

Interim Report No.1
Observation Mission of the Union of Jurists of Moldova (UJM) for
Parliamentary Elections of 28 september 2025

1. Introduction

The Parliamentary Elections (PE) will take place on September 28, 2025, according to Parliament Decision No. 77 of April 17, 2025¹, published in the Official Gazette on April 18, 2025. The electoral process is organized in accordance with Electoral Code No. 325/2022, the normative acts of the Central Electoral Commission (CEC), and other relevant legal provisions.

The Union of Jurists of Moldova (UJM) is a non-profit organization that promotes national, civic, democratic, and rule-of-law values and interests in its activities, as well as partnership, open competition, and adherence to the ethical norms of the non-profit sector. On July 16, 2025, the Union of Jurists of Moldova launched the Election Observation Mission for the September 28, 2025 parliamentary elections (EOM). The mission's purpose is to analyze and evaluate the organization and conduct of the electoral process and to inform the public on this subject. The observation is based on a systematic and professional approach, focused on analyzing the applicable legal framework, the activity of institutions involved in election administration, the observance of voters' and candidates' fundamental rights and freedoms, as well as monitoring all stages of the electoral process.

The monitoring effort will be conducted in accordance with national legislation, international standards on democratic elections, and the commitments assumed by the Republic of Moldova under the Organization for Security and Co-operation in Europe (OSCE), the Council of Europe, and other international bodies.

The UJM EOM methodology ensures a transparent and objective evaluation of the September 28, 2025 Parliamentary Elections. It is based on the principles of independence, impartiality, and professionalism and is structured into three levels: the central coordination team, long-term observers, and short-term observers assigned to polling stations on election day both within and outside the country. During the mission, information will be collected using standardized data collection tools: online questionnaires, standardized observation forms, field notes, and narrative observations of specific situations (supported by photo/video materials), scanning of online platforms, and the digital platform www.monitorizez.eu, which is set to be launched in the second half of August 2025.

The mission operates based on a mandate of independent, impartial, and non-political observation. The mission's findings, reflected in its monitoring reports, should be treated as observer notifications and addressed accordingly.

¹ Parliament Decision No. 77 of April 17, 2025

2. Mission Activities

On July 16, 2025, UJM officially launched the Election Observation Mission for the September 28, 2025 parliamentary elections. The launch marked the beginning of a national effort to monitor the organization and conduct of the parliamentary election, carried out in a spirit of impartiality, independence, and professionalism. During the event, the observation methodology, the mission's principles of operation, its organizational structure, and the digital platform www.monitorizez.eu, designed for reporting electoral incidents, were presented. The event brought together representatives of public authorities, political parties, civil society, the diplomatic community, and election experts.

On July 21, 2025, UJM issued a public call for the selection of national observers as part of the Election Observation Mission for the September 28, 2025 Parliamentary Elections. The call targets both long-term and short-term observers. They will monitor the electoral process in all administrative-territorial units of the Republic of Moldova² and at polling stations abroad. The selection process is based on criteria of integrity, impartiality, and professionalism, and the observers will receive training based on the observation methodology developed by UJM.

Additionally, the UJM EOM has held meetings with accredited diplomatic missions in Chişinău, public institutions, civil society organizations involved in election monitoring, and political parties

3. General Electoral Context

Political and social situation before the elections

List of political parties provided by the Public Services Agency

According to Article 27 g) of the Electoral Code, the CEC publishes the list of political parties entitled to participate in elections, based on data provided by the Public Services Agency (PSA). Only political parties registered with the PSA prior to the entry into force of the act establishing the election date are eligible to participate.

In accordance with Articles 11(5) and 11(7) of Law No. 294/2007 on political parties, amended by Law No. 100/2025, political parties are required to submit to the PSA—by the start of the electoral period—the numerical and nominal list of party members falling under Article 3(1) (e) of Law No. 133/2016 on asset and interest disclosure.

² List of political parties in the Republic of Moldova.

On 14 July 2025, based on PSA data, the CEC adopted Decision No. 3651³, which published the list of parties eligible to participate in the 28 September 2025 Parliamentary Elections. According to the decision, 39 political parties were included in the list. For the first time, the CEC introduced a "revocation reserve", applicable to 14 of the 39 parties, which could lose their right to participate if. The PSA fails to issue a favorable administrative act, and/or a final court decision is issued to dissolve or restrict the activity of the respective parties.

The 101 Members of Parliament are elected in a single nationwide constituency. Mandates are distributed proportionally based on the number of votes received by candidates nominated by political parties or electoral blocs, independent candidates. Seats are allocated in descending order of vote count to those who exceed the minimum representation threshold, as follows: 2% for independent candidates; 5% for party lists; 7% for electoral blocs.

4. Legal and Institutional Framework

Recent legislative context. Analysis and evaluation of electoral legislation

The previous parliamentary elections held on July 11, 2021, were organized in accordance with the provisions of Electoral Code No. 1381/1997. The parliamentary elections on September 28, 2025, will be held under the new Electoral Code No. 325/2022. Since the adoption of this new version of the Code, it has undergone multiple amendments and/or additions through nine laws passed by Parliament, and two other legislative interventions were made following the constitutional review exercised by the Constitutional Court.

After Parliament established the date of the Parliamentary elections, the text of the Electoral Code was amended through three laws: Law No. 112 of May 22, 2025; Law No. 130 of May 29, 2025; and Law No. 100 of June 13, 2025.

Law No. 112/2025 adjusted the provisions of the Electoral Code regarding the types of identity documents that voters can use to cast their vote, as well as the way their residence is certified, following the introduction of a new national identity document—the identity card—where information about the holder’s residence is available only electronically, through querying state information systems.

Law No. 130/2025 introduced a series of changes and additions to the Electoral Code, particularly in extending the operational terms of lower-level electoral bodies, especially district electoral councils. At the same time, new regulations were introduced that significantly altered the “rules of the game” for electoral actors or potential candidates. For example, the concept of an “independent candidate” was redefined to introduce new conditions that such candidates must meet, such as not having been a member of a political party in the 70 days prior to the elections or not having expressed any form of support for a political party during that period. The concept of a “camouflaged electoral bloc” was introduced, along with the legal consequences for this unauthorized form of association. New regulations also revised the concept of “complaint,” excluding the “notification” form from its content. Additionally, complaints submitted by individuals whose rights or interests are not directly affected will be handled under the general petition procedure as provided by the Administrative Code. The procedure for verifying whether complaints meet admissibility conditions was also revised. From now on, inadmissibility will be communicated to the relevant party without reviewing the complaint on its merits, through an administrative act issued by the president of the electoral body. However, the detailed procedure is to be established by the Central Electoral Commission (CEC). Law No. 130/2025 also amended Law No. 294/2007 on political parties, particularly by modifying the donation regime for individuals. The list of financial sources allowed for donations to

³ CEC adopted Decision No. 3651

political parties has been expanded to include income from farming activities, individual entrepreneurship, patent holders, freelancers, and so on.

According to Law No. 100/2025, in addition to the Electoral Code, a number of other laws were modified, some of which are not directly related to the electoral field—such as Law No. 54/2003 on combating extremist activity. Most of the changes targeted the text of Law No. 294/2007 on political parties. One major electoral-impact modification introduced the obligation for political parties to create and/or update electronic registers of their members, in accordance with criteria established by law, and to submit nominal lists of the members of their governing bodies to the Public Services Agency. According to the new provisions, failure to submit the required data will result in the party being disqualified from eligibility as an electoral actor. Thus, after the election date was set, the legislator imposed new participation conditions on registered political parties, which substantially affects the principle of legislative stability established by Article 27 of the Electoral Code and the Code of Good Practice in Electoral Matters. According to the MO UJM, this new measure placed on political parties during the election preparation process is a disproportionate measure in relation to its intended goals. Such a measure could have been adopted in a timely manner before the announcement of the election date or enforced after the elections. Otherwise, this imposes an unjustified burden on political actors during the electoral campaign.

Among the provisions of related legislation, we note amendments to the Penal Code and the Contravention Code to strengthen the framework for preventing and sanctioning electoral corruption. Additionally, new forms of misdemeanors were introduced, such as the collection of signatures in support of an independent candidate or a referendum by unauthorized persons.

We observe that most of the recent changes to electoral and related legislation address procedural aspects and clarify gaps observed in previous elections. However, legislative solutions that delegate to the CEC the task of clarifying electoral procedures through its own normative acts are regrettable—especially when these are developed and approved shortly before or even during the election period. Moreover, the continued practice of amending electoral legislation shortly before scheduled elections undermines legal certainty and the transparency of electoral procedures.⁴

The comparative evolution of electoral legislation

The provisions of Electoral Code No. 325/2022 regarding the organization of parliamentary elections will be applied for the first time in the 2025 elections. From a comparative perspective, we note that the new electoral law provisions increased the number of candidates allowed on electoral lists from 103 to 111.

Additionally, Title III of the Electoral Code clarifies and details the procedures for modifying candidate lists, including the deadlines by which these changes can be requested. These new regulations standardized and extended the deadline for such modifications to no later than 10 days before election day (previously, the deadline was 14 days). The nomination and registration period for candidates has also been revised. The MO UJM positively appreciates the fact that the total time allocated for these activities remains the same—30 days. However, the timeline for starting and ending the nomination period has changed: nominations now begin no earlier than 70 days before the elections and end no later than 40 days before the elections⁵. These observations are not meant to assess whether the changes are reasonable, but rather to reiterate that such interventions should be avoided on the eve of an election. These modifications were introduced by Law No. 130/2025.

⁴ See the findings in Chapter IV of the Final Report of the OSCE/ODIHR Election Observation Mission for the presidential election and constitutional referendum in the Republic of Moldova on 20 October 2024.

⁵ Previously, “60 days before election day and ending 30 days before election day.”

Another new element of Electoral Code No. 325/2022 concerns the clarification of procedures for registering electoral blocs, including required documents, the agreement for their creation, and the consequences of a party withdrawing or joining. Previously, these matters were vaguely regulated and required detailed provisions in CEC regulations. However, this approach has also been criticized, particularly the late adoption of new CEC regulations regarding bloc formation, just before the start of the registration period.

Considering the progress toward digitization of the electoral process, legislative provisions allowing the use of electronic signatures to support a candidate are welcomed. During the 2024 presidential elections, some initiative groups used qualified electronic signatures to collect support via electronic subscription lists. However, the CEC should detail the procedures and ensure the necessary technical and regulatory conditions to manage this mechanism transparently and securely, facilitating participation while reducing the risks of error, fraud, or manipulation.

After the parliamentary election date was set and the Electoral Code amended through the aforementioned three laws, the CEC⁶ revised its regulatory framework, as follows:

4 normative acts were approved in new versions:

- 1) The **Regulation on the Formation and Registration of Electoral Blocs** was revised and adjusted to align with the new provisions introduced by Law No. 130/2025, especially regarding the concept of “camouflaged electoral⁷ bloc.” It clarified the procedure for submitting documents for bloc registration and the process for new parties joining an already registered bloc. However, the regulation contains two controversial provisions: one prohibits the use of names and symbols by blocs that are identical to those of their constituent parties (point 14), and the other (point 17) stipulates that bloc candidates must either be members of the constituent parties or individuals who have not shown political affiliation or sympathy in the 70 days prior to the election. These restrictions are seen as infringing upon the constitutional right to be elected and as disproportionate measures that exceed the limits of the law. According to Article 16, paragraph (2) of Law No. 100/2017 on normative acts, a regulation issued by the public administration must remain within the scope of the superior normative act it is meant to implement.
- 2) The **Regulation on the Status and Activity of Representatives of Electoral Competitors and Referendum⁸ Participants** was adjusted in line with Law No. 130/2025. The main changes involve the confirmation of representatives to polling stations by district electoral councils (previously, this was done directly by precinct bureaus), the procedures for submitting confirmation requests, and special provisions for confirming representatives in polling stations abroad.

⁶ CEC Decision No. 3592 of 17 June 2025.

⁷ Ibidem

⁸ CEC Decision No. 3636 of 10 July 2025.

- 3) The **Regulation on the Formation and Registration of Initiative Groups and the Collection and Verification of Subscription⁹ Lists** was updated primarily to apply to the new legal framework on the voluntary amalgamation of first-level administrative-territorial units, as per Law No. 225/2023. It also incorporated recent Electoral Code amendments allowing for the collection and processing of electronic signatures using the “Electronic Subscription List” information subsystem.
- 4) The **Instruction on Vote Counting, Tabulation, and Transmission of Materials by Postal Voting**¹⁰ was adjusted following the adoption of Law No. 129/2025, which amended Law No. 109/2024 on the partial implementation of postal voting.

12 Adjusted normative acts:

An initial analysis of the regulatory framework adjustment activity¹¹ shows that, for the most part, the CEC has aligned its normative framework with the recent amendments to electoral and related legislation. This activity is welcome, especially since the adjustments were made before the start of the electoral period, allowing sufficient time for the targeted stakeholders to become familiar with the new requirements. Otherwise, any changes made at the beginning or during the electoral period undermine the transparency, efficiency, and coherence of electoral procedures.

However, the MO UJM notes that, at the time this report was prepared, the CEC had not yet adjusted the Regulation on the Procedure for Examining Electoral Complaints. The Electoral Code allows electoral bodies to verify the admissibility of complaints ex officio, without examining the merits. The steps and conditions for applying this procedure should have been defined in a timely manner¹².

⁹ CEC Decision No. 3641 of July 10 2025

¹⁰ CEC Decision No. 3654 of July 16 2025

¹¹ Regulations on: the specific features of nominating and registering candidates for parliamentary elections; the specific features of registering participants in a referendum; the activity of the constituency electoral council during the electoral period; the activity of the polling station electoral bureau; the financing of political party activities; the financing of initiative groups and electoral campaigns; the coverage of elections by mass media institutions; the manner of supplying, distributing, and broadcasting political and electoral advertising and public interest messages; the specific features of organizing and implementing voting by mail.

Instructions on: approving the template, printing, delivery, and storage of ballot papers; ensuring the infrastructure of the polling station; identifying remote voters through digital means.

¹² CEC Decision No. 3536 of 8 May 2025.

Moreover, the MO UJM observes that the Regulation on the establishment of polling stations abroad and the Regulation on polling stations for voters from East localities of the Nistru river were not revised in light of changes to Articles 1, 60, and 78 of the Electoral Code.

Additionally, other draft normative acts submitted for public consultation by the electoral authority, available on its official website, have not yet been debated in a public session of the Commission¹³.

Regardless of reasonableness or timing, we reiterate that the practice of developing or adjusting electoral regulations during an election period undermines the principles of transparency, stability, and predictability of legal norms.

On the Regulation concerning the status and accreditation procedure of observers, subject posted for public consultation in July 2025, the MO UJM expresses disagreement and concern regarding certain proposed additions. According to the analysis, some proposals may unjustifiably limit the access of civil society organizations to the electoral observation process, particularly by:

1. Imposing the obligation to submit a detailed description of the organization's technical capacities, human resources, qualifications, and experience;
2. Requiring exhaustive lists of all funding sources for the observation mission, along with contact details of donors and copies of supporting documents.

While the MO UJM appreciates the CEC's effort to ensure transparency in observer accreditation, it believes that some of these requirements are excessive and could have a discouraging effect on small, local, or newly formed organizations. Despite limited resources, such organizations can contribute significantly to a fair, pluralistic, and transparent electoral process. These additions risk creating administrative barriers that disproportionately limit the free and fair access of civil society to the electoral process.

The MO UJM also highlights that the new conditions apply to both national and foreign NGOs. Based on Article 88(4) of the Electoral Code, which states that international observers (foreign NGOs) monitor the election at the invitation of the CEC, the requirement for invited organizations to prove technical capacity, staff, and experience is baseless and unreasonable. Such demands risk unjustifiably hindering the observation process and discouraging participation by credible organizations — contrary to the principles of transparency and openness in electoral administration.

¹³ Subsection "Decision-making process," items No. 1, 2, 4, 7, 8, 12, and 25 (year 2025).

We emphasize that the introduction of these requirements represents an unjustified expansion of legal obligations, contradicting the principle of electoral legal stability established by Article 27 of the Electoral Code and recommended by the Venice Commission's Code of Good Practice in Electoral Matters.

Given that electoral observation is a public-interest activity carried out to support transparency and integrity, we consider that treating observers as if they were electoral competitors—for example, by requiring financial reports—contradicts international principles of independent election monitoring.

Finally, we draw attention to a potential overreach of CEC's authority in requesting information outside its legal mandate. According to Article 7(3) of Law No. 86/2020 on Non-Commercial Organizations, such information is provided upon request, and is not a precondition.

5. Activity of Electoral Bodies in Organizing the Elections

Activity of Electoral Bodies in Organizing the Elections

The parliamentary elections are administered by the Central Electoral Commission (CEC). Within the system of electoral bodies, the CEC serves as the highest hierarchical authority, coordinating the work of second-level District Electoral Councils (35 permanent CECE II and 2 CECE II established at least 65 days before election day¹⁴), as well as the electoral bureaus of polling stations (EBPS).

Transparency of CEC Activity

CEC meetings are open to the public. However, their analysis reveals deficiencies and a series of actions or inactions by Commission members that may indicate, indirectly or implicitly, sympathies toward certain political parties. These include:

Intentional interruptions limiting participants' freedom of expression,

- Ignoring arguments or limiting speakers to ambiguous 2-minute time slots,
- Unprofessional conduct or interventions,
- Turning sessions into score-settling platforms,
- Occasional arrogance of participants toward CEC members,
- Unresolved technical issues (e.g., inaudible reports during sessions or online broadcasts).

These issues raise serious concerns about their impact on democratic processes and the constitutional rights of session participants. MO UJM believes that these deficiencies could compromise the transparency, objectivity, and fairness of the electoral process. Urgent action is needed to protect participants' constitutional rights and uphold public trust in democratic procedures.

¹⁴ ECE II for polling stations abroad and for localities on the left bank of the Dniester.

Information is shared with stakeholders and the general public through press releases, CEC social media pages, and a new online platform for the diaspora. However, as of the time of the report's drafting, the CEC website content only moderately meets citizens' interest in learning about election preparations.

From the 25 announcements under the "Decision-Making Process" sub-section, at least 16 normative acts were approved or amended. However, for only one of these acts were all related documents published: summary of objections and recommendations, the draft post-consultation, and the adopted decision. For another act, only the summary table was published. Moreover, about 44% of the approved normative acts (regulations and instructions) remain available in their outdated versions under the "Regulations" and "Instructions" sections, causing confusion for process participants and those interested in the topic.

MO UJM also identified delays of up to five calendar days in publishing decisions related to the upcoming elections under the "Parliamentary Elections 2025" section, created to centralize electoral process information. This section also lacks a "Complaints Filed to the CEC" subsection, unlike in previous elections—despite known public reports of complaints submitted to the authority

Certification of Future Electoral Officials

The certification (professionalization) process of electoral officials and other interested individuals is conducted by the Center for Continuing Electoral Training (CICDE) in cooperation with CECE II. The exam pass rate is 80%, indicating a relatively high level of professionalism among future members of electoral bodies, at least at the national level. However, MO UJM points out that this crucial certification stage is not reflected in the "Parliamentary Elections 2025" section of the CEC website, unlike other phases of election organization. Citizens must access the CICDE website separately to find this information.

Accreditations and Authorizations Issued by the CEC

By the time this report was written, the CEC had:

- Accredited 77 national observers from UJM, Promo-LEX Association, and ADEPT,
- Confirmed 7 journalists from the periodic publication "Observator de Nord" SRL,
- Authorized 4 public opinion surveys and 1 publication of voter preferences,
- Approved 3 public interest messages, 1 by the CEC and 2 by the Ministry of Education and Research.

MO UJM observes that the CEC is currently authorizing any type of public interest message, which exceeds the specific scope of its role—organizing and conducting elections. The Commission should only authorize public interest messages with electoral themes during the electoral period. MO UJM recommends that Parliament amend Article 17(2) of Law No. 62/2022 on Advertising accordingly.

Lack of Reaction to the early Electoral Campaign

The right to participate in the parliamentary race of 28 September 2025 was conditionally granted to 39 political parties, the electoral bloc “ALTERNATIVA”, and citizens of the Republic of Moldova independent of political parties and electoral blocs.

According to the Electoral Code (Art. 63 and Art. 70), political formations may nominate candidates for the position of MP only starting from 20 July 2025, and the electoral campaign may begin no earlier than 30 days before election day (i.e., on 29 August 2025). The UJM Observation Mission noted violations of the legal framework, namely premature and unrestricted promotion of candidate lists by several parties, dissemination of electoral advertising, and meetings with voters (see Chapter 6).

We note the lack of any response or warning from the CEC in this regard towards all political parties, which runs contrary to the expectations of the stakeholders in the electoral process and of the general public. After all, the Commission has the duty to monitor compliance with electoral legislation and to ensure fair campaign conditions for all electoral competitors, including through impartial treatment¹⁵.

Nomination and Registration of Electoral Competitors/Candidates

In accordance with the new regulations, at the time of drafting this report, the CEC had registered the electoral bloc “ALTERNATIVA”¹⁶ and had refused the registration of the electoral bloc “VICTORIE – ПОБЕДА”¹⁷. As justification for the refusal, the Commission stated that the activities of the participants in the administrative procedure bear elements at least falling under the restrictions outlined in Art. 3 para. (12), items 1)(c), 2), 3), 4), and 6) of Law No. 294/2007 on Political Parties.¹⁸

In addition, the electoral authority registered the first electoral competitor – the Political Party “Action and Solidarity” (PAS), which complied with the minimum gender quota requirement (40%), and is examining the resubmitted¹⁹ application for registration from the Political Party “Democrația Acasă” (PPDA). The CEC also registered two initiative groups for collecting signatures in favor of two potential candidates (Olesea Stamate and Andrei Năstase), and issued signature sheets for nine potential independent candidates who will collect signatures independently. Compared to the 11 July 2021 parliamentary elections, this race sees an increased interest from independent candidates for a parliamentary mandate in the Republic of Moldova. MO, given the intention to run in a particular election, potential candidates must comply with the legal framework, which imposes certain rules of the game. Furthermore, to avoid such situations, it would be beneficial to provide a space for potential candidates and registration committee members to clarify misunderstandings or questions that may arise.

¹⁵ Mission of the Central Electoral Commission.

¹⁶ CEC Decision No. 3611 of 25 June 2025.

¹⁷ CEC Decision No. 3670 of 19 July 2025.

¹⁸ Provisions included through Law No. 100/2025 for the amendment of certain legislative acts.

¹⁹ The CEC rejected the first application for the registration of the list of candidates for the position of Member of Parliament of the Republic of Moldova, submitted by the political party “Democracy at Home.”

Another aspect is the period for submitting documents for registration in the electoral race. The UJM Election Observation Mission draws attention to a procedural inconsistency that arose during the process of registering candidates for the parliamentary elections of 28 September 2025. According to CEC Decision No. 3655²⁰, the period for submitting files was set between 20 July – 19 August 2025, explicitly including Sunday, 20 July, when political parties and independent candidates could submit their documents between 09:00 and 16:00. Later, by Decision No. 3675²¹, the Commission amended the submission period, restricting it to working days (Monday–Friday). In the opinion of the Observation Mission, this change created an imbalance among electoral contestants. The ex post modification of participation conditions is a non-transparent practice and violates the principle of equal treatment of electoral actors. In this case, the CEC favored the registration of one electoral contestant (PAS). Regarding the registration of the electoral contestant PAS, we note that this political party was registered by the CEC as an electoral contestant on 27 July 2025²². On the party’s candidate list there are 101 persons, with positions no. 42 and 46 occupied by two representatives of the Political Party “Dignity and Truth Platform” (PPPPA), one of them being the party’s president. By Law No. 130/2025, Article 1 of the Electoral Code was supplemented with a new concept: *“camouflaged electoral bloc – an irregular form of association between political parties and/or electoral competitors through which they conduct common, concerted and/or coordinated electoral activities.”* This legislative intervention was necessary due to situations observed in previous elections where cases of unfair competition were recorded — situations in which some political parties, without formally creating an electoral bloc, participated jointly in elections with the same purpose — either promoting common candidates for the position of MP or a single candidate for the presidency. Such an attempt was noted by the CEC during the presidential election of 20 October 2024. At that time, the Commission rejected the registration request of the initiative group supporting Valeriu Pleșca’s candidacy, on the grounds that a camouflaged electoral bloc existed between the European Social Democratic Party (PSDE) and the Christian-Social Union of Moldova (UCSM), whose president was the designated candidate. In the reasoning section of its decision, the Commission stated:²³

“/.../ From the materials provided by the Public Services Agency, as well as during their examination, it was found that, at the time of submitting the documents for registering the initiative group supporting candidate Valeriu Pleșca, Mr. Pleșca still held the position of president of a party other than PSDE. In this regard, the Commission upholds the imperative conclusions set out in paragraphs 90–97 of Constitutional Court Decision No. 29/2014 regarding the confirmation of the results of the parliamentary elections of 30 November 2014 and the validation of the mandates of the elected deputies, according to which the creation and functioning of camouflaged electoral blocs is inadmissible, meaning the candidacy of a party leader on behalf of another political entity /.../.”

The CEC’s practice was therefore based on earlier conclusions formulated by the Constitutional Court, which also explained the reasoning behind this conclusion:

“/.../ The Court finds that participation in the elections on a joint list of the political party ‘Party of Socialists of the Republic of Moldova’ and the political party ‘United Moldova’ constitutes in fact a camouflaged electoral bloc, through which an attempt was made to circumvent the minimum representation threshold of 9% established by Article 86(2)(b) of the Electoral Code, and to obtain the application of the 6% threshold, valid in the case of political parties /.../.”

Thus, in the Court’s opinion, unfair competition in the case of camouflaged electoral blocs is manifested through “circumvention of the electoral threshold,” applicable only in parliamentary elections. Therefore,

²⁰ CEC Decision No. 3655 of 18 July 2025.

²¹ CEC Decision No. 3675 of 24 July 2025.

²² CEC Decision No. 2733 of 24 August 2024.

²³ The CEC rejected the initial application for the registration of the list of candidates for the position of Member of Parliament of the Republic of Moldova, submitted by the political party “Democrația Acasă” (Democracy at Home)

if the CEC found such unfair competition in the case of presidential elections where no electoral threshold exists, it should have been even more concerned with ensuring fair competition in the current parliamentary election, where the threshold is applicable and varies depending on the contestant: political party or electoral bloc.

In the findings section of Decision No. 3680, the Commission states that “/.../ through the notification registered at the Commission under No. CEC-7/20853 of 20 July 2025, the Political Party ‘Dignity and Truth Platform’ informed that Dinu Plîngău and Stela Macari had ceased to be members of the political party, as well as members of the Permanent Political Bureau and the National Political Council /.../.” The CEC decision also mentions that the ASP (Public Services Agency) was contacted by the Commission on 24 July 2025 regarding the membership of the two individuals in PPPDA. The next day, on 25 July 2025, the CEC received a response stating that documents had been submitted to change the administrator of the legal entity and the members of the leadership bodies, and that the changes had been made according to the request.

What stands out here is the speed with which the events unfolded. In the identical situation observed in the case of candidate Valeriu Pleșca described above, the Commission stated in its decision that “/.../ the registrar in the field of state registration is to examine the request and the documents submitted for registration in order to verify compliance with legal requirements and to issue the appropriate decision /.../,” and that “/.../ from the materials provided by the Public Services Agency, as well as during their examination, it was found that, at the time of submitting the documents for registering the initiative group supporting candidate Valeriu Pleșca, Mr. Pleșca still held the position of president of a party other than PSDE /.../.”

It is noteworthy that according to open data from the ASP, published on the government portal asp.gov.md, at the time of examining the request for registration of PAS’s candidate list, Dinu Plîngău was listed as the president of PPPDA.

Furthermore, analyzing this case and comparing the above circumstances with the statutory provisions of PPPDA²⁴, we can see that the procedure for expelling at least Dinu Plîngău from the party was flawed. According to point 12.1(f) of the PPPDA Statute, the party president may be expelled from the party only by the Party Congress, upon the proposal of the National Political Council. According to point 44(c) of the PPPDA Statute, the Congress has the exclusive authority to elect and revoke the party president. In conclusion, the UJM Observation Mission notes a double-standard approach by the CEC in absolutely identical cases. It should be mentioned, however, that in the PSDE-UCSM case the concept of “camouflaged electoral bloc” was not defined in the Electoral Code, unlike in the PAS-PPPDA case, where this provision is found in the law

Pre-registration and Registration for Voting by Mail

On 22 April 2025, the CEC (Central Electoral Commission) launched the “**Pre-registration**” **application**, allowing eligible voters intending to vote abroad to voluntarily register the country and locality where they will be on election day, as well as the polling station where they wish to vote. According to statistics on the site inregistrare.cec.md, 10,463 voters have pre-registered so far for the autumn parliamentary elections. Moldovan citizens have registered in 51 (58%) of the 88 countries where polling stations are set up. The highest numbers of pre-registrations come from the Russian Federation (9,256), Germany (160), Italy (145), the United States (137), and the United Kingdom (112). The app holds a total of 122,664 pre-registrations, including from previous elections. Voters who have not changed their location abroad do not need to re-register.

²⁴ Statute of the Political Party “Dignity and Truth Platform” (Platforma Demnitate și Adevăr)

Compared to voluntary pre-registration, **registration for voting by mail** is **mandatory** for voters who wish to vote abroad by post or courier. Importantly, previous registration from earlier elections is no longer valid; a new registration is required. The CEC launched the “**Registration for Voting by Mail**” application on 3 June 2025, targeting voters in the USA, Canada, Norway, Sweden, Finland, Iceland, Japan, South Korea, Australia, and New Zealand. According to vpc.cec.md, 937 voters have opted for this alternative voting method, mostly from the USA (493) and Canada (276).

Applications for mail voting must be approved by the CEC or Constituency Electoral Commission II (CECE II) no later than 30 days before the election.

Both pre-registration and registration for voting by mail aim to estimate:

- The number of voters intending to vote in the parliamentary election on 28 September 2025,
- The number of polling stations to be set up,
- The print run for ballots and other electoral materials.

On 15 July 2025, the Ministry of Foreign Affairs proposed to the CEC a list of 293 polling stations, which includes those from the 2024 elections with some additions or relocations²⁵.

Authorities, including the CEC, Ministry of Foreign Affairs, Moldovan embassies, and the Border Police, actively encourage all citizens abroad to pre-register regardless of the voting method. However, the Parliament Speaker and PAS party leader Igor Grosu addressed only Moldovan citizens in the ten countries designated for mail voting.

The UJM Observation Mission encourages all Moldovan citizens abroad to pre-register regardless of voting method.

Cooperation with Public Authorities in Organizing the Elections

Organizing elections at the national level is a complex process involving multiple stages, procedures, and coordination among central and local public administration authorities. The obligation for these entities to collaborate with the CEC in organizing and conducting elections is stipulated in Article 28 of the Electoral Code. In this regard, the CEC assigned additional responsibilities related to their areas²⁶ of competence to eight public authorities at central and local levels.

The respective CEC decision, like all others, is binding on all public authorities, both central and local, as well as on individuals and legal entities, regardless of their field of activity or legal form of organization. Public institutions periodically inform or report to the Commission on the actions they are responsible for through inter-institutional working groups.

²⁵ Letter of the Ministry of Foreign Affairs No. DC/2/402/7137 dated 15 July 2025.

²⁶ CEC Decision No. 3646 of 14 July 2025.

6. Pre-Electoral and Electoral Period

In its initial version, the Electoral Code defined the "electoral period" as "the period from the day the act setting the election date enters into force until the day the election results are confirmed by the competent bodies, but not exceeding 120 days." This was amended by Law No. 1/2024 with the addition: "The start date of the electoral period is established by a decision of the Central Electoral Commission." Following this amendment, the provision became vague and open to interpretation. On the one hand, the text implies that the electoral period begins when the act establishing the election date enters into force — in this case, April 18, 2025²⁷. On the other hand, according to the calendar program approved by the CEC, the electoral period began on July 14, 2025.²⁸ If the former interpretation applies, the electoral period would end by August 18. If the latter is used, it would extend to October 14. According to Article 60(3) of Law No. 100/2017 on normative acts, legal provisions must be clear and precise. The MO UJM considers the lack of precision regarding this temporal marker problematic, as it affects the flawless execution of the calendar program activities. A major challenge is distinguishing the electoral campaign period from the rest of the electoral period, especially in terms of the types of advertising allowed: political advertising vs. electoral advertising.

Article 1 of the Electoral Code introduces the term "pre-electoral agitation" – referring to calls, declarations, actions related to candidate nominations, signature gathering, or other pre-campaign efforts. However, the law does not regulate how this agitation unfolds — no guidelines on its duration, forms, or rules. Thus, this term appears superfluous and without legal applicability. Likewise, the law does not define a "pre-electoral period", making it clear that pre-electoral agitation must not exceed the boundaries of the electoral period.

Hidden Advertising and Use of Administrative Resources

Law No. 62/2022 on Advertising²⁹ defines a "public interest message" as advertising promoting values or goals of public/community interest, aiming to raise awareness, change attitudes, or prevent harmful behaviors. The media campaign promoted by the Government, titled "Moldova Can" (Moldova poate), and disseminated through spots, posters, leaflets, billboards, etc., featuring government achievements or capital investment plans, is presented as public interest messaging. Upon comparing this content with the legal definition, it becomes clear that it constitutes disguised political advertising. Due to its similarities with the governing party's political advertising, the campaign appears to transfer political benefit from the Government to the ruling party (PAS). The MO UJM observes the use of administrative resources by both PAS (Party of Action and Solidarity) and the National Alternative Movement (MAN) (part of the "ALTERNATIVA" electoral bloc).

Websites of the Government and its subordinate institutions display electoral-sounding slogans such as:

- "Moldova Can" (Moldova poate)
- "Building European Moldova"(Constrium Moldova Europeană)
- "European Village"(Satul European)
- "Europe is Near"(Europa este aproape)

On the same topic, we mention the recent budget adjustment, called the "Plus Budget," and the allocation of funds for social sectors such as water supply, sewage, school preparation assistance, and compensations. This initiative appears aimed at promoting the image of the ruling party, an electoral contestant. The clearly electoral nature becomes even more evident considering the timing when the

²⁷ State Register of Legal Acts.

²⁸ CEC Decision No. 3601 of 18 June 2025

²⁹ Law No. 62 of 17 March 2022 regarding Advertising

National Social Insurance House is set to transfer the one-time financial support (1,000 lei) starting from 4 September 2025 — just three weeks before the parliamentary election day, although school preparation is provided throughout July and August.

The reduction by the Energy Regulatory Agency of the regulated electricity supply prices by the companies Premier Energy and FEE-Nord also aims to gain political capital. We consider that by temporarily lowering tariffs by 51 and 68 bani per kWh respectively, an effort is made to create a positive impression among the electorate before elections. The practice of recent years shows that after such tariff reductions near elections, the regulatory authority reversed these measures by increasing prices again, citing tariff deviations recorded by energy suppliers.

Although, by law, the President of the Republic of Moldova is obligated to remain apolitical, without direct or indirect involvement in party activities, we observe an association with the ruling party, thus transferring image benefits to PAS (through participation in the National Political Council meeting, annual political conference, and identification of potential candidates)³⁰.

When analyzing the official website of the Chişinău City Hall, by analogy, we note messages with similar goals as those described above but under the aegis of the city hall — “We Build. It Shows!”, “We Do. We Have Proven It Can Be Done”, “For the Youth!” — promoting the image of MAN, part of the electoral bloc “ALTERNATIVA.”

The UJM Observation Mission considers that the indirect involvement of public authorities in the electoral process, through the use of administrative resources and promotion of messages with electoral subtext favoring the ruling party, creates a clear imbalance in electoral competition, affecting the principle of equal opportunity among contestants and undermining the perception of impartiality of state institutions, which may compromise the integrity and fairness of the electoral campaign.

Electoral Activity of Political Parties

Based on the scan of the Facebook pages of the main political parties in the Republic of Moldova³¹, three types of activities with an electoral nature were frequently observed:

1. Dissemination of electoral informational materials,
2. Promotion of potential candidates,
3. Actions intended to influence public opinion or create a favorable image of certain candidates.

The transparency of this exercise was influenced by both the public’s access to information about parties’ actions and by the parties’ own efforts to communicate their activities. Some political parties do not have an official Facebook page, while others carried out no visible activity on the monitored platform. Formations like the Party of Socialists of Moldova (PSRM) and Our Party (PN) had more modest presences but were visibly active at times.

³⁰ The new candidates accepted the invitation of the President of the Republic of Moldova to run on the PAS party list.

³¹ Party of Action and Solidarity (PAS), Party of Socialists of the Republic of Moldova (PSRM), “Democrația Acasă” Party, “Respect Moldova Movement” Party, Communist Party of the Republic of Moldova (PCRM), Change Party, “Renaștere” Political Party, “Victorie” Political Party, “Șansă” Political Party, Alliance for the Union of Romanians (AUR), Dignity and Truth Platform (Platforma DA), “Moldova Mare” Political Party, Coalition for Unity and Welfare (CUB), Our Party, Party for Development and Consolidation of Moldova, Common Action Party – Civic Congress, National Alternative Movement (MAN), “Inima Moldovei” Political Party, “Moldovan National Party” Political Party.

The MO UJM notes that political parties use online platforms differently for communication, and that many conducted campaign-like activities and spread defamatory speech, which contradicts the principles of fair and respectful electoral competition. The findings are:

- 45 instances of distributing electoral information (PAS – 38; PSRM – 2; PN – 2; Moldova Mare – 2; PS – 1);
- 34 instances of candidate promotion (PAS – 32; PN – 2);
- 24 instances of spreading hate speech or intolerance (PAS – 3; PSRM – 2; PDA – 15; PN – 4);
- 11 instances of using administrative resources (PAS – 11);
- 51 instances of using state institutions to promote electoral initiatives (PAS – 51);
- 32 instances of public opinion manipulation or building favorable images of candidates (PAS – 28; PSRM – 4).

Premature Electoral Campaigning

At the time of writing, the right to participate in the electoral race had been granted to political parties, the electoral bloc “ALTERNATIVA”, and independent Moldovan citizens.

According to the Electoral Code (Articles 63 and 70):

- Political parties can only designate candidates starting from July 20, 2025.
- The official electoral campaign begins no earlier than 30 days before election day, i.e., August 29, 2025.

However, MO UJM observed violations of this legal framework, specifically:

- Premature and unrestricted promotion of party lists;
- Electoral advertising dissemination;
- Meetings with voters held outside of the allowed period.

Examples:

On July 2 and July 14, 2025, Renato Usatîi, leader of PN, organized two large concerts for graduates. His appearance on stage as host served to promote his personal image, shifting it from businessman to political candidate. Given PN³²s publicly declared intent to run in the autumn elections, these concerts qualify as covert electoral advertising targeting young voters before the campaign began.

On July 23, 2025, Igor Grosu, PAS president and lead candidate, published a video message about the asphaltting of six out of ten km of the G65 road (Telenești – Mândrești – Cîșla). This electoral content, also disseminated by PAS, promised to renovate the remaining four km.³³

On July 27, 2025, ³⁴during the TV program "7 Days," Radu Marian, number 21 on PAS's list, declared: “We have real chances to join the European Union in the next 4 years.”

MO UJM notes that such statements do not reflect current parliamentary activity.

On July 28, 2025, the Mayor's Office of Țaul posted a Facebook notice inviting citizens to a meeting with PAS parliamentary candidates scheduled for July 30, 2025. A few hours later, the announcement

³² The program “Noua Săptămână” (“The New Week”) with Anatolie Golea.

³³ The electoral message of Igor Grosu.

³⁴ The show “7 Days” featuring Radu Marian, Tudor Ulianoschi, and Ion Bulgac.

was changed to reference a general discussion on local development, with Parliament and Government representatives attending.

Additionally, PAS and PSRM maintained billboard campaigns, aimed at ensuring constant visibility and shaping public perception ahead of the autumn elections. Though framed as “informative,” the content is considered electoral in nature.

Opposition Mobilization

MO UJM observed opposition mobilization efforts. During the monitoring period:

Two protests and one rally took place:

- A protest supporting Marina Tauber at Buiucani Court;
- A protest by the “Victory” bloc in front of the Court of Appeal;
- The patriotic rally “For Moldova”, organized by PSRM, PCRM, PIM, and PVM.

Regarding the “For Moldova” rally:

- Although such events are legitimate democratic expressions, they must be voluntary;
- Reports of 300 MDL payments to participants and the involvement of minors raise serious concerns about the freedom of expression;
- Police documented multiple cases where financial incentives were offered or received in exchange for participation.³⁵

7. Media Monitoring of Party Coverage

In the context of the parliamentary elections on 28 September 2025, the UJM Observation Mission analyzed the frequency and manner in which 19 political parties in the Republic of Moldova³⁶, randomly selected by system, were covered in the national media (4 TV channels: PRO TV, Jurnal TV, TV8, Moldova 1; 3 radio stations: Radio Moldova, Radio Chişinău, Radio Europa Liberă; 10 online portals: realitatea.md, stiri.md, zdg.md, newsmaker.md, noi.md, unimedia.md, deschide.md, agora.md, nordnews.md, nokta.md; 3 news agencies: IPN, INFOTAG, MOLDPRES).

- **Television:** The monitored TV channels reflected the activity of 10 political parties. The most mentioned was Party Şansă (14 mentions), followed by the “Inima Moldovei³⁷” Party and PSRM (11 mentions each), and PAS (10 mentions). In 68% of cases, mentions were negative, in 30% neutral, and only 2% positive (attributed to PAS).
- **Radio:** The monitored radio stations reflected activity of 5 political³⁸ parties. The most frequently reflected were PAS and the “Inima Moldovei” Party (6 mentions each), the least was PDA (3 mentions). In 83% of cases, mentions were neutral, and in 17% negative (regarding PSRM, Inima Moldovei, and Partidul Viitorul Moldovei).
- **Online Press:** Activity of 12 political parties was reflected. The most frequently mentioned was PAS (47), followed by Inima Moldovei (14), PDA (13), and PSRM (10). In 67% of cases mentions were

³⁵ Documentation by the Police of the Republic of Moldova of cases of payment for participation in rallies.

³⁶

³⁷ PAS, PSDE, PSRM, PN, PCRM, MAN, PRIM, PVM, PNM, PRM, LOC, PMM, PDA, ALDE, PS, PDCM, CUB, PAC, PŞ.

³⁸ PAS, PSRM, PN, PCRM, PRIM, PVM, LOC, PDA, PS, PŞ.

neutral, 17% negative, and only 16% positive, concerning Inima Moldovei, Partidul Respect Moldova, PSRM, PN, and Partidul Viitorul Moldovei.

- **News Agencies:** Activity of 10 political³⁹ parties was covered. PAS had the most mentions (12)⁴⁰, followed by Partidul Șansă (7) and PSRM (6). In 53% of cases, mentions were negative, 38% neutral, and only 9% positive (mainly PAS).

Conclusion:

The ruling party (PAS) had the highest media visibility (75 appearances/mentions), followed by Inima Moldovei (35), PSRM (32), Partidul Șansă (26), Partidul Viitorul Moldovei and PDA (24 each). The analysis reveals mainly neutral mentions (54%), negative mentions (38%), and positive mentions (9%). PAS, despite its highest visibility, was also the most exposed to criticism, followed by PSRM and Partidul Șansă, which were mostly covered negatively.

ACRONYMS

AP – Parliamentary Elections

ASP – Public Services Agency

ALDE – Alliance of Liberals and Democrats for Europe Party

BESV – Precinct Electoral Bureaus

CEC – Central Electoral Commission

CECE II – Level-Two District Electoral Council

CICDE – Continuous Training Centre in Electoral Matters

LOC – Political Party “League of Cities and Communes”

MAE – Ministry of Foreign Affairs

MAN – Political Party “National Alternative Movement”

MO – Observation Mission

OSCE – Organization for Security and Co-operation in Europe

PAS – Party of Action and Solidarity

PCRM – Party of Communists of the Republic of Moldova

PDCM – Party of Development and Consolidation of Moldova

PPDA – Political Party “Home Democracy”

PPPDA – Political Party “Dignity and Truth Platform”

PSDE – European Social Democratic Party

PMM – Political Party “Greater Moldova”

³⁹ PAS, PSRM, PN, PCRM, PRIM, PVM, PNM, PRM, PMM, PDA, ALDE, PȘ.

⁴⁰ PAS, PSRM, PCRM, MAN, PRIM, PVM, PNM, PDA, PS, PȘ.

PN – “Our Party”

PNM – National Moldovan Party

PRM – Party “Respect Moldova”

PSRM – Party of Socialists of Moldova

PRIM – Republican Party “Heart of Moldova”

PS – Party of Change

PVM – Party “Future of Moldova”

CUB – Coalition for Unity and Welfare Party

PACC – Party “Common Action – Civic Congress”

PŞ – Party “Chance”

SUA – United States of America

UJM – Union of Jurists of Moldova

UCSM – Christian Social Union of Moldova

UTAG – Gagauzia Territorial Autonomous Unit