Platform Moldova Freedom, Mihail Sirkeli receives dozens of messages with threats and insults, 3 April, 2025 <https://www.mapmf.org/alert/33135>; MAPMF – Media Alert Platform Moldova Freedom, Governor of Gagauzia threatens to sue journalist for violent criticism, 20 March 2025, <https://www.mapmf.org/alert/33113>; MAPMF – Media Alert Platform Moldova Freedom, Ziarul de Gardă journalists harassed online after attack near court in Chișinău, 8 March 2025, <https://www.mapmf.org/alert/33101>; MAPMF – Media Alert Platform Moldova Freedom, Officials in Gagauzia intimidate journalists at local assembly congress, 15 February 2025, <https://www.mapmf.org/alert/32960>.

¹⁷¹ Centrul pentru Jurnalism Independent (CJI), We condemn the reprehensible manner in which the Superior Council of Magistracy (CSM) attempted to "mitigate" the harmful regulations on press access to courts, and we once again call for their annulment, 30 April 2025, <https://cji.md/condamnam-modalitatea-reprobabila-prin-care-csm-a-incercat-sa-atenueze-reglementarile-nocive-privind-accesul-presei-in-instantele-de-justitie-si-cerem-repetat-anularea-acestora/>; Centrul pentru Jurnalism Independent (CJI), We condemn the restriction of journalist Vlada Verșinina from Nokta from attending a public court hearing in the criminal case of Evghenia Guțul and call for the urgent intervention of the Superior Council of Magistracy (CSM), 19 May 2025, <https://cji.md/condamnam-ingradirea-accesului-jurnalistei-nokta-vlada-versinina-la-o-sedinta-publica-de-justitie-pe-cauza-penala-a-evgheniei-gutul-si-solicitam-interventia-urgenta-a-csm/>; MAPMF – Media Alert Platform Moldova Freedom, Superior Council of Magistracy restricts journalists' access to courts, <https://www.mapmf.org/alert/33222>.

¹⁷² MAPMF – Media Alert Platform Moldova Freedom, Unknown culprits spray paint on Television and Radio Company of Moldova headquarters, 27 July 2025, <https://www.mapmf.org/alert/33675>.

¹⁷³ Centrul pentru Jurnalism Independent (CJI), Statement on the Increasing Number of Cases of Assault and Intimidation Against Journalists, 03 July 2025, <https://cji.md/declaratie-pe-marginea-sporirii-numarului-de-cazuri-de-agresare-si-intimidare-a-jurnalistilor/>.

¹⁷⁴ Criminal Code of the Republic of Moldova, Art. 346 (Incitement to violent actions based on prejudice), Art. 135/2 (Propaganda of genocide or crimes against humanity), Art. 176/1 (Violation of citizens' rights by propagating fascism, racism and xenophobia and by denying the Holocaust), op. cit.

different legal provisions.¹⁷⁵ The definition of hate speech in the Audiovisual Media Services Code was amended in July,¹⁷⁶ based on the definition of the Committee of Ministers of the Council of Europe from Recommendation Rec/CM (2022)16. Hate speech was widespread during the electoral period, taking sexist, homophobic, and xenophobic forms, and drawing on stereotypes, prejudices, and even incitement to violence or death threats. It was promoted mainly online, but also at public gatherings by electoral competitors, opinion leaders, and supporters of political parties. The fact that hate speech is mainly transmitted and disseminated online,¹⁷⁷ seems to create difficulties in countering the phenomenon. There are also additional issues related to the territorial jurisdiction of the police. The police are legally empowered to sanction hate speech; however, despite adopting an instruction for this purpose, it has not yet managed to make a significant contribution to preventing and sanctioning this phenomenon. The Audiovisual Council is legally empowered to sanction disinformation¹⁷⁸ and hate speech in the mass media.¹⁷⁹

In March, a group of MPs proposed an amendment¹⁸⁰ to introduce an administrative offence for online disinformation, but it was not adopted after being criticised by civil society organisations.¹⁸¹

Standard II. The state facilitates and protects freedom of opinion and expression.

Individuals and CSOs use online resources and other means of communication to publish content and express opinions that are not subject to regulations applicable to media. The law also protects the confidentiality of journalists' sources of information.¹⁸²

¹⁷⁵ Constitution of the Republic of Moldova, art. 32(3); Law No. 64/2010 on Freedom of Expression, art. 2; Contraventions Code, arts. 54 (Violation of Legislation on Religious Groups), 52(3) (Electoral Agitation Prohibited – Hate Speech as an Aggravating Circumstance), 69(3) (Insult), 70(3) (Slander), 70¹ (Incitement to Discrimination), and 354 (Disorderly Conduct), op. cit.

¹⁷⁶ Law No. 221/2025 Amending the Audiovisual Media Services Code of the Republic of Moldova (Law No. 174/2018), https://www.legis.md/cautare/getResults?doc_id=150262&lang=ro

¹⁷⁷ Promo-LEX Association, Analysis: Prevention and Combating of Online Hate Speech in the Republic of Moldova 2025, (in Romanian) https://promolex.md/wp-content/uploads/2025/06/analiza_combaterea_du_online_in_republica_moldova_2025.pdf

¹⁷⁸ Audiovisual Media Services Code of the Republic of Moldova, Art. 11 and Art. 17 (in Romanian), https://www.legis.md/cautare/getResults?doc_id=138546&lang=ro; Audiovisual Council Decision 285/2023, Methodology for Identifying and Evaluating Cases of Disinformation in Audiovisual Content <https://consiliuaudiovizual.md/news/ca-a-aprobat-metodologia-privind-constatarea-si-evaluarea-cazurilor-de-dezinformare-in-continuturile-audiovizuale/>

¹⁷⁹ Audiovisual Council, Decision 160/2023, Methodology for Monitoring Hate Speech in Audiovisual Media Content (in Romanian), https://consiliuaudiovizual.md/news/ca-a-aprobat-metodologia-de-monitorizare-a-discursului-de-ura/?fbclid=IwARivcNhrGiLuhQQQtfZtEcdx8BGUpNUiXC_i5PRnvOjpr38UChPSOqEZhk

¹⁸⁰ Parliament of the Republic of Moldova, Amendment to the Draft Law on the Amendment of Certain Normative Acts 381 of 17 December 2024, 17 March 2025 <https://www.parlament.md/preview?id=c0b119fd-78a8-425a-8f87-d12b43eb4bc8&url=https://ep-sp.parlament.md/materials/638697240112970194/Documents/20250317161444.pdf&method=GetDocumentContent>

¹⁸¹ Centrul pentru Jurnalism Independent (CJI), Opinion on the Amendment Introducing Administrative Liability for Online Disinformation, 20 March 2025, <https://cji.md/opinia-cji-pe-marginea-amendamentului-ce-presupune-instituirea-raspunderii-contraventionale-pentru-dezinformarea-online/>

¹⁸² Law No. 64/2010 on Freedom of Expression, art. 13 (in Romanian), op. cit.; Law No. 243/1994 on the Press, art. 18 ("Non-disclosure of Information Source") (in Romanian), https://www.legis.md/cautare/getResults?doc_id=109428&lang=ro

In July, the Audiovisual Media Services Code (AMSC) transposed additional safeguards from the European Media Freedom Act (EMFA) to protect media service providers and editorial staff against detention, sanctions, interception, searches, or seizure related to journalistic sources and confidential communications.¹⁸³ The primary task was to ensure these safeguards are also incorporated into legislation governing other types of media. Censorship, as well as the creation of public authorities for the control of information to be disseminated by the media, is prohibited.¹⁸⁴ There were no reported cases of media organisations being searched or raided in the current reporting period.

In 2025, the Contravention Code was supplemented with Article 61^I (insulting a journalist), and Article 180^I (the intentional obstruction of media activity or intimidation for criticism) of the Criminal Code was strengthened. Both provisions will come into force in 2026.

The July amendment to the Audiovisual Media Services Code aimed at ensuring the independence of Teleradio-Moldova (TRM) and the Audiovisual Council. This amendment follows the repeated call made in March 2024 by the Council of Ministers of the Council of Europe in this regard. The same amendment introduced a chapter regulating video-sharing platform services into the Code, aligned with EU Directive 2018/1008 on audiovisual media services and, to a lesser extent, with EU Regulation 2022/2065 on digital services. Video-sharing platforms in the Republic of Moldova are required to protect minors and the public from harmful content (pornography, violence, hate speech, terrorism, child pornography, racism, xenophobia), while the Audiovisual Council is empowered to prohibit the retransmission of foreign media services containing advertising targeted at the domestic audience.¹⁸⁵ The amendments were criticised by some video-sharing service providers (e.g., Privesc.eu).

The SIS continued to block disinformation websites, restricting access to over 35 pro-Kremlin propaganda pages,¹⁸⁶ a practice that began during the COVID-19 pandemic and continued after Russia's invasion of Ukraine.

In May, the Government approved¹⁸⁷ an instruction on the procedure for blocking access to web pages containing information intended for and used in the preparation or

¹⁸³ Law No. 221/2025 on the Amendment of the Audiovisual Media Services Code of the Republic of Moldova No. 174/2018, https://www.legis.md/cautare/getResults?doc_id=150262&lang=ro

¹⁸⁴ Constitution of the Republic of Moldova, art. 34(5); Law No. 243/1994 on the Press, art. 1(2); Law No. 64/2010 on Freedom of Expression, art. 5, op. cit.

¹⁸⁵ European Court of Human Rights (ECHR), Committee of Ministers' 1492nd meeting decisions (12-14 March 2024) (DH) - H46-23 Manole and Others v. Republic of Moldova (Application No. 13936/02), CM/Del/Dec(2024)1492/H46-23, <https://search.coe.int/cm/#{%22CoEIdentifier%22:%220900001680aec20f%22,%22sort%22:%22CoEValidationDate%20Descending%22}>.

¹⁸⁶ RISE Moldova, The Russian network is hard to stop, <https://www.rise.md/articol/reteaua-rusa-greu-de-oprit/>

¹⁸⁷ Government of the Republic of Moldova, Government Decision 317/2025 on the Approval of the Instruction on the Procedure for Blocking Access to Web Pages Containing Information Intended for and Used in the Preparation or Commission of Crimes, and for the Removal of Such Content at the Source https://www.legis.md/cautare/getResults?doc_id=148739&lang=ro

commission of crimes, as well as for removing such content at the source, based on the existing legislation.

Since 2022, 33 TV and radio stations (including two in 2025) have been targeted by license suspension decisions,¹⁸⁸ issued either by the Commission for Exceptional Situations during the state of emergency or by the Council for the Promotion of Investment Projects of National Importance, established at the end of 2023.¹⁸⁹ None of these mechanisms provide the possibility to appeal the decisions in court.

In 2024, non-commercial media, alongside commercial media, benefited from subsidies, with a total value of 35 million MDL,¹⁹⁰ from the Fund for Media Subsidies.¹⁹¹ The implementation practices of the subsidies have sparked public criticism due to grants being awarded to media outlets with political affiliations or those that do not comply with the Journalists' Code of Ethics.¹⁹² This happened because, although the legal criteria for awarding subsidies are clear, they apply to individual media products regardless of the characteristics of the media entities receiving them.

The law also protects whistleblowers,¹⁹³ however, there is not enough evidence to assess the effectiveness of the relevant legal provisions in practice.

The deliberate dissemination of defamatory and deceitful information (defamation) is an administrative offence;¹⁹⁴ although it is usually applied by under-qualified police officers. Analysis by the Legal Resources Centre from Moldova (LRCM) from previous years¹⁹⁵ found that up to 70% cases brought against media organisations in the Supreme Court of Justice between 2019 and 2023 were SLAPPs, two-thirds of the actions analysed directly attacked media sources, and more than half of the plaintiffs were politicians or state officials. The average length of examination of these cases was more than three years, triple the average length of examination of all civil cases.

¹⁸⁸ Centrul pentru Jurnalism Independent (CJI), Report on the mechanisms for suspending/revoking the broadcasting licenses of audiovisual media service providers under the jurisdiction of the Republic of Moldova, 2025, <https://cji.md/raport-privind-mecanismele-de-suspendare-revocare-a-licentelor-de-emisie-a-furnizorilor-de-servicii-media-audiovizuale-aflati-sub-jurisdictia-republicii-moldova/>

¹⁸⁹ The Council for the Promotion of Investment Projects of National Importance, <https://gov.md/ro/content/consiliului-pentru-promovarea-proiectelor-investitionale-de-importanta-nationala>

¹⁹⁰ Ministry of Culture (MC), The Second Competition for Granting Subsidies to Media Institutions, <https://mc.gov.md/ro/content/ministerul-sulturii-lanseaza-al-doilea-concurs-pentru-acordarea-de-subventii-institutiilor>

¹⁹¹ Law No. 50/2024 Regarding the Media Subsidization Fund, <https://www.parlament.md/ProcesulLegislativ/Proiectedeactenormative/tabid/61/LegislativId/6629/language/ro-RO/Default.aspx>.

¹⁹² CUSENS, The beneficiaries of the first media subsidies, <https://cusens.md/ro/investigatii/beneficiarii-primelor-subventii-pentru-presa/>

¹⁹³ Law No. 165/2023 on Whistle-blowers, https://www.legis.md/cautare/getResults?doc_id=137744&lang=ro.

¹⁹⁴ Contraventions Code of the Republic of Moldova, Art. 70 ("Defamation"), op. cit.

¹⁹⁵ Legal Resources Centre from Moldova (LRCM), 'Media freedom through the lenses of justice: How to counteract strategic lawsuits against public participation', 2024 (in Romanian) <https://crjm.org/libertatea-de-exprimare-a-mass-mediiei-in-fata-justitiei-cum-combatem-procesele-judiciare-menite-sa-reduca-la-tacere-jurnalistii/23189/>.

Specific recommendations:

- The Government and specialised institutions should combat disinformation via a predictable, clear and transparent mechanism applicable for identification and sanctioning sources that promote false information, including procedural guarantees and an appeals procedure;
- The Audiovisual Council should develop institutional capacities for monitoring freedom of expression in the online environment by building human capacities and creating a subdivision dedicated to online content;
- The Parliament should amend the legislation on video-sharing platform services in accordance with the EU *acquis*, including the EU Digital Services Act while respecting freedom of expression standards; and
- The Parliament should adopt anti-SLAPP legislation on the model of 'Daphne's Law' / Directive (EU) 2024/1069¹⁹⁶ to protect people who speak out on matters of public interest against abusive legal action designed to silence them (including a mechanism for accelerated determination of the SLAPP nature of the action brought against mass media, possibly resulting in the rejection of the examination of the case).

¹⁹⁶ Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings ('Strategic lawsuits against public participation'), <https://eur-lex.europa.eu/eli/dir/2024/1069/oj>.

3.7 Right to Privacy

Overall score per area: **4.4/7**

Legislation: **5.3/7**

Practice: **3.4/7**

The right to privacy, family and private life, home and correspondence is protected for everyone and cannot be subject to arbitrary or illegal interference whether in physical or virtual environment regardless of the author. Personal data is protected under a dedicated law and the state provides monitoring and control for protection of personal data held by legal persons through the National Centre for Personal Data Protection (CNPDCP). CSOs are entitled to handle personal data and are subject to the same obligations and requirements as other legal persons. The legal framework provides for the protection of privacy and personal data, but this protection is not always offered in practice.

The number of complaints regarding unlawful data processing has steadily increased, indicating growing public awareness. In 2024, CNPDCP confirmed 173 violations, 143 of which were sanctioned administratively. Criminal cases for violations of private life rose from three in 2021–2022 to ten in 2024, with seven recorded so far in 2025, highlighting the need for stronger compliance and preventive measures.

The new Law on Personal Data Protection, adopted in 2024 and effective from 2026, transposes the EU GDPR into national law. It introduces new rights (data portability, right to be forgotten), clear rules on data security, defined responsibilities for data controllers, confidentiality measures (pseudonymisation), and modern tools for international data transfers. In July, Parliament adopted amendments criminalising digital violence, harassment, online threats, non-consensual sharing of intimate images, and stalking. In May, the Ministry of Justice held a public consultation on a draft law regarding data processing for crime prevention.

CNPDCP's report shows that access to personal data by national institutions decreased by 11% in 2024, indicating slight improvements in control, though the Ministry of Internal Affairs and the State Fiscal Service remain the most active processors.

Surveillance is legally possible as part of a criminal investigation, but only upon authorisation of the investigative judge at the prosecutor's request. Searches of offices or homes are possible only following the issuing of a court warrant, or following an urgent exceptional procedure, but only on grounds prescribed by the penal procedure. Criminal procedure provides guarantees against surveillance-related abuses, including for CSOs or associated individuals. It is not clear to what extent the legal mechanisms to protect against illegal or disproportionate collection, processing and storage of personal information work in practice, except in cases brought to public attention by media investigations. There were no reported unauthorised entries into CSO offices or access to their documents.

The SIS holds surveillance prerogatives even outside criminal investigations, including monitoring homes and intercepting communications without judicial consent. The procedure for authorising counterintelligence measures remains unclear, and the Venice Commission has highlighted SIS's extensive powers and the lack of effective oversight mechanisms.

The overall score in the area of the Right to Privacy increased from 4.3 in 2024 to 4.4 in 2025, due to an improvement in the legislation score. The practice score remained the same. The legislation score increased from 5.2 in 2024 to 5.3 in 2025, following the adoption by Parliament of a set of amendments criminalising digital violence.

The recommendations remain the same and focus on the need to review the expanded powers of the SIS that could impact privacy, data protection, and freedom of expression. Additionally, it is recommended that the Prosecutor General ensures post-factum notification requirements regarding the use of special interception and surveillance methods in legal investigations.

Standard I. Everyone enjoys the right to privacy and data protection.

The rights to privacy, family and private life, home and correspondence are protected by the Constitution of the Republic of Moldova¹⁹⁷ for everyone. These cannot be subject to arbitrary or illegal interference, in either a physical or a virtual environment regardless of the author.¹⁹⁸

Personal data is protected under a dedicated law,¹⁹⁹ which regulates the processing, storing and use of personal data. CSOs are entitled to handle personal data and are subject to the same obligations and requirements as other legal persons. Monitoring and control of compliance with the relevant legislation is the duty of the CNPDCP.²⁰⁰ Violations of privacy entail sanctions for contravention.²⁰¹

The number of citizens approaching the CNPDCP regarding violations related to the processing of personal data has continuously increased in recent years. In 2024, the CNPDCP received 1,160 petitions, most of which reported the processing of personal data through video/audio surveillance systems (435 cases), without the subject's consent (346 cases), through disclosure on social media (179 cases), and regarding the exercise of individuals' rights (access, information, intervention, objection) (134 cases). The CNPDCP initiated inspections in 312 cases, resulting in 173 confirmed violations, of which 143 were classified as administrative offences.²⁰² The number of criminal cases addressed in court under Article 177 (Violation of Personal Life) has risen in recent years, from three cases in 2021 and 2022 to ten cases in 2024, with seven cases recorded so far in 2025.²⁰³

¹⁹⁷ Constitution of the Republic of Moldova, Art. 28, (Intimate, family and private life); Art. 29, (Inviolability of the home); Art. 30, (The Privacy of Correspondence) op. cit.

¹⁹⁸ Criminal Code of the Republic of Moldova, Art. 177 (Violation of Privacy); Art. 178 (Violation of the Right to Privacy of Correspondence); Art. 179 (Inviolability of the Domicile); Art. 193 (Trespassing); Art. 197 (Deliberate Destruction or Damaging of Goods); Art. 2601 (Illegal Interception of an Information Data Transfer); Law on freedom of expression 64/2010 Art. 10 (The right to respect for private and family life) op. cit.

¹⁹⁹ Law 133/2011 on Personal Data Protection, https://www.legis.md/cautare/getResults?doc_id=10607&lang=ro.

²⁰⁰ National Centre for Personal Data Protection (CNPDCP), <https://datepersonale.md/en/>.

²⁰¹ Contraventions Code Art. 74¹ (Personal data processing with violation of the law on personal data protection); Art.74² (The refusal to provide information or deny access to the staff of the National Centre for Personal Data Protection); Art. 74³ (Failure to implement the decisions of the National Centre for Personal Data Protection).

²⁰² National Centre for Personal Data Protection (CNPDCP), 'Annual activity report 2024', (2025), (in Romanian). Chapter II, Control Activity, https://datepersonale.md/wp-content/uploads/2025/03/raport_de_activitate_RO_web.pdf.

²⁰³ National Courts' Web Portal, search results for cases involving "Încălcarea inviolabilității vieții,"

https://instante.justice.md/ro/cereri-si-doasare-pendite?Instance=All&Denumirea_dosarului=%C3%8Enc%C4%83lcarea%20inviolabilit%C4%83%C8%9Bii%20vie%C8%9Bii%20&Numarul_dosarului=&Statutul_dosarului=&date=2020-01-01%20TO%202025-09-21&Tipul_dosarului=All&items_per_page=50.

These trends indicate a growth in public awareness of personal data protections and a corresponding increase in reported violations. However, the high number of confirmed breaches and the steady rise in court cases suggests that compliance with data protection standards remain insufficient, underscoring a need for stronger enforcement and preventative measures.

The new Law on Personal Data Protection adopted in 2024,²⁰⁴ will come into force in August 2026. The new Law transposes the EU GDPR²⁰⁵ into the national regulatory framework, includes provisions regarding the activities of the CNPDCP, and covers liability for non-compliance with the legal framework. The Law provides benefits such as easier access to personal data, a new right to data portability, a clearer 'right to be forgotten', a comprehensive set of rules regarding the violation of personal data security, more clearly defined responsibilities for data controllers and clearer obligations for data processors, techniques favourable to confidentiality (pseudonymisation), and a modern set of tools for international data transfers.

In July, Parliament introduced amendments²⁰⁶ criminalising forms of digital violence, including harassment, online threats, and non-consensual sharing of intimate images, and created a new offence of stalking that penalises physical or online behaviour that causes fear or insecurity.

In May 2025, the Ministry of Justice launched a public consultation on the draft law governing the protection of personal data processed for the prevention and investigation of crime, aimed at transposing EU Directive 2016/680 (personal data)²⁰⁷ into national legislation.

The CNPDCP's latest annual report for 2024 shows that national institutions accessed personal data 50 million times, down from 56.3 million in 2023—an overall decrease of 11%. This marks a reversal of the trend observed in previous years, particularly compared to the previous year, which had seen an increase of 20 million accesses. The main institutions that process personal data stored in the key automated state information resources, were the Ministry of Internal Affairs (over 28 million accesses), the State Fiscal Service (over 21 million accesses), the SIS (over 128,000 accesses), the National Anticorruption Centre (over 26,000 accesses), and the General Prosecutor's Office (over 1,000 accesses – half the number from 2022). The only institution that

²⁰⁴ Law No. 195/2024 on Personal Data Protection, https://www.legis.md/cautare/getResults?doc_id=144681&lang=ro.

²⁰⁵ Regulation (EU) 2016/679 – General Data Protection Regulation (GDPR), <https://eur-lex.europa.eu/eli/reg/2016/679/oj>.

²⁰⁶ Law No. 252/2025 Amending Certain Normative Acts, https://www.legis.md/cautare/getResults?doc_id=150197&lang=ro.

²⁰⁷ Draft Law on the Protection of Personal Data Processed for the Purpose of Preventing and Combating Crime, <https://particip.gov.md/ro/document/stages/proiectul-de-lege-privind-protectia-datelor-cu-caracter-personal-prelucrate-in-scopul-prevenirii-si-combaterii-infractiunilor/14431>

recorded an increase in the number of accesses was the Customs Service, with 240,000 additional accesses.²⁰⁸

An example of this is the illegal surveys conducted during the parliamentary election campaign, in which personal data databases were used without clarity on how they were obtained, who collected them, and where they are stored.

Standard II. The state protects the right to privacy of CSOs and associated individuals.

The state provides protection for private data held by legal persons. Personal data stored and processed by CSOs is subject to specific legal procedures.²⁰⁹ Reports submitted by CSOs are compliant with personal data protection legislation and they do not affect the privacy of members, donors, board members and employees, or the confidentiality of their personal assets.

Searches of offices or homes are possible only following the issuing of a court warrant, or following an urgent exceptional procedure, but only on grounds prescribed by the Criminal Procedure Code.²¹⁰ In 2025, there were no reported cases of the authorities breaking into CSOs' offices or accessing CSOs' documents.

Surveillance is legally possible as part of a criminal investigation, but only upon authorisation of the investigative judge at the prosecutor's request.²¹¹ Criminal procedure²¹² provides guarantees against surveillance-related abuses, including for CSOs or associated individuals. It is not clear to what extent the legal mechanisms to protect against illegal or disproportionate collection, processing and storage of personal information work in practice, except in cases brought to public attention by media investigations, as has been the case in previous years. In 2025, there were no recorded cases of unauthorised interference compromising the confidentiality of the communications involving CSOs or associated persons.

SIS has surveillance prerogatives, even outside the scope of a criminal investigation,²¹³ including the right to monitor a person's home, to install audio, video or photo surveillance devices in the home, and to visually monitor and intercept communications, even without the consent of a judge. There is also a confusing

²⁰⁸ National Centre for Personal Data Protection (CNPDCP), 'Annual activity report 2023', (March 2024), (in Romanian) https://datepersonale.md/wp-content/uploads/2024/03/raport_de_activitate_2023_romweb.pdf.

²⁰⁹ Law No. 133/2011 on Personal Data Protection, op. cit.

²¹⁰ Criminal Procedure Code of the Republic of Moldova No. 122/2003, sec. 4 ("Searching and Picking Up Objects and Documents") (in Romanian), https://www.legis.md/cautare/getResults?doc_id=126190&lang=ro.

²¹¹ Criminal Procedure Code of the Republic of Moldova, ch. III, op. cit.; Law No. 59/2012 on Special Investigation Activity, https://www.legis.md/cautare/getResults?doc_id=110235&lang=ro.

²¹² Criminal Procedure Code of the Republic of Moldova, Art. 7 (Legality of Criminal Procedures); Art. 8 (Presumption of Innocence); Art. 9 (Equal Protection of the Law); Art. 10 (Observance of Human Rights, Freedoms, and Dignity); Art. 11 (Inviolability of a Person); Art. 12 (Inviolability of a Domicile); Art. 13 (Inviolability of Property); Art. 14 (Privacy of Correspondence); Art. 15 (Inviolability of Private Life) op. cit.

²¹³ Law No. 136/2023 on the Security and Intelligence Service of the Republic of Moldova, https://www.legis.md/cautare/getResults?doc_id=137512&lang=ro; Law No. 179/2023 on Counterintelligence Activity and External Intelligence Activity, https://www.legis.md/cautare/getResults?doc_id=138152&lang=ro.

procedure for authorising counterintelligence measures (essentially, special investigative measures). The Council of Europe’s Venice Commission has pointed out that the SIS has extensive surveillance powers and identified issues regarding the control mechanisms and undefined notions that allow for ambiguous interpretations.²¹⁴

Specific recommendations:

- The Parliament should review the SIS’s extensive powers and should put in place clear and effective control mechanisms with procedural guarantees over the SIS’s activities that could affect private life, data protection and freedom of expression;
- The Prosecutor General’s Office should guarantee transparency of information on the use of special means of interception and surveillance investigations;
- The Prosecutor General’s Office should ensure that investigating judges inform post-factum wiretapped persons about every single case of interception; and
- The competent bodies should investigate the unlawful interference with private life in electronic communications, data storage and surveillance systems, etc. and should apply sanctions to persons who disclose private information.

3.8 State Duty to Protect

Overall score per area: **4.6/7**

Legislation: **4.9/7**

Practice: **4.3/7**

State institutions have the obligation to protect the life, integrity, health, freedom, property and other legitimate rights of citizens and the community. CSOs and associated individuals have access to effective complaint and appeal mechanisms in court against decisions affecting freedom of association or other rights and freedoms exercised by a CSO or its members. CSOs can also represent beneficiaries whose rights have been violated in court and engage strategic litigation.

CSOs are vulnerable to surveillance and interception of private communications, but it is not common practice for these kinds of attacks to be addressed in court. Public institutions are obliged to intervene through competent authorities in order to protect CSOs and associated individuals from attacks and interference on the part of third parties or state bodies’ representatives. Law enforcement provided protection for the LGBTQ+ Pride March

²¹⁴ Venice Commission, CDL-AD(2023)008-e Republic of Moldova - Opinion on the draft law on the Intelligence and Security Service, as well as on the draft law on counterintelligence and external intelligence activity, adopted by the Venice Commission at its 134th Plenary Session (Venice, 10-11 March 2023), [https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD\(2023\)008-e](https://www.venice.coe.int/webforms/documents/?pdf=CDL-AD(2023)008-e).

from hostile third-party groups, despite existing controversies, confirming thus a longstanding commitment. Investigations and court cases related to illegal interferences with private life have not yet produced final outcomes. Verbal attacks against CSO representatives are mainly observed from illiberal political actors. In 2025, the Ministry of Justice initiated the drafting of a law on human rights defenders to provide legal recognition, support, and protection in accordance with international standards, and worked on anti-SLAPP amendments.

AML/CTF and anti-corruption legislation do not directly restrict CSOs' legitimate activities or the rights of their staff and donors, but banking policies continue to impose barriers to fundraising, including high fees, extra documentation requirements, and classification of all CSOs as 'high risk' in AML policies. CSOs participate in the FIU's National Risk Assessment for terrorist financing, which concluded that the risk of misuse of CSOs remains low. No CSOs were affected by claims of extremism, terrorist financing, money laundering, or corruption in 2025.

Public institutions were actively involved in countering hybrid threats from the Russian Federation, which included illegal financing schemes and electoral corruption through foreign non-profit Organisations. Sociological estimates suggest these kinds of mechanisms influenced 15–20% of voters in the 2024 European integration referendum, that threatened to disrupt democracy and human rights protection in the Republic of Moldova in the aftermath of the parliamentary elections in 2025.

2025 marked the second consecutive year without restrictions on freedom of assembly, expression, or access to information under the state of emergency.

The overall score in the area of the 'State Duty to Protect' remained the same. The legislation score decreased from 5.0 in 2024 to 4.9 in 2025, following legislative amendments that pose risks for CSOs, such as the ambiguous expansion of the definition of extremist activity, the possibility of suspending CSOs, restrictions on access to information provided under the Law on Crisis Situations, and the obligation of CSOs to provide information under the National Security Law. At the same time, the practice score increased from 4.2 in 2024 to 4.3 in 2025, due to the intensive efforts of public institutions to counter hybrid attacks and protect democracy. The opposite trends in the legislation, and practice scores balanced each other, keeping the overall score unchanged.

The recommendations in this area include identifying measures to combat the financing of terrorism based on the risk assessment of NPOs, with CSO participation and adopting a law on the protection of human rights defenders drafted in close cooperation with CSOs.

Standard I. The state protects CSOs and individuals associated with CSOs from interference and attacks.

The Constitution sets out the obligations of the state to protect its citizens.²¹⁵ The life, integrity, health, freedom, property and other legitimate rights of citizens and communities are protected by law,²¹⁶ with both positive and negative obligations placed on state institutions. The state respects, protects and ensures freedom of association, and may intervene in the activities of CSOs only when necessary in a democratic society, for example, to safeguard national security, public safety, law enforcement or

²¹⁵ Constitution of the Republic of Moldova, Art. 18 (Protection of the Citizens of the Republic of Moldova) Constitution of the Republic of Moldova op. cit.

²¹⁶ Law No. 320/2012 on Police, art. 18; Law No. 219/2018 on the General Inspectorate of Carabineers, art. 22; Law No. 3/2016 on the Prosecutor's Office, art. 1.

the prevention of crime, or to protect public health, morals, or the rights and freedoms of others.²¹⁷

CSOs or associated individuals can challenge the court's decisions which affect the exercise of freedom of association,²¹⁸ judgments prohibiting or changing the conditions of an assembly,²¹⁹ a refusal of access to information,²²⁰ freedom of expression²²¹ and other particular rights provided by specific laws. CSOs can also represent beneficiaries whose rights were violated in court and conduct strategic litigation.

Public institutions have a duty to intervene in order to protect CSOs and associated individuals from attacks or interference by third parties or by representatives of state bodies. While CSOs have access to justice, it is uncommon for such attacks to be brought to court, especially considering the lack of trust in the judiciary.²²²

Verbal attacks against CSO representatives manifest mainly on the illiberal side of the political spectrum and at the local level.²²³ In 2025, the police opened a criminal case and detained the person who, three years earlier, had made death threats against journalist Viorica Tătaru on social media. The case demonstrated intolerance toward such acts and was supported by other sanctions imposed by the police; but it cannot yet be considered a generalised practice.

In April 2025, the Ministry of Justice initiated the drafting of a law on human rights defenders in response to the increasing threats against CSOs and HRDs. The aim of the draft law is to provide legal recognition for human rights defenders, support their activities, and ensure their protection in accordance with international standards. This initiative had previously been included in the PNADO, and the Ombudsman published a concept on this topic.²²⁴ In September, the Ministry of Justice was also working on a set of anti-SLAPP amendments.

In 2025, after three years of effectively managing the Pride March, law enforcement still provided protection for participants throughout the event, but their performance was less coordinated, resulting in confusion and a deviation from the planned route at the start of the march.²²⁵

²¹⁷ Law No. 86/2020 on Non-Commercial Organisations, arts. 5(1) and 5(11), op. cit.

²¹⁸ Ibid., Art. 13(13), 16(4), 25(6).

²¹⁹ Law No. 26/2008 on Assemblies, op. cit.

²²⁰ Law No. 148/2023 on Access to Information of Public Interest, ch. IV.

²²¹ Law No. 64/2010 on Freedom of Expression, ch. II, op. cit.

²²² Institutul de Politici Publice (IPP), Public Opinion Barometer, October 2024 (In Romanian), reporting 15% trust <https://ipp.md/2024-10/barometru-opinii-publice-2024/>.

²²³ Bogdan Tîrdea, 'Sorosists and the deep state in Moldova', 18 November 2024 (in Romanian)

https://youtu.be/MjY6F8gjKTA?si=40uxwY_wTMX4NAec.

²²⁴ Ombudsman Office (OAP), Concept on Human Rights Defenders, 2024, (in Romanian),

<https://ombudsman.md/post-document/concept-privind-aparatorii-drepturilor-omului/>

²²⁵ . Centre for Policies and Reforms (CPR) and Promo-LEX Association, Report on the organisation of the Moldova Pride march 2025, <https://cpr.md/wp-content/uploads/2025/08/Raport-privind-desf%C4%83%C8%99urarea-Mar%C8%99ului-Moldova-Pride-2025-2.pdf>

2025 is the second year without restrictions to freedom of assembly, freedom of expression, or access to information being imposed under the state of emergency formerly in place since the onset of the Covid-19 pandemic in 2020 and the beginning of the Russian invasion of Ukraine in 2022.

Standard II. Measures used to fight extremism, terrorism, money laundering or corruption are targeted and proportionate, in line with the risk-based approach, and respect human rights standards on association, assembly, and expression.

The state can establish rules for CSOs for the purposes of AML/CTF only to the extent that these rules are in line with international human rights standards.²²⁶ AML/CTF laws²²⁷ and anti-corruption laws²²⁸ do not contain provisions which directly restrict or impede CSOs from carrying out their legitimate activities or enjoying their fundamental freedoms, nor do they restrict or infringe the rights of their employees and donors. Nevertheless, AML/CTF banking policies create barriers to CSOs' fundraising activities, such as high commission rates for non-cash donations, the rejection of payments made to CSOs from foreign credit cards, treating crowdfunding platforms as 'high-risk' clients akin to e-commerce, and the imposition of extra requirements and high commission fees.²²⁹

CSOs are affected by AML/CTF regulations as they must submit statements identifying the UBO of the legal entity, defined as the individual(s) who exercise ultimate control over the non-commercial organisation (based on amendments from 2023).²³⁰ In 2024, according to an ASP regulation,²³¹ a CSO's UBOs are considered to be its founders, council members, or general assembly members. Experts note that the ASP does not apply the rules on beneficial owners uniformly, with similar organisations indicating different individuals from distinct bodies (General Assembly, Council, or Administrators) based on the registrars' suggestions. However, most of the time, these individuals are not the true UBOs and do not exercise real control, meaning the legal definition does not align with practice for CSOs in the way it does for business entities.

In April 2025, the Moldovan FIU presented the 2025 Terrorist Financing Risk Assessment of the NPO Sector,²³² however, it was not published by the time this report was prepared. The report was developed with the support of the EU Global Facility on

²²⁶ Law No. 86/2020 on Non-Commercial Organisations, Art. 5(10), op. cit.

²²⁷ Law No. 308/2017 on Preventing and Combating Money Laundering and Terrorism Financing.

²²⁸ Law No. 82/2017 on Integrity, https://www.legis.md/cautare/getResults?doc_id=120706&lang=ro.

²²⁹ European Center for Not-for-Profit Law (ECNL) and International Center for Not-for-Profit Law (ICNL), 'Assessment of the Legal Framework for Philanthropy in Moldova', September 2024 <https://ecnl.org/sites/default/files/2024-10/Environment%20for%20Philanthropy%20in%20Moldova%20-%20Assessment%20Report%20by%20ECNL%20and%20ICNL.pdf>.

²³⁰ Law 308/2017 on Preventing and Combating Money Laundering and Terrorism Financing, Arts. 5 and 14.; Law No. 66/2023 for the Modification of Some Normative Acts, 1 July 2023, https://www.legis.md/cautare/getResults?doc_id=136851&lang=ro.

²³¹ Public Services Agency (ASP), Order 573/04.09.2023.

²³² Financial Intelligence Unit (FIU) of the Republic of Moldova, Risk Assessment Report in the Non-commercial Sector (2025), <https://www.spcsb.gov.md/ro/news/prezentarea-raportului-de-evaluare-a-riscurilor-in-sectorul-necomercial>

AML/CFT, based on the Greenacre methodology,²³³ after Moneyval found deficiencies in the implementation of Recommendation 8²³⁴ regarding NPOs in 2024. The rating was maintained at Partially Compliant.²³⁵ The assessment which resulted in a 'Partially Compliant' rating in 2024, concluded that the risk of abuse of NPOs for terrorist financing remains low. Higher-risk NPOs are those with links to the Islamic community, particularly where the entity has connections to high-risk jurisdictions—only ten such organisations currently exist in Moldova (0.2% of the sector). Medium-risk NPOs are those funded in cash from foreign sources, representing approximately 3% of all NPOs. However, CSOs are classified to date as 'high risk' under AML/CTF policies, requiring them to submit extra documents such as project details for outgoing international transfers.

In contrast with the previous National Risk Assessment,²³⁶ CSOs were invited to participate in the assessment at the earliest stage, both as part of a working group, and as part of a larger oversight group.

In 2025, as in previous years, there were no reported cases of CSOs being affected by claims of a connection with extremism, terrorism financing, money laundering or corruption. The anticorruption normative framework does not affect the activity of CSOs and their stakeholders.

In 2025, public institutions were extensively involved in preventing and countering the hybrid attacks by the Russian Federation against the Republic of Moldova, aimed ultimately at subverting election results and changing the democratic regime. The police uncovered illegal financing schemes,²³⁷ seized funds,²³⁸ and exposed groups trained to prepare mass disorder.²³⁹ At least two non-commercial organisations from

²³³ Greenacre's NPO Sector Risk Assessment Methodology, <https://greenacregroup.co.uk/greenacre-government/npo-risk-assessments/#:~:text=The%20Methodology%20employs%20a%20six,on%20which%20to%20base%20assessments.>

²³⁴ Financial Action Task Force (FATF), Recommendation 8 requires that the laws and regulations that govern NPOs be reviewed so that these organisations cannot be abused for the financing of terrorism.

²³⁵ MONEYVAL, 'AML and CTF measures Republic of Moldova, 2nd Enhanced Follow-up Report & Technical Compliance Re-Rating Follow-up Report', May 2024 <https://rm.coe.int/moneyval-2024-4-md-5thround-2ndenhfur/1680b05e46>.

²³⁶ Service for the Prevention and Combating of Money Laundering (SPCSB), Report on the National Risk Assessment of Money Laundering and Terrorist Financing 2022, http://spscb.gov.md/ro/news/raportul-privind-evaluarea-naional-a-riscurilor-in-domeniul-sp-l-rii-banilor-i-finan-rii-terorismului?fbclid=IwAR0Q2RvREUxzooq9PDeimzt_vDGwve4HjN-1L7yILdy8Zq7sJLdQlvdgWDY.

²³⁷ Poliția Republicii Moldova, 46 searches in the case concerning electoral bribery, illegal financing of political parties, and money laundering, <https://politia.md/ro/politia-actiune/46-de-perchezitii-dosarul-privind-coruperea-electorala-finantarea-ilegala>

²³⁸ Poliția Republicii Moldova, The CNA and prosecutors are conducting searches in Chișinău in a case involving the illegal financing of several political groups. Over 20 million lei have been seized, <https://cna.md/ro/comunicate-de-presa/cna-si-procurorii-efectueaza-perchezitii-chisinau-intr-un-dosar-de-finantare>

²³⁹ Poliția Republicii Moldova, Military camps in Serbia, organised by Russian intelligence services (including the GRU), aimed at creating destabilization and mass disorder in the Republic of Moldova. 74 people have been detained., 22.09.2025,

<https://politia.md/ro/politia-actiune/tabere-militare-din-serbia-organizate-de-serviciile-secrete-ruse-inclusiv-gru>
CU SENS, Investigation: Trained to Create Chaos. Part II, <https://www.youtube.com/watch?v=aLS73NNXCOg>
CU SENS, Investigation: Trained to Create Chaos. Part III, <https://www.youtube.com/watch?v=MORFbUMILEk>

Russia—the ‘Center for New Youth Policies’²⁴⁰ and ‘Evrazia’²⁴¹ were involved in subversive electoral corruption activities in Moldova in 2025.²⁴²

The legislative package for combating electoral corruption, adopted in April, expanded the notion of ‘extremist activity’ to include unregistered organisations, media outlets, religious groups, and individuals. Activities considered extremist include, among others, any actions that promote the ‘humiliation of national dignity’, an ambiguous term that could be used to discourage active civil-society participation in public life.

In July, SIS filed a request with the court to have Evrazia declared an extremist organisation²⁴³ under the new provisions of the Law on Counteracting Extremist Activity,²⁴⁴ following evidence of external interference in the 2024 electoral processes. If the court upholds the SIS’s request, Evrazia would become the first organisation based in the Russian Federation to be declared extremist in the Republic of Moldova, which would entail a ban on any activities within the country’s territory and the freezing of its accounts and assets. According to sociological estimates, during the 2024 European integration referendum, these electoral corruption mechanisms influenced up to 15%-20% of voters.²⁴⁵

The Law on Crisis Management, adopted in July 2025, allows the Government to suspend the activities of CSOs, restrict access to information, or affect the confidentiality of communications during states of alert and emergency,²⁴⁶ all without judicial oversight and on the basis of vague grounds. This creates a serious risk of arbitrary interference and affects the freedom of expression and the functioning of civil society.²⁴⁷

The new National Security Law, adopted also in July 2025, requires CSOs and other entities to cooperate with the security sector and provide resources and information.

²⁴⁰ Centre for National and International Media Policy (Russia) (website), <http://cnmp.ru/>

²⁴¹ Evrazia (Eurasian Movement website), <https://evrazia.su/>

²⁴² NordNews, Cinci luni sub acoperire : Bani, propagandă și manipulare electorală, 2025
https://youtube.com/watch?v=IQ_fQcSkPw&si=MB_8MMbnL5IGSTLp

²⁴³ National Courts’ Web Portal, Case Information,
https://instante.justice.md/ro/pigd_integration/pdf/generate/pending/2-25105813-02-2-25072025-1/56C2AD8D-8A90-DD11-AB9B-001E0B8014EB

²⁴⁴ Law No. 54/2003 on Counteracting Extremist Activity,
https://www.legis.md/cautare/getResults?doc_id=148960&lang=ro#

²⁴⁵ Radio Europa Liberă, “Essentially...” Sociologist Vasile Cantarji on the phenomenon of ‘button votes’ in Moldova’s elections, <https://moldova.europalibera.org/a/in-esenta-sociologul-vasile-cantarji-despre-fenomenu-voturilor-de-la-buton-in-scrutinele-din-r-moldova/33172063.html>;

Ziarul de Gardă (ZdG), What would have been the results of the October 20 elections if Șor did not exist? A sociologist’s answer, <https://www.zdg.md/stiri/politic/care-ar-fi-fost-rezultatele-alegerilor-de-pe-20-octombrie-daca-nu-exista-sor-raspunsul-unui-sociolog/>

²⁴⁶ Law No. 248/2025 on Crisis Management, https://www.legis.md/cautare/getResults?doc_id=150247&lang=ro

²⁴⁷ Contact Centre and Legal Resources Centre from Moldova (LRCM), Analysis of the Legal Framework Applicable to the Activities of Civil Society Organisations in the Republic of Moldova, (2025).

The broad wording of these obligations may allow arbitrary requests for sensitive data, without clear safeguards for confidentiality or freedom of association.²⁴⁸

Specific recommendations:

- The FIU and the National Bank should implement CTF measures impacting CSOs (including banking policies) only to FATF NPOs, in line with FATF Recommendation 8, arising from the Terrorist Financing Risk Assessment of the NPO Sector;
- The FIU should continue to proactively engage CSOs in identifying measures to address CSOs' vulnerabilities to terrorist financing and money laundering;
- The relevant competent bodies should apply effective prevention and protection measures in all dangerous situations to which CSOs and their representatives are exposed (e.g., illegal wiretapping, cyberattacks, privacy violation, online attacks, etc.);
- The National Bank should initiate a dialogue with CSOs and banks to address issues related to CSOs' access to banking services and explore potential solutions to improve de-risking policies and practices, using a risk-based approach;
- CSOs should relaunch dialogue on the adoption of a law on the protection of human rights defenders; and
- The Parliament should revise the definition of the beneficial owner for CSOs to reflect their structural specificities and non-profit nature, and to ensure a differentiated, risk-based application in line with FATF Recommendation 8, while also providing clear guidance for CSOs on practical implementation.

3.9 State Support

Overall score per area: **4.4/7**

Legislation: **4.7/7**

Practice: **4.0/7**

The state provides funding to CSOs through different mechanisms such as non-reimbursable financing (based on a framework regulation for all CPAs), contracting of works and services, or through special purpose financing, including social order, percentage designation, and direct subsidies to CSOs. CSOs are exempt from income tax, including for economic activities, if they conduct activities according to statutory purposes, but pay income tax, social and medical contributions for their employees. CSOs can benefit from a zero VAT rate and customs benefits for projects approved under international treaties.

²⁴⁸ Contact Centre and Legal Resources Centre from Moldova (LRCM), Analysis of the Legal Framework Applicable to the Activities of Civil Society Organisations in the Republic of Moldova, (2025).

CPAs run yearly grant programmes in the areas of youth, culture and the environment, based on a Framework Regulation, with priorities and results publicly available. Some LPAs support grant programmes at the district level. These resources are included in national and local budgets, while in-kind support consists mainly of granting free or preferential access to public property.

Percentage designation continues the growing trend with 0.74 million EUR in 2024 for 915 CSOs, but is still far from its full potential. While the number of beneficiaries increased, taxpayers decreased from 38,000 to 35,000, and 20% of funds went to five organisations linked to former state employees. Amendments to the Regulation in February 2025 improved transparency and deadlines, but public awareness remains low, limiting the mechanism's potential.

The fiscal benefits for donations are low and do not encourage philanthropic activity, individuals receive no incentives. The related amendments proposed by CSOs are not considered by the Government. Social entrepreneurship remains weak, with 12 registered social enterprises generating EUR 1.9 million in 2024, 96% from three entities. The proposals for legal or fiscal improvements remain unaddressed by the Government. The participation of CSOs in public procurement procedures is burdensome and puts CSOs at a disadvantage compared to commercial entities. There are only few social services contracted by the state from CSOs, while dozens of CSOs were contracted annually for medical and sanitary services.

Some CSOs continue to receive direct subsidies, contrary to principles of transparency and equal treatment. Almost all forms of support have their own drawbacks and provide only minor incentives to CSOs.

There were 128 CSOs with public benefit status in 2025, 40 more than in 2024, after the Certification Commission resumed activity. The status mainly provides access to public property, and monitoring does not restrict activities. No penalties or status withdrawals were reported.

There are legal benefits for volunteering but also some burdensome administrative responsibilities for CSOs which do not serve to encourage volunteering. The number of registered host CSOs fell by 50% in 2025 (to 32). The new Law on Volunteering, adopted in first reading in July 2025, simplifies certification and reporting, introduces digital tools and inclusive volunteering programs, and establishes a coordination commission with CSO participation...

The overall score for the area of State Support, as well as the legislation and practice scores, remained the same as in the previous reporting period.

The recommendations remain the same and aim to develop state support tools, including popularising the percentage designation mechanism, improving the regulatory framework for social entrepreneurship, adopting the Law on Volunteering, and increasing financial support for CSOs.

Standard I. There are a number of different and effective mechanisms for financial and in-kind state support to CSOs.

State funding can be provided to CSOs through mechanisms²⁴⁹ such as non-reimbursable financing, contracting of works and services, or through special purpose

²⁴⁹ Republic of Moldova, State Budget Law; Law 131/2015 on Public Procurements; Law 179/2008 on Public-Private Partnership; Government of the Republic of Moldova, Government Decision 1213/2010 Approving Some Measures to Support Youth Activities; Government of the Republic of Moldova, Framework Regulation on Organisation and Implementation of the Grants Programme for Youth Organisations and National/Local Project Contest for Youth

financing, including social order, percentage designation, and direct subsidies to CSOs.²⁵⁰ The concept of social order is provided for in the Law on Non-Commercial Organisations, but there is no implementation mechanism in place. Resources allocated for this purpose are provided for in the state budget and in local government budgets. In-kind support granted by the state is achieved mainly by offering CSOs the right to use public property either free of charge or on preferential terms.²⁵¹

According to the survey conducted by the Contact Center in 2024, international donors remain the main source of income for CSOs (72.7%), with limited state support covering a small part of their basic needs. In 2025, as in 2024, an emerging practice continued: approximately 30 contracts for medical services and preventive measures were awarded to CSOs,²⁵² but only a few social services were outsourced to them.²⁵³

In 2024, the percentage designation mechanism generated 0.74 million EUR in income for 914 CSOs.²⁵⁴ Approximately 20% of the total amount went to five organisations affiliated with former employees of the internal affairs system, the tax inspectorate, and the energy sector. Although the total amount and number of beneficiaries increased, the number of taxpayers decreased from 38,000 to 35,000. There remains an imbalance in the distribution of income between benefitting organisations, and the number of invalid designations also remains at eight percent of the total.²⁵⁵ There is still untapped potential, mostly because of a lack of awareness among the population.

In February 2025, the Regulation on the Percentage Designation Mechanism was amended.²⁵⁶ The changes aimed to increase the transparency and efficiency of the mechanism by clarifying terminology, establishing procedures for submitting and verifying applications, defining eligibility criteria, regulating the annual update and publication of beneficiary lists, introducing mechanisms to exclude those with debts or removed from the registry, and aligning with fiscal and civil legislation. The application

Initiative Groups; Government of the Republic of Moldova, Regulation on state budget funding of cultural projects implemented by civic associations, adopted by Government Decision No 834/2014; Ministry of Youth and Sports, Order of the Minister of Youth and Sports Approving the Framework Regulation on Organisation and Implementation of the Grants Programme for Youth Organisations and National/Local Project Contest for Youth Initiative Groups; Ministry of Labour and Social Protection, Regulation on organisation and implementation of the Small Grants Programme in the field of active ageing.

²⁵⁰ Law No. 86/2020 on Non-Commercial Organisations, art 5(4), op. cit.

²⁵¹ Ibid., Art. 5(6).

²⁵² National Medical Insurance Company, Contracts with medical and sanitary institutions 2023 (in Romanian) <https://date.cnam.md/contracte-cu-institutiile-medico-sanitare/?dir=7988>.

²⁵³ CNFACEM Association, Free telephone assistance for children (116 111) provided by 'CNFACEM' Association. Hotline for female victims of domestic violence provided by 'La Strada' Centre. Free telephone assistance service for people with disabilities provided by AO Keystone Moldova. Public Association, Woman and Children - Protection and Support'.

²⁵⁴ State Tax Service of Moldova, Report on the results of the percentage designation in the year 2023, 2023 (in Romanian) <https://sfs.md/uploads/files/rapoarte/raport%20desemnarea%20procentuala%202023.pdf>.

²⁵⁵ European Center for Not-for-Profit Law (ECNL) and International Center for Not-for-Profit Law (ICNL), Assessment of the Legal Framework for Philanthropy in Moldova, (2024), <https://ecnl.org/sites/default/files/2024-10/Environment%20for%20Philanthropy%20in%20Moldova%20-%20Assessment%20Report%20by%20ECNL%20and%20ICNL.pdf>.

²⁵⁶ Government of the Republic of Moldova, Government Decision 94/2025 amends the Regulation on the Percentage Designation Mechanism, https://www.legis.md/cautare/getResults?doc_id=147371&lang=ro

period for inclusion in the list of beneficiaries was extended from one month to four months (June-September).

As described in section 3.2 (*Equal Treatment*), a number of CSOs receive direct subsidies, which is not in line with good practices under the principles of transparency, free competition open to wider civil society and equal treatment.

The number of officially registered social enterprises²⁵⁷ remained the same (12) as in 2024.²⁵⁸ The total revenues of social enterprises were 1.9 million EUR in 2024, with 96% of revenues accounted for by three social enterprises. A disincentive to obtaining social enterprise status, however, is the fee that the entity must pay in addition to the fees paid upon registration of the entity's legal form. Recommendations²⁵⁹ from CSOs to improve the legal, fiscal, and procurement aspects of social entrepreneurship are yet to be considered by the Government and the Parliament.

The participation of CSOs in public procurement procedures is possible, but it is burdensome and CSOs are put at a disadvantage compared to commercial entities. See section 3.2 (*Equal Treatment*) for further details.

Standard II. State support for CSOs is governed by clear and objective criteria and allocated through a transparent and competitive procedure.

State support for CSOs is guided by the Framework Regulation regarding the Non-Reimbursable Financing Mechanism for Projects of Non-Commercial Organisations.²⁶⁰ Financial support should follow a public tender and should be guided by the principles of transparency, free competition, equal treatment, proportionality, simplicity, dialogue, non-retroactivity, annual public tenders, multi-annual financing and the efficient use of public financial resources. The Regulation requires the funding authorities to consult funding priorities with non-commercial organisations and to publish them on the authority's official website at the beginning of the financial year. Commissions consisting of at least five members, including at least one CSO representative, evaluate and select grant recipients. The Regulation does not specify a monitoring and evaluation mechanism for state funding to CSOs.

Government grant programmes (for youth, culture, active ageing, and environmental initiatives) were implemented and awarded in 2024 and 2025 according to regulations

²⁵⁷ Law No. 223/2017 on the Amendment and Completion of Certain Legislative Acts, https://www.legis.md/cautare/getResults?doc_id=101472&lang=ro.

²⁵⁸ Ministry of Economic Development and Digitalisation, LIST of organisations with the status of social enterprise / social insertion enterprise, updated on 2 May 2024 (in Romanian) https://mded.gov.md/wp-content/uploads/2024/05/lista_org.necomerciale_srl_cu_statut_isi_is-2.docx.

²⁵⁹ Eco Visio, 'White Paper on Social Entrepreneurship 2022', (2022) (in Romanian), <https://drive.google.com/file/d/1m-dRZgx5PjENWESNoO8Wix9ogF3S-oar/view>.

²⁶⁰ Government of the Republic of Moldova, Government Decision 656/2022 for the approval of the Framework Regulation regarding the non-reimbursable financing mechanism of projects of non-commercial organisations, https://www.legis.md/cautare/getResults?doc_id=133924&lang=ro.

adopted in 2023.²⁶¹ Information on the funding priorities, application procedure and selection criteria²⁶² was published on the webpages of the relevant authorities along with the selection results.²⁶³

There is no evidence that state support is used to interfere in the activities of CSOs, or to undermine their independence.

Standard III. CSOs enjoy a favourable tax environment.

CSOs pay income tax and social and medical contributions for employees, but are exempt from income tax, including for economic activities, if they conduct activities according to statutory purposes.²⁶⁴ If, during a given year, a CSO sells services for more than 60,000 EUR, it is obliged to pay VAT. The Tax Code lacks clarity on the level of detail required in a CSO's bylaws to ensure tax-exempt income from fundraising activities like charitable events.²⁶⁵ CSOs can benefit from a zero VAT rate and customs benefits for projects approved under international treaties.²⁶⁶ In 2025, there were over

²⁶¹ Ministry of Labour and Social Protection, Order of Ministry of Labour 23/23 February 2023, Regulation regarding the organisation and implementation of the National Small Grants Program in the field of active ageing, <https://social.gov.md/wp-content/uploads/2023/03/Regulament-Program-Granturi-2023.docx>, Order of the Ministry of Education and Research, Ministry of Education and Research 419 / 28 April 2023, Regulation on the organisation and conduct of project competitions for youth organisations, https://mec.gov.md/sites/default/files/program_de_granturi_semnat_1.pdf, Ministry of Culture, Order 13/2024 for the approval of the Regulation regarding the non-reimbursable financing mechanism of cultural projects implemented by non-commercial organisations, <https://mc.gov.md/sites/default/files/file-cloud/reg-pro-cult-onc-24-rar>, Government of the Republic of Moldova, Government Decision 711 / 19 October 2022 regarding the approval of the Regulation on the manner of administration of the National Fund for the Environment, https://www.legis.md/cautare/getResults?doc_id=137300&lang=ro.

²⁶² National Youth Agency, Grant programme for youth organisations (in Romanian) <https://tineret.gov.md/programe/programul-de-granturi-pentru-organizatiile-de-tineret/>, Ministry of Culture, Cultural projects contest (in Romanian) <https://mc.gov.md/ro/content/proiecte-culturale-2024>, Ministry of Labour and Social Protection, Small grant program for active ageing (in Romanian) <https://social.gov.md/comunicare/ministerul-muncii-si-protectiei-sociale-a-dat-start-inscrierilor-pentru-programul-de-granturi-mici-in-domeniul-imbatranirii-active-editia-2024/>, National Environment Fund (in Romanian) <https://onipm.gov.md/apel-fnm>, <https://onipm.gov.md/finantare>.

²⁶³ Grant programme for youth organisations, Selected projects https://tineret.gov.md/wp-content/uploads/2024/03/lista_proiecte_castigatoare_pg_2024.pdf, Cultural projects contest, List of financed projects <https://mc.gov.md/ro/content/un-numar-record-de-84-de-proiecte-lista-finala-proiectelor-culturale-finantate-de-stat-anul>, Small grant program for active ageing, awarded grants <https://social.gov.md/comunicare/comunicate/ministerul-muncii-si-protectiei-sociale-a-desemnata-castigatorii-celui-de-al-viii-lea-program-de-granturi-mici-in-domeniul-imbatranirii-active/>, National Environment Fund, List of approved projects <https://onipm.gov.md/sites/default/files/lista%20proiectelor%20aprobate.pdf>

²⁶⁴ Tax Code of the Republic of Moldova, Art. 52 (Non-commercial organisations), Tax Code of the Republic of Moldova.

²⁶⁵ European Center for Not-for-Profit Law (ECNL) and International Center for Not-for-Profit Law (ICNL), Assessment of the Legal Framework for Philanthropy in Moldova, September 2024 <https://ecnl.org/sites/default/files/2024-10/Environment%20for%20Philanthropy%20in%20Moldova%20-%20Assessment%20Report%20by%20ECNL%20and%20ICNL.pdf>.

²⁶⁶ Government of the Republic of Moldova, Government Decision 246/2010 on how to apply the tax benefits and customs duty breaks related to the implementation of ongoing technical assistance and investment projects that fall in the scope of international treaties that the Republic of Moldova is party to, https://www.legis.md/cautare/getResults?doc_id=110454&lang=ro.

800 projects (of which approximately 25% were implemented by CSOs) benefiting from this facility.²⁶⁷

CSOs can receive public benefit status attributed by the Certification Commission for Public Benefit Status for a period of five years²⁶⁸ via a clear procedure.²⁶⁹ At the date of the current report, there were 144 CSOs with public benefit status,²⁷⁰ 56 CSOs more than in 2024, when the activity of the Certification Commission was resumed. Monitoring and evaluation of compliance with public benefit requirements does not interfere with CSOs' activities. There is no record of CSOs being subject to unjustified tax penalties, or the withdrawal of public benefit status by state authorities. The public benefit status is primarily used to obtain free or leased space in publicly owned premises, and it is an eligibility requirement for certain public funding, for example, the CNAM Prevention Fund.

Standard IV. Businesses and individuals enjoy tax benefits for their donations to CSOs.

The Law on Philanthropy and Sponsorship²⁷¹ defines the legal status of philanthropy and sponsorship activities, contractual standards, the mechanisms for providing tax benefits and reporting. Businesses that offer donations to CSOs can officially enjoy tax benefits, unlike individuals who do not enjoy tax incentives for donations. Taxpayers have the right to make tax-deductible donations (both monetary and non-monetary) during the fiscal year for philanthropic or sponsorship purposes, but they cannot exceed five percent of the total taxable income, a threshold that provides no effective incentives.²⁷² The Platform for the Promotion and Development of Philanthropy proposed a set of amendments pursuing an increase in the tax benefits for donors to up to 20% of taxable income, with progressive levels depending on size of income/business turnover. The proposed amendments have not yet been accepted by the Ministry of Finance.

One of the amendments in the legislative package aimed at combating electoral corruption²⁷³ prohibits recipients of sponsorships and donations from publicly disclosing support received from individuals required to submit asset declarations or from electoral competitors. The restriction affects over 60,000 people annually and creates a risk of sanctions for CSOs that inadvertently reveal the identities of their

²⁶⁷ Government of the Republic of Moldova, List of ongoing technical assistance projects, which fall under the scope of international treaties, for the application of exemptions, https://www.legis.md/UserFiles/Image/RO/2021/mo209-210md/246_an_1.doc.

²⁶⁸ Law No. 86/2020 on Non-Commercial Organisations, art. 22(2), op. cit.

²⁶⁹ Ibid., Ch. V, Public Benefit Status.

²⁷⁰ Public Services Agency (ASP), Certification Commission, (in Romanian) <https://www.asp.gov.md/ro/informatii-utile/comisiei-de-certificare>.

²⁷¹ Law No. 1420/2002 on Philanthropy and Sponsorship, https://www.legis.md/cautare/getResults?doc_id=108161&lang=ro.

²⁷² Expert Grup, 'Fiscal Mechanisms for Stimulating Philanthropy,' (2011), (in Romanian), https://www.expert-grup.org/media/k2/attachments/Mecanisme_fiscale_de_stimulare_a_filantropiei.pdf.

²⁷³ Law No. 100/2025 on the Amendment of Certain Normative Acts (for the effective combating of electoral corruption and related issues) https://www.legis.md/cautare/getResults?doc_id=148941&lang=ro

sponsors. It unjustifiably restricts the transparency of civic activities, affecting the public's right to be informed about the funding sources and supporters of CSOs.²⁷⁴

Food donations for CSOs are exempt from VAT and the expenses related to food donation become deductible as with residues, waste, and natural perishability.²⁷⁵ VAT paid on donated food is not deducted if it exceeds a set monthly limit (up to five units of any food product can be donated to each consumer, with culinary product donations determined by the individual operator).²⁷⁶

Standard V. Legislation and policies stimulate volunteering.

The status of volunteers and volunteering is defined in a dedicated Law on Volunteering.²⁷⁷ The Law, and its associated regulatory framework,²⁷⁸ provide for volunteering activities in organisations that have the status of 'host institution'. CSOs can be certified as institutions by the Certification Commission²⁷⁹ that operates under the Ministry of Education and Research. After the Commission's mandate expired in June 2024, the Ministry amended the Regulation and the composition of the Commission to operate temporarily until the adoption of a new law on volunteering.²⁸⁰

In 2025, there were 32 CSOs registered as volunteering host institutions,²⁸¹ 50% less than in 2024.²⁸² The causes for the decrease could be the burdensome administrative responsibilities for CSOs related to volunteering (such as a special certificate, internal volunteering regulation, the three-year volunteering programme, annual activity reports, contracts, volunteer cards and registers for cards, contracts and volunteers) and the current transitional stage to a new law.

²⁷⁴ Contact Center, Legal Resources Centre from Moldova (LRCM), Analysis of the Legal Framework Applicable to the Activities of Civil Society Organisations in the Republic of Moldova, (2025).

²⁷⁵ Law No. 148/2024 for the Amendment of Some Normative Acts (Facilitating Food Donation) https://www.legis.md/cautare/getResults?doc_id=143894&lang=ro.

²⁷⁶ Law No. 299/2022 on the Prevention of Food Loss and Waste, art. 12, https://www.legis.md/cautare/getResults?doc_id=132168&lang=ro.

²⁷⁷ Law No. 121/2010 on Volunteering, https://www.legis.md/cautare/getResults?doc_id=18722&lang=ro#.

²⁷⁸ Government of the Republic of Moldova, Regulation Implementing the Law on Volunteering, https://www.legis.md/cautare/getResults?doc_id=18722&lang=ro.

²⁷⁹ Ministry of Education, Culture and Research, Order 525/2014 Regulation on the organisation and functioning of the Certification Commission and the model Certificate of host institutions regarding voluntary activity, <https://mecc.gov.md/ro/content/voluntariat>, https://www.legis.md/cautare/getResults?doc_id=126377&lang=ro, Certification Commission 2021-2024, https://mec.gov.md/sites/default/files/componenta_comisiei_igav.pdf.

²⁸⁰ Ministry of Education and Research, Order 1571/2024 on amending the Order of the Minister of Youth and Sports No. T/525/A/2014 regarding the Organisation and functioning of the Certification Commission and the model of the Host Institution Certificate for volunteer activities https://www.legis.md/cautare/getResults?doc_id=145638&lang=ro

²⁸¹ Ministry of Education and Research, List of institutions hosting the volunteer activity, 2024, https://mec.gov.md/sites/default/files/registru_de_evidenta_al_institutiilor_gazda_a_activitatii_de_voluntariat_2025.docx.

²⁸² Ministry of Education and Research, List of institutions hosting the volunteer activity, 2024, https://mec.gov.md/sites/default/files/registru_de_evidenta_al_institutiilor_gazda_a_activitatii_de_voluntariat_3.pdf

The current law provides legal incentives²⁸³ for volunteers, but these are not observed to a great extent in practice. Volunteer experience is recognised as work experience upon entrance to employment. It is an advantageous experience for enrolling in higher education institutions, receiving scholarships, obtaining university accommodation, and transferable study credits are available from universities for internships in areas of public benefit that are related to the volunteer's education profile and speciality. LPAs may grant tax exemptions from local taxes and provide facilities to hosting institutions.²⁸⁴ International volunteering is defined and regulated by law.²⁸⁵ CSOs can engage foreign volunteers and also send volunteers abroad.

In July 2025, the Parliament voted in the first reading on the draft of the new Volunteering Law.²⁸⁶ Its adoption in the second reading is expected during the mandate of the newly elected Parliament on 28 September 2025, which submitted the draft law for public consultations in November.²⁸⁷ The draft law provides clarification of volunteering types (formal, informal, and corporate) and revised procedures for registering host entities with certified volunteer programs for up to three years. Volunteer certificates will replace current ID cards and registers, facilitating both employment and academic recognition, and digital tools will be integrated for administration and official validation of individual contributions.

The draft also includes support measures for intergenerational volunteering, the involvement of vulnerable groups, and the establishment of a government program to support volunteers. Certification for volunteering initiatives will be coordinated by the National Agency for Development and Youth Programs, and a Volunteering Policy Coordination Commission, including representatives of CSOs, will be established to ensure intersectoral cooperation.

²⁸³ Law No. 121/2010 on Volunteering, ch. IV ("Policies and Measures Encouraging Volunteering"), op. cit. 338. Ibid., art. 16.

²⁸⁴ Ibid., Art. 16.

²⁸⁵ Ibid., Art. 2 and Art. 17 (International volunteering).

²⁸⁶ Parliament of the Republic of Moldova, Draft Law 295/2025 on Volunteer Activity, <https://www.parlament.md/material-details-md.nspx?param=c2898f2f-7a46-49c5-b3dc-ae0ab92c5276>

²⁸⁷ Parliament of the Republic of Moldova, Public consultation announcement regarding Draft Law No. 295/2025 on Volunteering Activities, <https://www.parlament.md/ns-newsarticle-anun%C8%9B-consult%C4%83ri-publice-cu-referire-la-proiectul-de-lege-nr-2952025-cu-privire-la-activitatea-de-voluntariat.nspx>

Specific recommendations:

- The State Tax Service and other responsible state institutions should facilitate the dissemination of information to the population about the mechanism on percentage designation and aim to enhance procedures and results on all aspects of the mechanism, including on the limitation of the contributions only to an electronic format;
- The Ministry of Finance should increase the amount of the percentage designation to three percent of taxable income and to extend the mechanism of the percentage designation to legal persons;
- The Ministry of Finance should replace the procedure for registering CSOs at the ASP to benefit from the percentage designation, through a simple procedure open to all CSOs by simply expressing their intention;
- The Government should adopt amendments provided by CSOs for the regulatory framework on social entrepreneurship in order to boost the development of this tool;
- The MDDED should simplify the procedure for obtaining social enterprise status by eliminating double taxation upon registration of the status;
- The Government should adjust the public procurement framework by establishing a distinct mechanism that enables contracting authorities to procure social services from CSOs and other accredited private providers, based on clear procedures, standard model documents, and practical training for these authorities in applying the mechanism.
- The CPA and LPAs should increase financial support from the state budget, and national mechanisms for support to CSOs on the basis of the best national and international practices should be implemented, including through multiannual contracts based on the consistent allocation of funds to LPA budgets;
- The Parliament should adopt the new Draft Law on Volunteering, including setting up the Committee for Coordination of Volunteering Policies;
- The Government should develop a national programme and fund to support volunteering; and
- The State Chancellery should establish a working group comprising the Ministry of Finance, the State Tax Service, the Platform for the Development and Promotion of Philanthropy, CSOs, and other key stakeholders to discuss challenges related to philanthropy and the percentage designation mechanism, identify short-term and longer-term practical steps to address these challenges, and monitor the implementation of relevant government policies.

3.10 State-CSO Cooperation

Overall score per area: **4.4/7**

Legislation: **4.7/7**

Practice: **4.0/7**

Institutionalised cooperation between the state and CSOs is legally enabled mostly based on transparency and participation legislation, joint structures for monitoring specific policies, and permanent structures for specific areas. The National Security Strategy includes cooperation between state institutions and civil society as one of the four principles, emphasising both coordination with CSOs and the development of cooperation to counteract threatening informational influences.

The Government approved the Roadmap on the Rule of Law and the Roadmap on Democratic Institutions, established as benchmark criteria in the EU accession process. Both documents include objectives and actions aimed at improving the CSO environment.

The State Chancellery presented the first report on the implementation of the CSO Development Programme 2024-2027 (CSODP). According to the report, 50% of the actions planned for 2024 were fully completed, with the remaining half in progress, resulting in a 75% completion rate. However, no financial resources were allocated for the programme in 2024, and its implementation was further affected by the withdrawal of USAID funding.

The Directorate for Human Rights and Cooperation with Civil Society, part of the State Chancellery, is the state structure with the largest mandate for monitoring CSO-related policies and cooperation with CSOs, although it has scarce resources and tools.

The Government and Parliament have created platforms and expert councils for CSO participation, but most are not yet fully functional. At the local level, over 40 Local Action Groups (LAGs) and forums such as Rayon Participation Councils and Local Transparency Councils continue to engage CSOs in municipal and district decision-making.

Self-organised CSO structures, including the NGO Council and the Moldovan National Platform of the Eastern Partnership Civil Society Forum, remain key actors in dialogue with state institutions. CSOs also continued their partnerships with LPAs and the CPA to support Ukrainian refugees.

The overall score in the area of State–CSO Cooperation increased from 4.3 in 2024 to 4.4 in 2025, due to an improvement in the legislation score. The practice score remained unchanged. The legislation score rose from 4.6 in 2024 to 4.7 in 2025, following the Government’s approval of two roadmaps, containing blocks and actions dedicated to CSOs, aimed at improving the operating environment for civil society.

The recommendations in this area emphasise the need to allocate sufficient resources for implementing the CSODP and to maintain and strengthen the dialogue and cooperation mechanisms between the Government, Parliament, and CSOs. Additionally, the development of framework cooperation mechanisms between LPAs and CSOs is encouraged.

Standard I. State policies facilitate cooperation with CSOs and promote their development.

The National Development Strategy “European Moldova 2030”²⁸⁸ does not include objectives specifically focused on CSOs. CSOs are mentioned only contextually in a few policy areas, such as Public Administration Reform (*Improving cooperation mechanisms between the state and civil society, including through the development of communication and coordination platforms, direct funding of CSOs, and social contracting*), Electronic Transformation (*Promoting the digitalisation of administrative processes in the private sector—businesses, non-governmental organisations, etc.—and reducing bureaucratic burdens*), and in the field of Labor and Inclusion (*Establishing partnerships between authorities and non-governmental organisations for the economic integration of persons with disabilities*). The programme of activities of the Government²⁸⁹ sworn in 2025 contains no priorities or references relating to CSOs.

In 2025, the State Chancellery presented the first report on the implementation of the CSODP 2024-2027,²⁹⁰ which had been approved by the Government in 2023 took effect in 2024. According to the report, 50% of the actions planned for 2024 were fully completed, whilst the remaining half are still in the process of implementation. The share of actions completed for 2024 reached 75%.²⁹¹ The implementation of the PDOSC and OGP was further affected by the withdrawal of USAID funding, which was supposed to cover part of the planned actions but did not materialise.

The results of an independent evaluation by civil society were not yet available by the date of the current report. The CSODP and the action plan are focused on three main objectives: (i) to strengthen cooperation mechanisms between the CPA, LPAs and civil society and increase transparency in policy formulation and decision-making; (ii) to increase the financial sustainability of CSOs; and (iii) to improve CSOs’ capacities, addressing social issues and promoting democratic values. The CSODP Action Plan includes specific deliverables, deadlines, responsible institutions and budgets.

The OGP Action Plan 2023-2025 is currently being implemented and focuses on the following areas: (i) access to information; (ii) open institutions; (iii) open budgets; (iv) public procurement; and (v) capacity development integrated with other

²⁸⁸ Law No. 315/2022 approving the National Development Strategy “European Moldova 2030”,

https://www.legis.md/cautare/getResults?doc_id=134582&lang=ro

²⁸⁹ The Activity Program of the Government „EU, PEACE, DEVELOPMENT”

https://docs.google.com/document/d/1G8S7tly7YMdz1vA67ZKSvHmsjg6_Ys8T/edit?rtopof=true&sd=true&tab=t.0

²⁹⁰ Government of the Republic of Moldova, Government decision 845 / 01.11.2023 to approve the Civil Society Organisations Development Programme 2024-2027,

https://www.legis.md/cautare/getResults?doc_id=141016&lang=ro.

²⁹¹ State Chancellery of the Republic of Moldova, Report on the Implementation of the CSODP for the Period 2024–2027 (Year 2024), (2025),

<https://gov.md/sites/default/files/Filepdf/RAPORT%20implimentarea%20PDOSC%20anul%202024%20.pdf>

commitments²⁹² with the supervision of the Coordinating Committee, including CSO representatives. In 2025, no progress evaluation report was presented.

The National Security Strategy adopted in December 2023²⁹³ stated the following goals relevant to state-CSO cooperation as two of its four principles: the ‘cooperation and coordination between state authorities and non-governmental entities including civil society, academia, and mass media’ and the ‘development of cooperation between public institutions, civil society and mass media in order to counteract threatening informational influences’.

In 2025, the Government approved two roadmaps established as benchmarks in the Republic of Moldova’s EU accession process, which include objectives and actions targeting CSOs. The roadmap on *Democratic institutions*²⁹⁴ contains a thematic block on the role of civil society that sets out objectives and actions aimed at strengthening the protection of human rights defenders and individuals involved in public participation processes, improving administrative procedures for the registration, reporting, and record-keeping of CSOs, enhancing financial sustainability, and improving public consultation mechanisms in the decision-making process. The roadmap on the *Rule of Law*²⁹⁵ includes objectives related to strengthening freedom of assembly and association, data protection, and media freedom. The roadmap on *Public administration reform*²⁹⁶ provides for actions aimed at stimulating civil society participation in the decision-making process.

Standard II. The state has special mechanisms in place for supporting cooperation with CSOs.

Cooperation between state institutions and CSOs is legally enabled through different mechanisms. The transparency legislation²⁹⁷ provides public institutions with a framework for creating temporary working groups with the participation of CSOs for developing or consulting on public policies. There are also joint structures for monitoring specific policies, alongside permanent structures for specific areas established based on government decisions (such as the National Council for Child

²⁹² Government of the Republic of Moldova, Government decision 158 / 03.11.2023 regarding the Priority Areas and Commitments for Open Government for the years 2023-2025, https://www.legis.md/cautare/getResults?doc_id=139835&lang=ro.

²⁹³ Parliament of the Republic of Moldova, Parliament Decision 391/2023 regarding National Security Strategy, https://www.legis.md/cautare/getResults?doc_id=141253&lang=ro.

²⁹⁴ Government of the Republic of Moldova, Government Decision 276/2025 approving the Roadmap on “Functioning of Democratic Institutions” https://www.legis.md/cautare/getResults?doc_id=148502&lang=ro

²⁹⁵ Government of the Republic of Moldova, Government Decision 275/2025 approving the Roadmap on “Rule of Law” https://www.legis.md/cautare/getResults?doc_id=148501&lang=ro.

²⁹⁶ Government of the Republic of Moldova, Government Decision 274/2025 approving the Roadmap on “Public Administration Reform” https://www.legis.md/cautare/getResults?doc_id=148499&lang=ro.

²⁹⁷ Law 239/2008 on Transparency in Decision-making, op. cit.

Rights Protection²⁹⁸ and the National Committee for Combating Trafficking in Human Beings).²⁹⁹

For CSOs operating at the municipal/district levels, there are a small number of forums for participation (CRPs and CLTs)³⁰⁰ which engage CSOs in the decision-making processes and monitoring of LPAs.³⁰¹

The Directorate for Human Rights and Cooperation with Civil Society, part of the State Chancellery, is a dedicated body responsible for cooperation with CSOs and also includes the focal point for relations with CSOs (established in 2019). In March, the Directorate was supplemented with an additional position responsible for cooperation within civil society.³⁰² None of these positions are, however, supported by a specific framework which provides tools and methods to be applied in the Directorate's relations with CSOs. The Directorate itself has little visibility or direct engagement with CSOs, apart from supporting the coordination of several national programmes, strategies and secretariats.³⁰³

In 2024, the Government and the Parliament created cooperation structures with CSOs as part of the platforms' initiation in 2023. The consultative platforms at the CPA level, with some exceptions, do not seem to make a meaningful contribution to improving cooperation. This is due to limited representation, the absence of a predictable and engaging formats and low activity. The expert councils created at the level of parliamentary committees (see section 3.5 (*Right to Participation in Decision-Making*) of this report for more details) had limited activity (an average of one meeting per year for each council) which raised questions regarding their representativeness. Many active CSOs are unaware of the existence of consultative platforms or expert councils. The concept of these councils was largely developed without CSO participation. The annual conference 'Cooperation between Parliament and Civil Society', was revived in 2023, but its conduct in 2025 is uncertain given the parliamentary election schedule.³⁰⁴

²⁹⁸ National Council for Child Rights Protection (Republic of Moldova), <https://cnpdc.gov.md/ro/advanced-page-type/membrii-consiliului>.

²⁹⁹ National Committee for Combating Trafficking in Human Beings, <http://antitrafic.gov.md/>.

³⁰⁰ Soroca Rayon Participation Council, <http://euparticip.md/>; Causeni Rayon Participation Council, <https://www.facebook.com/crp.causeni/>; Cahul Rayon Participation Council, <https://crp-cahul.md/>.

³⁰¹ Law No. 436/2006 on Local Public Administration, art. 43(1)(t).

³⁰² State Chancellery of the Republic of Moldova, Report on the Implementation of the CSODP for the Period 2024–2027 (Year 2024), (2025),

<https://gov.md/sites/default/files/Filepdf/RAPORT%20implimentarea%20PDOSC%20anul%202024%20.pdf>

Government Decision 126/2025, https://www.legis.md/cautare/getResults?doc_id=147524&lang=ro

³⁰³ Commission for Consultations and Collective Negotiations <http://cncnc.gov.md/>; National Council for Human Rights <https://cancelaria.gov.md/ro/apc/consiliul-national-pentru-drepturile-omului>.

³⁰⁴ Parliament Decision 149/2023 regarding the approval of the Platform for dialogue and civic participation in the Parliament's decision-making process, https://www.legis.md/cautare/getResults?doc_id=137492&lang=ro.

Over 300 CSO representatives participated in the working groups within the coordination mechanism of Moldova's EU integration process.³⁰⁵ They largely operated in the bilateral screening stage, through participation in report preparation, contributions on progress, and presentations at meetings.

At the local level, the existing 40 plus LAGs are an important cooperation forum between LPAs, CSOs and businesses for the benefit of local communities. The most prominent self-organised platforms of CSOs are the NGO Council,³⁰⁶ a representative structure engaged in dialogue on issues concerning the CSO enabling environment, and the Moldovan National Platform Eastern Partnership Civil Society Forum,³⁰⁷ which supports EU integration and serves as a consultative platform.

CSOs continued to support Ukrainian refugees in cooperation with the CPA and LPAs under the direction of the Commission for the Coordination of Activities in the Field of Migration and Asylum.³⁰⁸ In 2025, Moldova hosted 135,000 Ukrainian refugees³⁰⁹ and the estimated financial requirements for the UN Refugee Agency's Regional Refugee Response Plan for the Republic of Moldova was estimated at 206 million USD.³¹⁰

Specific recommendations:

- The Government should allocate all necessary financial resources to ensure the implementation of the CSODP 2024-2027;
- The Parliament should maintain organisation of the annual cooperation conference with CSOs as a tool for ongoing dialogue;
- The State Chancellery should adopt institutional procedures for direct and open collaboration between the Directorate for Human Rights and Cooperation with Civil Society, including specific instructions to enhance the activities of the focal point appointed for relations with CSOs and the consultative platform; and
- LPAs and the CPA should develop a framework mechanism for cooperation with CSOs, to ensure the representation, involvement and development of local CSOs.

³⁰⁵ Government of the Republic of Moldova, Government Decision 180/2024 on the coordination mechanism of the accession process of the Republic of Moldova to the European Union and the organisation and functioning of the negotiation team within this process, https://www.legis.md/cautare/getResults?doc_id=142350&lang=ro.

³⁰⁶ NGO Council (Cousiliul), <https://www.consiliuonq.md/prezentarea-generalala/>.

³⁰⁷ Moldovan National Platform – Eastern Partnership Civil Society Forum, <https://www.eap-csf.md/>.

³⁰⁸ Government of the Republic of Moldova, Government decision 947/2018, 3 October 2018, https://www.legis.md/cautare/getResults?doc_id=129950&lang=ro.

³⁰⁹ UNHCR Operational Data Portal, Republic of Moldova, RRP 2024 <https://data.unhcr.org/en/dataviz/248?sv=54&geo=10784>.

³¹⁰ Ukraine Regional Refugee Response Plan (RRP), PowerBI dataset, <https://app.powerbi.com/view?r=eyJrjoiZWESMTAyYjYtNDZmYi00NGYzLWFKYjEtMzQ5MTAxZDBiZTU1IiwidCI6ImUYzMTM3OTgxLTYNjQ0tNDEzNC04YTBjLTYNjNDkMmFmODBiZSIsImMiOiJh9&pageName=ReportSection437de5295a71905db6ba>.

3.11 Digital rights

Overall score per area: **4.3/7**

Legislation: **4.5/7**

Practice: **4.1/7**

There is widespread and affordable access to the internet across the whole of Moldova, allowing for increasing online activity. The digital environment is regulated by laws and institutions mostly oriented on technical aspects.

The Parliament adopted a new Law on Electronic Communications (effective 2026), which reaffirms the right to internet access and internet neutrality – among the few regulated digital rights in the country. The legislative changes also include the amendments to the Audiovisual Media Services Code regulating video-sharing platforms.

Digitalisation is prioritised through the Digital Transformation Strategy 2023–2030 (STDM) tangentially addressing the ‘digital divide’, digital illiteracy and the promotion and protection of rights and freedoms online. There are a few modest initiatives in place to close the ‘digital gap’ in Moldova. The 2025–2027 Implementation Program was adopted in 2025, aiming to expand high-speed internet, promote digital literacy, ensure digital public services are accessible, and protect citizens’ personal data.

The White Book on Data Governance and AI that issued by the Government in 2024 should serve as a guideline for the development of public policies in this field. To date, digital technologies have been developed without mechanisms to ensure respect for human rights. Legislation and institutions primarily focus on technical aspects of the digital environment. Public awareness of digital rights remains very low.

Several CSO and Ombudsman initiatives addressed digital rights and the impact of digitalisation on human rights in dialog platforms, research and policy briefs throughout the year. Despite these efforts, digital rights literacy, especially in law enforcement and the justice sector, remains insufficient.

There is no official evidence on AI integration in public information systems and there are no human rights oversight mechanisms. State-owned systems currently in use include facial recognition technology, surveillance, and traffic monitoring systems, some of which are interconnected with registries that hold personal data.

The overall score for the area of Digital rights, as well as the legislation and practice scores, remained the same as in the previous reporting period.

The main recommendations in this area focus on building multilateral dialogue on digital rights, integrating a human rights-based approach into digitalisation policies, and increasing digital skills and digital literacy nationwide and ensuring oversight of emerging technologies such as AI. Additionally, public authorities should take a more proactive approach to closing the ‘digital divide’ and involve CSOs in the development process of the STDM 2023-2030.

Standard I. Digital rights are protected, and digital technologies are compliant with human rights standards.

The access of any natural or legal person to publicly accessible electronic communications services is guaranteed throughout the territory of the country, under

non-discriminatory and confidential conditions.³¹¹ The protection of the exercise of rights online is not subject to specific legislation, but rather to general legislation. Limitations to digital rights could arise from gaps in legislation, which have not been expressly designed for the online environment.

The online environment is protected by the Law on Electronic Communications and other laws and administrative bodies, including the International Convention on Cybercrime ratified in 2009, the Law on Preventing and Combating Cybercrime 20/2009, the Law on Personal Data Protection 133/2011. It is also protected by regulators such as ANRCETI, the CNPDCP and specialised law enforcement, such as the Cyber Security Agency,³¹² the Directorate for Combating Cyber Crimes, part of the General Police Inspectorate. The STISC³¹³ supports these efforts by managing IT infrastructure, telecommunications for public authorities, and implementing cyber security policies.

The Republic of Moldova signed³¹⁴ the Council of Europe Framework Convention on AI³¹⁵ but has not yet ratified it. Although the Government issued the White Book on Data Governance and AI in 2024³¹⁶ as a guideline for the development of public policies in this field, there is still a notable lack of legislation regarding new digital technologies (such as AI, blockchain, the Internet of Things (IoT), big data, mining, etc.).

In April, Parliament adopted a new Law on Electronic Communications, which will enter into force on 1 January 2026.³¹⁷ The law transposes several EU directives and explicitly reaffirms the right to access the internet and, implicitly, the right to internet neutrality. Although the drafting process was justified by the transposition of Directive (EU) 2018/1972, the final version of the law stipulates only partial compatibility.³¹⁸ The

³¹¹ Law No. 241/2007 on Electronic Communications, 15 November 2007, https://www.legis.md/cautare/getResults?doc_id=125279&lang=ro.

³¹² Government of the Republic of Moldova, Government Decision 1028/2023 on the establishment, organisation and operation of the Cyber Security Agency https://www.legis.md/cautare/getResults?doc_id=143785&lang=ro.

³¹³ Serviciul Tehnologia Informatiei si Securitate Cibernetică (STISC), Information Technology and Cyber Security Service, <https://stisc.gov.md/ro>.

³¹⁴ Ministry of Economic Development and Digitalisation (MDED), Republic Moldova has signed the Council of Europe Framework Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law, 5 September 2024 (in Romanian) <https://mded.gov.md/republica-moldova-a-semnat-conventia-cadru-a-consiliului-europei-privind-inteligenta-artificiala-drepturile-omului-democratia-si-statul-de-drept/>.

³¹⁵ Council of Europe, Framework Convention on Artificial Intelligence, Human Rights, Democracy and the Rule of Law, <https://www.coe.int/en/web/artificial-intelligence/the-framework-convention-on-artificial-intelligence>.

³¹⁶ Ministry of Economic Development and Digitalisation (MDED), 'White Book on Data Governance and Artificial Intelligence', 2 October 2024 (in Romanian) <https://mded.gov.md/carteia-alba-privind-inteligenta-artificiala-si-guvernanta-datelor-primul-document-cadru-de-politici-al-mded/>.

³¹⁷ Law No. 72/2025 on Electronic Communications, https://www.legis.md/cautare/getResults?doc_id=148392&lang=ro

³¹⁸ Parliament of the Republic of Moldova, Table of Conformity of the Draft Electronic Communications Law with EU Legislation, <https://www.parlament.md/preview?id=057fd451-6da5-4211-816b-b2cb7ef002ec&url=https://ep-sp.parlament.md/materials/638768088047961625/Documents/20250306081654.pdf&method=GetDocumentContent>

summary of divergences prepared by Parliament included proposals from just one CSO.³¹⁹

The MDED manages digital policy making. The Cyber Security Coordinating Council, led by the Minister of MDED, has been tasked with promoting and coordinating cybersecurity policies at a strategic and operational level³²⁰ and consists exclusively of representatives from state institutions.

The SCIA (which includes CSO representatives), established by MDED in 2024,³²¹ had planned for the development of a legal framework for the responsible use of artificial intelligence in 2024–2025, but did not manage to generate any initiatives in this regard.

The MDED coordinates and monitors the implementation of the STDM 2023–2030,³²² which aims for a well-protected cyberspace, to ensure rights in the digital space and preserve personal data protection. Key interventions include promoting internet access as a fundamental human right, fast and affordable internet access for every citizen, participation of citizens in political life through digital technologies, a national digital literacy programme, integrating digital literacy in basic educational processes, proactive, simple and intuitive digital public services, and establishing a cybersecurity authority. The targets of the STDM 2023–2030 include 70% of citizens with an active digital identity, 80% of the population with basic digital skills, 75% of the population with connectivity of at least 100 Mbps, and 25% of the population covered by the 5G cellular network. In May 2025, the Government approved the Implementation Program for 2025–2027 of the STDM.³²³ The specific objectives of the program include ensuring high-speed internet access for at least 90% of the population (including rural and disadvantaged areas), increasing transparency in the public sector through the use of digital technologies, and ensuring a high level of protection for critical infrastructure and citizens' personal data.

The Register of State Information Resources and Systems (RRSI), operated by the EGA,³²⁴ lists information systems and registers run by state institutions. The RRSI was created to address the lack of centralised records of the various state information

³¹⁹ Parliament of the Republic of Moldova, Summary of Divergences in the Draft Electronic Communications Law, <https://www.parlament.md/preview?id=057fd451-6da5-4211-816b-b2cb7ef002ec&url=https://ep-sp.parlament.md/materials/638768088047961625/Documents/20250306081654.pdf&method=GetDocumentContent>

³²⁰ Government of the Republic of Moldova, Government Decision 333/2024 regarding the establishment, organisation and functioning of the Coordinating Council in the field of cyber security, 8 May 2024, https://www.legis.md/cautare/getResults?doc_id=143430&lang=ro.

³²¹ Ministry of Economic Development and Digitalisation (MDED), Order 91/23 July 2024, <https://mded.gov.md/ordin-de-instituire/>.

³²² Government of the Republic of Moldova, Government Decision 650/2023 regarding the approval of the Digital Transformation Strategy of the Republic of Moldova for the years 2023–2030, https://www.legis.md/cautare/getResults?doc_id=139408&lang=ro.

³²³ Government of the Republic of Moldova, Government Decision 308/2025 on the Approval of the Implementation Program for 2025–2027 and the Digital Transformation Strategy of the Republic of Moldova for 2023–2030, 52/MDED/2025, https://www.legis.md/cautare/getResults?doc_id=148811&lang=ro

³²⁴ Registrul Resurselor Statului Informațional (RRSI), <https://rsi.gov.md/>.

systems, which had led to chaotic development and duplication of technical solutions and data. Some state systems fail to meet legal requirements for documentation (concepts, regulations, terms of reference) and concerns have been raised about security, personal data management, interoperability and sustainability.³²⁵

There is no widespread practice of blocking websites or removing online content. In 2025, the practice of the SIS blocking web pages with ‘fake news’ content was not verified; the latest public information on this dates back to October 2024. There are no cases of arrests of or pressure on activists, bloggers, journalists, or CSOs that engage in online activities.

In May 2025, the Government approved an instruction regulating the procedure for blocking access to web pages containing information intended for and used in the preparation or commission of crimes, ³²⁶ including the 2024 amendments ³²⁷ allowing the police and the SIS to suspend access to such pages. The instruction clarifies the website-blocking procedure provided by the Law on Preventing and Combating Cybercrime, ³²⁸ establishing criteria for issuing orders by the Ministry of Internal Affairs or the SIS, requiring publication of these orders, providing a 15-day period for court appeal, and limiting the blocking period to a maximum of 90 days.

In September, the Government approved a decision on the implementation of cybersecurity obligations by service providers in critical EU sectors, partially transposing Implementing Regulation (EU) 2024/2690.³²⁹

Standard II. The state creates conditions for the enjoyment of digital rights.

The access of any natural or legal person to electronic communications services accessible to the public is guaranteed throughout the territory of the country, under non-discriminatory and confidential conditions.³³⁰ The new Electronic Communications Law, ³³¹ which will enter into force on 1 January 2026, explicitly

³²⁵ DCAF – Geneva Centre for Security Sector Governance, ‘Strategic Assessment of the Ministry of Internal Affairs of the Republic of Moldova’, 2021.

³²⁶ Government of the Republic of Moldova, Government Decision 317/2025 on the Approval of the Instruction on the Procedure for Blocking Access to Websites Containing Information Intended for or Used in Preparing or Committing Crimes and for Removing Such Content at the Source, 28 May 2025, https://www.legis.md/cautare/getResults?doc_id=148739&lang=ro.

³²⁷ Law 200/2024 amending the Law on the Prevention and Combating of Cybercrime https://www.legis.md/cautare/getResults?doc_id=144568&lang=ro.

³²⁸ Centrul pentru Jurnalism Independent (CJI), Instruction Regulating the Procedure for Blocking Web Pages: What the Document Entails and Why It Does NOT Pose Censorship Risks, https://cji.md/instructiunea-ce-reglementeaza-procedura-de-blocare-a-paginilor-web-ce-presupune-documentul-si-de-ce-acesta-nu-prezinta-riscuri-de-cenzura/?fbclid=IwY2xjawKk1R9leHRuA2FlbQlXMAbicmlkETBucGZpOmtqU3JNSnA3aHRXAR79Za5Gg4WiE8k83pdhjVym-vXRM2xHJmoAjxdD7KChetjVA9VQc0IS_ynBhA_aem_88tSgXih55IOcpm7Cvn8CA

³²⁹ Government of the Republic of Moldova, Government Decision 562/2025 on the Implementation of Cybersecurity Obligations by Service Providers in Critical EU Sectors, 25 July 2025, https://www.legis.md/cautare/getResults?doc_id=150574&lang=ro

³³⁰ Law No. 241/2007 on Electronic Communications, 15 November 2007, https://www.legis.md/cautare/getResults?doc_id=125279&lang=ro#.

³³¹ Law No. 72/2025 on electronic communications, 10 April 2025, https://www.legis.md/cautare/getResults?doc_id=148392&lang=ro

provides for the right of access to the internet and implicitly guarantees the right to internet neutrality. The providers of public electronic communications networks and/or services have the obligation to measure and publish the values of the administrative and technical quality indicators of the connections.³³² Internet access in Moldova is relatively affordable and accessible.³³³ The latest data from 2024 shows that 96.6% of the population had active mobile-broadband subscriptions, while 4G/LTE/WiMAX mobile networks cover 99.3% of the population. The affordability of internet in Moldova was 0.59% of GNI per capita for data only and mobile data and voice low-consumption basket and 1.24% of GNI per capita for fixed-broadband internet basket, compared to European averages of 0.47 and 1% of GNI per capita respectively.³³⁴ ‘White areas’ (without fixed-line internet) include 431 localities, representing 6.35% of all households in the country,³³⁵ 82.6% of the population accesses the internet via mobile phones.³³⁶

According to the 2024 UN Electronic Government Survey,³³⁷ the Republic of Moldova moved from the “high” to the “very high” category on the Electronic Government Development Index, reflecting substantial progress in online services, telecommunications infrastructure, and human capital.

The EGA,³³⁸ is the public authority responsible for promoting the digitalisation of public services. The EGA is responsible for technological development of administrative (including for CSOs) and public services, with most of these available online.³³⁹ Available online services include business registration, electronic submission of documents for CSO registration and services related to judicial procedures and electronic petitioning, all with the protection of personal data. The ability to use a digital signature is open to everyone for a fee of at least 11 EUR annually and a one-off fee for each use.³⁴⁰ In 2025, the Republic of Moldova issued one million free identity cards with the option of an included electronic signature. Nevertheless, there are

³³² ANRCETI - National Regulatory Agency for Electronic Communications and Information Technology, Quality parameters of public electronic communications services (in Romanian)

https://www.anrceti.md/parametrii_de_calitate.

³³³ International Telecommunication Union (ITU) Republic of Moldova Country Digital Development Profile, 2021

[https://www.itu.int/en/ITU-D/Regional Presence/Europe/Documents/Events/2021/Regional%20Innovation%20Forum/Moldova.pdf](https://www.itu.int/en/ITU-D/Regional%20Presence/Europe/Documents/Events/2021/Regional%20Innovation%20Forum/Moldova.pdf).

³³⁴ ITU DataHub, Moldova <https://datahub.itu.int/data/?e=MDA>.

³³⁵ Government of the Republic of Moldova, Government Decision 308/2025 on the Approval of the Implementation Program for 2025-2027 and the Digital Transformation Strategy of the Republic of Moldova for 2023-2030, 52/MD/2025, https://www.legis.md/cautare/getResults?doc_id=148811&lang=ro.

³³⁶ E-Government Agency (AGE), Annual National Survey 2024: Public Perception, Adoption, and Support for Electronic Government and the Modernisation of Government Services, https://egov.md/sites/default/files/document/attachments/raport_sondaj_anual_2024_rom_validat_final_docx.pdf

³³⁷ E-Governance Agency of the Republic of Moldova, <https://www.undp.org/moldova/our-focus/digitaltransformation>.

³³⁸ E-Governance Agency of the Republic of Moldova, <https://egov.md/en/about>.

³³⁹ Public Services Portal of the Republic of Moldova (in Romanian) <https://servicii.gov.md/ro>.

³⁴⁰ Public Services Agency (ASP), ‘Expansion of the pilot project: issuing electronic signatures in ASP multifunctional centres’, 30 August 2024 (in Romanian) <https://www.asp.gov.md/ro/media/2024-08-30>.

inconsistencies among public institutions in terms of signatures created on mobile devices not being recognised as electronic signatures. The ‘EVO’ mobile public services integrated application provides individuals with digital access to personal and business information.³⁴¹ In May 2025, the Government approved the Regulation on the e-Dosar Information System for the electronic management of criminal and administrative cases.³⁴² The National Program for Public Order and Safety 2026–2030 includes actions to strengthen the capacity to respond to threats related to the digital environment, which affect the rights and safety of the population.³⁴³

Access to services through digital technologies has specific limitations, such as the *Facebook* donate feature being unavailable in Moldova. The big digital divide in Moldova between the elderly and the young is being addressed by the EGA via a digitalisation agenda³⁴⁴ that seeks to ensure that services are accessible to all citizens. The digital divide and digital illiteracy are also addressed in the STDM 2030. In 2025, the EGA extended the number of digital public services available in the network from 64 to 71³⁴⁵ out of 105 Unified Public Service Centres (CUPS).³⁴⁶ CUPS are common access points where specialists offer information and technical support to the rural population so that it can obtain quality public services.

Public awareness on digital rights in Moldova is essentially non-existent. There is also a lack of literacy on digital rights among law enforcement and in the justice sector that could potentially affect the quality of the interpretations and decisions regarding violations of digital rights. Initiatives to promote digital rights have come predominantly from CSOs. In November, the Office of the Ombudsman consulted a study on the impact of digitalisation on human rights in the Republic of Moldova, providing an overview of the situation across 13 distinct rights.³⁴⁷ The Ombudsman established as a strategic priority the guarantee of human rights in digitalisation and the use of AI.

The Moldova Internet Governance Forum,³⁴⁸ an annual event that brings together experts, policymakers, business representatives, CSOs, and organisations for the

³⁴¹ E-Governance Agency (EGA), Launch of EVO application, 6 June 2024 (in Romanian)

<https://www.egov.md/ro/node/40407>.

³⁴² Government of the Republic of Moldova, Government Decision 267/2025 on the Approval of the Regulation on the Management of the Information Resource Formed by the ‘e-Case: Electronic Management of Criminal / Contravention Cases’ Information System, https://www.legis.md/cautare/getResults?doc_id=148406&lang=ro

³⁴³ Government of the Republic of Moldova, Government Decision 727/2025

<https://gov.md/sites/default/files/media/documents/sedinte-de-guvern/2025-11/NU-725-MAI-2025.pdf>

³⁴⁴ E-Governance Agency (EGA), Digital Literacy Campaigns (in Romanian) <https://www.egov.md/ro/advanced-page-type/digital-literacy-campaigns>.

³⁴⁵ Public Services Portal, Unified Centres for the Provision of Public Services, <https://servicii.gov.md/ro/cups>.

³⁴⁶ Government of the Republic of Moldova, Government Decision 322 / 10.11.2023 regarding piloting the unified centres for provision of public services, 10 November 2023,

https://www.legis.md/cautare/getResults?doc_id=132798&lang=ro.

³⁴⁷ Ombudsman’s Office of the Republic of Moldova, Study on the Assessment of the Impact of Digitalisation on Human Rights in the Republic of Moldova, 2025.

³⁴⁸ Moldova Internet Governance Forum 2025, <https://www.igf.md/#schedule>.

analysis and development of strategies aimed at accelerating digital progress and strengthening technological security in the country and the region, addresses the protection of fundamental human rights and freedoms on the Internet, supports the democratic process and the rule of law, and touches upon digital rights.

Organisations from the CSO Meter HUB have launched a multi-sectoral dialogue platform to discuss digital rights issues. During two roundtables³⁴⁹ with participants from public institutions, CSOs, and the business sector, participants analysed what the current situation was, launched public policy proposals on digital rights,³⁵⁰ and developed a matrix and roadmap on digital rights in the Republic of Moldova.³⁵¹

Public institutions use several technologies, such as face recognition systems at border control and road traffic monitoring systems (including drones).³⁵² There is only informal evidence regarding the integration of AI in public institutions and the availability of more advanced technologies in monitoring and surveillance. Still, there is no oversight mechanism for seeking remedies against violations of digital rights and any suspicions of violation may only be subject to traditional legal mechanisms.

The Law on Contracts for the Supply of Digital Content and Digital Services, adopted in 2024, had the stated aim of transposing the EU Digital Services Act into Moldovan legislation.³⁵³ In July 2025, the Parliament amended the Audiovisual Media Services Code by adding a chapter on video-sharing platform services.³⁵⁴ As a result, video-sharing platforms in the Republic of Moldova are required to protect minors and the public from harmful content (pornography, violence, hate speech, terrorism, child pornography, racism, and xenophobia). The Audiovisual Council is also empowered to prohibit the retransmission of foreign media services that contain advertising targeted

³⁴⁹ Promo-LEX Association, Digital Rights in the Republic of Moldova: First Steps Towards a Common Agenda, 10 December 2024, <https://promolex.md/drepturile-digitale-in-republica-moldova-primii-pasi-spre-o-agenda-comuna/>; Promo-LEX Association, Roundtable: 'Digital Rights in the Republic of Moldova: Visions and Proposals for Current Issues, 19 September 2025

<https://promolex.md/masa-rotunda-drepturile-digitale-in-republica-moldova-viziuni-si-propuneri-pentru-problemele-actuale/>

³⁵⁰ Ilie Chirtoacă, Policy Brief: Application of Artificial Intelligence in the Courts of the Republic of Moldova – Opportunities and Risks for the Quality of Justice and Human Rights, (2025), (in Romanian)

<https://promolex.md/propunere-de-politici-publice-aplicarea-inteligentei-artificiale-in-instantele-de-judecata-din-republica-moldova-opunitati-si-riscuri-pentru-calitatea-justitiei-si-drepturile-omului/>

Cristina Durnea, Policy Brief: Regulation of Non-linear Audiovisual Media Services and Video Sharing Platforms in the Republic of Moldova – Seeking a Delicate Balance Between Protecting Some Digital Rights and Possibly Limiting Others, (2025), (in Romanian) <https://promolex.md/propunere-de-politici-publice-reglementarea-serviciilor-media-audiovizuale-nelineare-si-a-platformelor-de-partajare-video-in-republica-moldova-in-cautarea-echilibrului-delicat-intre-apararea-unor-d/>

³⁵¹ Promo-LEX Association, Digital Rights Matrix and Roadmap on Digital Rights in the Republic of Moldova, 2025, (in Romanian) <https://promolex.md/matricea-drepturilor-digitale-si-foaia-de-parcurs-privind-drepturile-digitale-in-republica-moldova-2025/>

³⁵² General Inspectorate of Police, 'The process of equipping the National Police with modern equipment and training police officers continues', 15 April 2024 (in Romanian) <https://politia.md/ro/content/procesul-de-dotare-politiei-nationale-cu-echipamente-moderne-si-instruirea-politistilor>.

³⁵³ Law No. 247/2024 on contracts for the provision of digital content and digital services, 9 November 2024, https://www.legis.md/cautare/getResults?doc_id=145889&lang=ro.

³⁵⁴ Law No. 221/2025 amending the Audiovisual Media Services Code of the Republic of Moldova 174/2018, 10 July 2025, https://www.legis.md/cautare/getResults?doc_id=150262&lang=ro

at the domestic audience. The amendments also help clarify the jurisdiction and regulation of video platforms, increase platform transparency and accountability, combat illegal content, disinformation, and hate speech, and provide users with rights to remedies and appeals.

Specific recommendations:

- The MDED should build policy-making capacities to integrate a human rights-based approach in digitalisation policies;
- The Government should build around the SCIA an informal national platform for open dialogue between state institutions, the business sector, CSOs and national human rights institutions (the Ombudsman and the Equality Council) with the purpose of transferring expertise and skills in the area of digital rights;
- The Government should implement a large-scale uniform national digital skills development programme for increasing the level of digital literacy across the country;
- The justice system and law enforcement should develop the proficiency of the literacy in digital rights of judges, prosecutors and lawyers;
- CSOs should adopt a proactive position in the promotion of digital rights;
- The Parliament should adopt the legislation on the provision of digital content and digital services in line with the EU *acquis*, including the EU Digital Services Act; and
- The Government should ensure institutional capacity to implement priority areas under the STDM 2023–2030, in particular to align legislation with EU requirements on electronic identification, data protection and cybersecurity, including the EU 5G Cybersecurity Toolbox.

IV. KEY PRIORITIES

The CSO enabling environment in the Republic of Moldova has remained largely unchanged during this period, although the sector was affected by several potentially disruptive developments. These include the withdrawal of USAID funding, increased attacks from the illiberal political segment, and the promotion of the draft foreign agents law. Nevertheless, these threats were countered, and following the parliamentary elections in September, the most significant achievement of the period was that the country's development trajectory toward European integration was maintained, despite serious concerns about a possible deviation from the democratic path. This confirms that the Republic of Moldova will continue on the path to reform and continued EU integration, which will also benefit the CSO environment.

In this context, several initiatives aiming at positive changes were launched throughout the year. Three recommendations from the 2024 CSO Meter Report were implemented (none of them among the key priorities). These relate to: (i) the Government initiating the process to draft a law on the protection of human rights defenders; (ii) the Government approving the new Law on Volunteering which was passed by Parliament in the first reading; and (iii) improvements to the publication system on the Parliament's website through the launch of a new web portal.

Another 20 recommendations were partially implemented or are in progress. These include the initiation of draft laws on public participation, on the protection of human rights defenders, and on combating SLAPPs, which are at various stages of development, as well as partial amendments to legislation on video-sharing platform services in accordance with the EU acquis. Proactive access to information has been strengthened through the adoption of the Law on Open Data and Reuse of Information from the Public Sector, and through continued government efforts to implement the law via training and improvements to the particip.gov.md platform. The digital rights sector will benefit from the new Law in Electronic Communications (effective from 2026), which transposes multiple EU directives and explicitly reconfirms the right to internet access and, implicitly, the right to internet neutrality.

In light of this, the following nine recommendations out of total number of 68 recommendations in 11 areas are identified as key priorities:

1. The Ministry of Finance should increase tax benefits for philanthropic donations and sponsorship to a level that would provide real benefits for philanthropic activity;
2. The legal framework for public procurement should be adjusted, with a legal mechanism for social contracting with clear instructions, a standard package of model documents, and knowledge being built in public institutions based on this mechanism;
3. LPAs and law enforcement should adopt non-violent and non-intrusive assistance and response procedures regarding peaceful assemblies based on the observance of human rights, including for critical and anti-government assemblies;
4. The FIU and the National Bank should implement CTF measures impacting CSOs (including banking policies) only to FATF NPOs, in line with FATF Recommendation 8, arising from the Terrorist Financing Risk Assessment of the NPO Sector;
5. LPAs should increase transparency in decision-making by developing modules on their webpages similar to those used by the Government (particip.gov.md) and establish District Participation Councils (CRPs) based on existing functional models;
6. The Government and Parliament should ensure that the Public Participation Law is drafted and finalised with broad civil society involvement;
7. The Government should ensure the allocation of financial resources for the implementation of the Civil Society Development Program (PDOSC);
8. Public institutions supported by the EGA should improve transparency and participation in decision-making by developing a unified online platform which would include updated information on legal initiatives at all stages and all amendments from introduction up to adoption; and
9. The Government should adopt amendments provided by CSOs for the regulatory framework on social entrepreneurship in order to boost the development of related initiatives.

V. METHODOLOGY

The CSO Meter supports regular and consistent qualitative and quantitative monitoring of the environment in which CSOs operate in the Eastern Partnership (EaP) countries. It consists of a set of standards and indicators in 11 different areas to measure both law and practice. It is based on international standards and best practices. The CSO Meter was developed by a core group of experts from ECNL and local partners from the six EaP countries.

The country partners, together with other CSOs part of the CSO Meter Hub, conducted the monitoring process and drafted the narrative country report. They also established Advisory Boards in each country, composed of expert representatives of key local stakeholders. The members of the boards have two main tasks: to review the narrative reports and to assign scores for every standard based on the narrative reports.

This country report covers the period of December 2024–November 2025.

Monitoring process

The report was prepared by the local partner of the CSO Meter project in the Republic of Moldova, Promo-LEX Association, following a joint methodology for all six EaP countries. It focuses on the changes that have occurred in the CSO environment in the Republic of Moldova during December 2024–November 2025. The report reviews 32 standards that are part of the CSO Meter and provides recommendations for improvement in each of the 11 areas covered. The process included data collection, interviews, desk research, focus groups, brief information exchanges and analysis of the collected information and of other studies on the CSO environment during the reference period.

The findings and conclusions of the study do not cover the working environment of CSOs from the Transnistrian region of the Republic of Moldova, which is outside the control of the constitutional authorities of the Republic of Moldova.

List of interviewed persons

Natalia Postolachi (Executive Director, CASMED Association), Aliona Țurcan (Senior Consultant, CICO), Cătălina Molodoi, Lilia Curchi (Association of Environmental Journalists), Tamara Morar (Head of the Public Relations Department, Bălți Municipality City Hall), Mihai Peicov (Executive Director of the Civic Initiatives *for National Minorities* Association), Natalia Postică (Deputy Head of Directorate for Human Rights and Cooperation with Civil Society, State Chancellery), Angela Belobrov (Head of the Department of legal entities registration and licensing, ASP), Mihail Drăgan

(Head of the Department of Registration and Licensing of Legal Entities, ASP), Veronica Ignat (Head of Section for Registration of Non-Commercial Organisations, ASP), Cristina Borozan (Head of the Beneficial Owner Identification Service, ASP), and Cristina Voroneanu (former NDI Moldova employee).

Brief information exchange

Ana Spînu (Association CASMED), Ana Lupașcu (Department for the Implementation of Youth Policies and Programs, National Youth Agency), Irina Serebreanschi (Head of the Parliamentary Studies Directorate, Parliament Secretariat), Irina Corobcenco (Hate Speech Analyst, Promo-LEX Association), Rodica Jereghi (Deputy Head, Bureau for European Integration), Irina Corobcenco (Hate Speech Analyst, *Promo-LEX Association*), Vlada Ciobanu (*Center for Policies and Reforms*), Victor Tihoneac (Senior Consultant, Ministry of Culture), Sergiu Gurău (Social Enterprise, Floare de Cireș”), Arcadie Grama (State Chancellery, and Chișinău territorial Office).

This report was developed with the contribution of an Advisory Board that consisted of representatives of key local stakeholders to ensure that the findings and recommendations reflect the overall situation in the country:

- Andrei Brighidin (Director for Development, Monitoring and Evaluation, *East Europe Foundation*)
- Tudor Lazăr (Executive Director, *Centre for Organisational Consultancy and Training, CICO*)
- Serghei Neicovcen (Executive Director, *Centrul CONTACT*)
- Natalia Răileanu (President, *ProCimișlia Association*)
- Andrei Lutenco (Executive Director, *Centre for Policies and Reforms Moldova*)
- Irina Corobcenco (Hate Speech Analyst, *Promo-LEX Association*)
- Vitalie Hotnogu (Project Coordinator, *Cahul 2030 Association*)
- Natalia Postolachi (Executive Director, *CASMED Association*)
- Svetlana Ciobanu (Executive Director, *Pas-cu-Pas South Region Association*)
- Corina Erhan (Executive Director, *Association for Development and Social Innovation*)
- Irina Beșliu (Project Officer, *Delegation of the European Union to the Republic of Moldova*)

The drafted country narrative report was reviewed by the Advisory Board members in Moldova at a meeting held on 1 November 2024. Based on the recommendations of the Advisory Board members, the findings and recommendations were further revised and finalised.

Scoring process

The country researcher(s) and ten Advisory Board members in Moldova assessed the Standards of the 11 areas of the CSO Meter tool in Legislation and in Practice which noted significant changes as compared to the previous year's reports. The final score of each standard was then calculated according to a formula in which the researchers score participates with 50%, and the Advisory Board members' average score with 50%. The score of each area is then calculated as the average value of the final scores of each standard and calculated and rounded with one decimal for presentation purposes.

For the scoring procedure, a seven-point scale is used. The extreme values of the scale are conceived as the extreme/ideal situation or environment. For example, (1) is an extremely unfavourable (authoritarian) environment for CSOs, while (7) is an extremely favourable (ideal democratic) environment for CSOs. For more information on the CSO Meter tool, the scoring process and calculation, please visit <https://csometer.info/>.

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